

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6876E
As of April 17, 2023

Subject: 2023 Tree Mortality Non-Bypassable Charge Resource Adequacy - Use of Unsold Capacity

Division Assigned: Energy

Date Filed: 03-08-2023

Date to Calendar: 03-13-2023

Authorizing Documents: D1812003

Disposition:	Accepted
Effective Date:	04-07-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

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(951)965-8905
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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

March 8, 2023

Advice 6876-E

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

Subject: 2023 Tree Mortality Non-Bypassable Charge Resource Adequacy - Use of Unsold Capacity

I. Introduction**A. Purpose**

Pursuant to Decision (D.) 18-12-003, Pacific Gas and Electric Company (PG&E) hereby submits this Tier 1 Advice Letter to inform the California Public Utilities Commission (Commission or CPUC) of the disposition of unsold capacity following the results of PG&E's 2021 Tree Mortality (TM) Non-Bypassable Charge (NBC) Resource Adequacy (RA) Sales Solicitation (Solicitation).

B. Background

On December 21, 2018, the CPUC issued D.18-12-003 (TM NBC Decision) establishing a methodology to recover the net costs of the statutorily mandated TM power purchase agreements (PPA), including Burney Forest Products and Wheelabrator Shasta from all customers through a NBC. On February 19, 2019, PG&E submitted its Advice Letter 5478-E, which included the TM NBC RA Sales Framework and Protocols as confidential Appendix C (TM NBC Sales Framework). Following the May 23, 2019, approval of that Advice Letter and to comply with the TM NBC Decision, PG&E made available for sale the RA capacity from its existing TM PPAs with Burney Forest Products and Wheelabrator Shasta by issuing its TM NBC RA Sales Solicitation on July 19, 2019. Pursuant to Senate Bill (SB) 901,¹ PG&E extended contracts with Burney Forest Products and Wheelabrator Shasta, and newly contracted with Woodland Biomass Power.

Following the contract extensions and new contract executed pursuant to SB 901, PG&E made available for sale the TM RA capacity for the TM PPAs with Burney Forest Products,

¹ SB 901, Stats. 2018, Ch. 626 (codified in relevant part at Cal. Pub. Util. Code § 8388). Pursuant to SB 901, PG&E will seek to amend contracts that procure electricity generated from biomass to include, or seek approval for new contracts that will include, an expiration date 5 years later than the expiration date in the original contracts (operative in 2018 and expire on or before December 31, 2023), so long as the extensions include applicable feedstock requirements.

Wheelabrator Shasta, and Woodland Biomass Power by issuing its TM NBC RA Sales Solicitation on August 13, 2021. The solicitation was handled through a process that followed the sales framework and protocols described in Advice Letter 5478-E. Per the TM NBC Decision, PG&E values RA capacity associated with PG&E's TM PPAs using the results of the solicitation and deducts the total notional value amount from the TM NBC. On November 22, 2021, PG&E filed Advice Letter 6414-E informing the Commission that the solicitation resulted in the retention of the RA capacity from PG&E's TM PPA with Woodland Biomass Power from the initial delivery date of January 1, 2022, through the expected delivery end date of August 31, 2026. The RA Capacity from the contract extensions of the TM PPAs associated with Burney Forest Products and Wheelabrator Shasta went unsold as part of the TM NBC Solicitation.

C. Project and Product Details in Accordance with PG&E's TM NBC Sales Framework

1. Projects

Burney Forest Products, Wheelabrator Shasta and Woodland Biomass facilities (the Projects) listed in Table 1 below, are currently under contract to PG&E.

Table 1: Facility List

Name of Facility	Technology	Location	Host Balancing Authority	Resource ID
Burney Forest Products	Biomass	County: Shasta 35586-B Highway 299 East Burney, CA 96013	CAISO	BURNYF_2_UNIT 1
Wheelabrator Shasta	Biomass	County: Shasta 20811 Industry Road Anderson, CA 96007	CAISO	WSENGY_1_UNIT 1
Woodland Biomass Power	Biomass	County: Yolo 1786 East Kentucky Avenue Woodland, CA 95776	CAISO	BIOMAS_1_UNIT 1

2. Product

The RA capacity from existing TM PPAs with PG&E is listed in Table 2 below. The product is Generic North System RA capacity for Burney Forest Products and Wheelabrator Shasta, and Local Sierra RA capacity for Woodland Biomass Power.

Table 2: PG&E TM PPA Details

Facility Name	Contract Capacity (MW)	Initial Energy Delivery Date	Expected Delivery End Date
Burney Forest Products	29	11/1/2022	10/31/2027
Wheelabrator Shasta	34	1/1/2023	11/30/2027
Woodland Biomass	25	1/1/2022	8/31/2026

3. Project Background, e.g., Expiring QF Contract, Phased Project, Previous Power Purchase Agreement, Contract Amendment

The Projects are existing and operating facilities under current TM PPAs to deliver RA capacity, among other products, to PG&E.

