

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



**Pacific Gas & Electric Company  
ELC (Corp ID 39)  
Status of Advice Letter 6716E  
As of November 16, 2022**

Subject: Pacific Gas and Electric Company's 2023 Annual Low Carbon Fuel Standard Electric Credit and Revenue Estimate

Division Assigned: Energy

Date Filed: 09-30-2022

Date to Calendar: 10-07-2022

Authorizing Documents: D1412083

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>10-30-2022</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

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(415) 973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**

September 30, 2022

**Advice 6716-E**  
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Pacific Gas and Electric Company's 2023 Annual Low Carbon Fuel  
Standard Electric Credit and Revenue Estimate**

**Purpose**

Pursuant to Ordering Paragraph (OP) 5 and Appendix C of Decision (D.) 14-12-083, Pacific Gas and Electric Company (PG&E) hereby submits its 2023 Annual Low Carbon Fuel Standard (LCFS) Electric Credit and Revenue Estimate (2023 Annual Electric Estimate).

The requirement in D.14-12-083 states that the utilities shall submit the following:

Tier 2 Advice Letter (AL) filed no later than September 30 of each year beginning in 2015 containing information about LCFS credits and revenues for the following calendar year:

- a. An estimate of the number of credits the utility expects to generate for the following year;
- b. An estimate of the amount of revenue the utility expects to generate from the sale of those credits;
- c. An estimate of the balance that will be in the utility's balancing account on January 1 of the following year;
- d. An estimate of the cost of administering the LCFS credit program in the following year, including customer outreach expenses;
- e. An estimate of the amount of revenue that will be distributed to customers in the following year; and
- f. An estimate of the number of drivers to whom credits will be distributed and the value that will be distributed to each driver.

## **Background**

Under the California Air Resources Board's (CARB) current LCFS regulation,<sup>1</sup> providers of alternative fuels with carbon intensities that meet the LCFS program targets<sup>2</sup> are eligible to voluntarily opt-in to the LCFS program to generate LCFS credits.<sup>3</sup> Electric distribution utilities<sup>4</sup> that choose to opt-in to the LCFS program act as proxy regulated entities on behalf of their customers and receive LCFS credits for electricity supplied through residential electric vehicle (EV) charging equipment.<sup>5</sup> Natural gas utilities that choose to opt-in to the LCFS program and own fueling stations at which fossil compressed natural gas (CNG) is dispensed to vehicles for transportation use will receive LCFS credits for fueling by public customers and their own vehicle fleets.<sup>6</sup>

On March 24, 2011, the California Public Utilities Commission (Commission or CPUC) opened Rulemaking (R.) 11-03-012 to address various issues related to greenhouse gas (GHG) emissions. Track 2 of R.11-03-012 addresses the use of revenues that electric and natural gas utilities (collectively, "IOUs") may receive from the sale of LCFS credits pursuant to CARB's LCFS regulation.

On May 19, 2014, the Commission issued D.14-05-021, which authorized the IOUs to sell their LCFS credits and established the criteria and reporting requirements for the sale of these credits, pursuant to Public Utilities Code Section 853(b).<sup>7</sup> Additionally, the Commission directed the utilities that have opted-in to the LCFS program and wish to sell LCFS credits to file a Tier 2 AL to propose their upfront standards and plans to sell their LCFS credits, as well as the policies to return the LCFS revenue to customers. Upon approval of the AL, the IOUs may begin selling LCFS credits and recover associated costs from the sales revenue.<sup>8</sup>

On December 18, 2014, the Commission issued D.14-12-083, which approved the IOUs' use of several different methods to return revenue from the sale of LCFS credits. For electric utilities, the Commission authorized use of either a one-time or annual rebate, or a combination of both. For natural gas utilities, the Commission authorized use of a reduction in the fuel price at utility-owned natural gas fueling stations or a credit applied to the customer's utility bill. In D.14-12-083, the Commission modified the requirements

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<sup>1</sup> 17 CCR § 95480 et seq.

<sup>2</sup> 17 CCR § 95482.

<sup>3</sup> 17 CCR § 95484(a)(6)(A), p. 35 ("For transportation fuel supplied through EV charging equipment in a single or multi-family residence, the Electrical Distribution utility is eligible to opt-in as the regulated party in their service territory.")

<sup>4</sup> 17 CCR § 95481(a)(23), p. 12 ("'Electrical Distribution Utility' means an entity that owns or operates an electrical distribution system.")

<sup>5</sup> D.14-12-083, p. 6.

<sup>6</sup> *Id.*

<sup>7</sup> D.14-05-021, Ordering Paragraph 1.

<sup>8</sup> D.14-05-021, Ordering Paragraphs 1, 6.

set forth in D.14-05-021<sup>9</sup> and required the IOUs to submit a Tier 2 AL containing an Implementation Plan describing the IOUs' plans for the sale of LCFS credits and return of revenue in accordance with the AL filing requirement in Appendix A of D.14-12-083.<sup>10</sup> The Tier 2 AL must be approved prior to commencement of the sale of LCFS Credits and the recovery of associated costs from the sales revenue.<sup>11</sup>

On March 18, 2015, PG&E filed AL 3575-G/4604-E containing its Implementation Plan. Pursuant to the requirements in D.14-12-083, the Implementation Plan outlined PG&E's proposed requirements for LCFS credit sales, provided a forecast of 2015 revenue return activity, and described the proposed process for identifying revenue recipients, calculating rebate amounts, and processing rebates. The Implementation Plan also created LCFS subaccounts for electricity and natural gas in its existing Greenhouse Gas Revenue Balancing Account (GHGRBA) and Gas Programs Balancing Account (GPBA), respectively, to track and record the proceeds from the sale of consigned LCFS credits, any approved program costs, and the LCFS revenues returned to customers. On August 7, 2015, the Commission approved PG&E's AL 3575-G/4604-E, effective immediately.

In February 2020, the Commission issued a ruling with the draft Transportation Electrification Framework, which covered a variety of topics related to the utilities and transportation electrification including policies to support and ensure efficient implementation of the LCFS program. The Commission issued D.20-12-027 on the LCFS electric credit holdback revenue utilization by the Investor Owned Utilities (IOU) on December 17, 2020, which created requirements for the use of the LCFS holdback revenue and directed each IOU to file an Implementation Plan via a Tier 2 Advice Letter with at least one program proposal within 180 days of the decision. In accordance with D.20-12-027, PG&E filed AL 6226-E<sup>12</sup> with the 2021 LCFS Implementation Plan which included five program proposals in June 2021 and received CPUC approval in December 2021. As described in the Implementation Plan, PG&E will continue to report the forecast of LCFS program and financial data through annual forecasts and reports.

In 2022, the CPUC requested that PG&E file separate advice letters for the electric and gas portions of its LCFS Annual Estimate. The Electric portion can be found in Advice 6716-E, and the Gas portion in Advice 4460-G.

### **Annual Electric Forecast**

PG&E's annual electric forecast of LCFS program and financial data for 2023 is provided in CONFIDENTIAL Attachment A of this filing.

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<sup>9</sup> D.14-12-083, p. 32.

<sup>10</sup> D.14-12-083, Ordering Paragraphs 2, 3.

<sup>11</sup> D.14-05-021, Ordering Paragraphs 1, 6.

<sup>12</sup> [https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\\_6226-E.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6226-E.pdf)

**Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than October 20, 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

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Confidentiality**

PG&E requests confidential treatment of the redacted information in this AL. Pursuant to D.16-08-024, a confidentiality declaration describing the information in this advice filing for which PG&E requests confidential treatment and the justification for protecting the confidentiality of the information is provided in Public Attachment B.

The confidential material in this advice filing will be made available to non-market participants in accordance with and upon execution of PG&E's Proposed Non-Disclosure Certificate Agreement. Parties wishing to obtain access to the confidential material of this advice filing may contact Ben Ellis in PG&E's Law Department at b1ez@pge.com to obtain a non-disclosure agreement.

**Tier Designation**

Pursuant to D.14-12-083, this advice filing is submitted with a Tier 2 designation.

