

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6862E**  
**As of March 16, 2023**

Subject: 2023 Energy Resource Recovery Account Trigger Amount

Division Assigned: Energy

Date Filed: 02-15-2023

Date to Calendar: 02-27-2023

Authorizing Documents: D0210062

Authorizing Documents: D0401050

Authorizing Documents: D0412048

Authorizing Documents: D1505008

Authorizing Documents: D2201023

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>02-15-2023</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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

AL Certificate Contact Information:

Annie Ho

(415) 973-8794

[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**

February 15, 2023

**Advice 6862-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: 2023 Energy Resource Recovery Account Trigger Amount**

Pacific Gas and Electric Company (PG&E) hereby submits its annual advice letter calculating the Energy Resource Recovery Account (ERRA) trigger amount for 2023, pursuant to Decisions (D.) 02-10-062, D.04-01-050, D.04-12-048, D.15-05-008, D.22-01-023.

**Purpose and Background**

The purpose of this advice letter is to establish PG&E's 2023 ERRA trigger amount in compliance with Public Utilities Code Section 454.5(d)(3); and D.02-10-062, D.04-01-050, D.04-12-048, and D.15-05-008.

In D.02-10-062, the California Public Utilities Commission (Commission or CPUC) established a "trigger" mechanism to comply with the Public Utilities Code Section 454.5(d)(3) requirement that "any overcollection or undercollection in the power procurement balancing account does not exceed 5 percent of the electrical corporation's actual recorded generation revenues for the prior calendar year excluding revenues collected for the Department of Water Resources."<sup>1</sup> In D.04-01-050, the Commission ordered the utilities to submit their ERRA trigger amount advice letters on or before April 1 of each year. In Ordering Paragraph (OP) 8 of D.22-01-023, the ERRA trigger mechanism was modified to consider ERRA account balances net of PABA balances when calculating whether over-collections or under-collections are above the four percent trigger point and five percent threshold of the utility's authorized fuel and power purchase revenue requirement approved in the previous year. PG&E will comply with said orders in determining whether PG&E's net balances are under- or over-collected for the purpose of adjusting rates.

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<sup>1</sup> D.02-10-062, p. 54 (quoting Pub. Util. Code § 454.5(d)(3)).

### **ERRA Trigger Calculation**

Pursuant to D.02-10-062, the 4 percent trigger requires PG&E to file an expedited application requesting approval within 60 days should the balance reach or exceed the 5 percent threshold of prior year recorded generation revenues. PG&E's 2023 ERRA trigger amount – or 4 percent of the actual recorded generation revenues for the prior calendar year – is \$214 million. PG&E's 2023 ERRA threshold amount – 5 percent of the actual recorded generation revenues for the prior calendar year – is \$268 million.

Consistent with PG&E's previous annual ERRA trigger advice letter submittals, this year's calculation is based on revenue streams from the balancing accounts that record PG&E's generation revenues. These revenue streams include ERRA (and the Assembly Bill (AB) 920 credit), the Portfolio Allocation Balancing Account (PABA), the Modified Transitional Cost Balancing Account (MTCBA), the New System Generation Balancing Account (NSGBA), the Transitional Bundled Commodity Cost (TBCC), the Green Tariff Shared Renewables Balancing Account (GTSRBA), and the PCIA Undercollection Balancing Account (PUBA). These balancing accounts include fuel and electric procurement costs, ongoing competition transition costs, the capital and non-fuel operating costs in PG&E's existing generation asset base, cost allocation mechanism costs, and expenses PG&E incurred to procure renewable generation resources for customers participating in the Green Tariff Shared Renewables Program, respectively.

The 2022 revenues from these regulatory accounts and the corresponding 2022 trigger amount are shown below:

2022 ERRA Revenues (incl. ERRA-PFS, TBCC revenues & AB920 credit)	\$3,419,170,766
2022 PABA Revenues (incl PUBA revenues)	\$1,665,294,505
2022 MTCBA Revenues	\$15,116,065
2022 NSGBA Revenues	\$202,078,648
2022 GTSRBA Revenues	\$59,773,498
<b>Total 2022 Generation Revenues, excluding DWR</b>	<b>\$5,361,433,482</b>
2023 ERRA Trigger (4% of total 2022 revenue)	\$214,457,339
2023 ERRA Threshold Amount (5% of total 2022 revenue)	\$268,071,674

### **Conclusion**

PG&E requests that the Commission approve \$214 million as PG&E's 2023 ERRA trigger amount and \$268 million as PG&E's 2023 ERRA threshold amount. PG&E also requests that this 2023 trigger amount and threshold amount remain in effect until the Commission adopts the 2024 trigger amount and threshold amount, to be submitted by advice letter on or before April 1, 2024.

The submittal would 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 March 7, 2023, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

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

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

**Effective Date**

PG&E requests that this Tier 1 advice letter become effective on February 15, 2023, which is the date this advice letter was submitted with the Commission.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for Application (A.) 22-05-029. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/                  

Sidney Bob Dietz II  
Director, Regulatory Relations

cc: Service List A.22-05-029



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Annie Ho  
 Phone #: (415) 973-8794  
 E-mail: PGETariffs@pge.com  
 E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE  
 ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6862-E

Tier Designation: 1

Subject of AL: 2023 Energy Resource Recovery Account Trigger Amount

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.02-10-062, D.04-01-050, D.04-12-048, D.15-05-008, D.22-01-023.

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

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

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 2/15/23

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

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

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx: (415)973-3582  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

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

Clear Form

**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  
Downey Brand LLP  
Dish Wireless L.L.C.

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

GenOn Energy, Inc.  
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