

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 25, 2023

Advice Letter 6844-E/E-A

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612
E-mail: PGETariffs@pge.com

SUBJECT: Procurement Transaction Quarterly Compliance Submittal (Q4 2022)

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 6844-E/E-A is effective as of March 1, 2023.

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

January 30, 2023

Advice 6844-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Submittal (Q4 2022)

Purpose

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for Q4 2022 in conformance with PG&E’s 2014 BPP approved in D.15-10-031. PG&E’s submittal of this Procurement Transaction Quarterly Compliance Report (“QCR”) for record period October 1, 2022 through December 31, 2022, (Q4 2022) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Procurement Transaction Quarterly Compliance Reports be submitted within 30 days of the end of the quarter.

Background

In D.07-12-052, the Commission directed Energy Division and the Investor-Owned Utilities (“IOUs”) to continue the collaborative effort to develop a reformatted QCR. The Commission authorized Energy Division to implement a reformatted QCR and to make ministerial changes to the content and format of the report as needs arise. Energy Division and the IOUs finalized the QCR format in December 2008. This QCR is consistent with the final format authorized by Energy Division on December 15, 2008.

Compliance Items

Attachment 1 to this Advice Letter includes a narrative with supporting Confidential Attachments that conforms to the reformatted QCR. The public version of Attachment 1 includes the Narrative, which is not confidential. Attachments 2-4 include the public versions of Attachments G and H, respectively. The confidential version of the QCR includes the following supporting Confidential Attachments:

- Attachment A: Q4 2022 Electric and Natural Gas Transactions
- Attachment B: Q4 2022 Counterparty Information
- Attachment C: Q4 2022 Electric Transactions Summary
- Attachment D: Q4 2022 Natural Gas Transactions Summary

Attachment E:	Q4 2022 Other Transactions
Attachment F:	Q4 2022 Key Briefing Packages
Attachment G:	Q4 2022 Independent Evaluator (IE) Reports
Attachment H:	Q4 2022 Contracts Executed/Contracts Amended
Attachment I:	Q4 2022 Summary of Retained Generation Investments Completed
Attachment J:	Q4 2022 System Load Requirements/Conditions
Attachment K:	Q4 2022 Risk Management Strategy Communication and Management Disclosure
Attachment L:	Q4 2022 Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M:	Q4 2022 Transactions Subject to Strong Showing

Attachment 5 to this Advice Letter includes confidentiality declarations and a matrix.

The public version of this QCR is provided to the service lists for Rulemakings (“R.”) 16-02-007. The confidential version of the QCR is provided to PG&E’s Procurement Review Group.

This submittal will not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than February 21, 2023, which is 22 days¹ 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

¹ The 20-day protest period concludes on a three-day holiday weekend, therefore, PG&E is moving this date to the following business day.

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

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is March 1, 2023, which is 30 days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically to parties shown on the attached list and the service lists for R.16-02-007. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail 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. 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.16-02-007 (Public Version)
PG&E's Procurement Review Group (Confidential Version)

Public Attachments:

Attachment 1: Narrative
Attachment 2: Attachment G-1 (Public Version)
Attachment 3: Attachment G-2 (Public Version)
Attachment 4: Attachment H (Public Version)
Attachment 5: Confidentiality Declarations and Matrix



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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 6844-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q4 2022)

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.03-12-062 and D.02-10-062

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:

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Attachment 5

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: Jay Bukowski, Jason.Bukowski@pge.com, John Ulloa, John.Ulloa@pge.com

Resolution required? Yes No Marianne Aikawa, Marianne.Aikawa@pge.com

Requested effective date: 3/1/23 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:
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

Attachment 1

Narrative

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE FOURTH QUARTER OF 2022

January 30, 2023

TABLE OF CONTENTS

A. Introduction.....	1
B. Summary.....	1
1. Competitive Solicitations (Approval Through the QCR).....	1
2. Other Competitive Solicitations (Approval Through Separate AL Filing or Regulatory Process).....	2
3. Other Procurement Activities (Approval Through the QCR).....	3
a) Electric Transactions.....	3
b) Gas Transactions.....	3
4. Other Procurement Activities (Approval Through Separate AL Filing or Regulatory Process).....	4
C. Master Data Request Documentation.....	5
1. Identification of the Ultimate Decision Maker(S) Up to the Board Level, Approving the Transactions.....	5
2. The Briefing Package Provided to the Ultimate Decision Maker.....	5
3. Description of and Justification for the Procurement Processes Used to Select the Transactions.	6
a) Electric Procurement – Description.....	6
b) Electric Procurement – Justification.....	6
c) Natural Gas Procurement – Description.....	10
d) Natural Gas Procurement – Justification.....	11
e) GHG and Other Commodities.....	14
4. Explanation/Justification of the Timing of the Transactions.....	15
a) Electric Transactions.....	15
b) Natural Gas Transactions.....	15
5. Discussion of the System Load Requirements/Conditions Underlying the Need for the Quarter’s Transactions.	16
a) PG&E Participation in the CAISO Markets.....	16
b) PG&E-Owned Generation Conditions.....	16
6. Discussion of How the Quarter’s Transactions Meet the Goals of the Risk Management Strategy Reflected in the Plan.....	18
7. Copy of Each Contract.....	18
8. The Valuation Results for the Contract(s) (for Contracts of Three Months or Greater Duration).....	18
9. An Electronic Copy of Any Data or Forecasts Used to Analyze the Transactions.	18
10. Provide a Reasonable Number of Analyses Requested by the Commission or the PRG and Provide the Resulting Outputs.....	18

TABLE OF CONTENTS
(CONTINUED)

11. Any Other Information Sought by the Commission Under the Pub. Util. Code.19
D. Additional Reporting Requirement, Pursuant to D.07-01-03919
E. Cost Recovery Mechanisms.....19

Summary of Public Attachments

- Public Attachment G: *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report(s) completed during the Quarter redacted to protect confidential information.
- Public Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter redacted to protect confidential information.

Summary of Confidential Attachments

- Confidential Attachment A: *Transactions*, provides a summary of all transactions executed during the Quarter, which are less than five years in length and that have not been filed through a separate advice filing or application.
- Confidential Attachment B: *Counterparty Information*, provides a summary of (1) all non-investment grade counterparties with whom PG&E transacted; and (2) the top 10 counterparties by volume during the Quarter.
- Confidential Attachment C: *Electric Transactions Summary*, provides a summary of the electric transactions executed during the Quarter.
- Confidential Attachment D: *Natural Gas Transactions Summary*, provides a summary of the gas transactions executed during the Quarter.
- Confidential Attachment E: *Other Transactions*, provides the executed transactions resulting from non-energy-related products during the Quarter.
- Confidential Attachment F: *Key Briefing Packages*, provides a summary of all relevant Procurement Review Group (PRG) agendas and presentations presented.
- Confidential Attachment G: *Independent Evaluator Reports*, provides any relevant IE report(s) completed during the Quarter.
- Confidential Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during the Quarter.

Summary of Confidential Attachments
(Continued)

- Confidential Attachment I: *Summary of Retained Generation Investments Completed*, provides a summary of any investments related to retained generation facilities and multiple contracts for the same supplier, resource or facility, consistent with the requirements of D.07-01-039.
- Confidential Attachment J: *System Load Requirements/Conditions*, provides a summary of all information related to addressing PG&E's residual net open position.
- Confidential Attachment K: *Risk Management Strategy Communication and Management Disclosure*, provides a summary of all procurement-related risk strategies and issues communicated to PG&E's senior management.
- Confidential Attachment L: *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*, provides a summary of any models related to the relevant transactions identified in this filing.
- Confidential Attachment M: *Transactions Subject to Strong Showing*, provides a summary and supporting documentation for strong showing transactions.

A. Introduction

As required by Ordering Paragraph (OP) 8 of Decision (D.) 02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048, and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period October 1, 2022 through December 31, 2022 (Quarter), were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.15-10-031. Any material related to PG&E's activities on behalf of the Central Procurement Entity will not be included in the Quarterly Compliance Report (QCR), it will be filed with the requisite Compliance Filing.

PG&E manages its transactions in compliance with its BPP. During the Quarter, PG&E had the following BPP activity updates:

- Advice Letter (AL) 6725-E: Update to Sales Framework (Appendix S), submitted October 5, 2022.
- AL 6799-E: Update to Electrical Capacity and Ratable Rate, Natural Gas Pipeline Capacity, Natural Gas Storage Procurement, and Greenhouse Gas Procurement Limits (Appendix C) and Resource Adequacy Solicitation Schedule (Appendix S), submitted December 22, 2022.

B. Summary

During the Quarter, PG&E engaged in the following procurement activities in accordance with its BPP-approved procurement methods and practices:

1. Competitive Solicitations (Approval Through the QCR)

- a. None for the Quarter.

2. Other Competitive Solicitations (Approval Through Separate AL Filing or Regulatory Process)

PG&E is seeking approval for BPP products through separate AL filings or other regulatory processes and are referenced here for informational purposes only:

- a. Bioenergy Market Adjusting Tariff (monthly auctions), ongoing;
- b. Renewable Market Adjusting Tariff, ongoing;
- c. Mid-term Reliability Request for Offers (“MTR RFO”) – Phase 2 (issued April 15, 2022);
- d. 2022 Independent Evaluator Request for Proposals (“IE RFP”) (issued May 17, 2022);
- e. 2022 Tree Mortality Non-Bypassable Charge Bundled Renewables Portfolio Standard (RPS) Energy Sale Solicitation (issued July 29, 2022);
- f. Summer 2022 Bundled RPS Energy Sale (“REC”) Solicitation (issued July 29, 2022);
- g. Summer 2022 Disadvantaged Communities (“DAC”) Request for Offer (RFO) (issued September 6, 2022);
- h. Fall 2022 Distribution Investment Deferral Framework RFO (issued September 15, 2022);
- i. 2022 Distribution Investment Deferral Framework Standard Offer Contract (SOC) Pilot (issued September 15, 2022);
- j. Fall 2022 PG&E Solar Choice RFO (issued October 14, 2022);
- k. Fall 2022 Regional Renewable Choice (“RRC”) RFO (issued October 14, 2022);
- l. Winter 2022 Disadvantaged Communities (“DAC”) RFO (issued December 21, 2022).

3. Other Procurement Activities (Approval Through the QCR)

PG&E also seeks approval of transactions executed from the following procurement activities, other than competitive solicitations, through the QCR.

a) *Electric Transactions*

- i. California Independent System Operator (CAISO) Allocations;*
 - a. CAISO Monthly Congestion Revenue Rights (CRR) Allocation Processes;
 - b. CAISO 2023 Annual CRR Tier 2 and Tier 3 Allocation Process.
- ii. CAISO Markets and Processes;*
 - a. Convergence Bidding.
- iii. Direct Bilateral Contracting for Short-Term Products;*
- iv. Bilateral Negotiated Contracts;*
- v. Electronic Solicitations issued by PG&E;*
- vi. Market Request for Proposal (RFP);*
- vii. Carbon-Free Energy Sales; and*
- viii. E-Solicitation, Transparent Exchanges, or Voice and On-Line Brokers.*

b) *Gas Transactions*

- i. Transparent Exchanges;*
- ii. Direct Bilateral Contracting for Short-Term Products;*
- iii. Voice Brokers;*
- iv. Electronic Solicitations; and*
- v. Cashouts.*

These procurement activities are described in greater detail in Section C.3, below.

4. Other Procurement Activities (Approval Through Separate AL Filing or Regulatory Process)

During the Quarter, approval of contracts resulting from the following procurement activities was requested through separate AL filings or regulatory processes and are referenced here for informational purposes only:

- a. Bilaterally negotiated contracts or amendments executed pursuant to other regulatory requirements.