**Effective Date**

PG&E requests that this Tier 2 advice submittal become effective upon October 30, 2022, which is 30 calendar days from the submittal date.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.11-03-012. 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. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

          /S/          

Sidney Bob Dietz II  
Director, Regulatory Relations

cc: Service List R.11-03-012

**Attachments**

Attachment A: Pacific Gas and Electric Company's 2023 Annual Low Carbon Fuel Standard Electric Credit and Revenue Estimate

Attachment B: Declaration Supporting Confidential Designation on Behalf of Pacific Gas and Electric Company Pursuant to D.16-08-024



# 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) #: 6716-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's 2023 Annual Low Carbon Fuel Standard Electric Credit and Revenue Estimate

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.14-12-083

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: Lydia Krefta, L1KE@pge.com.

Resolution required?  Yes  No

Requested effective date: 10/30/22

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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

**CONFIDENTIAL**

Market Sensitive Information Protected Under General Order 66-C,  
Public Utilities Code Section 454.5(g), Government Code Section 6254(k), and  
Decisions 06-06-066 and 08-04-023

## **ATTACHMENT A**

### **PACIFIC GAS AND ELECTRIC COMPANY'S 2023 ANNUAL LOW CARBON FUEL STANDARD ELECTRIC CREDIT AND REVENUE ESTIMATE**

**PACIFIC GAS AND ELECTRIC COMPANY’S 2023 ANNUAL LOW CARBON FUEL  
STANDARD ELECTRIC CREDIT AND REVENUE ESTIMATE**

**I. INTRODUCTION**

Pursuant to Ordering Paragraph (OP) 5 and Appendix C of Decision (D.) 14-12-083, Pacific Gas and Electric Company (PG&E) presents the following annual estimate for the calendar year 2023 for the sale of Low Carbon Fuel Standard (LCFS) credits and return of associated revenue to eligible electric customers.

The estimated values below represent reasonable assumptions based on current LCFS prices, electric vehicle adoption rates, program participation, program administrative costs, and other factors. The actual variables and the resulting revenues and program costs could differ significantly from the figures provided in this 2023 Annual Electric Estimate.

**A. Program Summary**

The June 2021 implementation plan outlined five new LCFS electric customer programs for PG&E.<sup>1</sup> PG&E is involved in two other existing programs for electric customers. This section provides a brief overview of each program; further details can be found in the implementation plan.

**1. Residential “Holdback” Electric Programs**

These programs are funded by the 33% of residential base proceeds left after the 67% required to fund the statewide California Clean Fuel Reward (CCFR) program is paid out. These leftover funds combined with revenue from forklift credits are referred to as “holdback” funds. PG&E will fund four programs with these funds as described in the implementation plan:

1. **Pre-Owned EV Rebate:** Will provide a post-purchase rebate for pre-owned EVs, with a \$1,000 base rebate and a \$4,000 rebate for income-qualified customers.
2. **Multi-Unit Dwelling (MUD) and Small Business Direct Install:** Will install low-power chargers (Level 1 or Level 2) at MUD and small business sites that have excess capacity on their electric panel, at no cost to the site host. The first phase of this turnkey pilot will focus exclusively on equity communities. PG&E will complement the infrastructure investment with an education campaign for the residents/tenants of each site.
3. **Resilient Charging:** Launched in August 2022, this pilot provides third-party software to communicate with customers and/or actively manage EV charging for the customer prior to a Public Safety Power Shutoff (PSPS) event to ensure they

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<sup>1</sup> AL 6226-E, “2021 Low Carbon Fuel Standard Implementation Plan”, available at: [https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\\_6226-E.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6226-E.pdf)

are fully charged during an emergency. The pilot also includes a phase to identify EV drivers in high fire threat districts. PG&E will continue the program into 2023 using unspent program budget from 2022.

4. **Residential Charging Solutions:** Will provide educational resources and financial support to help customers install EV chargers at their home while avoiding or lowering the cost of electric panel upgrades and/or electric distribution grid upgrades. It will be implemented in phases, providing a customer assessment tool in Phase 1 and a technology solution rebate in Phase 2.

