

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 17, 2022

Advice Letter 6655-E, 6655-E-A

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94177
E-mail: PGETariffs@pge.com

**SUBJECT: PG&E's Spring 2022 Solar Choice and Regional Renewable Choice RFOs
Collectively the Spring 2022 GTSR RFOs**

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 6655-E, 6655-E-A is effective as of November 16, 2022.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission



Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

October 28, 2022

Advice 6655-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental filing to AL 6655-E to address OP.10 of D. 21-12-036

Purpose

Pursuant to Ordering Paragraph 10 (“OP 10”) of Decision (“D.”) 21-12-036, Pacific Gas and Electric Company (“PG&E”) hereby submits this supplemental filing to Advice Letter (“AL”) 6655-E, which was submitted at the conclusion of the Spring 2022 Green Tariff Shared Renewables Program (“GTSR”) Request for Offers (“RFOs”).

Background

PG&E is required by OP 10 of D. 21-12-036 to “report the steps it proposes to implement to address the Independent Evaluator’s (“IE”) recommendations.” PG&E submitted Advice Letter 6655-E on July 20, 2022 to complete its Spring 2022 GTSR RFOs. This Supplemental filing to AL 6655-E addresses this requirement in OP 10 and reports the steps PG&E proposes for the Fall 2022 GTSR RFOs in response to the IE’s recommendations.

In the Spring 2022 Green Tariff (“GT”) and Enhanced Community Renewables RFO Report of the IE (the “Spring 2022 IE report”) written by Lewis Hashimoto of Arroyo Seco Consulting (“Arroyo”), there were two comments on items that PG&E could reconsider or enhance in the next RFO. The first item related to the Solar Choice maximum bid award price (“bid cap”) and the second item related to outreach, specifically for the Enhanced Community Renewables RFO.

Green Tariff Bid Cap

The Spring 2022 IE report stated in the high-level findings that PG&E has an opportunity to rethink how best to construct the maximum bid award price criterion for GT solicitations going forward. On page 22 of the Spring 2022 IE report, Arroyo states that the bid cap was “fair and reasonable” and acknowledges that “PG&E has limited access to fresher proposal pricing for solar PV projects in its service territory”. The primary advice in the IE report is to use more up to date pricing as the base of the bid cap.



Enhanced Community Renewables Outreach

The IE report noted that PG&E went “beyond its standard procedures for seeking proposers” for the Spring 2022 GTSR RFOs. While the Spring 2022 GT solicitation was not particularly robust even with the additional outreach, the Spring 2022 ECR RFO received no proposals. The Spring 2022 IE report listed numerous challenges that the program poses to both developers and the IOUs, and with which PG&E agrees. Despite the existing challenges, Arroyo said that “more could be done to elicit proposals within the constraints posed by the program design.”

Specifically, Arroyo states that “[o]nly a small subset of the solar generation development community has been devoted to the community renewables segment. This segment has its own industry association, which also might benefit from PG&E’s direct outreach to the non-profit association and to its individual members.”

PG&E reached out to Arroyo to understand specifically the industry associations to which this comment referred. Based on Arroyo’s feedback, PG&E sent an additional outreach e-mail to the Coalition for Community Solar Access (CCSA), requesting that they share PG&E’s Fall 2022 ECR RFO webpage and materials with all their members. PG&E will continue to communicate with CCSA in connection with its future solicitations.

Protests

To the extent that the Commission continues or reopens the protest period for Advice 6655-E, in accordance with GO 96-B, General Rule 7.5.1, PG&E requests that any new protest should be limited to the substance of the supplement or additional information in Advice 6655-E-A.

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than November 17, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6655-E-A

Tier Designation: 2

Subject of AL: Supplemental filing to AL 6655-E to address OP.10 of D. 21-12-036

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-12-036

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information: See confidential declaration and matrix
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Brendan Lucker, Brendan.lucker@pge.com

Resolution required? Yes No

Requested effective date: 8/25/22

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF BRENDAN LUCKER
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN SUPPLEMENTAL ADVICE LETTER 6655-E-A**

I, Brendan Lucker, declare:

1. I am a Senior Manger in the Renewable Procurement department within Energy Policy and Procurement at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include management of the procurement in PG&E's GTSR programs, which includes PG&E Solar Choice and Regional Renewable Choice (RRC). This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive procurement information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain procurement data and information contained in PG&E's Supplemental Advice Letter 6655-E-A submitted on October 28, 2022.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive procurement data and information covered by D.06-06-066. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

/S/

BRENDAN LUCKER

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

SUPPLEMENTAL ADVICE LETTER 6655-E-A

October 28, 2022

IDENTIFICATION OF CONFIDENTIAL INFORMATION

| Redaction Reference | Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To | Justification for Confidential Treatment | Length of Time Data To Be Kept Confidential |
|--|--|---|--|
| Document: Supplemental Advice Letter 6655-E-A | | | |
| Supplemental Advice Letter – Green Tariff Bid Cap | VIII.B – Quantitative analysis for scoring and evaluating bids | Confidential quantitative analysis for scoring and evaluating bids in solicitation. | Three years after winning bidders selected |

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
Braun Blasing Smith Wynne, P.C.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.

Resource Innovations

SCD Energy Solutions
San Diego Gas & Electric Company

SPURR

San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Stoel Rives LLP

Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy