

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6672E
As of August 31, 2022

Subject: Information-Only Advice Letter Regarding Air Pollution Control Information on Tree Mortality Contracts in Compliance with Decision (D.) 18-12-003

Division Assigned: Energy

Date Filed: 08-05-2022

Date to Calendar: 08-12-2022

Authorizing Documents: D1812003

Disposition:	Accepted
Effective Date:	08-05-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

(415) 973-8794

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

August 5, 2022

Advice 6672-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

**Subject: Information-Only Advice Letter Regarding Air Pollution Control
Information on Tree Mortality Contracts in Compliance with Decision
(D.) 18-12-003**

Purpose

In compliance with Decision (D.) 18-12-003 (the Decision), issued on December 21, 2018, Pacific Gas and Electric Company (PG&E) submitted Advice Letter 6442-E¹ to provide data on the Tree Mortality (TM)² facilities' compliance with air pollution control requirements. PG&E hereby submits this information-only advice letter to address an omission of data in Advice Letter 6442-E for the Burney Forest Products facility for the reporting period beginning on May 1, 2021 and ending on October 31, 2021.

Background

In Ordering Paragraph (OP) 6 of the Decision, the California Public Utilities Commission (Commission or CPUC) requires PG&E to collect air pollution control information on the TM facilities and to send an information-only advice letter to the Commission's Energy Division every six months, confirming whether the TM facilities under contract with PG&E have complied with their applicable air pollution control requirements over the previous six months, beginning six months after the date of the decision being issued. If the TM facilities do not comply with their air pollution control requirements, OP 6 requires that PG&E explain the circumstances of the non-compliance, the steps taken by the TM facility operator to rectify the non-compliance, and if the non-compliance is ongoing the expected resolution of the non-compliance. Furthermore, OP 6 of the Decision requires that each advice letter state whether any of PG&E's TM contracts are with facilities operating in federal severe or extreme nonattainment areas for particulate matter or ozone.

¹ Advice Letter 6442-E became effective on December 21, 2021.

² Tree Mortality contracts are those entered into pursuant to Resolutions E-4770, E-4805, and E-4977.

Air Pollution Control Information Reporting

The facility attestation provided in Advice Letter 6442-E omitted the occurrence of a deviation event on October 22, 2021, for the reporting period beginning on May 1, 2021, and ending on October 31, 2021, for Burney Forest Products. PG&E discovered the omission on July 12, 2022. PG&E submits a revised attestation from the facility, included as Attachment 1 this advice letter, that explains the circumstances of the non-compliance, the steps taken by the facility to rectify the non-compliance, and the resolution of the non-compliance.

The facility has confirmed compliance with the applicable air pollution and control requirements for the reporting period of May 1, 2021 to October 31, 2021 with the exception of the items described in the facility attestation. PG&E submits the Semi-Annual Monitoring Report, included as Attachment 2 to this advice letter, to support the information described in the facility attestation. Please note that the deviation report (Form 5-K2) located in the Semi-Annual Monitoring Report is intended to be blank and will be completed by the facility in its next annual compliance certification to its local air quality management district.

Attachments

Attachment 1: Burney Forest Products Air Quality Attestation (revised)
Attachment 2: Burney Forest Products Semi-Annual Monitoring Report

Protests

This is an information-only advice letter submittal.³ Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest.

Effective Date

PG&E requests that this information-only advice letter become effective upon date of submittal, which is August 5, 2022.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically on the attached list and the parties on the service list for A.16-11-005. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com.

³ See D.18-12-003 (OP 6) (specifying that the Advice Letter shall be information-only).



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 (ID U39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 6672-E

Tier Designation: Info-Only

Subject of AL: Information-Only Advice Letter Regarding Air Pollution Control Information on Tree Mortality Contracts in Compliance with Decision (D.) 18-12-003

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. 18-12-003

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets: N/A

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: (415)973-3582
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

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

Burney Forest Products Air Quality Attestation

(revised)

**APPENDIX C
AIR QUALITY ATTESTATION**

[VIA ELECTRONIC SUBMISSION]



July 14, 2022

PG&E

Attn: Energy Contract Management & Settlements
77 Beale Street, Mail Code NI2E
San Francisco, CA 94105-1702

Subject: Bioenergy Renewable Auction Mechanism Power Purchase Agreement (“BioRAM PPA”) by and between PG&E (“Buyer”) and Burney Forest Products, A Joint Venture (“Seller”) – Seller’s Air Quality Attestation

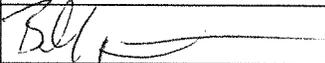
Dear Sir or Madam:

This Attestation was originally submitted on December 3, 2021, but upon later review it was noted that an omission had been made and this resubmittal includes the prior omission. Seller attests that the Project is in compliance with all applicable air pollution and control requirements for the period beginning May 1, 2021 and ending October 31, 2021, with the exception of two events listed below. Seller hereby represents and warrants that:

1. The original Air Quality Attestation was submitted on December 3, 2021, prior to the semiannual air quality attestation due date as specified in Section 3.11.
2. Seller was in compliance with all applicable air pollution and control requirements for the period, except for two events; 1) a forty-five minute period on August 19, 2021 when high opacity was caused from upset conditions in Boiler 1, 2) a period of two hours during startup of Unit #1 on October 22, 2021 when TR-1B wouldn’t start, no emission limits were exceeded during this event.
3. List of non-compliance: 1) On August, 19 2021, there was one forty-five minute period of Boiler 1 opacity exceeding 20%, which was caused from a plugged fuel feed chute which caused upset conditions in Boiler 1, and caused it to shut down. The issue was promptly reported to SCAQMD. 2) On October 22, 2021, there was a period of two hours during startup of Unit #1 when TR-1B wouldn’t start, and Unit #1 was promptly shutdown. In coordination with SCAQMD it was determined that the unit could stay within emission limits until parts were available for repairs, and the unit was started back up on October 24, 2021. Repairs were made on October 29, 2021. There were no excess emissions or exceedances of any emission limits due to this malfunction.

Compliance with the Project's applicable air quality and control requirements is documented in the attached Air Pollution Report. Buyer may request additional information to accommodate reporting and demonstrate Seller's compliance with air pollution and control requirements.

Capitalized terms used but not otherwise defined in this letter have the meanings set forth in the BioRAM PPA. The authorized signature from the Seller certifies that Seller has the knowledge and authority to attest that the information on this form is true and correct.

Seller	Burney Forest Products
Print Name	Billy Dillard
Signature	
Title	Plant Manager
Date	July 14, 2022

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 2

Burney Forest Products Semi-Annual Monitoring

Report



April 26, 2022

Ms. Lindsey Welch
Senior Air Pollution Inspector
Shasta County Air Quality Management District
1855 Placer Street, Suite 101
Redding, CA 96001

**Re: Title V Semi-Annual Monitoring Report
Title V Operating Permit # 87-TV-27n
Burney Forest Products**

Dear Ms. Welch

In accordance with Conditions 23 of the referenced permit, enclosed please find Burney Forest Product's completed Semi-Annual Monitoring Report. This submittal covers the time period from October 14, 2021 through April 13, 2022 reporting period.

If you have any questions or require additional information, please do not hesitate to contact me at 530-335-5023.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Dillard', with a long horizontal line extending to the right.

Bill Dillard,
Plant Manager, Burney Forest Products

Enclosures

cc: John Christian, Olympus Power (email)
File 201-40-09

CERTIFICATION REPORT (FORM 5-K1)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY = DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest Products

I. FACILITY INFORMATION

1. Company Name: Burney Forest Products, a Joint Venture
2. Facility Name (if different than Company Name): Burney Forest Products
3. Mailing Address: 35586-B Highway 299 East, Burney, CA 96013
4. Street Address or Source Location: Same as mailing address
5. Facility Permit Number: 87-TV-27n

II. GENERAL INFORMATION

1. Reporting period (specify dates): October 14, 2021 through April 13, 2022
2. Due date for submittal of report: May 28, 2022

3. Type of submittal: Monitoring Report (complete Section III below)
 Compliance Schedule Progress Report (complete Section IV of Form 5-K2)
 Compliance Certification (complete Section V of Form 5-K2)

III. MONITORING REPORT INFORMATION

1. Were deviations from monitoring requirements encountered during the reporting period?
 No Yes (If Yes, complete Form 5-L)

CERTIFICATION REPORT (FORM 5-K2)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
	DISTRICT ID:
COMPANY NAME: Burney Forest Products, a Joint Venture	FACILITY NAME: Burney Forest Products

IV. COMPLIANCE SCHEDULE PROGRESS INFORMATION

1. Dates the activities, milestones, or compliance required by schedule of compliance was achieved/will be achieved:

2. Provide explanation of why any dates in schedule of compliance were not/will not be met:

3. Describe in chronological order preventive or corrective action taken:

V. COMPLIANCE CERTIFICATION

1. Was source in compliance during the reporting period specified in Section II of Form 5-K1 and is source currently in compliance with all applicable federal requirements and permit conditions.

Yes No (If no, re-submit Forms 5-I and 5-J)

I certify based on information and belief formed after reasonable inquiry, the statement and information in this document and supplements are true, accurate, and complete.

Bill Dillard
Signature of Responsible Official

5-2-2022
Date

Bill Dillard
Print Name of Responsible Official

Plant Manager, Burney Forest Products
Title of Responsible Official and Company Name

Telephone Number of Responsible Official: (530) 335 - 5023

DEVIATION REPORT (FORM 5-L)

DISTRICT: Shasta County AQMD	< DISTRICT USE ONLY =
COMPANY NAME: Burney Forest Products, a Joint Venture	DISTRICT ID:
	FACILITY NAME: Burney Forest Products

I. DEVIATION INFORMATION

1. Permit number(s) of emission unit or control unit affected: 87-TV-27n
2. Description of deviation: Compliance Assurance Monitoring Plan Excursion – ESP Transformer Voltage out of Range.
3. Description and identification of permit condition(s) deviated: Condition 43 – The permittee shall respond to and report as excursions all periods where the following conditions (as described in the Compliance Assurance Monitoring Plan) have occurred: a. Primary Transformer Voltage of less than 70 volts AC. B. Secondary (Precipitator) Voltage less than 10.0 KV, (DC). C. Secondary Transformer (Precipitator) Current less than 0.01 MA, (DC).
4. Associated equipment and equipment operation (if any): Boiler # 1 ESP TR-1B
5. Date and time when deviation was discovered: October 22, 2021 at approximately 13:00
6. Date, time and duration of deviation: October 22, 2021 at approximately 13:00 hours. Taken offline at 15:00. Duration was approximately 2 hours. Boiler #1 was restarted on October 24, 2021, at approximately 19:45, and ran without TR-1B until October 29, 2021, in coordination with SCAQMD. No opacity limits were exceeded during this timeframe.
7. Probable cause of deviation: At around 13:00 hours on October 22, 2021, while starting up Boiler #1 after an outage for performing unscheduled maintenance, the Operator noticed Boiler #1 ESP TR-1B wouldn't start. The cause was due to a malfunction of the ESP controller.
8. Preventive or corrective action taken: During startup of Boiler #1 on Oct 22, 2021, TR-1B would not start. The Boiler was taken offline for troubleshooting and repair, and the issue was determined to be a malfunctioning controller. The replacement part was going to take several days to arrive and be installed. The issue was reported to SCAQMD on October 24, 2021 with a request to run without TR-1B under the condition of watching the opacities and staying within permitted limits. Boiler #1 was restarted on October 24, 2021. In coordination with and approval from SCAQMD, Boiler #1 continued to operate from October 24, 2021 until the controller was replaced and repairs completed on October 29. No excess opacity emissions were observed during the time period when TR-1B was offline.

**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.
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