

July 31, 2023

**Advice 7001-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Procurement Transaction Quarterly Compliance Submittal (Q2 2023)**

**Purpose**

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for Q2 2023 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 April 1, 2023 through June 30, 2023, (Q2 2023) 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 2-3 include the public versions of Attachments G and H, respectively. The confidential version of the QCR includes the following supporting Confidential Attachments:

Attachment A: Q2 2023 Electric and Natural Gas Transactions  
Attachment B: Q2 2023 Counterparty Information  
Attachment C: Q2 2023 Electric Transactions Summary  
Attachment D: Q2 2023 Natural Gas Transactions Summary  
Attachment E: Q2 2023 Other Transactions  
Attachment F: Q2 2023 Key Briefing Packages

Attachment G:	Q2 2023 Independent Evaluator (IE) Reports
Attachment H:	Q2 2023 Contracts Executed/Contracts Amended
Attachment I:	Q2 2023 Summary of Retained Generation Investments Completed
Attachment J:	Q2 2023 System Load Requirements/Conditions
Attachment K:	Q2 2023 Risk Management Strategy Communication and Management Disclosure
Attachment L:	Q2 2023 Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M:	Q2 2023 Transactions Subject to Strong Showing

Attachment 4 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 August 21, 2023, which is 21 days<sup>1</sup> 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).

---

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

**Effective Date**

In accordance with D.02-10-062, the requested effective date of this Tier 2 advice letter is August 30, 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  
CPUC Communications

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 (Public Version)  
Attachment 3: Attachment H (Public Version)  
Attachment 4: 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 #: (279)789-6209

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) #: 7001-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q2 2023)

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 4

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: 8/30/23 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 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:  
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 SECOND QUARTER OF 2023**

**July 31, 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 Advice Filing or Regulatory Process).....	1
3. Other Procurement Activities (Approval Through the QCR).....	2
a) Electric Transactions.....	2
b) Gas Transactions.....	2
4. Other Procurement Activities (Approval Through Separate Advice Filing or Regulatory Process).....	3
C. Master Data Request (MDR) Documentation.....	4
1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.....	4
2. The briefing package provided to the ultimate decision maker.....	4
3. Description of and justification for the procurement processes used to select the transactions.....	5
a) Electric Procurement – Description.....	5
b) Electric Procurement – Justification.....	5
c) Natural Gas Procurement – Description.....	9
d) Natural Gas Procurement – Justification.....	9
e) GHG and Other Commodities.....	12
4. Explanation/justification of the timing of the transactions.....	13
a) Electric Transactions.....	13
b) Natural Gas Transactions.....	13
5. Discussion of the system load requirements/conditions underlying the need for the Quarter’s transactions.....	14
a) PG&E Participation in the CAISO Markets.....	14
b) PG&E -Owned Generation Conditions.....	14
6. Discussion of how the Quarter’s transactions meet the goals of the risk management strategy reflected in the Plan.....	16
7. Copy of each contract.....	16
8. The valuation results for the contract(s) (for contracts of three months or greater duration).....	16
9. An electronic copy of any data or forecasts used to analyze the transactions.....	17
10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.....	17

TABLE OF CONTENTS  
(CONTINUED)

11. Any other information sought by the Commission under the Pub. Util. Code .....17  
D. Additional Reporting Requirement Pursuant to D.07-01-039 .....17  
E. Cost Recovery Mechanisms.....17

## **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 April 1, 2023 through June 30, 2023 (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) 6922-E: Update to Electric Energy and Natural Gas Procurement Limits and Ratable Rates (Appendix C) submitted May 4, 2023, was approved June 13, 2023, effective May 4, 2023.