## 2. Electric Non-Holdback Programs

PG&E proposed one program funded by the credit proceeds from workplace charging at PG&E offices and EV Charge Network (EVCN) charging stations that PG&E owns:

5. **Research and Innovation (R&I) Fund:** Will support small proof-of-concept pilots for nascent technologies and research studies to fill in data gaps in support of accelerating widespread transportation electrification. Potential project categories that would be funded by the R&I fund could include data & analysis (e.g. market trends and customer needs), hardware (e.g. safety testing of a streetlight-mounted charger), or software (e.g. discrete testing of automated load management technology).

PG&E will continue to fund two legacy programs that were in place before D.20-12-027 with residential base credit proceeds in the bank prior to said decision.

6. **Clean Fuel Rebate:** Ran from 2017 through 2020 and provided a rebate for EV purchases or leases; it was succeeded by the CCFR in late 2020. PG&E does not accept new applications for this program, but still has some administrative requirements including cancelling and reissuing customer checks lost in the mail.
7. **California Clean Fuel Reward:** Statewide program; provides an upfront purchase or lease incentive at the dealer or retailer. The program is administered by SCE on behalf of the California utilities, but PG&E participates in several committees to provide oversight and contributes funds to the program.

## II. 2023 ELECTRIC ESTIMATE

**A. Credit Estimate.** *An estimate of the number of credits the utility expects to generate for the following year.*

PG&E estimates it will receive [REDACTED] electric credits during calendar year 2023 from electricity usage in Q3 2022 to Q2 2023, based on assumptions about the number of electric vehicles in PG&E's territory, CARB's credit estimation methodology,

and the inputs to that methodology.<sup>2</sup> This includes credits received for separately metered residential electric usage, PG&E workplace charging, and PG&E-owned commercial charging from the EV Charge Network (EVCN) program, as well as non-separately metered residential electric vehicle charging and forklift credits.

**B. Revenue Estimate.** *An estimate of the amount of revenue the utility expects to generate from the sale of credits sold in the following year.*

For the purpose of this estimate, PG&E assumes [REDACTED]  
[REDACTED]  
PG&E estimates a LCFS credit price of [REDACTED] At this price, the market value of [REDACTED]  
[REDACTED]

**C. Balancing Account Estimate as of January 1, 2023.** *An estimate of the balance that will be in the utility's balancing account on January 1 of the following year.*

PG&E's March 18, 2015 AL 3575-G/4604-E created LCFS subaccounts for electricity and natural gas in its existing Greenhouse Gas Revenue Balancing Account (GHGRBA) and Gas Programs Balancing Account (GPBA), respectively, to track and record the proceeds from the sale of LCFS credits, any approved program costs, and the LCFS revenues returned to customers.<sup>5</sup>

For the purpose of this estimate, the balance in the LCFS subaccount in PG&E's Greenhouse Gas Revenue Balancing Account (GHGRBA) on January 1, 2023 is calculated as the balance in the account at the end of August 2022 plus estimated additional revenue and less estimated costs, CCFR transfers, and revenue distributed from September through December 2022.

As of August 2022, [REDACTED] and estimates [REDACTED]  
[REDACTED] it will receive [REDACTED]  
[REDACTED] PG&E expects to transfer [REDACTED] to the CCFR program in Q3 and Q4 and incur an additional [REDACTED] in program and administrative expenses.

<sup>2</sup> The credit lifecycle occurs as follows: PG&E reports electricity usage to CARB to generate credits one quarter after the usage occurred. Credits are received early in the quarter following reporting, and credits are sold within the quarter they are received. For the statewide Clean Fuel Reward program, PG&E must transfer the revenue to the program the quarter after credits are received. For example: charging station usage in Q1 is reported in Q2, credits are received and sold in Q3, and a portion of that revenue is transferred to the statewide Clean Fuel Reward in Q4.

<sup>3</sup> PG&E keeps a credit reserve in case of credit invalidation or other credit adjustments where PG&E would need to return credits to CARB. The reserve contains PG&E holdback funds; however, depending on the nature of the credit adjustment, PG&E would also pass on the adjustment to statewide CCFR transfers.

<sup>4</sup> Forecasted average LCFS credit price across four quarters of sales in 2023.

