

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6945E
As of June 15, 2023

Subject: Information-Only: Executed Contracts Pursuant to the May 11, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework Filing and Process Requirements

Division Assigned: Energy

Date Filed: 05-15-2023

Date to Calendar: 05-24-2023

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	05-15-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

May 15, 2023

Advice 6945-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Information-Only: Executed Contracts Pursuant to the May 11, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework—Filing and Process Requirements

Purpose

In accordance with Revised Reform #41¹ in the Administrative Law Judge's Ruling on Recommended Reforms for the Distribution Investment Deferral Framework Process (Ruling), issued June 21, 2021, Pacific Gas and Electric Company (PG&E) respectfully submits this information-only advice letter providing details of executed contracts that includes a project description, summary of bid and procurement outcomes, and the executed contracts from PG&E's Fall 2022 Distribution Investment Deferral Framework (DIDF) Request for Offers (RFO) and Standard Offer Contract (SOC) Pilot.

Background

On August 14, 2014, the California Public Utilities Commission (Commission or CPUC) instituted Rulemaking (R.) 14-08-013 to establish policies, procedures, and rules to guide the California investor-owned utilities (IOUs) in developing their Distribution Resource Plan (DRP) proposals. This rulemaking also established new policies to evaluate the IOUs' existing and future electric distribution infrastructure and planning procedures with respect to incorporating Distributed Energy Resources (DERs) into the planning and operations of their electric distribution systems.

As part of the Distribution Investment Deferral Framework (DIDF) process in R.14-08-013, the IOUs were required to submit a Tier 2 Advice Letter for contract approval within 6 months of approval of their DIDF solicitation. To improve the process and explore opportunities to further streamline contract execution, the Ruling determined that the Tier 2 Advice Letter requesting for contract approval could be eliminated and that the IOUs

¹ June 21, 2021 DIDF Improvements Ruling, p. 9

could instead submit an information-only submittal upon contract execution.² The Tier 2 Advice Letter requesting for contract approval was removed in Revised Reform #41 and replaced by an Information-Only Submittal upon contract execution³.

Project Description

PG&E sought offers for Distributed Energy Resources at three Candidate Deferral Opportunities in its Fall 2022 DIDF RFO and one Candidate Deferral Opportunity in its 2022 SOC Pilot: Camden 1106 in Kings County, Old River Bank 2 in Kern County, San Joaquin Bank 2 in San Joaquin County, and Blackwell Bank 1 in Kern County respectively. Table 1 outlines the DER service requirements below⁴. Since each Candidate Deferral Opportunity may mitigate one or more grid needs (i.e., San Joaquin Bank 2), there may be one or more sets of DER Service Requirements for a given Candidate Deferral Opportunity. All the DER Service Requirements for a given Candidate Deferral Opportunity are necessary to defer the investment.

Table 1: DER Service Requirements

Deferral Need	Grid Need Location	Grid Need (MW)	Delivery Month Range	Days/Year	Delivery	Hours Duration	Delivery Day Range	Online Year	Deferral Term (Years)
Camden 1106	Camden 1103	1.32	6-8	61	6PM-10PM	4	Mon-Sun	2025	7
	Hardwick Bank 1	2.25	5-8	92	4PM-12AM	7	Mon-Sun	2025	7
	Henrietta 1110	0.27	6-8	74	3PM-11PM	5	Mon-Sun	2025	7
	Schindler 1110	CC	CC	CC	CC	CC	CC	2025	7
Old River Bank 2	Old River Bank 1	CC	CC	CC	CC	CC	CC	2025	7
	Old River 1102	0.38	6-7	43	9AM-9PM	12	Mon-Fri	2025	7
	Old River Bank 2	0.46	6	8	7PM-9PM	2	Mon-Sun	2025	7

² May 11, 2020 DIDF Improvements Ruling, p.66

³ June 21, 2021 DIDF Improvements Ruling, p. 9

⁴ Customer confidential (CC) DER service requirements are provided in Appendix B.

San Joaquin Bank 2	San Joaquin Bank 1	2.39	6-8	82	2PM-12AM	9	Mon-Sun	2025	7
	San Joaquin 1106	1.16	6-7	61	3PM-12AM	7	Mon-Sun	2025	7
	Stroud Bank 1	CC	CC	CC	CC	CC	CC	2025	7
Blackwell Bank 1	Blackwell Bank 1	CC	CC	CC	CC	CC	CC	2025	7

Summary of Bid and Procurement Outcomes

PG&E engaged in negotiations with viable counterparties for the RFO and asked Sellers to provide a “best and final” offer prior to making a final execution decision. PG&E received a viable bid from White Pine Renewables for the San Joaquin project; however negotiations were ceased due to the timing of the in-service date. PG&E executed an SOC contract with White Pine Renewables for the Blackwell project. The executed contract was for an offer less than the Cost Effectiveness Cap.⁵ To the extent there are contingency costs, PG&E will track any contingency costs in its Distributed Energy Resources Distribution Deferral Account (DERDDA) and will seek recovery for costs reasonably incurred in its General Rate Case.⁶ Appendix A provides a summary of the evaluation of all offers from the Fall 2022 DIDF RFO and SOC Pilot.

Executed Contract

The executed contract is included as Appendix C.

Protests

This is an information-only advice letter submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest.

⁵ The cost effectiveness cap is based on the indicative deferral value calculated using the Real Economic Carrying Charge (RECC) methodology as described in PG&E’s Demo B final report, section 8.2, <http://drpwg.org/wp-content/uploads/2016/07/R1408013-PGE-Demo-Projects-A-B-Final-Reports.pdf>

⁶ Rulemaking (R.) 14-08-013, Administrative Law Judge’s Ruling Modifying the Distribution Investment Deferral Framework—Filing and Process Requirements, Att. A, Item 51 (May 11, 2020).