## **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 Advice Filing or Regulatory Process)**

PG&E is seeking approval for BPP products through separate advice 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. Mesa Substation Transmission Alternative RFO (issued December 16, 2022);

- e. 2023 Distribution Investment Deferral Framework Partnership Pilot (issued January 17, 2023);
- f. MTR RFO – Phase 3 (issued February 7, 2023);
- g. 2023 PCIA Renewables Portfolio Standard (RPS) Long-Term Market Offer (issued March 7, 2023)
- h. Spring 2023 RRC RFO (issued May 16, 2023)
- i. Spring 2023 PG&E Solar Choice RFO (issued May 16, 2023)

### **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 Annual CRR 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 Advice Filing or Regulatory Process)

During the Quarter, approval of contracts resulting from the following procurement activities was requested through separate advice 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. *Refer to Summer Reliability c.i below.*
- b. Qualifying Facility (QF) contracts or amendments executed pursuant to other regulatory requirements.
  - i. *Refer to Summer Reliability c.i. below.*
- c. Summer Reliability

In response to the rotating blackouts that occurred during the August 2020 heat storm, the CPUC opened an Emergency Reliability Rulemaking (R.20-11-003) to make more resources available on an expedited basis to prevent a recurrence of blackouts. The Commission issued D.21-02-028 and D.21-03-056 to procure incremental capacity for potential extreme weather events in the summers of 2021 and 2022 and subsequently issued D.21-12-015 to procure additional resources for summers 2022 and 2023.

PG&E will be receiving cost recovery via the Cost Allocation Mechanism (CAM) for the transactions executed during the quarter in compliance with D.21-02-028, D.21-03-056, and D.21-12-015.

- i. *PG&E filed Advice Letter 6949-E on May 25, 2023, for approval of five short-term Emergency Reliability Agreements executed during the quarter. The Advice Letter 6949-E was approved on of June 13, 2023, effective on May 30, 2023.*
  - a. Five Letter Agreements include three QFs and two RPS facilities. These Letter Agreements are non-routine amendments for existing PG&E contracts.
- d. 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. None for the Quarter.*

These transactions are detailed in Confidential Attachments F, H (Info Only Summer Reliability tab).

### **C. Master Data Request (MDR) 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, Gillian Clegg, Vice President, Energy Policy and Procurement; Candice Chan, Senior Director, Electric and Gas Acquisition; Don Howerton, Senior Director, Commercial Procurement; Chris McNeece, Director, Short-Term Electric Supply; Mark Muranishi, Director, Structured Energy Transactions; 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) Standard Offer Contracts (SOC) (*for informational purposes only*); and
- Pro forma contracts executed under the California Highway Patrol (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 April 2023, May 2023, and June 2023, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for May 2023, June 2023, and July 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

None for the Quarter.

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 June 30, 2023, 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 – During the Quarter, PG&E executed transactions consisting of the following product types: (1) System RA with Flexible RA Purchase (2) System RA with Flexible RA Sale and (3) System RA Sale and (4) Import Allocation Rights Sale.

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

- Electronic Solicitations issued by PG&E

Import Energy - During the Quarter, PG&E executed two firm energy transactions at selected import delivery locations. Relevant information is included in Confidential Attachment A.

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

The July – December 2023 RA and Import Energy E-Solicitation was monitored by an IE.

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

- Market RFP

RA – None for the Quarter.

- Carbon Free Energy Sales –None for the Quarter.

- 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 – During the Quarter, PG&E executed transactions consisting of the following product types: (1) System RA Sale and (2) System RA with Flexible RA Sale.

Relevant information is included in Confidential Attachments E and H.

- 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 two 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 2023 year from the California Air Resources Board (CARB) in September 2022. All of the EDU allowances will be consigned into the 2023 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 May 17, 2023, for Vintage 2023 and Advance Vintage 2026 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 March 21, 2023. 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 Ahead 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 60 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 3 (404 MW). There were no maintenance outages lasting longer than 72 hours at Helms during the

Quarter. Forced outages lasting longer than 24 hours at Helms during the Quarter included Helms Unit 3 (404 MW).