- i. *See section c.i.*

- b. Qualifying Facility (QF) contracts or amendments executed pursuant to other regulatory requirements.

- i. *PG&E executed a Letter Agreement with Western Power and Steam. Relevant information is included in the Informational Only QF section of Attachment H.*

- c. Other Procurement Obligations

To address the load migration that has taken place since D.19-11-016, the CPUC issued D.22-05-015, whereas the Load-Serving Entities (LSE) with the new load have the option to enter into a new agreement with the relevant Investor-Owned Utility (IOU) to purchase the system Resource Adequacy (RA) capacity that was procured on behalf of the IOUs bundled customers that have since departed from the IOU service and are now being served by another LSE.

- i. PG&E will be receiving cost recovery via the Modified Cost Allocation Mechanism (MCAM) for the sale transactions executed during the Quarter. PG&E submitted AL 6811-E on January 3, 2022, in compliance with D. 22-05-015.

These transactions are detailed in Confidential Attachments F, K, and H (Info Only Other tab).

C. Master Data Request Documentation

D.02-10-062, Appendix B, as clarified by D.03-06-076, sets forth specific elements to be addressed in this report. Each element is discussed below.

1. Identification of the Ultimate Decision Maker(S) Up to the Board Level, Approving the Transactions.

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of: Fong Wan, Senior Vice President, Energy Policy and Procurement; Gillian Clegg, Vice President, Energy Policy and Procurement; Candice Chan, Senior Director, Electric and Gas Acquisition; Don Howerton, Director, Structured Energy Transactions; Chris McNeece, Director, Short-Term Electric Supply; Scott Ranzal, Director, Portfolio Management; and/or John Ulloa, Manager, Electric Gas Supply, consistent with the delegation of authority effective for the period.

2. The Briefing Package Provided to the Ultimate Decision Maker.

The “decision-maker” for a particular contemplated transaction depends on many factors, such as term, volume, and notional value. For many of the transactions during the Quarter, the “decision-maker” was a gas or power trading employee executing transactions per an established plan or to achieve a particular objective (such as balancing the portfolio supply and demand). For such transactions, briefing packages are not prepared. Briefing packages prepared during the Quarter for transactions or procurement activities that required senior management approval are included in Confidential Attachment K. In addition, copies of presentations made by PG&E to its PRG during the Quarter are included in Confidential Attachment F.

3. Description of and Justification for the Procurement Processes Used to Select the Transactions.

a) *Electric Procurement – Description*

PG&E is authorized to use any of the following BPP-approved electricity procurement transaction processes during the Quarter:

- Competitive Solicitations;
- CAISO Allocations;
- CAISO Markets and Process;
- Direct Bilateral Contracting for Short-Term Products;
- Bilateral Negotiated Contracts;
- Electronic Solicitations issued by PG&E;
- Market RFP;
- Carbon-Free Energy Sales;
- E-Solicitation, Transparent Exchanges, or Voice and On-Line Brokers;
- Public Utility Regulatory Policies Act (PURPA) SOCs (*for informational purposes only*); and
- Pro forma contracts executed under the Combined Heat and Power (CHP) Feed-In Tariffs Program (*for informational purposes only*).

b) *Electric Procurement – Justification*

i. *For competitive solicitations held by PG&E, describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.*

The approved procurement processes used during the Quarter and supporting documentation include the following:

- CAISO Allocations

CAISO Monthly CRR Allocation Process

PG&E procures CRRs to narrow the distribution of PG&E's energy procurement costs due to expected electric transmission congestion.

PG&E obtains CRRs, subject to risk assessment, for specific source/sink combinations as approved in its BPP.

PG&E acquires CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (e.g., retail loads and Helms pumping load) or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E is also authorized to acquire CRRs for such positively correlated paths.

In October 2022, November 2022, and December 2022, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for November 2022, December 2022, and January 2023, respectively.

PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP CRR (Appendix I) filed in AL 5473-E, effective May 30, 2019.

CAISO Annual CRR Allocation Process

PG&E participated in the 2023 Tier 2 and Tier 3 Allocation Processes. Awards from Tier 2 were posted on October 10, 2022 and for Tier 3 on October 21, 2022.

PG&E's procurement during the Quarter was consistent with PG&E's updates to its BPP CRR (Appendix I) filed in AL 5473-E, effective May 30, 2019.

Relevant information for the Monthly CRRs is included in Confidential Attachments F, J, and L.

- CAISO Markets and Processes

- Convergence Bidding

PG&E suspended Convergence Bidding activities after trade day May 26, 2018. As of December 31, 2022, all Convergence Bidding activities remain suspended. Relevant information is included in Confidential Attachment E, F, and J.

- Direct Bilateral Contracting for Short-Term Products

Transmission capacity is purchased to relocate power from one point to another, often necessary outside a Regional Transmission Operator, such as the CAISO.

Relevant information is included in Confidential Attachment A.

- Bilateral Negotiated Contracts

RA – None for the Quarter.

- Electronic Solicitations issued by PG&E

RA and Import Energy – During the Quarter, PG&E executed the transactions consisting of the following types: (1) System RA Purchase; (2) System, Flexible RA Sale, (3) System RA Sale, and (4) Import Allocation Rights Sale.

There were two E-Solicitations for RA and Import Energy that PG&E held in Q3 and Q4 2022 with transactions executed in Q4. They were monitored by an IE: (1) the 2023 Annual RA and Import Energy

E-Solicitation, Phase 2 and (2) PG&E 2023 Feb-Dec RA and Import Energy E-Solicitation.

Relevant information is included in Confidential Attachments E, F, G, and H.

- Market RFP

RA – None for the Quarter.

- Carbon-Free Energy Sales – During the Quarter, PG&E executed Carbon-Free Energy transactions.

- E-Solicitation, Transparent Exchange, or Voice and On-Line Brokers

Electric Financial Transactions – During the Quarter, PG&E executed electric financial transactions via E-Solicitation or Transparent Exchange (including Voice and On-line Brokers).

Relevant information is included in Confidential Attachments A and L.

RA Broker Transaction – None for the quarter.

- PURPA SOC (for informational purposes only)

Under the new PURPA SOC Program, QF generators may enter into PG&E’s pro forma SOC for QFs up to 20 megawatts (MW). In addition, many of the remaining legacy QF contracts are still active and may require amendments or letter agreements to help the generator meet the requirements of the Commission’s CHP Program (e.g., greenhouse gas (GHG)) administration and metering issues) that were not required under the former program.

Relevant information is included in the “Informational Purposes Only” Section of Attachment H.

- CHP Feed-In Tariffs (for informational purposes only)

Under the Waste Heat and Carbon Emissions Act, codified as California Public Utilities Code (Pub. Util. Code) Section 2840 et seq. (Stats. 2007, Ch. 713), the Commission established a standard tariff for the sale of electricity from efficient CHP systems under 20 MW and directed the electrical corporations to purchase excess electricity from eligible CHP generators. A CHP generator that is certified by the California Energy Commission (CEC) is eligible under the CEC’s legal and technical guidelines to obtain a CHP feed-in tariff. In D.09-12-042, the Commission approved three pro forma contracts for use with CHP systems (known as “AB 1613 PPAs”) that are applicable to generators of different sizes: a standard contract for CHP generators up to 20 MW, a simplified PPA for CHP generators less than 5 MW, and a further simplified PPA for smaller CHP systems under 500 kilowatts.

Relevant information is included in the “Informational Purposes Only” section of Attachment H.

c) Natural Gas Procurement – Description

PG&E procured natural gas during the Quarter using various BPP-approved procurement processes and methods, including:

- Competitive Solicitations;
- Transparent Exchanges;
- Direct Bilateral Contracting for Short-Term Products;
- Voice and On-Line Brokers;
- Electronic Solicitations; and
- Cashouts.

d) *Natural Gas Procurement – Justification*

- i. *For competitive solicitations (RFO), describe the process used to rank offers and select winning bid(s).*

None for the Quarter.

- ii. *For other transactional methods, provide the documentation supporting the selection of the chosen products.* Transparent Exchanges: Electronic trading exchanges for transparent prices:

Commodity Purchases/Sales – PG&E buys and sells physical natural gas on Intercontinental Exchange (ICE) and the ICE Natural Gas Exchange (NGX) physical clearing service. ICE is an electronic system that matches buyers and sellers of natural gas products. Once buyer and seller are matched, ICE trades become bilateral trades. ICE/NGX trades are cleared by NGX, rather than bilaterally. Physical transactions in the Quarter include next-day and same-day transactions, for delivery periods of one to five days, and monthly transactions for deliveries each day of a calendar month. Relevant information of transactions executed via Transparent Exchanges during the QCR period is included in Confidential Attachment A.

Gas Financial Transactions – PG&E’s procurement during the Quarter is consistent with PG&E’s updates to its BPP Hedging Plan (Appendix E) filed in AL 6051-E.

Gas Financial Transactions are cleared through exchanges (ICE or the New York Mercantile Exchange (NYMEX)). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for over-the-counter products. These products include Henry Hub futures and options, locational options, and basis futures against the industry benchmark

indices, including Gas Daily, Natural Gas Intelligence (NGI) and Inside Federal Energy Regulatory Commission (IFERC) Gas Market Report. Details demonstrating PG&E's compliance with D.15-10-031 during the Quarter are included in Confidential Attachments J and L.

Relevant information is included in Confidential Attachment A.

- Direct Bilateral Contracting for Short--Term Products

Commodity Purchases/Sales – PG&E buys and sells physical gas directly with counterparties in the bilateral market. Spot gas (deliveries less than one month) is traded at fixed prices and daily index (Gas Daily). Prompt month supply (deliveries each day of the following month) and term gas (greater than one month forward or one month in duration) is traded at fixed price, daily index (Gas Daily), or monthly or bi-week index (NGI, or IFERC) prices. For any bilateral physical supply trades with a term of one month, PG&E concluded these transactions bilaterally, but also used electronic solicitation methods, such as instant messaging, e-mail, voice solicitation (telephone), Real-Time Market (RTM) prices, and/or broker quotes, to inform and conduct these transactions.

Relevant information is included in Confidential Attachments A, J, and M.

PG&E executed five bilateral transport/storage/park transactions during the quarter to help balance its positions. The details of these transactions are available in Attachment A.

- Voice and On-Line Brokers – Gas Financial Transactions

PG&E executes natural gas financial transactions (futures) through voice brokers that resulted in exchange-cleared trades. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled

over-the-counter or cleared through NYMEX or ICE. The broker market trades the same financial products as the exchanges.

Relevant information of transactions executed via voice brokers is included in Confidential Attachment A.

- Voice and On-Line Brokers – Commodity Purchases/Sales

PG&E executes physical gas supply transactions through voice brokers that resulted in transactions. Brokers provide access to anonymous bids and offers from both over-the-counter parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled over-the-counter or cleared through NGX. The broker market trades the same products as the bilateral market.

Relevant information is included in Confidential Attachment A.

- Electronic Solicitations

Conducted via Instant Messaging and Telephone – PG&E conducts electronic solicitations for the purchase or sale of physical gas supply and financial products, with delivery terms ranging from a single day, to one month or longer, using instant messaging and telephone. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the counterparty with the best bid(s) or offer(s).

Relevant information is included in Confidential Attachments A, F, J, and L.

- Cashouts: Commodity Purchases/Sales

Cashouts are used by gas pipelines, according to their tariff, to cure certain imbalances between supply and demand. When a pipeline applies a cashout, it results in a commodity transaction.

Relevant information is included in Confidential Attachment A.

e) GHG and Other Commodities

i. For competitive solicitations, describe the process used to rank offers and select winning bid(s).