<sup>5</sup> AL 3575-G/4604-E, Appendices B, C.



**D. Administrative Cost Estimate.** *An estimate of the cost of administering the Low Carbon Fuel Standard credit program in the following year, including customer outreach expenses.*

Table 1 below shows the administrative, marketing education and outreach (ME&O), and evaluation estimated budgets for each program or spending category for 2023. These budgets include PG&E, third-party implementer, and community-based organization (CBO) spend.

**Table 1. PG&E LCFS Electric Program Administration, Evaluation, and ME&O Costs in 2023**

Program/Category	Admin	Evaluation	ME&O	Total
<b>Overhead</b>				
Overhead	\$517,000	\$0	\$0	\$0
<b>Holdback Programs</b>				
Pre-Owned EV Rebate	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
MUD & Small Business Direct Install	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Resilient Charging	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Residential Charging Solutions	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>Holdback Total</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>Non-Holdback Programs</b>				
PG&E Clean Fuel Rebate	\$12,000	\$0	\$0	\$12,000
California Clean Fuel Reward	\$8,000	\$0	\$0	\$8,000
Research & Innovation Fund	\$52,000	\$0	\$0	\$52,000
<b>Non-Holdback Total</b>	<b>\$72,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$72,000</b>
<b>Total</b>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

A brief description of the spending for each program/category follows:

- **Overhead (non-program expenses):** Includes activities required to participate in the LCFS program, including compliance activities (quarterly reporting to CARB, annual reports and forecasts to the CPUC and CARB), credit sales, transferring funding to the CCFR, and implementation plan development.
- **Holdback programs** (Pre-Owned EV Rebate, MUD/Small Business Direct Install, Resilient Charging, Residential Charging Solutions)<sup>6</sup>

<sup>6</sup> See implementation plan for a detailed description of administrative, ME&O, and evaluation expenses for each program

- *Administrative expenses:* Includes program management from PG&E, a third-party implementer, and/or CBOs (and relevant activities, such as invoicing), program design, IT to build websites and applications, application processing and rebate payment, and other activities specific to the program.
- *ME&O:* Includes PG&E collateral development, email campaigns, co-marketing; third-party implementer broad or targeted outreach campaigns; CBO targeted outreach to equity communities; and other activities specific to the program, such as on-site tenant education for the MUD/Small Business Direct Install pilot or development of an education tool for the Residential Charging Solutions program.
- *Evaluation:* The implementation plan set aside 2% of each program’s budget per year for evaluation activities. This may include traditional evaluations or targeted studies based on the specific needs of each program. PG&E may also choose to save evaluation budget in order to conduct a larger multi-year study once the program has been established.
- **PG&E Clean Fuel Rebate:** Minimal effort, confined to cancelling and reissuing customer checks lost in the mail.
- **California Clean Fuel Reward:** PG&E participates in several committees and, per the Governance Agreement, does not bill this time to the statewide program. PG&E also performs data analysis on participation records, which are used to inform future program development and distribution planning.
- **Research & Innovation Fund:** Administration includes selecting, managing, and reporting on studies to be completed.

PG&E has several requirements from CARB and the CPUC in implementing its customer programs, including on spending for equity, resilience, and administration. These are summarized in Table 2.

**Table 2. Estimates Against Compliance Targets in 2023**

Requirement	2023 Target	2023 Forecasted
Equity expenditures (CPUC) <sup>7</sup>	55%	65%
Equity expenditures as a percentage of prior year proceeds (CARB) <sup>8</sup>	30%	65%
Resiliency expenditures as a percentage of prior year proceeds (CPUC)	≤ 20%	6%
Equity administration expenditures (CARB)	≤ 10%	9%

<sup>7</sup> PG&E plans to exceed its equity requirements in 2023 to make up for a likely underspend on equity in 2022 due to delays in launching programs. This amount will be added to our requirements in 2023 (i.e. we are required to spend 55% plus the dollar value of the 2022 underspend).