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Bucks Creek Powerhouse Unit #2 (32 MW), Caribou #1 Powerhouse Unit #1 (25 MW), Caribou #1 Powerhouse Unit #2 (25 MW), Caribou #1 Powerhouse Unit #3 (25 MW), Caribou #2 Powerhouse Unit #5 (60 MW), Cresta Powerhouse Unit #1 (35 MW), Cresta Powerhouse Unit #2 (35 MW), Drum Powerhouse #2, Unit #5 (49.5 MW), Haas Powerhouse Unit 1 (72 MW), Hass Powerhouse Unit 1 (72 MW), James B. Black Powerhouse Unit #1 (86 MW), James B. Black Powerhouse Unit #2 (86 MW), Kings River Powerhouse Unit 1 (52 MW), Pit Powerhouse 6 Unit 1 (40 MW), Pit Powerhouse 7 Unit 1 (56 MW), Pit Powerhouse 7 Unit 2 (56 MW), Pit Powerhouse 7 Unit 2 (56 MW), Rock Creek Powerhouse Unit #1 (63 MW), Rock Creek Powerhouse Unit #2 (63 MW), Salt Springs Powerhouse Unit #1 (11 MW), Tiger Creek Powerhouse Unit #1 (29 MW), and Tiger Creek Powerhouse Unit #2 (29 MW).

Maintenance outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Butt Valley Powerhouse (41 MW), Electra Powerhouse Unit #3 (36 MW), Haas Powerhouse Unit 2 (72 MW), Salt Springs Powerhouse Unit #1 (11 MW), Salt Springs Powerhouse Unit #2 (33 MW), Tiger Creek Powerhouse Unit #1 (29 MW), and Tiger Creek Powerhouse Unit #2 (29 MW).

Forced outages lasting longer than 24 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Belden Powerhouse (125 MW), Butt Valley Powerhouse (41 MW), Drum Powerhouse #1, Unit #4 (14.5 MW), Haas Powerhouse Unit 2 (72 MW), Kerckhoff Powerhouse 2 Unit 1 (155 MW), Pit Powerhouse 1 Unit 1 (30.5 MW), Tiger Creek Powerhouse Unit #1 (29 MW), and Tiger Creek Powerhouse Unit #2 (29 MW).

Planned outages lasting longer than 72 hours at Humboldt during the Quarter included Unit 2 and Unit 3. Maintenance outages lasting longer than 72 hours at Humboldt during the Quarter included: Unit 5, Unit 7, Unit 8, and Unit 9.

Forced outages lasting longer than 24 hours at Humboldt during the Quarter included: Unit 1 and Unit 9.

At PG&E's fossil combined cycle facilities, planned outages lasting longer than 72 hours during the Quarter included Gateway Generating Station (580 MW) and Colusa Generating Station (657 MW). 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 2<sup>nd</sup> quarter 2023, Diablo Canyon Power Plant (DCPP) Unit 1 had no reductions in power, the unit was at full power during the quarter. During the 2<sup>nd</sup> quarter 2023, DCPP Unit 2 had no reductions in power, the unit was at full power during the quarter.

**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 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 on page 154. There were no transactions or investments to report during the Quarter.

**E. Cost Recovery Mechanisms**

**1. CAM**

In the Quarter, to support the procurement ordered in the summer reliability decisions D.21-03-056, D.21-02-028, and D.21-12-015, PG&E executed Letter Agreements resulting from PG&E's Summer 2023 procurement efforts.

The five Letter Agreements provide PG&E the ability to receive incremental energy and capacity during a CAISO system emergency. PG&E submitted AL 6949-E for approval on May 25, 2023. PG&E received its disposition letter approving the AL on June 13, 2023, effective on May 30, 2023.

PG&E will be receiving cost recovery via the CAM for these transactions executed during the quarter in compliance with D.21-02-028, D.21-03-056, and D.21-12-015.

These transactions are detailed in Confidential Attachment H (Info Only Summer Reliability tab).

2. Modified Cost Allocation Mechanism

None for the Quarter.