None for the Quarter.

ii. For other transactional methods, provide the documentation supporting the selection of the chosen products. PG&E received its annual allocation of Electric Distribution Utility (EDU) Current Vintage allowances for the 2022 year from the California Air Resources Board (CARB) in September 2021. All of the EDU allowances were consigned into the 2022 CARB Auctions as required by the regulations and consistent with PG&E's BPP. CARB and Québec's ministère du Développement durable, de l'Environnement et de la Lutte contre les changements climatiques held a joint allowance auction on November 16, 2022, for Current 2021 and 2022 Vintage and Advance 2025 Vintage allowances.

PG&E is authorized to procure GHG products through CARB Auctions and other CPUC-approved procurement processes and methods. PG&E provided information regarding its bilateral market procurement strategy to the PRG.

PG&E's procurement during the Quarter was consistent with PG&E's Conformed BPP GHG Procurement Plan filed in AL 5579-E, effective July 1, 2019.

All relevant GHG transactional information and supporting justification is included in Confidential Attachments E and L.

4. Explanation/Justification of the Timing of the Transactions.

a) Electric Transactions

When selecting electric transactions, the best-priced bids/offers are selected first (merit -order selection) among those available for the required products at the time of the transaction, subject to credit and other limitations and operational constraints. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J.

b) Natural Gas Transactions

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage by utility-owned and contracted electric generating units and supply delivered on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of these units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of term transactions was based on the PG&E Electric Portfolio Quarterly Position Update, presented to the

PRG on September 20, 2022. Documentation supporting the timing of transactions is included in Confidential Attachment J.

5. Discussion of the System Load Requirements/Conditions Underlying the Need for the Quarter's Transactions.

a) PG&E Participation in the CAISO Markets

PG&E participates in the CAISO Day-Ahead and RTMs. PG&E's Day-Ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, price forecasts, dispatch costs and current bilateral electric market and forecasts of the CAISO's Integrated Forward Market (IFM) prices. The results of this process allow PG&E to determine the incremental costs of dispatchable resources that are bid into the IFM and the RTM. It also determines the price upon which PG&E is willing to pay the CAISO for meeting its hourly load. The CAISO then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

In the RTM, similar to the Day A-head market, PG&E submits resource bids and schedules into CAISO markets and those resources that clear the market will be obligated to operate in Real Time.

b) PG&E-Owned Generation Conditions

PG&E received 125 percent of average rainfall during the Quarter.

Planned outages lasting longer than 72 hours at the Helms Pumped Storage Facility (Helms) during the Quarter included: Helms Unit 1 (404 MW), Helms Unit 2 (404 MW), and Helms Unit 3 (404 MW). There were no maintenance outages lasting longer than 72 hours at Helms during the Quarter. There were no forced outages lasting longer than 24 hours at Helms during the Quarter.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Belden (125 MW), Bucks Creek

Unit 2 (32 MW), Caribou 1 Unit 2 (25 MW), Caribou 1 Unit 3 (25 MW), Cresta Unit 1 and Unit 2 (70 MW, total), Electra Unit 1 (31 MW), Electra Unit 2 (31 MW), Electra Unit 3 (36 MW), Haas Unit 1 (72 MW), Haas Unit 2 (72 MW), Kerckhoff 2 Unit 1 (155 MW), Pit 1 Unit 2 (30.5 MW), Pit 5 Unit 1 and Unit 2 (80 MW, total), Pit 6 Unit 1 and Unit 2 (80 MW, total), Salt Springs Unit 2 (33 MW), Stanislaus (91 MW), and Tiger Creek Unit 1 and Unit 2 (58 MW, total).

Maintenance outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Electra Unit 1 (31 MW), Electra Unit 2 (31 MW), Haas Unit 2 (72 MW), James B. Black Unit 1 and Unit 2 (172 MW, total), and Poe Unit 1 (60 MW).

Forced outages lasting longer than 24 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Caribou 1 Unit 1 (25 MW), Electra Unit 3 (36 MW), Pit 1 Unit 1 (30.5 MW), Poe Unit 1 (60 MW), Salt Springs Unit 1 (11 MW), and Stanislaus (91 MW).

There were no planned outages lasting longer than 72 hours at Humboldt during the Quarter. Maintenance outages lasting longer than 72 hours at Humboldt during the Quarter included: Unit 5, Unit 7, Unit 8, and Unit 10.

Forced outages lasting longer than 24 hours at Humboldt during the Quarter included: Unit 2, Unit 3, Unit 4, Unit 5, Unit 6, Unit 7, and Unit 10.

At PG&E's fossil combined cycle facilities, there were no planned outages longer than 72 hours during the Quarter. There were no maintenance outages longer than 72 hours during the Quarter. There were no forced outages longer than 24 hours during the Quarter.

During the 4th Quarter 2022, Diablo Canyon Power Plant (DCPP) Unit 1 had no reductions in power.

During the 4th Quarter 2022, DCPP Unit 2 performed a maintenance refueling outage and had no other reductions in power.

6. Discussion of How the Quarter’s Transactions Meet the Goals of the Risk Management Strategy Reflected in the Plan.

As described in Sections 3.b. and 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of relevant information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachments F and K.

7. Copy of Each Contract.

A list of transactional contracts executed and/or modified by PG&E during the Quarter is included in Confidential Attachment H. Copies of the contracts PG&E seeks approval of through this QCR are also included in this attachment.

8. The Valuation Results for the Contract(s) (for Contracts of Three Months or Greater Duration).

PG&E provides the valuation method and results for the contracts filed via this QCR in Confidential Attachment H.

9. An Electronic Copy of Any Data or Forecasts Used to Analyze the Transactions.

Because transaction personnel are continuously monitoring a wide range of market information on a 24-hour-per-day, 7-day-per-week basis, it is not feasible to provide all the data and forecasts used to analyze all potential and executed transactions. However, key analysis data utilized during the Quarter is in Confidential Attachment J.

10. Provide a Reasonable Number of Analyses Requested by the Commission or the PRG and Provide the Resulting Outputs.

To the extent any analyses requested by the Commission or PRG during the Quarter were not already included as a part of PG&E’s response to Items 1 through 9 above, such additional analyses would be contained in Confidential Attachment F.

11. Any Other Information Sought by the Commission Under the Pub. Util. Code.

To the extent that the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) has requested information for the Quarter as identified in its Master Data Request (MDR), this information will be included in PG&E's MDR response and submitted to the Cal Advocates 14 days after the filing of the QCR. In addition, the Commission's Energy Division has requested that PG&E provide transparent exchange traded prices. PG&E has included this information in Confidential Attachments A and E.

D. Additional Reporting Requirement, Pursuant to D.07-01-039

As required by OP 12 of D.07-01-039, PG&E has included in Confidential Attachment I, investments in retained generation that were completed during the Quarter, as well as any multiple contracts of less than five years with the "same supplier, resource or facility," as required in D.07-01-039, page 154. There were no transactions or investments to report during the Quarter.

E. Cost Recovery Mechanisms

1. Cost Allocation Mechanism

None for the Quarter.

2. Modified Cost Allocation Mechanism

During the Quarter, PG&E entered into three sale agreements with two LSEs. One of these sale agreements was to sell RA benefits for the 2023 RA compliance year. The other two sales agreements were to sell RA benefits starting in 2024 for the duration of the contracts signed pursuant to D.19-11-016. On October 3, 2022, PG&E submitted AL 6811-E in compliance with D.22-05-015.

PG&E will be receiving cost recovery via the MCAM for the executed transaction.

This transaction is detailed in Confidential Attachments F, K, and H (Info Only Other tab).

Attachment 2

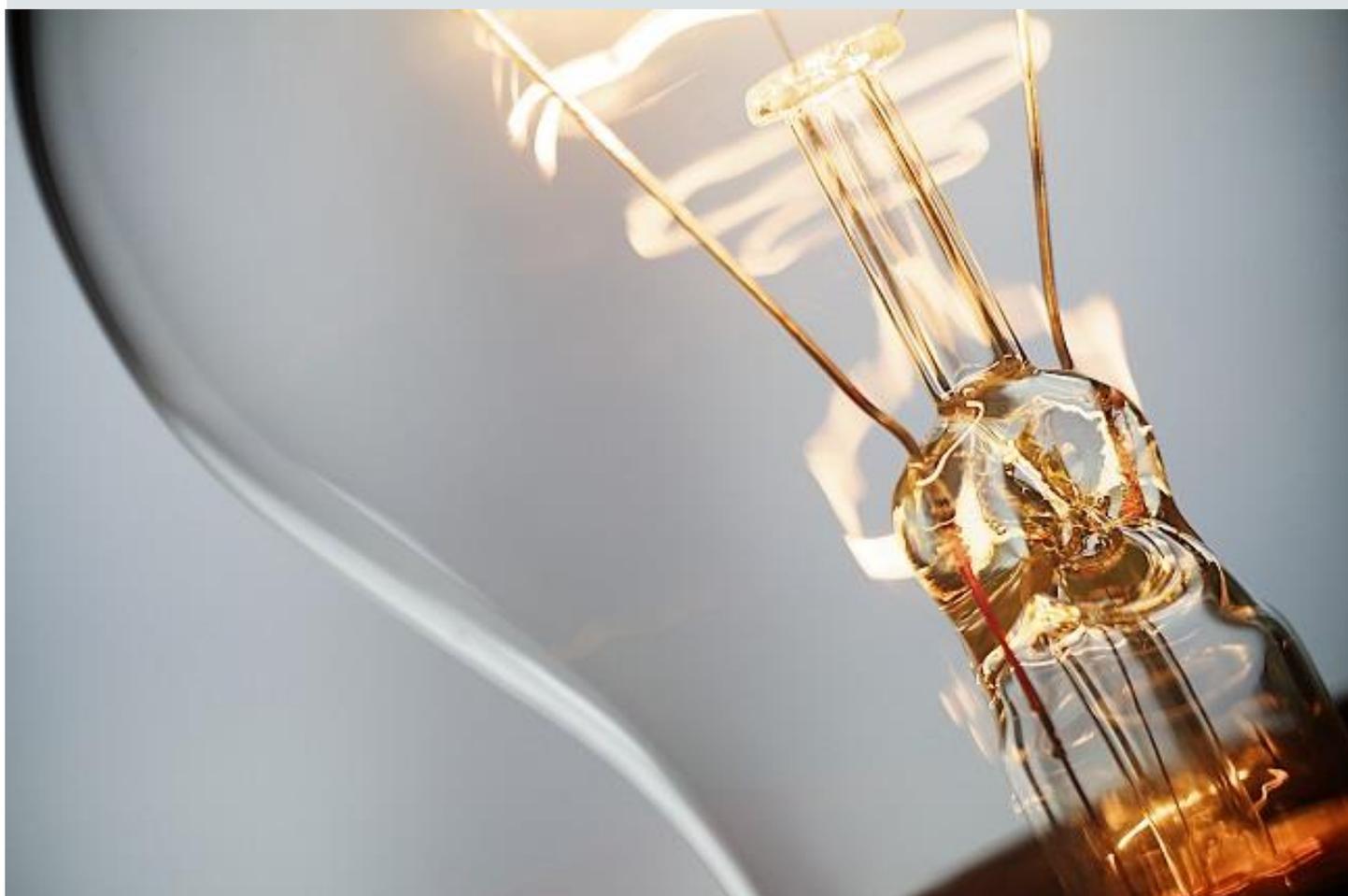
Attachment G-1 (Public Version)



PACIFIC GAS & ELECTRIC

Independent Evaluator Report for Phase II
of the 2023 Annual Resource Adequacy
and Import Energy Electronic Solicitation

January 20, 2023



PA Regional Office:
PA Consulting Group
Cooper Perkins
517 York Street
San Francisco, CA 94110
USA
Tel: +1 415 529 7680
www.paconsulting.com

Prepared by: C. Janecek and L. Farih

Version no: 1.0

Document reference:

EXECUTIVE SUMMARY

PA Consulting Group, Inc. (PA) served as the Independent Evaluator (IE) for Phase II of the Pacific Gas & Electric (PG&E) 2023 Annual Resource Adequacy (RA) and Import Energy Electronic Solicitation (E-Solicitation) (2023 Annual RA Solicitation or the Solicitation). This report provides PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiation of contracts.