Effective Date

PG&E requests that this information-only advice letter become effective upon date of submittal, which is May 15, 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 lists for R.14-08-013 and R.21-06-017. 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

Attachments:

Appendix A: Summary of Evaluation of All Offers and Costs
Appendix B: Final IE Report
Appendix C: Distribution Services Agreement

cc: Service Lists R.14-08-013 and R.21-06-017



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) #: 6945-E

Tier Designation: Information-Only

Subject of AL: Information-Only: Executed Contracts Pursuant to the May 11, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework—Filing and Process Requirements

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 #:

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 Confidentiality Declaration and Matrix
 Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Satvir Nagra, satvir.nagra@pge.com

Resolution required? Yes No

Requested effective date: 5/15/23

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

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

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

1. I, Satvir Nagra, am a Director of Asset Planning within Pacific Gas and Electric Company (“PG&E”), a California corporation. Martin Wyspianski, the Vice President of Electric Engineering, Asset, and Regulatory of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

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

Name or Docket No. of CPUC Proceeding (if applicable): Advice Letter 6945-E

3. Title and description of document(s):

- Appx_A_Summary-of-Evaluation-of-All-Offers-and-Costs_CONF.xlsx

- Appx_B_PGE DIDF RFO and SOC Pilot IE Report DRAFT AMENDED 5.12.2023_CONF

- Appx_C_DSA_PGE_Blackwell-Test-Facility_Blackwell_CONF.pdf

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the

basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	<p>Redacted information in Advice Letter 6945-E;</p> <p>Entirety of Attachment A: Summary of Offers and Valuation (CONF);</p> <p>Entirety of Attachment B: PG&E DIDF RFO and SOC Pilot IE Report Draft Amended 5.12.2023 (CONF);</p> <p>Entirety of Attachment C: Distribution Services Agreement between Pacific Gas and Electric Company and Blackwell Test Facility, LLC (CONF);</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p>	

(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)

Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data

(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

Redacted information in Advice Letter 6945-E;
Entirety of Attachment A: Summary of Offers and Valuation (CONF);
Entirety of Attachment B: PG&E DIDF RFO and SOC Pilot IE Report Draft Amended 5.12.2023 (CONF);
Entirety of Attachment C: Distribution Services Agreement between Pacific Gas and Electric Company and Blackwell Test Facility, LLC (CONF);

Corporate financial records

(Protected under Govt. Code §§ 6254(k), 6254.15)

Third-Party information subject to non-disclosure or confidentiality agreements or obligations

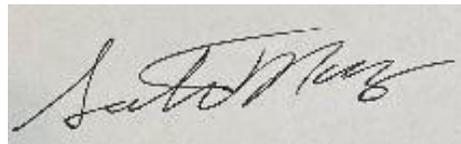
(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

Redacted information in Advice Letter 6945-E;
Entirety of Attachment A: Summary of Offers and Valuation (CONF);
Entirety of Attachment B: PG&E DIDF RFO and SOC Pilot IE Report Draft Amended 5.12.2023 (CONF);
Entirety of Attachment C: Distribution Services Agreement

between Pacific Gas and Electric Company and Blackwell Test Facility, LLC (CONF);

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a)) [NEED TO EXPLAIN HOW THE PUBLIC INTEREST SERVED BY NOT DISCLOSING THE RECORD CLEARLY OUTWEIGHS THE PUBLIC INTEREST SERVED BY DISCLOSURE]):

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 15th day of May, 2023 at Oakland, California.



Satvir Nagra
Director
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

ATTACHMENT TO DECLARATION

5/15/2023

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Appx_A_Summary-of-Evaluation-of-All-Offers-and-Costs_CONF.pdf	Summary of Evaluation of all Offers and Costs (CONF)	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data (Protected under Civ. Code §§3426 <i>et seq.</i> ; Govt. Code §§ 6254, <i>et seq.</i> , e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)	All pages within document.
Appx_A_Summary-of-Evaluation-of-All-Offers-and-Costs_CONF.pdf	Summary of Evaluation of all Offers and Costs (CONF)	Third-Party information subject to non-disclosure or confidentiality agreements or obligations (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)	All pages within document.
Appx_B_PGE DIDF RFO and SOC Pilot IE Report DRAFT AMENDED_5.12.2023_CONF	IE Report – (CONF)	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data	All pages within document.

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
		(Protected under Civ. Code §§3426 <i>et seq.</i> ; Govt. Code §§ 6254, <i>et seq.</i> , e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)	
Appx_B_PGE DIDF RFO and SOC Pilot IE Report DRAFT AMENDED_5.12.2023_CONF	IE Report – (CONF)	Third-Party information subject to non-disclosure or confidentiality agreements or obligations (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)	All pages within document.
Appx_C_DSA_PGE_Blackwell-Test-Facility_Blackwell_CONF.pdf	Distribution Services Agreement - Pacific Gas and Electric - White Pine Renewables (CONF)	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data (Protected under Civ. Code §§3426 <i>et seq.</i> ; Govt. Code §§ 6254, <i>et seq.</i> , e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)	All pages within document.

PACIFIC GAS AND ELECTRIC COMPANY

Appendix A

Summary of Evaluation of All Offers and Costs

(Confidential)

PACIFIC GAS AND ELECTRIC COMPANY

Appendix B

Final IE Report

(Confidential)

PACIFIC GAS AND ELECTRIC COMPANY

Appendix C

Distribution Services Agreement

(Confidential)

**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 Community Choice Association
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