## **Attachment 2**

Attachment G (Public Version)



# **JULY - DECEMBER 2023 RESOURCE ADEQUACY AND IMPORT ENERGY ELECTRONIC SOLICITATION INDEPENDENT EVALUATOR REPORT**

PREPARED FOR PACIFIC GAS &  
ELECTRIC COMPANY

**July 12, 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**

**Prepared by: C. Janecek and L. Farih**



# Independent Evaluator Report

PA Consulting Group, Inc. (PA) served as the Independent Evaluator for the Pacific Gas and Electric Company (PG&E) 2023 July-December Resource Adequacy and Import Energy Electronic Solicitation (2023 Jul-Dec RA and Import Energy Electronic Solicitation or the E-Solicitation), including the second phase of this E-Solicitation (Phase II 2023 Jul-Dec RA and Import Energy Electronic Solicitation or the Phase II 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.

## 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 July 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 July 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 July 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. Additionally, in the Market Notice PG&E noted that it was seeking single month offers and bids. Further, PG&E noted that multi-month or annual strip offers and bids could still be submitted but would be considered non-conforming and evaluated after the solicitation evaluation. Lastly, the Market Notice noted that outside of the System RA, IAR, and IE products already specified, that PG&E would possibly have additional opportunities to sell firm physical Import Energy to interested buyers. PG&E specified that these potential IE opportunities were not yet confirmed, may not include IARs, and that interested parties should note their interest in discussing these opportunities further in their submission email. 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	Jul-Dec 2023	Fixed Price \$/kW-month
Import Allocation Rights	Sell	1 MW	Jul-Dec 2023	Fixed Price \$/kW-month
Import Energy	Buy	5 MW	Jul-Dec 2023	CAISO LMP, ICE Index, or Fixed Price \$/MWh

After launching the 2023 July-Dec RA and Import Energy Electronic Solicitation, PG&E launched the Phase II 2023 July-Dec RA and Import Energy Electronic Solicitation. In the Phase II E-Solicitation, PG&E sought bids to purchase (i.e., **PG&E sells**) of System RA from resources expected to be online soon, but not yet online, with August through December 2023 delivery periods. In the Market Notice for the Phase II E-Solicitation, PG&E noted that the delivery of any capacity from resources sold through this solicitation would be contingent on the resources' successful upstream delivery of the product to PG&E. PG&E also included the same note about potential firm physical IE opportunities as it had in the Market Notice for the E-Solicitation. In order to enable participants to make informed decisions on whether or not to bid into the Phase II E-Solicitation, the bid submission deadline for the Phase II E-Solicitation was the target date for confirms to be fully executed from the E-Solicitation. Table 2 below summarizes the products sought in the Phase II E-Solicitation.

**Table 2. Phase II E-Solicitation Products**

Product	PG&E Seeking To	Minimum Volume	Delivery Period	Pricing
System RA	Sell	1 MW	Aug-Dec 2023	Fixed Price \$/kW-month

In the E-Solicitation, PG&E received [REDACTED] 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 contracted for [REDACTED].

In the Phase II E-Solicitation, PG&E received [REDACTED] and contracted for [REDACTED]. [REDACTED] RA bids that PG&E received through the Phase II E-Solicitation is inclusive of the refreshed and new bids received through the refresh period. [REDACTED]

## Main Independent Evaluator Activities During the E-Solicitation

PA's role in PG&E's 2023 Jul-Dec RA and Import Energy Electronic Solicitation, including in the Phase II E-Solicitation, spanned approximately three months from April 2023 through June 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, for both phases of the 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 Market Notice for the E-Solicitation and Phase II E-Solicitation prior to PG&E's issuance. PG&E has continually refined its development of a straightforward Market Notice template.
- PA received all communications between PG&E and bidders. PA was invited to attend all conference calls between PG&E and bidders and was in attendance for a majority of those calls. In the instance where PA was not able to attend one call, PG&E provided information about what was discussed in the call.
- 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 counterparties.
- 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 for both phases of the E-Solicitation 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 both phases of the 2023 Jul-Dec RA and Import Energy Electronic Solicitation.