Overview of Solicitation

PG&E conducted the 2023 Annual RA Solicitation in two phases. Phase I was intended to address market needs after the release of the initial California Independent System Operator (CAISO) 2023 Year-Ahead RA allocations and Net Qualifying Capacity (NQC) lists; Phase II was intended to finalize procurement upon release of the final NQC list. PA served as the IE only for Phase II of the Solicitation as an IE was not needed for Phase I.

In developing PG&E's RA positions prior to Phase II of the Solicitation, it was identified that for 2023, PG&E was [REDACTED] on a System basis [REDACTED]

PG&E did not specify the amounts of RA capacity it wished to sell. Phase II of the E-Solicitation was launched on September 22, 2022 with offers and bids originally due September 29, 2022. However, because of the uncertainty related to exactly when the CAISO would release its final NQC list, the E-Solicitation specified that if the CAISO had not released the final NQC list by September 26, 2022, that PG&E retained the right to delay the deadline(s) on a day-by-day basis. Ultimately, bids and offers were due on October 4, 2022.

Phase II activities concluded in November 2022, with PG&E executing transactions with [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PA's IE Report

PA's IE report generally follows the California Public Utilities Commission's (Commission or CPUC) Solicitation Shortlist Report Templates. The main sections include:

- Section 1: Summary of the 2023 Annual RA Solicitation
- Section 2: Summary of PA's role as IE for the E-Solicitation
- Section 3: PG&E's outreach efforts
- Section 4: PG&E's methodology design
- Section 5: Fairness of the application of PG&E's Bid Evaluation Criteria
- Section 6: Merit of E-Solicitation shortlists
- Section 7: Fairness of negotiations
- Section 8: PA support for contract approval

Main IE activities during solicitation

PA's role in PG&E's Phase II E-Solicitation spanned approximately three months from September through November 2022. The following provides a summary of PA's main activities during this E-Solicitation:

- PA reviewed drafts of the E-Solicitation documents prior to PG&E issuing the E-Solicitation.
- PA received all communications between PG&E and bidders. PA directly received all the emails, including bid packages that were sent to and received from bidders as well as non-conforming offers participants made to PG&E.
- PA and PG&E conducted several IE calls during which PG&E advised PA of the status of the E-Solicitation and discussed the treatment of certain bids.
- PA reviewed all Phase II bids.
- PA reviewed and confirmed PG&E's shortlisted bids by fully reconciling all bids in Phase II. PA completed this review and confirmation of PG&E's shortlisted bids prior to the shortlist notifications for Phase II.
- PA reviewed PG&E's contract negotiations via redlined documents with selected bidders to ensure that the negotiation process was fair and all bidders were treated consistently.

High level summary of findings

Overall, PA confirms that PG&E conducted a fair and equitable Phase II E-Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for the E-Solicitation was adequate, the E-Solicitation materials were clear and concise, and that PG&E further clarified its position in follow-up bidder questions throughout the E-Solicitation. [REDACTED]

[REDACTED]

- During Phase II of the E-Solicitation, [REDACTED]
- Based on our review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted Phase II of the 2023 Annual RA Solicitation evaluation analysis fairly and selected appropriate offers.

CONTENTS

- EXECUTIVE SUMMARY** **1**
- Overview of Solicitation 1
- PA's IE Report 2
- Main IE activities during solicitation 2
- High level summary of findings 2

- 1 SUMMARY OF PHASE II OF THE 2023 ANNUAL RESOURCE ADEQUACY SOLICITATION** **6**
- 1.1 PG&E's Local RA Requirements 7
- 1.2 Conforming and Non-conforming Offers 7
- 1.3 Solicitation Bid Evaluations, Shortlisting, and Negotiations 7

- 2 INDEPENDENT EVALUATOR ACTIVITIES DURING THE SOLICITATION** **9**
- 2.1 IE's key roles and responsibilities 9
- 2.2 PA's activities as IE 9

- 3 ADEQUACY OF PG&E'S OUTREACH** **12**
- 3.1 Notifications and announcements 12
- 3.2 Solicitation materials 12

- 4 PG&E'S BID EVALUATION DESIGN** **13**
- 4.1 Principles used to evaluate methodology 13
- 4.2 Amount and type of RA products 13
- 4.3 Description of PG&E's bid evaluation methodology 13
- 4.4 Evaluation of PG&E's methodology 14

- 5 FAIRNESS OF PG&E BID EVALUATION** **15**
- 5.1 Principles IE used to evaluate evaluation methodology 15
- 5.2 Administration of bid evaluation process 15
- 5.3 IE's review of PG&E's conformance checks 15
- 5.4 Review of PG&E's application of the bid evaluation methodology 15
- 5.5 IE's review of PG&E's selected shortlists 16
- 5.6 Fairness of PG&E's evaluation 16
- 5.7 Recommendations 16

- 6 MERIT OF SOLICITATION SHORTLIST** **17**
- 6.1 Did PG&E conduct the Solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology? 17
- 6.2 Do selected shortlisted bids provide the best overall value to ratepayers? 17
- 6.3 Did the shortlist conform to PG&E's RA sales strategy? 17
- 6.4 Reasonableness of the shortlist 17

7	FAIRNESS OF PROJECT-SPECIFIC NEGOTIATIONS	18
7.1	Principles PA used to evaluate fairness of negotiations	18
7.2	Describe fairness of negotiations	18
7.3	What terms and conditions underwent significant changes during the course of negotiations?	18
7.4	Was similar information and options made available to other participants?	18
8	MERIT OF CONTRACT APPROVAL	19

1 SUMMARY OF PHASE II OF THE 2023 ANNUAL RESOURCE ADEQUACY SOLICITATION

In this E-Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**), bids to purchase (i.e., **PG&E sells**), and offers for sale / bids to purchase (i.e., **simultaneous PG&E buys/PG&E sells**) of eligible System RA with January through December 2023 delivery periods. PG&E also sought bids to purchase (i.e., **PG&E sells**) for Import Allocation Rights (IAR) monthly products for the January through December 2023 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy for the January through December 2023 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify minimum volumes of 1 MW for all products except Import Energy, which had a minimum volume of 5 MW specified.

The Market Notice further noted that PG&E’s preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions. Table 1 below summarizes the products sought in the E-Solicitation.

Table 1. E-Solicitation Products

Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Jan-Dec 2023	Fixed Price \$/kW-month
Import Allocation Rights	Sell	1 MW	Jan-Dec 2023	Fixed Price \$/kW-month
Import Energy	Buy	5 MW	Jan-Dec 2023	CAISO LMP Index, ICE Index, or Fixed Price \$/MWh

PG&E planned to conduct the E-Solicitation in two Phases. Phase I of the E-Solicitation was intended to seek bids after the CAISO released its Draft 2023 NQC values list. The E-Solicitation protocol for Phase II launched on September 22, 2022 prior to the CAISO issuing its final NQC list. The Market Notice for Phase II originally required bids and offers to be submitted by September 29, 2022. However, due to a delay in CAISO posting its final NQC list, bids and offers were ultimately not due until October 4, 2022 for Phase II.

PG&E’s Solicitations have evolved into using a predesigned bid input form developed internally at PG&E using MS Excel spreadsheets and containing “macros”, a type of coding language used in the spreadsheets. The purpose of the form has been to ensure that all bids conformed to a specific format containing information related to the bidding entity, what type of RA, IAR, or Import Energy the entity was seeking to purchase or sell, the month and quantity of the bid, and the price. Additionally, in this E-Solicitation PG&E added a new info-only column for bidders to indicate the MCC Buckets of the resources that they were bidding or offering for. [REDACTED]

[REDACTED] The bid form has been designed to not allow bidders to change most of the format, thus ensuring

consistency and standardization of bids, allowing for PG&E staff to incorporate all bids into its optimization model quickly and accurately.

In a limited number of cases, bidders' email security systems blocked the receipt of the bid form due to the bid forms' use of the macro coding language. In anticipation for this potential issue, PG&E provided the bid form to bidders in a second email, with the market notice email specifying that a second email would contain the form. In doing so, PG&E ensured that bidders received the market notice information and could inquire for the bid form if the original email containing the bid form was blocked by the bidder's security system. In reviewing the email communications surrounding this issue, it is PA's belief that no bidders were blocked from submitting a bid due to email security system issues.

1.1 PG&E's Local RA Requirements

Resource Adequacy (RA) is the primary mechanism to ensure reliability of supply for Load Serving Entities (LSEs) operating under CPUC jurisdiction, including PG&E. RA in California consists of three distinct components: System RA, Local RA, and Flexible RA. LSEs were previously required to procure Local RA on a three-year forward basis. Beginning with compliance year 2023, the responsibility to procure Local RA belongs to newly formed Central Procurement Entities (CPE) operating independently from CPUC jurisdictional LSEs. As such, PG&E did not seek to procure Local RA through Phase II of the 2023 Annual RA Solicitation. System and Flexible are procured on a one-year forward basis; a requirement that remains with individual LSEs, rather than CPEs. LSEs must either self-build or contract for required RA capacity.

1.2 Conforming and Non-conforming Offers

In prior solicitations, PG&E accepted only those offers which strictly conformed to its bid forms, allowing for evaluation, and shortlisting of multiple bids within the necessary timeframes. Though this process has worked well for PG&E in prior solicitations, PG&E has recognized the merits of considering non-conforming offers in recent solicitations. As such, PG&E allowed for the submission of non-conforming offers in Phase II of the 2023 Annual RA Solicitation. In doing so, PG&E allowed participants to make bids or offers for system / flex swaps at a premium and for multi-month strips. These offers were considered non-conforming as the original bid forms do not allow for the entry of these types of bids or offers.

During the E-Solicitation, PG&E discussed with PA its desire to entertain offers which did not conform to the original bid forms, or non-conforming offers. PG&E felt that this strategy would maximize the value of the E-Solicitation and associated transactions to PG&E and its customers, while remaining a fair and equitable procurement process. PG&E ensured this fairness by following a process in which all conforming offers and bids were evaluated first, and any resulting RA positions (either long or short) PG&E had would then be evaluated in light of any non-conforming offers PG&E received. In this manner, all bidders' conforming offers were evaluated on equal footing in PG&E's optimization modeling. After this evaluation, any non-conforming offers were evaluated on an individual basis. The process that PG&E has developed for evaluating non-conforming offers worked well in Phase II of the 2023 Annual RA Solicitation. PA agreed with PG&E's decision to entertain non-conforming offers while working to ensure fair and equitable treatment of all bidders.

1.3 Solicitation Bid Evaluations, Shortlisting, and Negotiations

[REDACTED]

[Redacted text block]

2 INDEPENDENT EVALUATOR ACTIVITIES DURING THE SOLICITATION

This section provides a description of PA's activities as the Independent Evaluator throughout the E-Solicitation, bid selection process, and contract negotiations.

2.1 IE's key roles and responsibilities

The role of the IE is to provide advice to the utility on the design, administration, and evaluation aspects of the E-Solicitation. The CPUC has clarified that the role of the IE is not to conduct or administer the E-Solicitation, but to "separately evaluate and report on the IOU's entire solicitation, evaluation, and selection process."

