

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6811E
As of January 30, 2023

Subject: Resource Adequacy Sales Agreements Pursuant to Decision 22-05-015

Division Assigned: Energy

Date Filed: 01-03-2023

Date to Calendar: 01-13-2023

Authorizing Documents: D2205015

Disposition:	Accepted
Effective Date:	01-03-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio
(415) 973-4587
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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



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

January 3, 2023

Advice 6811-E
Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

Subject: Resource Adequacy Sales Agreements Pursuant to Decision 22-05-015

Purpose

Pacific Gas and Electric Company (PG&E) hereby informs the California Public Utilities Commission (Commission or CPUC) of two executed sales agreements pursuant to Decision (D.) 22-05-015 issued in the Electric Integrated Resource Planning and Related Procurement Processes proceeding, Rulemaking 20-05-003.

Background

In Ordering Paragraph (OP) 4 of D. 22-05-015, the Commission ordered that for procurement conducted on behalf of bundled service customers of the investor-owned utilities (IOU) in accordance with D.19-11-016, where the load has subsequently migrated to be served by another load serving entity (LSE), the LSE with such new load shall have the option to enter into a new agreement with the relevant IOU to purchase the system resource adequacy (RA) capacity associated with the procurement conducted by the IOU on behalf of the bundled service customers that have since departed from the IOU service and are now being served by such other LSE (RA Benefits), at the Power Charge Indifference Adjustment Market Price Benchmark (MPB). D.22-05-015 stipulated that “[o]nce executed, the IOU(s) shall file Tier 1 Advice Letters with all such agreements by no later than October 1, 2022.”¹

On August 23, 2022, East Bay Community Energy and Peninsula Clean Energy Authority independently contacted PG&E to express interest in purchasing their share of RA Benefits pursuant to D.22-05-015. Through subsequent and separate conversations between PG&E and these two LSEs, PG&E agreed to execute separate RA sales agreements with each LSE to sell RA Benefits to each LSE for the 2023 RA compliance year. PG&E and LSEs also agreed to continue working on separate additional RA sales agreements with each LSE to sell RA Benefits for RA compliance years after 2023 to

¹ On October 3, 2022, PG&E submitted interim RA agreements for 2023 capacity; see PG&E Advice 6723-E.

each LSE. PG&E and the LSEs are on track to have two separate additional RA sales agreements finalized and executed one with each LSE for the sale of RA Benefits for RA compliance years after 2023 by no later than December 31, 2022.

On October 3, 2023, the CPUC executive director granted PG&E's request for additional time to comply with OP 4 of D.22-05-015 for executed RA agreements beyond 2023, which enabled PG&E to separately submit transactions for the 2023 compliance year and long term agreements, and established December 31, 2022 as the filing date.²

I. Overview of the Agreements

The new sales agreements have been developed based on the Edison Electric Institute (EEI) RA confirmation letter. In accordance with OP 4 of D.22-05-015, these sales agreements were entered into at the 2023 forecast System RA MPB, which was the most recent RA MPB available at the time. Both agreements include a provision for this price to be updated and, for all settled months, to be trued up upon the publication of the 2023 final RA MPB and all future published updates. The agreements cover the term beginning on January 1, 2024 and extend through the final expiration date of PG&E's supply contracts executed pursuant to D.19-11-016. As of the date of execution of the RA sales agreements the final expiration date for the underlying supply contracts is expected to be July 31, 2038.

More information about these sales agreements is available in confidential Appendix A to this advice letter.

II. Confidentiality Treatment

In support of this advice letter, PG&E has provided the confidential information listed below. This information is being submitted in the manner directed by D.08-04-023 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under Public Utilities Code section 454.5(g) or the IOU Matrix, Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023. The Declaration of Alan Wecker Seeking Confidential Treatment is being submitted concurrently with this advice letter.

² A copy of this letter granting PG&E's extension of time request to December 31, 2022 served to the parties appearing on the R.20-05-003 service list is available at hyperlink <http://pgera.azurewebsites.net/Regulation/ValidateDocAccess?docID=720978>. Rule 1.5 of General Order (GO) 96-B extends the due date to include the first business day after the Commission-directed compliance requirement is due, if the last day does not fall on a business day. Therefore, the time limit to serve this advice letter is extended to Tuesday, January 3, 2023.

III. Exhibits Accompanying this Advice Letter

In support of this advice letter, PG&E provides the following additional information:

Appendix A: Confidential Transaction Information (Confidential)

Appendix B: Confidential Agreement 1 (Confidential)

Appendix C: Confidential Agreement 2 (Confidential)

Appendix D: Declaration of Alan Wecker

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than January 23, 2023, 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).

Effective Date

PG&E requests that this Tier 1 advice letter submittal become effective upon the date of submittal, which is January 3, 2023.

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.20-05-003. 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



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) #: 6811-E

Tier Designation: 1

Subject of AL: Resource Adequacy Sales Agreements Pursuant to Decision 22-05-015

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.22-05-015

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: Alan Wecker, alan.wecker@pge.com

Resolution required? Yes No

Requested effective date: 1/3/23

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

Appendix A

Confidential Transaction Information

(Confidential)

Appendix B

Confidential Agreement 1

(Confidential)

Appendix C

Confidential Agreement 2

(Confidential)

Appendix D

Confidential Declaration of Alan Wecker

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

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF ALAN WECKER
SEEKING CONFIDENTIAL TREATMENT FOR CERTAIN INFORMATION
CONTAINED IN ADVICE LETTER 6811-E**

I, Alan Wecker, declare:

1. I am a Manager in the Energy Transactions department within Energy Policy and Procurement at Pacific Gas and Electric Company (PG&E). In this position, I am responsible for overseeing commercial negotiations and execution of energy transactions at PG&E, including Resource Adequacy transactions. Through these experiences I have become familiar with the types of information that the Commission has indicated is confidential and gained knowledge about the types of information that electricity sellers consider confidential and proprietary. 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 information.

2. Based on my knowledge and experience, and in accordance with Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain confidential information contained in PG&E's Advice Letter 6811-E, submitted on January 3, 2023.

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 data and information covered by Decision 06-06-066 and Decision 08-04-023. 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.

4. The statement in the foregoing paragraph that the identified confidential data are not already public means that, to my knowledge, PG&E does not have a practice of releasing data of this type to the general public without a protective order or applicable non-disclosure agreement in place. It is possible that the data have been released publicly by another party, including by the counterparty to a particular procurement contract. Additionally, it is possible that a member of the public could ascertain with reasonable certainty the confidential data using publicly available circumstantial evidence, including through public statements made by third parties. I understand that pursuant to Ordering Paragraph 8 of Decision 06-06-066, if a party seeks access to specific information that is marked confidential in this upload and that party can demonstrate that the information has already been made publicly available, then the Commission may reject PG&E's assertion of confidentiality and disclose the data.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on January 3, 2023, at San Francisco, California.

/s/

ALAN WECKER

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

**ADVICE LETTER 6811-E FOR APPROVAL OF AGREEMENTS PURSUANT TO DECISION 22-05-015
JANUARY 3, 2023**

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
Appendix A: Confidential Transaction Information	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the executed RA Sales Agreements presented in this appendix are generally confidential.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Appendix B: Confidential Agreement 1	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the executed RA Sales Agreements presented in this appendix are generally confidential.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Appendix C: Confidential Agreement 2	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the executed RA Sales Agreements presented in this appendix are generally confidential.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.

**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 Blaising 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
Dish Wireless L.L.C.

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

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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