## Eligibility Screening of Submitted Bids and Offers

PG&E's bid and offer form provides instructions on how to submit bids/offers and what information must be filled out within the form. Conforming bids/offers are bids/offers that are:

- Submitted on time to the E-Solicitation as specified in the Market Notice.
- Submitted for products that PG&E is looking to transact for, as specified in the Market Notice.
- Complete with product information appropriately provided, including pricing, term, and quantity.
- Submitted for individual months and not for multi-month or annual strips.

Historically, PG&E has received bids/offers to its E-Solicitations that are deemed non-conforming due to the bids/offers being submitted as multi-month or annual strips. In PG&E's 2023 Feb-Dec RA and Import Energy Electronic Solicitation, PA recommended that PG&E provide clarity through future Market Notices on multi-month and annual strips being considered non-conforming. PG&E implemented that recommendation and instructions related to this aspect of conformance was provided in the Market Notice for the 2023 Jul-Dec RA and Import Energy Electronic Solicitation. [REDACTED]

Several days after the bid submission deadline had passed for the E-Solicitation, one bidder inquired about updating their bid. PG&E replied to the bidder indicating that the bid submission deadline had passed and in order

to be fair to all bidders, they would be unable to update their bid. PA finds that PG&E's response was appropriate and reasonable.

The E-Solicitation utilized PG&E's bid and offer form to collect the required information for bids/offers that were submitted into the E-Solicitation. However, the Phase II E-Solicitation did not utilize PG&E's bid and offer form, but rather PG&E asked bidders to submit their bids via email. This decision was made as PG&E was soliciting a contingent RA product that isn't typically included in its solicitations and was not soliciting interest in the broader selection of products typically included in its RA solicitations. Additionally, PG&E decided, because of the simpler range of products being offered, to manually evaluate the bids received instead of using its RA Bid Evaluation Tool (RABET) and as such the use of the standard bid and offer form was not necessary.

### 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 bidder's proposed price for each product. [REDACTED]

PA discussed the RA supply curve that PG&E uses to evaluate offers. PG&E provided the supply curve to PA and PA reviewed it and found it reasonable. Additionally, PG&E and PA discussed PG&E's tool for [REDACTED]. This calculation is done in order to be able to [REDACTED] received. PA found the tool and calculation to be reasonable.

Historically, PG&E has used its RABET to complete the initial evaluation and proposed shortlist. PG&E used the RABET for the evaluation in the E-Solicitation. [REDACTED]

[REDACTED] PG&E outlined its evaluation methodology, which followed the principles that the RABET uses in evaluating bids and provided it to PA ahead of evaluating bids received in the Phase II E-Solicitation. PA found PG&E's bid/offer evaluation methodology appropriate for the E-Solicitation and Phase II E-Solicitation.

### PG&E's Shortlisting

As noted, PG&E received [REDACTED]

PG&E selected a shortlist for each product type in the E-Solicitation and Phase II E-Solicitation, following its bid evaluation methodology discussed above. [REDACTED]

[REDACTED] PA manually reconciled all of PG&E's shortlisting decisions for both the E-Solicitation and Phase II E-Solicitation and found PG&E's shortlisting decisions to be reasonable. [REDACTED]

[REDACTED] PG&E delayed the notification date for which it would notify bidders of their shortlist status by one day. PG&E notified bidders by distributing an updated schedule in the Market Notice.

### PG&E's Negotiation of Confirms

The Market Notice for the 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. Additionally, the Market Notice also stated that PG&E sought to include specific language in its Import Energy Confirmations related to undelivered energy due to an uncontrollable force as well as defining that the IE product should not be sourced from resources internal to the CAISO Balancing Authority Area.