Additionally, the IE is to ensure that PG&E treats all bidders fairly and equitably and that no particular counterparty is favored. The IE also ensures that the bid selection process is transparent and is aligned with the procurement requirements. PG&E can also call on the IE's advice as to various evaluation issues that may arise during the E-Solicitation process. During the course of this E-Solicitation, PG&E did consult with the IE regarding certain aspects of the evaluation process.

2.2 PA's activities as IE

This section describes the activities PA performed associated with each stage in the E-Solicitation process in the role of IE for Phase II of the 2023 Annual RA Solicitation. PA was involved from PG&E's development of the E-Solicitation materials in September through the selection of the bids and the negotiation and execution of contracts through November. PA evaluated whether the procedures followed by PG&E were aligned with the process it established in its Solicitation protocol and provided fair and equitable treatment of all bids. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying, and resolving potential issues, and providing recommendations throughout the process.

2.2.1 Solicitation materials

PA reviewed the E-Solicitation protocols prior to the Market Notice issuance and was in contact with PG&E regarding the development of the E-solicitation protocol, evaluation methodology, draft Confirmation Agreement, and other E-Solicitation materials. PG&E provided the draft Confirmation Agreement.

The E-Solicitation email providing Market Notice contained a draft Confirmation Agreement (Confirm) for bidders to consider and notified bidders that PG&E would not entertain material revisions to the draft Confirm. An additional email was sent to bidders containing the E-Solicitation bid form.

2.2.2 Bid submittal process

PG&E's bid intake process for the E-Solicitation was conducted entirely via email, including the Market Notice, draft RA Confirm, and Bid Forms. Bidders submitted both bid forms as well as non-conforming offers via email.

2.2.3 Communication with bidders

PG&E communicated with bidders via email and conference calls. The conference calls were infrequent and often scheduled on short notice.

PA attempted to attend all conference calls with bidders and PA closely followed subsequent email communications with the given bidder in light of the call to ensure that PG&E did not provide preferential treatment of any kind to any bidder. Additionally, in some instances, bidders contacted PG&E directly via telephone where PA was not present. In those instances, PG&E promptly notified PA and provided notes on what occurred on the call between the bidder and PG&E.

2.2.4 Initial bid review and conformance check

After receiving bids, PG&E conducted a conformance check on each bid to determine its compliance with all bid requirements. Bidders copied PA on initial email contact with PG&E and PA was able to effectively monitor communication between bidders and PG&E.

Given the complexity of the E-Solicitation, with PG&E buying and selling System RA, the bid forms necessarily included limitations on what bidders can submit as a conforming offer. Specifically, currently multi-month strip bids/offers and system/flex swaps are not considered conforming offers. PG&E did receive some questions from multiple bidders, both before and after submitting their bids/offers, on how to correctly submit their bids/offers to be considered conforming. PA did not consider the number of questions regarding the bidding process to be excessive, but rather indicative of the evolving nature of RA procurement for all entities as well as the multiple solicitations occurring in California at the same time as LSEs sought to satisfy all of their RA requirements for the upcoming compliance deadlines. Ultimately, PG&E and PA found some bids to be non-conforming.

2.2.5 Evaluation process

PG&E developed an optimization model incorporating PG&E’s initial supply positions for System RA and PG&E’s IAR position; the optimization model and evaluation process are described in detail in Section 4 of this report. PG&E has used this model in prior solicitations and has previously described the model and its methods for ranking, accepting, and rejecting bids based on a combination of bid price and requested volumes, and PA is familiar with the model and comfortable that it equitably determines the optimal combination of shortlisting awards. [REDACTED]

[REDACTED] While PA did not execute the optimization models, PA assembled a summary of all bids and their shortlisting status and conducted a full reconciliation of all bids from Phase II and their ultimate acceptance or rejection and found no issues with PG&E’s ultimate bid shortlisting.

2.2.6 Shortlist determination

The initial proposed Phase II shortlist was provided to PG&E’s Procurement Review Group (PRG) and PG&E provided PA with copies of the proposed shortlist. PG&E reviewed with and discussed all shortlists with PA prior to notifying any bidders and incorporated PA’s recommendations regarding decisions PG&E faced.

2.2.7 Contract negotiations

To streamline the process and reduce time between shortlisting notifications and Confirm executions, PG&E included the draft Confirmation document (Confirm) in the E-Solicitation Market Notice. PG&E has used this process in recent solicitations, and the majority of bidders to this E-Solicitation have been participating in many of these E-Solicitations and typically have few, if any revision requests.

Overall, bids required multiple email exchanges to come to an agreement on confirm language. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

PA monitored all email communications during negotiations.

3 ADEQUACY OF PG&E'S OUTREACH

This section addresses the adequacy of PG&E's outreach for the E-Solicitation as well as the E-Solicitation materials.

3.1 Notifications and announcements

PG&E's outreach included notifications to PG&E's E-Solicitation RA list containing almost 500 email addresses. PA observed heightened interest in PG&E's E-Solicitation relative to prior solicitations and believes that between this general market awareness of RA procurement activities and PG&E's efforts to publicize its E-Solicitation, PG&E extended adequate outreach for the Solicitation.

3.2 Solicitation materials

PG&E created E-Solicitation Market Notices and associated materials Phase II of the E-Solicitation. The E-Solicitation materials were provided to PG&E's Solicitation email distribution list in the E-Solicitation outreach, including the Market Notice, draft Confirm, and the bid submittal form developed by PG&E. The Market Notice included information on the types of products PG&E was seeking and over what term, as well as a proposed E-Solicitation evaluation schedule.

In PA's opinion, PG&E provided appropriate E-Solicitation materials and provided prompt response to any questions received by potential bidders.

4 PG&E'S BID EVALUATION DESIGN

This section describes PG&E's bid evaluation methodology for the E-Solicitation.

4.1 Principles used to evaluate methodology

PA used the following principles to guide its evaluation:

- The procurement targets and objectives should be clearly defined in PG&E's E-Solicitation materials;
- The evaluation should only be based on those criteria requested in the response form;
- The methodology should identify how quantitative measures will be considered and be consistent with an overall metric;
- The approach should not be biased for or against specific counterparties; and
- The methodology does not have to be the one that the IE would independently have selected but it needs to be "reasonable".

4.2 Amount and type of RA products

In this E-Solicitation, PG&E sought offers for sale (i.e., PG&E buys), bids to purchase (i.e., PG&E sells), and offers for sale / bids to purchase (i.e., simultaneous PG&E buys/PG&E sells) of eligible System RA with January through December 2023 delivery periods. PG&E also sought bids to purchase (i.e., PG&E sells) for Import Allocation Rights (IAR) monthly products for the January through December 2023 delivery periods. PG&E sought offers for sale (i.e., PG&E buys) of WSPP Schedule C Import Energy for the January through December 2023 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify minimum volumes of 1 MW for all products except Import Energy, which had a minimum volume of 5 MW specified.

The Market Notice further noted that PG&E's preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions.

4.3 Description of PG&E's bid evaluation methodology

PG&E's valuation and selection approach was intended to evaluate the different product types as consistently as possible. The initial step included a conformance check of each offer. The conforming offers then went through an optimization analysis designed to maximize ratepayer value while maintaining compliance with RA requirements. The methodology considered both quantitative as well as qualitative factors as described below.

4.3.1 Conformance check

The initial analysis included an assessment of conformance. All offers needed to conform to the minimum participation criteria and eligibility. The E-Solicitation was less complex than other procurement processes in which the utility is seeking to acquire resources, and as such had more limited conformance requirements.

The conformance requirements were generally limited to the following required document:

- An RA Bid Form Template, indicating the types, delivery term, and volumes the bidder wished to purchase.

As noted above, PG&E determined that non-conforming bids would be accepted and reviewed after conforming offers were evaluated for shortlisting. These included multi-month bids/offers which could not be accommodated in PG&E’s model as well as bids/offers for system/flex swaps at a premium. PA is not aware of any bids which were rejected for non-compliance nor of any late bids which were rejected due to being submitted past the submittal deadlines.

4.3.2 Quantitative bid evaluation

PG&E primarily relied on a quantitative evaluation of each bidder’s proposed volumes of RA to be purchased or sold and the bidder’s proposed price for each product. [REDACTED]

[REDACTED]

Development of supply curves

[REDACTED]

Bid optimization

[REDACTED]

4.4 Evaluation of PG&E’s methodology

PA generally believes that PG&E’s methodology was reasonable, within the context of the principles set forth in Section 4.1.

5 FAIRNESS OF PG&E BID EVALUATION

This section addresses the application or administration of the methodology described in Section 4.

5.1 Principles IE used to evaluate evaluation methodology

As in the previous section, PA used the following principles to guide its evaluation, and in this case phrased as questions:

- Were bidder questions answered fairly and consistently and the answers made available to all?
- Did the utility ask for "clarifications" that provided the bidder an advantage over others?
- Were all bids given equal credibility in the economic evaluation?

5.2 Administration of bid evaluation process

A description of PA's activities in its role as IE is provided in Section 2. Based on PA's participation and observations we believe that:

- Bidder questions were answered fairly and consistently
 - PA monitored all communications between bidders and PG&E including questions, and believes the questions posed were reasonably and fairly answered
- PG&E's clarification questions were minimal and reasonable, and did not advantage any bidder;
- PG&E applied conformance requirements fairly to all bids and consistent with bid documents;
- All conforming bids were given equal credibility in the quantitative evaluation;
- Bids were ranked and evaluated as consistently as possible; and
- PG&E's evaluation of bids and selection of shortlisted bids conformed to the E-Solicitation documents.

5.3 IE's review of PG&E's conformance checks

After the Phase II bids were submitted and the E-Solicitation closed, PG&E began an initial conformance check. PA also received a complete copy of all the bids as they were submitted. PA was included on all communications participants. Given the E-Solicitation was relatively straightforward with few requirements, PA did not anticipate and is not aware of any bids which PG&E rejected for non-conformance due to incorrectly submitting the bid or offer into the bid form template. However, several bids/offers were deemed non-conforming due to constraints from PG&E's optimization model (these bids/offers being multi-month strips or system/flex swaps).

5.4 Review of PG&E's application of the bid evaluation methodology

5.4.1 Review of evaluation of offers

PA reviewed PG&E's quantitative evaluation by manually reconciling every individual bid's acceptance for shortlisting or rejection by PG&E.

Through this process, PA was able to review and confirm PG&E's interpretation of the original bid data as well as the application of the optimization modeling. PG&E's evaluation of

the bids consisted of optimizing the bids for value and RA requirements compliance, which required updating PG&E's RA positions for System RA.

5.5 IE's review of PG&E's selected shortlists

PA held discussions with PG&E regarding its proposed shortlist for Phase II of the E-Solicitation. PA believes the final Phase II shortlisted bids and offers were selected appropriately.

5.6 Fairness of PG&E's evaluation

Based on PA's review of PG&E's analysis, participation in calls and meetings and other IE activities, PA believes that PG&E conducted the 2023 Annual RA Solicitation evaluation analysis fairly.

5.7 Recommendations

PA believes that PG&E conducted the 2023 Annual RA Solicitation evaluation in a fair and consistent manner and that the E-Solicitation process went reasonably smoothly.

While PA found the timeline for this E-Solicitation to be relatively short, we found that the majority of the time spent on the negotiations for the transactions was spent on negotiating the MCC Bucket attribute language and what each counterparty and what PG&E was willing to accept. These discussions were new to this Solicitation when compared to previous solicitations, but PA believes were handled well as PG&E agreed to split award amounts between MCC Bucket 1 and other MCC Buckets in a similar and reasonable manner amongst the counterparties. However, for future solicitations, PA recommends that PG&E does not include the request for MCC Bucket information in the bid template (as was done in this Solicitation) and instead request the information during negotiations to minimize confusion with bidders.