4. Source of Agreement, i.e., RA Solicitation Year or Bilateral Negotiation

In accordance with the TM NBC Sales Framework, PG&E can use unsold RA capacity from Burney Forest Products and Wheelabrator Shasta for compliance at the benchmark RA values established by the TM NBC Decision.

D. General Transaction Description

The Projects are described in Table 1 and 2 above. As the contract extensions associated with Burney Forest Products and Wheelabrator Shasta went unsold during the 2021 Solicitation, PG&E can use the unsold RA for the delivery period of June 2023 through and including October 2023, without a representative transaction.

E. General Transaction Structure

While there were no transactions, PG&E will use the Generic North System RA capacity from the Burney Forest Products and Wheelabrator Shasta Projects under the TM PPAs.

1. Full Available Facility Capacity

PG&E will use RA capacity from the Burney Forest Products and Wheelabrator Shasta Projects, listed in Table 1 above, for the delivery period of June 2023 through and including October 2023.

2. Outage Management (e.g., Planned Outages, Forced Outages, Substitution)

The allocation of all penalties and incentives associated with the RA capacity from these Projects, including those incurred from the Resource Adequacy Availability Incentive Mechanism (RAAIM), are discussed in Advice Letter 5478-E Appendix C.

II. Consistency With Commission Decisions

A. PG&E Advice 5478-E

1. Identify the Commission approval of the utility's Resource Adequacy Sales Framework and Protocols for Tree Mortality contracts. Did the utility adhere to the filing?

PG&E's TM NBC Sales Framework was approved by the Commission on May 23, 2019, as part of PG&E's Advice Letter 5478-E. PG&E complied with all procedural requirements of

the TM NBC Decision with regard to the filing of its TM NBC Sales Framework.

- 2. Discuss how the Transactions are consistent with the utility's Resource Adequacy Sales Framework and Protocols for Tree Mortality contracts and meet utility procurement and portfolio needs (e.g., capacity, electrical energy, resource adequacy, or any other product resulting from the Transactions).**

Pursuant to the TM NBC Decision, PG&E developed the TM NBC Sales Framework, submitted as Appendix C in the approved Advice 5478-E, to make available for sale the RA capacity from its existing TM PPAs. On November 22, 2021, PG&E filed Advice Letter 6414-E informing the Commission that the solicitation resulted in the retention of the RA capacity from PG&E's TM PPA with Woodland Biomass Power from the initial delivery date of January 1, 2022, through the expected delivery end date of August 31, 2026. The RA Capacity from the contract extensions of the TM PPAs associated with Burney Forest Products and Wheelabrator Shasta went unsold as part of the TM NBC Solicitation. Consistent with the TM NBC Sales Framework, PG&E is alerting the Commission via a Tier 1 Advice Letter that it will use the RA from the unsold Projects, and no confirmation will be executed.

3. Sales

- a. For Sales contracts, provide a quantitative analysis that evaluates selling the proposed contracted amount vs. using the RA towards future RA compliance requirements (or any reasonable other options).**

Not applicable.

- b. Explain the process used to determine price reasonableness, with maximum benefit to ratepayers.**

Not applicable.

B. Procurement Review Group (PRG) Participation

- 1. List PRG participants (by organization/company).**

PG&E's PRG includes the Commission's Energy Division, the California Public Advocates Office, The Utility Reform Network, the Coalition of California Utility Employees, and Coast Economic Consulting.

- 2. Describe the utility's consultation with the PRG, including when information about the contract was provided to the PRG, whether the information was provided in meetings or other correspondence, and the steps of the procurement process where the PRG was consulted.**

Not applicable.

C. Independent Evaluator (IE)

1. **The use of an IE is required by D.04-12-048 and D.07-12-052. Provide name of the IE and the oversight provided by the IE.**

Not applicable.

2. **List when the IE made any findings to the Procurement Review Group regarding the applicable solicitation, the project/bid, and/or contract negotiations.**

Not applicable.

3. **Insert the public version of the project-specific IE Report.**

Not applicable.

D. Request for Commission Disposition

PG&E requests that the Energy Division issue a disposition letter no later than March 31, 2023. Any such disposition that makes this advice letter effective shall be deemed to constitute the following:

1. A finding that the RA use from unsold Projects is consistent with the TM NBC Sales Framework approved as part of Appendix C in PG&E's Advice Letter 5478-E and is consistent with OP 5 of D.18-12-003, and that the use of RA capacity is in the public interest.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than March 28, 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 upon submittal and receive a disposition letter by no later than March 31, 2023, to include the Project in the appropriate filings for the RA compliance month of June 2023. The filing for the RA compliance month of June 2023 is due to the CPUC on April 17, 2023.

Notice

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



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (U 39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (951)965-8905

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: stuart.rubio@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) #: 6876-E

Tier Designation: 1

Subject of AL: 2023 Tree Mortality Non-Bypassable Charge Resource Adequacy - Use of Unsold Capacity

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-12-003

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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: 3/8/23

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Clear Form

**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