[Redacted text block]

[Redacted text block]

[Redacted text block]

### Recommendations

[Redacted text block]

[Redacted text block]

- [Redacted list item]
- [Redacted list item]
- [Redacted list item]

[Redacted text block]

### Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable 2023 Jul-Dec RA and Import Energy Electronic Solicitation and Phase II 2023 Jul-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 conducted the Independent Evaluation.
- PA finds that PG&E's outreach for the E-Solicitation and Phase II 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 the E-Solicitation and Phase II E-Solicitation, all RA transactions were executed with counterparties who already had executed EEI Master Agreements.
- Based on PA's review of PG&E's analysis, PA's communication with PG&E, and completion of other independent evaluation activities, PA finds that PG&E conducted the 2023 Jul-Dec RA and Import Energy Electronic Solicitation and Phase II 2023 Jul-Dec RA and Import Energy Electronic Solicitation fairly.



## About PA.

We believe in the power of ingenuity to build a positive human future in a technology-driven world.

As strategies, technologies and innovation collide, we create opportunity from complexity.

Our diverse teams of experts combine innovative thinking and breakthrough use of technologies to progress further, faster. Our clients adapt and transform, and together we achieve enduring results.

An innovation and transformation consultancy, we are 3,300 specialists in consumer and manufacturing, defence and security, energy and utilities, financial services, government and public services, health and life sciences, and transport. Our people are strategists, innovators, designers, consultants, digital experts, scientists, engineers and technologists. We operate globally from offices across the UK, US, Netherlands and Nordics.

**PA. Bringing Ingenuity to Life.**

---

Discover more at [paconsulting.com](https://www.paconsulting.com)

## Denver Office

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

## paconsulting.com

This report has been prepared by PA Consulting Group on the basis of information supplied by the client, third parties (if appropriate) and that which is available in the public domain. No representation or warranty is given as to the achievability or reasonableness of future projections or the assumptions underlying them, targets, valuations, opinions, prospects or returns, if any, which have not been independently verified. Except where otherwise indicated, the report speaks as at the date indicated within the report.

## All rights reserved

© PA Knowledge Limited 2022

This report is confidential to the organisation named herein and may not be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical or otherwise, without the prior written permission of PA Consulting Group. In the event that you receive this document in error, you should return it to PA Consulting Group, PA Consulting Group Inc., Suite 3550, 1700 Lincoln Street, Denver, CO 80203, USA. PA Consulting Group accepts no liability whatsoever should an unauthorised recipient of this report act on its contents.

## **Attachment 3**

Attachment H (Public Version)

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q2 2023**

**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.

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

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q2 2023**

**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)	Price (kW-mo) or (MW-day)	Notional Value (\$)	Confirm File Name
East Bay Community Energy Authority (33B238V07)	5/10/2023	Import Allocation Rights (Sale)	N/A		25			Q2 2023 Bilateral
Southern California Edison (33B217V02) <sup>1</sup>	5/17/2023	System, Flexible RA (Purchase)	N/A		194			Q2 2023 Bilateral
					194			
					194			
					194			
					194			
					194			
					194			
					194			
Southern California Edison (33B217V03) <sup>1</sup>	5/17/2023	System, Flexible RA (Sale)	N/A		194			Q2 2023 Bilateral
					194			
					194			
					194			
					194			
					194			
					194			
					194			
East Bay Community Energy Authority (33B238V08)	6/2/2023	Import Allocation Rights (Sale)	N/A		35			Q2 2023 Bilateral
San Diego Community Power (33B278V10)	6/22/2023	System RA (Sale)	N/A		166.44			Q2 2023 Bilateral

<sup>1</sup> In accordance with the contract, volumes have been changed since the time of execution. Please see Confidential Attachment E, Bilateral folder for more details.