Specific to the bid evaluation process and timeline, PA recommends that wherever possible, in future solicitations PG&E allow for additional time to conduct the quantitative evaluations. PA understands that the timeframe for the Phase II evaluation was driven by the timing of the preliminary and final RA allocations released by the CPUC and the final NQC determinations by the CAISO relative to the compliance filing requirement. However, to the extent that PG&E is better able to capture MCC Bucket information in the bid template in future solicitations, more time to complete the quantitative evaluation would be prudent as it adds a layer of complexity to the evaluation.

As PG&E continues to update their optimization model, PA recommends that PG&E look to make additional updates to the model to allow for multi-month strip bids/offers and system for flex swaps. If PG&E is able to revise their optimization model to allow for these options, it could allow for an increase of more competitive bids in future solicitations.

Additionally, PG&E continues to have new participants (firms or individuals) to the solicitation who are unaware of the specific bid process or what is considered a conforming bid. As such, PA recommends for all future RA solicitations that PG&E should specify what makes a bid/offer non-conforming in their Market notice and for future large or annual solicitations, PA recommends that PG&E host a pre-bid conference to discuss how to appropriately complete the bid form. In Phase II of the 2023 Annual RA Solicitation, PG&E answered bidders' questions effectively. However, a pre-bid conference could help dispel any confusion to new bidders, or bidders with employees new to PG&E's solicitations.

PA believes PG&E conducted Phase II of the 2023 E-Solicitation relatively smoothly and effectively.

6 MERIT OF SOLICITATION SHORTLIST

Through the bid evaluation and selection process, PA believes that PG&E selected the best offers submitted for Phase II of the 2023 Annual RA Solicitation.

6.1 Did PG&E conduct the Solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology?

It is PA's opinion that PG&E conducted a fair solicitation consistent with Commission decisions and PG&E's defined bid evaluation methodology.

6.2 Do selected shortlisted bids provide the best overall value to ratepayers?

PA believes PG&E fairly selected its shortlists of bids for the Solicitation and that the bids provide the best overall value to ratepayers.

6.3 Did the shortlist conform to PG&E's RA sales strategy?

The shortlists prepared by PG&E did conform to the RA sales strategy.

6.4 Reasonableness of the shortlist

In PA's opinion, PG&E's shortlists were reasonable.

7 FAIRNESS OF PROJECT-SPECIFIC NEGOTIATIONS

PA closely monitored the contract negotiations and PG&E provided PA copies of contract drafts, included PA on e-mails, and instructed counterparties to include PA on all communications.

7.1 Principles PA used to evaluate fairness of negotiations

PA applied the following three principles to evaluate the fairness of negotiations:

- PG&E should not show bias toward any bidder by allowing contract conditions not offered to other bidders unless those conditions are balanced by comparable concessions by the bidder;
- PG&E should not negotiate harder or less hard with a bidder than with any other bidder; and
- PG&E should not attempt to impose contract conditions in the negotiation that significantly change the balance of the bargain, relative to what the bidder could have reasonably expected based on the E-Solicitation protocol materials.

7.2 Describe fairness of negotiations

PA received copies of red-lined draft contract documents to review and was copied on all emails between PG&E and bidders. PA believes that PG&E treated bidders consistently and fairly relative to each other (the first two principles above).

7.3 What terms and conditions underwent significant changes during the course of negotiations?

PG&E provided bidders a draft RA Confirm agreement with the initial E-Solicitation materials. Providing draft contracts prior to bid submittal is beneficial for both the bidders and PG&E. Draft contract documents provide bidders more clarity on the product, risk sharing, technical and other factors so that they are able to design and price their offers appropriately. It also can improve PG&E's ability to evaluate the bids when the requirements and parameters are clearly identified as part of the bidding process.

Generally, most counterparties who ultimately executed transactions via the E-Solicitation are familiar with PG&E's Confirms and the negotiations were straightforward and quickly concluded. To the extent that certain bidders had multiple emails and in some cases telephone conference calls with PG&E, these cases tended to be instances where the counterparty and PG&E were exploring specific nuances.

Additionally, as discussed in previous sections of the report, the [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

7.4 Was similar information and options made available to other participants?

PA believes that similar information and options were made available to each participant.

8 MERIT OF CONTRACT APPROVAL

PG&E negotiated and signed a total of [REDACTED] through this E-Solicitation, including PG&E [REDACTED] in Phase II of the E-Solicitation. These contracts will involve [REDACTED]

Through the bid evaluation and selection process, PA believes that PG&E selected appropriate offers. Based on the analysis and assumptions described throughout this report, PA recommends approval of these transactions.

Attachment 3

Attachment G-2 (Public Version)



FEBRUARY – DECEMBER 2023 RESOURCE ADEQUACY AND IMPORT ENERGY ELECTRONIC SOLICITATION INDEPENDENT EVALUATOR REPORT

PREPARED FOR PACIFIC GAS & ELECTRIC COMPANY

January 2023

Bringing Ingenuity to Life
paconsulting.com

Denver Office
PA Consulting Group Inc.
Suite 3550
1700 Lincoln Street
Denver
CO 80203
USA
+1 720 566 9920

paconsulting.com

Cover photo: Frank Schulenberg

INDEPENDENT EVALUATOR REPORT

PA Consulting Group, Inc. (PA) served as the Independent Evaluator for the Pacific Gas and Electric Company (PG&E) 2023 February-December Resource Adequacy and Import Energy Electronic Solicitation (2023 Feb-Dec RA and Import Energy Electronic Solicitation or the E-Solicitation). This report provides a summary of PA's evaluation of the process from the drafting of the E-Solicitation documents through to the recommendation of selected bids and negotiations of contracts submitted to the California Public Utilities Commission (CPUC or Commission).

Overview of the E-Solicitation

In this E-Solicitation, PG&E sought offers for sale (i.e., **PG&E buys**), bids to purchase (i.e., **PG&E sells**), and offers for sale / bids to purchase (i.e., **simultaneous PG&E buys/PG&E sells**) of eligible System RA with February through December 2023 delivery periods. PG&E also sought bids to purchase (i.e., **PG&E sells**) for Import Allocation Rights (IAR) monthly products for the February through December 2023 delivery periods. PG&E sought offers for sale (i.e., **PG&E buys**) of WSPP Schedule C Import Energy (IE) for the February through December 2023 delivery periods. PG&E did not specify the amounts of RA capacity it wished to purchase but did specify minimum volumes of 1 MW for all products except Import Energy, which had a minimum volume of 5 MW specified.

The Market Notice further noted that PG&E's preference is to transact Import Energy indexed to CAISO LMP but would also consider offers for ICE Indexed or Fixed Prices transactions. Table 1 below summarizes the products sought in the E-Solicitation.

Table 1. E-Solicitation Products

Product	PG&E Seeking to:	Minimum Volume	Delivery Period	Pricing
System RA	Buy, Sell, Simultaneous Buy/Sell	1 MW	Feb-Dec 2023	Fixed Price \$/kW-month
Import Allocation Rights	Sell	1 MW	Feb-Dec 2023	Fixed Price \$/kW-month
Import Energy	Buy	5 MW	Feb-Dec 2023	CAISO LMP, ICE Index, or Fixed Price \$/MWh

PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED]. PG&E received [REDACTED] to the E-Solicitation and contracted for [REDACTED]. PG&E received [REDACTED] to the E-Solicitation and [REDACTED].

Main Independent Evaluator Activities During the E-solicitation

PA's role in PG&E's 2023 Feb-Dec RA and Import Energy Electronic Solicitation spanned approximately three months from November 2022 through January 2023. PA performed the role of Independent Evaluator and was involved from PG&E's development of the Market Notice materials through the submittal of the bids/offers and ultimately the negotiation of the [REDACTED] confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in its E-Solicitation and provided fair and equitable treatment of all bids/offers. PA was in regular contact with PG&E staff throughout the process, addressing PG&E's questions, identifying and resolving potential issues, and providing recommendations throughout the process. The following provides a summary of PA's main activities during this solicitation:

- PA reviewed the E-Solicitation's Market Notice prior to PG&E's issuance and had one substantial suggested edit to the Notice. PA recommended that PG&E clarify that multi-month strip offers and annual strip offers will be considered non-conforming. PG&E updated its Market Notice upon receiving PA's recommendation. PG&E has continually refined its development of a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA directly received all the emails, including bids/offers that were sent to and received from bidders.
- PA reviewed the bids/offers received and negotiation emails with all bidders.
- PA reviewed the draft and executed confirmation documents related to the selected bids/offers.
- PA was in regular communication with the PG&E team to discuss specific offers and PG&E's treatment of them.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices to PG&E's RA E-Solicitation distribution list of approximately 500 email addresses. PG&E has conducted multiple RA and related solicitations in the last several years and has continually added to its E-Solicitation distribution list. PA notes that in each successive solicitation, PG&E occasionally sees new counterparties who have not participated in PG&E's solicitations before and believes that PG&E extended adequate outreach for the 2023 Feb-Dec RA and Import Energy Electronic Solicitation.

PG&E's Bid Evaluation Methodology

PG&E primarily relied on a quantitative evaluation of each bidder's proposed volumes of RA desired and the bidders' proposed price for each product. [REDACTED]

PA discussed the RA supply curve PG&E uses to evaluate offers. PG&E provided the supply curve to PA and PA reviewed it and found it reasonable. PA found PG&E's bid/offer evaluation methodology appropriate for this E-Solicitation.

PG&E's Shortlisting and Negotiations of Confirms

The Market Notice for this E-Solicitation specified that PG&E would only contract for RA and IAR products with participants under an EEI Master Agreement. PG&E provided participants its Standard EEI RA Confirm and Import Allocation Rights Confirm. During the confirm negotiations, PG&E provided draft Confirms to each participant specific to their awarded price and volume. The Market Notice also specified that Import Energy offers should be for WSPP Schedule C firm energy.

As noted, PG&E received [REDACTED]

[REDACTED]

[REDACTED]

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2023 Feb-Dec RA and Import Energy Electronic Solicitation.

Some specific findings are noted below:

- PG&E in no way prevented PA from observing its process and analyzing its methods and did not interfere with PA's conducting the Independent Evaluation.
- PA finds that PG&E's outreach for this E-Solicitation was adequate and that the Market Notice materials were clear and concise related to the E-Solicitation.
- PA notes that PG&E has developed increasingly smooth RA and IE E-Solicitations. While many bidders have recently contracted with PG&E; there also have been new counterparties to PG&E's RA procurements, requiring the negotiation and execution of EEI Master Agreements and transaction specific Confirmation Agreements. For this E-Solicitation, all RA transactions were executed with counterparties who already had executed EEI Master Agreements.
- Based on our review of PG&E's analysis, our communication with PG&E, and completion of other independent evaluation activities, PA finds that PG&E conducted the 2023 Feb-Dec RA and Import Energy Electronic Solicitation fairly.