<sup>8</sup> Equity and resiliency expenditures as a percentage of proceeds is calculated against 2022 proceeds (the previous year), rather than 2023. This is the same method PG&E currently uses to calculate its

**E. Revenue to be Distributed to Customers.** *An estimate of the amount of revenue that will be distributed to customers in the following year*

PG&E expects to distribute \$24 million in revenue to customers across its five active electric programs in 2023 from direct incentives, equipment, and other value to customers. Table 3 shows the breakdown by program:

**Table 3. Revenue Distributed to Customers in 2023**

Program/Category	Incentives/Value to Customers
<b>Holdback Programs</b>	
Pre-Owned EV Rebate	██████████
MUD & Small Business Direct Install	██████████
Resilient Charging	██████████
Residential Charging Solutions	██████████
<b>Holdback Total</b>	██████████
<b>Non-Holdback Programs</b>	
PG&E Clean Fuel Rebate	\$0
California Clean Fuel Reward*	\$0
Research & Innovation Fund**	██████████
<b>Non-Holdback Total</b>	██████████
<b>Total</b>	<b>\$24,678,000</b>

\* PG&E transfers funds to the CCFR but is not responsible for distributing customer incentives.

\*\* This program funds studies and research in support of future programs rather than customer incentives.

PG&E does not distribute revenue to customers as part of the CCFR program, but it does transfer 67% of its revenue from residential base credits to the statewide CCFR program on a quarterly basis. PG&E estimates that it will transfer ██████████ in funding to the statewide CCFR in 2023 to be distributed to customers.<sup>9</sup>

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Renewable Natural Gas Fuel Credit and allows for more stable budgeting and program management than trying to adjust a program every quarter after the most recent credit deposits have been sold.

<sup>9</sup> This number does not include “non-opt-in” credits, which are generated by small EDUs that have not opted-in to participating in LCFS. Starting in 2019, CARB began estimating the amount of electricity used each quarter and allocating credits to the large IOUs to be sold. These credits are essentially a pass-through – 100% of the proceeds must be sent to the statewide CCFR program.



# **Attachment B**

**Confidential Declaration**

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Lydia Krefta, am the Sr. Manager of Clean Energy Transportation Regulatory Compliance and Pilots at Pacific Gas and Electric Company (“PG&E”), a California corporation. Aaron August, the Vice President of Business Development and Customer Engagement of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street, Mail Code 921A  
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): (R.) 11-03-012, *Order Instituting Rulemaking to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emissions 2.*

3. Title and description of document: *Pacific Gas and Electric Company’s 2023 Annual Low Carbon Fuel Standard Electric Credit and Revenue Estimate – Electric*
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart, with further detail provided in Appendix A, which is incorporated into this declaration:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&amp;E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	<p>Gray shaded areas of pages 1-7 of Attachment A</p>
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

Third-Party information subject to non-disclosure or confidentiality agreements or obligations  
 (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

Grey shaded areas on page 7 of Attachment A related to the Resilient Charging program

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a)):

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 30th day of September, 2022 at San Francisco, California.

Lydia Krefta

Lydia Krefta  
 Sr. Manager, Clean Energy Transportation  
 Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

(R.) 11-03-012, ORDER INSTITUTING RULEMAKING TO ADDRESS UTILITY COST AND REVENUE ISSUES ASSOCIATED WITH GREENHOUSE GAS EMISSIONS  
 ATTACHMENT TO DECLARATION  
 September 30, 2022

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
A	2023 Low Carbon Fuel Standard Annual Forecast – Electric	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p> <p>Third-Party information subject to non-disclosure or confidentiality agreements or obligations</p> <p>(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)</p>	<p>Gray shaded areas of pages 1-7 of Attachment A</p> <p>Grey shaded areas on page 7 of Attachment A related to the Resilient Charging program</p>

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

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF International Power Technology	Public Advocates Office Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc.
Atlas ReFuel BART	Intertie	Resource Innovations
Barkovich & Yap, Inc. Braun Blasing Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission	Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	SCD Energy Solutions San Diego Gas & Electric Company
California Hub for Energy Efficiency Financing	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	SPURR San Francisco Water Power and Sewer Sempra Utilities
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Modesto Irrigation District NLine Energy, Inc. NRG Solar	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
Chevron Pipeline and Power City of Palo Alto		TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
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		