Denver Office
PA Consulting Group Inc.
Suite 3550
1700 Lincoln Street
Denver
CO 80203
USA
+1 720 566 9920

All Rights Reserved
© PA Knowledge Limited 2020

paconsulting.com

Attachment 4

Attachment H (Public Version)

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed During the Quarter

The table below provides a summary of Request for Offer (RFO) and Competitive Solicitation contracts executed during this Quarter and filed for CPUC approval via this Procurement Transaction Quarterly Compliance Report (QCR) advice letter. A copy of the contract(s) is included. Workpapers providing the method for valuation results calculations are included in Confidential Attachment L - Reasonable Number of Analyses Models, Description of Models, and How Models Operate.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW)	Price (kW-mo)	Notional Value (\$)	Confirm File Name
None for the Quarter								

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed During the Quarter

The table below provides a summary of bilateral contracts, and significant exchange-placed trades, executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW-day)	Notional Value (\$)	Confirm File Name
None for the Quarter								

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed During the Quarter

The table below provides a summary of bilateral contracts, including GHG offset transactions, facilitated by brokers during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW-day)	Notional Value (\$)	Confirm File Name

**Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022**

New Contracts Executed During the Quarter

The table below provides a summary of e-solicitation contracts executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
Commercial Energy of Montana (33B202V01) ¹	10/21/2022	System, Flexible RA (Sale)	N/A		27			Q4 2022 E-Solicitation
					8			
					32			
					6			
					8			
					1			
					7			
					4			
The Energy Authority, Inc. (33B234V01) ¹	10/21/2022	System, Flexible RA (Sale)	N/A		11			Q4 2022 E-Solicitation
					19			
Central Coast Community Energy (33B236V01) ¹	10/21/2022	System, Flexible RA (Sale)	N/A		43			Q4 2022 E-Solicitation
					44			
					66			
					34			
					48			
					48			
					4			
					9			
					25			
					65			
					35			
					50			
					15			
					40			
		60						
Direct Energy Business Marketing, LLC (33B241V01) ¹	10/21/2022	System RA (Sale)	N/A		32			Q4 2022 E-Solicitation
		65						
		20						
		20						
Direct Energy Business Marketing, LLC (33B241V01) ¹	10/21/2022	System, Flexible RA (Sale)	N/A		40			Q4 2022 E-Solicitation
					70			
					200			

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
Direct Energy Business Marketing, LLC (33B241V02)	10/21/2022	Import Allocation Rights (Sale)	N/A		45			Q4 2022 E-Solicitation
Peninsula Clean Energy Authority (33B232V02)	10/24/2022	System RA (Purchase)	N/A		115			Q4 2022 E-Solicitation
					65			
Peninsula Clean Energy Authority (33B232V03) ¹	10/24/2022	System, Flexible RA (Sale)	N/A		115			Q4 2022 E-Solicitation
					65			
East Bay Community Energy Authority (33B238V02) ¹	10/24/2022	System, Flexible RA (Sale)	N/A		20			Q4 2022 E-Solicitation
					10			
East Bay Community Energy Authority (33B238V03)	10/24/2022	Import Allocation Rights (Sale)	N/A		10			Q4 2022 E-Solicitation
					25			
					13			
San Diego Community Power (33B278V01)	10/24/2022	Import Allocation Rights (Sale)	N/A		100			Q4 2022 E-Solicitation
San Diego Community Power (33B278V02)	10/24/2022	Import Allocation Rights (Sale)	N/A		50			Q4 2022 E-Solicitation
Sonoma Clean Power Authority (33B226V01) ¹	10/25/2022	System, Flexible RA (Sale)	N/A		23.43			Q4 2022 E-Solicitation
Silicon Valley Clean Energy Authority (33B230V01) ¹	10/25/2022	System, Flexible RA (Sale)	N/A		11.5			Q4 2022 E-Solicitation
					34.5			
					10			
					30			
					10.25			
					30.75			
					22.5			
					67.5			
					3.75			
					11.25			
					24.75			
74.25								
Constellation Energy Generation, LLC (33B251V01) ¹	10/25/2022	System, Flexible RA (Sale)	N/A		44.56			Q4 2022 E-Solicitation
Central Coast Community Energy (33B236V02)	12/16/2022	System RA (Sale)	N/A		12			Q4 2022 E-Solicitation
East Bay Community Energy Authority (33B238V04)	12/20/2022	System, Flexible RA (Sale)	N/A		40			Q4 2022 E-Solicitation
					40			

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
Direct Energy Business Marketing, LLC (33B241V03)	12/21/2022	Import Allocation Rights (Sale)	N/A		17			Q4 2022 E-Solicitation
Direct Energy Business Marketing, LLC (33B241V04)	12/21/2022	Import Allocation Rights (Sale)	N/A		9			Q4 2022 E-Solicitation
Dynergy Marketing and Trade, LLC (Vistra Corp) (33B263V01) ¹	12/22/2022	System, Flexible RA (Sale)	N/A		287.2			Q4 2022 E-Solicitation
					218.95			
		System RA (Sale)			222.8			
					291.05			
Peninsula Clean Energy Authority (33B232V04)	12/29/2022	System, Flexible RA (Sale)	N/A		3			Q4 2022 E-Solicitation
Peninsula Clean Energy Authority (33B232V05)	12/29/2022	System, Flexible RA (Sale)	N/A		8			Q4 2022 E-Solicitation
		System RA (Sale)			45			

¹ Some or all of the resources in this contract produce megawatts from battery storage. Due to the nature of batteries, flexible attributes are generally twice the procured capacity.

**Confidential Attachment H
 Pacific Gas and Electric Company
 Procurement Transaction Quarterly Compliance Report
 Q4 2022**

New Contracts Executed During the Quarter

The table below provides a summary of Carbon Free Energy Contracts executed during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included. Carbon Free Energy is energy produced by large hydroelectric resources and nuclear resources and sold to eligible Load Serving Entities (LSEs).

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value	Confirm File Name
Shell Energy North America (US), L.P. (33B022CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
3 Phases Renewables (33B113CA02)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
Commercial Energy				Jan-23				Q4 2022
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value	Confirm File Name
Commercial Energy of Montana (33B202CA04)	12/16/2022	Carbon Free Energy (Sale)		Jun-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
Calpine Energy Solutions, LLC (33B211CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
Sonoma Clean Power Authority (33B226CA04)	12/16/2022	Carbon Free Energy (Sale)		Aug-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
				Jan-23				
				Feb-23				
Silicon Valley Clean Energy Authority (33B230CA04)	12/16/2022	Carbon Free Energy (Sale)		Mar-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value	Confirm File Name
Peninsula Clean Energy Authority (33B232CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
Marin Clean Energy (33B235CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
Central Coast Community Energy (33B236CA05)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
East Bay Community Energy Authority (33B238CA05)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value	Confirm File Name
(33B236CA04)				Aug-23				Energy
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
CleanPowerSF (33B243CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
Pioneer Community Energy (33B245CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
City of San Jose (San Jose Clean Energy) (33B247CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
				Feb-23				
				Mar-23				
				Apr-23				
				May-23				
				Jun-23				
				Jul-23				
				Aug-23				
				Sep-23				
				Oct-23				
				Nov-23				
				Dec-23				
				Jan-23				
				Feb-23				

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value	Confirm File Name								
Valley Clean Energy Alliance (33B254CA04)	12/16/2022	Carbon Free Energy (Sale)		Mar-23		\$0	\$0	Q4 2022 Carbon Free Energy								
				Apr-23												
				May-23												
				Jun-23												
				Jul-23												
				Aug-23												
				Sep-23												
				Oct-23												
				Nov-23												
				Dec-23												
				Direct Energy Business, LLC (33B255CA04)					12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy
												Feb-23				
Mar-23																
Apr-23																
May-23																
Jun-23																
Jul-23																
Aug-23																
Sep-23																
Oct-23																
Nov-23																
Dec-23																
Redwood Coast Energy Authority (33B259CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy								
				Feb-23												
				Mar-23												
				Apr-23												
				May-23												
				Jun-23												
				Jul-23												
				Aug-23												
				Sep-23												
				Oct-23												
				Nov-23												
				Dec-23												
The Regents of the University of California (33B261CA04)	12/16/2022	Carbon Free Energy (Sale)		Jan-23		\$0	\$0	Q4 2022 Carbon Free Energy								
				Feb-23												
				Mar-23												
				Apr-23												
				May-23												
				Jun-23												
				Jul-23												
				Aug-23												
				Sep-23												

January 30, 2023

Contract/ Counterparty Name	Executed/ Signed Date	Product	Resource Pool	Term	Monthly Allocation Ratio ¹	Net Price ²	Notional Value	Confirm File Name
				Oct-23				
				Nov-23				
				Dec-23				

¹ Monthly percentage of the Buyer's PCIA Load Share.

² Price nets to zero because eligible LSEs pay for these MWhs through PCIA and PG&E is retaining all CAISO revenues.

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed During the Quarter

The table below provides a summary of Market RFP contracts executed through competitive processes during the Quarter and filed for CPUC approval via this QCR advice letter. A copy of the contracts subject to this QCR filing is included.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW) or (MT)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
None for the Quarter								

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed/Contracts Amended During the Quarter

Informational purposes only: A summary of a contract executed during the Quarter approved by an Advice Letter Filing. For further details, please see PG&E’s Q4 2022 QCR Public Narrative and Confidential Attachment F.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
	10/03/2022	RA	1 year	Contract	1/3/2023	Advice Letter 6811-E
	12/27/2022	RA	15 years	Contract	1/3/2023	Advice Letter 6811-E
	12/28/2022	RA	15 years	Contract	1/3/2023	Advice Letter 6811-E

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed/Contracts Amended During the Quarter

Informational purposes only: In accordance with PG&E’s CPUC approved BPP, below is a summary of contracts executed and/or amended during the Quarter (non-QF) filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
City of San Jose (San Jose Clean Energy) (33R543)	10/3/2022	RPS Energy REC Sales	1.5 months	Contract	10/7/2022	Advice Letter 6729-E
Constellation Energy Generation, LLC (33R540)	10/4/2022	RPS Energy REC Sales	1.5 months	Contract	10/7/2022	Advice Letter 6729-E
San Diego Community Power (33R541)	10/4/2022	RPS Energy REC Sales	1.5 months	Contract	10/7/2022	Advice Letter 6729-E
San Diego Community Power (33R542)	10/4/2022	RPS Energy REC Sales	1.5 months	Contract	10/7/2022	Advice Letter 6729-E
San Diego Community Power (33R544)	10/12/2022	RPS Energy REC Sales	5 years	Contract	10/21/2022	Advice Letter 6743-E
East Bay Community Energy Authority (33R545)	10/12/2022	RPS Energy REC Sales	5 years	Contract	10/21/2022	Advice Letter 6743-E
Daggett Solar Power 2 LLC (40S022)	10/17/2022	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2022 ERRA Compliance
RPCA Solar 8, LLC (33R533-AR)	11/9/2022	Disadvantaged Communities Green Tariff (DAC-GT)	20 years	Amended & Restated Contract	11/30/2022	Advice Letter 6775-E
Central Coast Community Energy (33B236V01)	11/16/2022	Resource Adequacy	N/A	Routine Amendment to Existing Agreement	N/A	2022 ERRA Compliance
Nexus Renewables U.S. Inc. (40S026)	11/16/2022	Energy Storage	N/A	Consent to Assignment General Consent	N/A	2022 ERRA Compliance
Direct Energy Business Marketing, LLC (33B241V01)	11/21/2022	Resource Adequacy	20 years	Routine Amendment to Existing Agreement	N/A	2022 ERRA Compliance
Four Dog Energy, LLC (33R107AB)	11/29/2022	AB1969/FiT	N/A	Consent to Assignment General Consent	N/A	2022 ERRA Compliance
Moss Landing Energy Storage 3 (40S032)	12/2/2022	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2022 ERRA Compliance
Geysers Power Company, LLC (40S041)	12/22/2022	Energy Storage	15 years	Contract	1/13/2023	Advice Letter 6825-E
Geysers Power Company, LLC (40S042)	12/22/2022	Energy Storage	15 years	Contract	1/13/2023	Advice Letter 6825-E
Fresno Disadvantaged Community Solar Project (33R499)	12/7/2022	Disadvantaged Communities Green Tariff (DAC-GT)	N/A	Consent to Assignment Financing	N/A	2022 ERRA Compliance
Sonoran West Solar Holdings 2, LLC (40S029)	12/19/2022	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2022 ERRA Compliance

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
Humboldt Bay Generating Station (Transport ID: 7070030)	12/24/2022	G-EG.NEG rate	6 months	Switch from G.EG rate to G-EG.NEG rate	11/1/2006	Advice Letter 2874-G
Hat Creek Bioenergy, LLC (33R437BIO)	12/29/2022	BioMAT	N/A	Consent to Assignment Financing	N/A	2022 ERRA Compliance

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

New Contracts Executed/Contracts Amended During the Quarter

Informational purposes only: In accordance with PG&E's CPUC approved BPP, below is a summary of QF contracts executed and/or amended during the Quarter filed via separate application, advice letter or other approval mechanisms:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process
Western Power and Steam II (25C138QPE)	11/21/2022	QF SOC PURPA 2020	N/A	Routine Amendment to Existing Agreement	N/A	2022 ERRA Compliance

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q4 2022

Expired and Terminated Contracts During the Quarter

Informational purposes only: In accordance with PG&E’s CPUC approved BPP, below is a summary of the contracts terminated/expired during the Quarter:

Contract/ Counterparty Name	Termination or Expiration ¹	Date	Product	Volume (MW)
Burney Forest Products (33R404)	Expiration	10/31/2022	RPS	29
MRP San Joaquin Tracy (33B101)	Expiration	10/31/2022	Tolling	323.3
Shasta - Sustainable Resource Management (33R406)	Expiration	12/1/2022	RPS	34
MRP San Joaquin Hanford Facility (33B108)	Expiration	12/31/2022	Tolling	96
MRP San Joaquin Henrietta (33B109)	Expiration	12/31/2022	Tolling	96
Wind Resource I (33R246)	Expiration	12/31/2022	RPS	8.71

¹ A terminated contract is ended before its original expiration date. An expiration date is the natural end of the contract.

Attachment 5

Confidentiality Declarations and Matrix

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6844-E**

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN
CONFIDENTIAL ATTACHMENTS A, B, C, E, G, H, J, L, AND M**

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company (“PG&E”) and have been an employee at PG&E since 1989. My current title is Senior Manager within PG&E’s Energy Policy and Procurement organization. In this position my responsibilities include reviewing regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E’s regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. 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 (“D.”) 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s January 30, 2023, Advice Letter 6844-E, Confidential Attachments A, B, C, E, G, H, J, L and M.
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 D.06-06-066, 14-10-033 and/or Public Utilities Code Section 454.5(g). 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 in the attached matrix that is pertinent to this submittal.

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

Executed on January 30, 2023, at Piedmont, California.



Marianne Aikawa

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6844-E
DECLARATION OF JAY BUKOWSKI
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S
CONFIDENTIAL ATTACHMENTS F AND K**

I, Jay Bukowski, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since October 1998. My current title is Manager within PG&E's Energy Policy and Procurement organization. In this position, my responsibilities include review of regulatory reports and managing PG&E's Procurement Review Group and Independent Evaluator program. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. 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 ("D.") 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E's January 30, 2023 Advice Letter 6844-E, Confidential Attachments F and K.
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 D.06-06-

066, 14-10-033, and/or Public Utilities Code Section 454.5(g). 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 in the attached matrix that is pertinent to this submittal.

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

Executed on January 30, 2023, at Oakland, California.

/s/

Jay Bukowski

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 6844-E**

**DECLARATION OF JOHN ULLOA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND INFORMATION
CONTAINED IN CONFIDENTIAL ATTACHMENTS A, B, D, J AND L**

I, John Ulloa, declare:

1. I am presently employed by Pacific Gas and Electric Company (“PG&E”) and have been an employee since 1998. My current title is Manager, Electric Gas Supply in the Electric and Gas Acquisition Department, which is part of the Energy Policy and Procurement organization. I am responsible for physical and financial trading of gas in support of PG&E’s utility-owned generation plants and PG&E’s tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved. 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 (“D.”) 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s January 30, 2023 Advice Letter 6844-E, Confidential Attachments A, B, D, J, and L.

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 D.06-06-

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 2023**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	D.14-10-033, GHG Confidential Information Matrix (As corrected by D. 15-01-024)	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Confidential Attachment E, Q4 2022 GHG Materials folder: File name: 08_PGE PRG PRES GHG Position Upd_121522.pdf, "Market Data Review, GHG Dispatch Curve", page 4 File name: 04_2022 Q4_Offset Procurement Strategy_Electric.docx	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite
Confidential Attachment F, Confid Attachment F Qtr04 2022 zip file: File name: PGE PRG PRES GHG Position Update_121522.pdf, "Market Data Review, GHG Dispatch Curve", page 4 Confidential Attachment F, Confid Attachment F, PRG Meeting Materials and Summaries, December 15, 2022 folder: File name: PGE PRG PRES GHG Position Update_121522.pdf, "Market Data Review, GHG Dispatch Curve", page 4	GHG Compliance Instrument Expected Prices	Pursuant to D.14-10-033, "ARB Confidential" information (such as GHG auction price forecasts and WAC records) are confidential and may not be disclosed to market participants or their reviewing representatives.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment A – Physical and Financial Electric Transactions	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 years
Attachment A – Physical and Financial Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	Item XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions, Carbon Free Transactions)	Public Utilities Code Section 454.5(g)	The information contains confidential counterparty information. Release of this commercially market sensitive information could impact market prices because it would release financing terms to other market participants and impact future negotiations. This could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of counterparty information. This information could be used by other market participants to gain a commercial advantage.	3 Years
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (GHG Transactions)	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board ("CARB") auctions and PG&E's net open position for GHG compliance.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment C – in its entirety: Electric Transactions	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	This information reveals actual electric quantities and cost, as well as procurement cost categorized by transaction type, which is provided to Energy Division and is confidential for three years.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
Attachment D – in its entirety: Natural Gas Transactions	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Each financial transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.	Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
	Item I) B) 2) Utility recorded gas procurement and cost information	Actual quantity and cost of procured physical gas are protected.	Utility recorded physical gas procurement and cost information is confidential for one year.
	XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation	Monthly procurement costs (ERRA Filings) are confidential for 3 years.

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment E – in its entirety: Other Transactions (Electric Information) (Except Greenhouse Gas (“GHG”) Information, which is presented separately below)	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric) Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of information in these executed contracts could provide market sensitive information to participants regarding PG&E’s net open position. Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.	3 years, except for the delivered product price of RA and RPS sales transactions, which are only confidential for two quarters following the month of delivery. Other non-public terms are confidential for three years from date contract states deliveries to begin; or until one year following expiration, whichever comes first.
Attachment E – in its entirety: Other Transactions- (GHG Information)	D.14-10-033 Public Utilities Code Section 454.5(g)	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations. Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment F –in its entirety: PRG Material	D.06-06-066 and Public Utilities Code Section 454.5(g)	<p>Presentations to the PRG include a variety of confidential commercially market sensitive information, including information about e-solicitation, bilateral contracts, pricing information, strategy discussions, recently issued RFO's, etc.</p> <p>Release of this commercially market sensitive information could impact market prices, cause harm to PG&E's customers, and put PG&E at an unfair business disadvantage by the disclosing this information. This information could be used by other market participants to gain a commercial advantage.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Length of Time for Specific Items identified in D.06-06-066 Matrix or Indefinite (for GHG information)
Attachment F –in its entirety: PRG Material-GHG Information	D.14-10-033	<p>Presentations to the PRG include confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.</p> <p>For each PRG material confidential matrix and declaration has been appended. Please see the specific matrices within Attachment F.</p>	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment G - Independent Evaluator (IE) Reports	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Disclosure of information in these executed contracts could provide market sensitive information to participants regarding PG&E's net open position.	3 Years
	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Items VIII) A) Bid Information and VIII) B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years
Attachment H - Executed Contracts	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric) Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties; Item VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids	Disclosure of information in these executed contracts could provide market sensitive information to participants regarding PG&E's net open position. Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 years, except for the delivered product price of RA and RPS sales transactions, which are only confidential for two quarters following the month of delivery. Other non-public terms are confidential for three years from date contract states deliveries to begin; or until one year following expiration, whichever comes first.

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment H - Executed Contracts – GHG Information	D.14-10-033	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.	Indefinite
	Public Utilities Code Section 454.5(g)	Information concerning GHG compliance instrument procurement strategy and/or activities. The release of this commercially sensitive information could cause harm to PG&E’s customers and put PG&E at an unfair business disadvantage by the disclosure of a GHG procurement strategy. This information could be used by other market participants to gain a commercial advantage. In addition, this information may reveal whether or not PG&E participated in California Air Resources Board (“CARB”) auctions and PG&E’s net open position for GHG compliance.	Indefinite
Attachment J – System Conditions	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	Residual net short/long is key input to PG&E’s confidential forecast of net open position. The residual net short/long is information provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Public Utilities Code Section 454.5(g)	In addition, this attachment contains market sensitive information and addresses PG&E’s energy procurement trading strategies.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment J - Natural Gas Transaction Documents	Item I) A) 3) Gas Demand Forecasts and 4) Long-term fuel (gas) buying and hedging plans	This information includes detailed information on PG&E's implementation of its fuel buying and hedging plans and must remain confidential to avoid disclosing PG&E's market strategy.	Physical gas information is confidential for 3 years; Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)
Attachment K – Risk Management	Item XII – Monthly Portfolio Risk Assessment of Appendix 1 of D.06-06-066 for three years. Public Utilities Code 454.5(g)	Value at Risk (VaR) or electric and gas for electric generation is deemed confidential the matrix. Public disclosure of TeVaR results would be detrimental for PG&E and its electric customers. Such disclosure would release confidential, sensitive market intelligence that would place PG&E at an unfair disadvantage in the energy and financial markets. Risk and Strategy papers are proprietary company information that if made public could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.	3 years Indefinite
Attachment L – In its entirety: Reasonable Number of Analyses	Item I) A) 4) Long-term fuel (gas) buying and hedging plans, Public Utilities Code 454.5(g)	This information includes detailed information on PG&E's hedging plan, and must remain confidential to avoid disclosing PG&E's market strategy. Information concerning a description of PG&E's long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage if publicly disclosed.	Financial gas information is confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY’S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment L - Reasonable Number of Analyses – Electric	Item VI) E) and F) Utility Planning Area Net Open for Energy and Capacity (Electric)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E’s position in the marketplace.	3 Years
	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E’s customers.	3 years, except for the delivered product price of RA and RPS sales transactions, which are only confidential for two quarters following the month of delivery. Other non-public terms are confidential for three years from date contract states deliveries to begin; or until one year following expiration, whichever comes first.
	VIII) A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids		
	Item XIII) Energy Division Monthly Data Request (AB 57)	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
	Item XI) Monthly Procurement Costs (Energy Resource Recover Accounts [ERRA] Filings)	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation.	Monthly procurement costs (ERRA Filings) are confidential for 3 years
	D-14-10-033	This information includes confidential GHG information, the disclosure of which is prohibited according to Title 17 of the California Code of Regulations.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 6844-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q4 2022
 JANUARY 30, 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 Date To Be Kept Confidential
Document: Quarterly Compliance Report			
Attachment M – Executed Contracts	Item VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties;	Disclosure of bid term, price and notional value information would provide market sensitive information regarding PG&E bid strategy and selection. This is commercially market sensitive information because it could be used by other market participants to gain a commercial advantage and could impact market prices and cause harm to PG&E's customers.	3 Years

**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