**Confidential Attachment H  
Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Q2 2023**

**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)	Price (kW-mo) or (MW-day)	Notional Value (\$)	Confirm File Name
Dynergy Marketing and Trade, LLC (33B263V02)	4/18/2023	System RA (Sale)	N/A		388			Q2 2023 Broker
					388			
San Diego Gas And Electric (33B256V03)	5/4/2023	System RA (Sale)	N/A		195			Q2 2023 Broker
					195			
					195			
					195			
					195			
					90			
					90			
					195			
					195			
					195			
					195			
					90			
					90			
					90			
					40			
					40			
					Peninsula Clean Energy (33B232V06)			
Silicon Valley Clean Energy Authority (33B230V02)	5/24/2023	System RA (Sale)	N/A		15			Q2 2023 Broker
Clean Power Alliance of Southern California (33B240V02)	6/13/2023	System RA (Sale)	N/A		15			Q2 2023 Broker
					139			
Silicon Valley Clean Energy Authority (33B230V03)	6/15/2023	System RA (Sale)	N/A		23			Q2 2023 Broker
Marin Clean Energy (33B235V02) <sup>1</sup>	6/15/2023	System, Flexible RA (Sale)	N/A		59			Q2 2023 Broker
San Jose Clean Energy (33B247V01) <sup>1</sup>	6/16/2023	System, Flexible RA (Sale)	N/A		74			Q2 2023 Broker

<sup>1</sup> 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  
Q2 2023**

**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)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
East Bay Community Energy Authority (33B238V06)	5/8/2023	Import Allocation Rights (Sale)	N/A		22			Q2 2023 E-Solicitation
					9			
San Diego Community Power (33B278V08)	5/8/2023	System RA (Sale)	N/A		7			Q2 2023 E-Solicitation
Direct Energy (33B241V06)	5/10/2023	System RA (Sale)	N/A		10			Q2 2023 E-Solicitation
3 Phases Renewables (33B113V01)	5/10/2023	Import Allocation Rights (Sale)	N/A		50			Q2 2023 E-Solicitation
Marin Clean Energy (33B235V01)	5/15/2023	System RA (Sale)	N/A		87			Q2 2023 E-Solicitation
3 Phases Renewables (33B113V02)	6/15/2023	System, Flexible RA (Sale)	N/A		14.25			Q2 2023 E-Solicitation
					14			
San Diego Community Power (33B278V09)	6/22/2023	System RA (Sale)	N/A		50			Q2 2023 E-Solicitation
					0.75			
					23			
					5			
					5			
Clean Power Alliance of Southern California (33B240V03)	6/15/2023	System RA (Sale)	N/A		36			Q2 2023 E-Solicitation
					94			

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q2 2023**

**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.

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

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q2 2023**

**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 Q2 2023 QCR Public Narrative and Confidential Attachment F.

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
SPI Biomass Portfolio (33R254)	5/19/2023	RPS	N/A	Non-Routine Amendment to Existing Agreement	5/25/2023	Advice Letter 6949-E
Wheelabrator Shasta Energy Co, Inc (33R484)	5/19/2023	RPS	N/A	Non-Routine Amendment to Existing Agreement	5/25/2023	Advice Letter 6949-E
Chevron U.S.A. (Coalinga) (25C055)	5/23/2023	QF	N/A	Non-Routine Amendment to Existing Agreement	5/25/2023	Advice Letter 6949-E
Chevron U.S.A. (Eastridge) (25C248)	5/23/2023	QF	N/A	Non-Routine Amendment to Existing Agreement	5/25/2023	Advice Letter 6949-E
Chevron U.S.A. (SE Kern River) (25C246)	5/23/2023	QF	N/A	Non-Routine Amendment to Existing Agreement	5/25/2023	Advice Letter 6949-E

**Confidential Attachment H  
Pacific Gas and Electric Company  
Procurement Transaction Quarterly Compliance Report  
Q2 2023**

**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:

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Contract</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
Rio Vista Executive Boat & RV Storage, LLC (33R546RM)	4/6/2023	ReMAT	N/A	Consent to Assignment - Financing	N/A	2023 ERRAs Compliance
Flying Goose Solar, LLC (33R547RM)	4/25/2023	ReMAT	20 years	New Contract	N/A	2023 ERRAs Compliance
Pilot Power Group, LLC (VM00013M)	5/12/2023	Voluntary Allocation	20 years	New Contract	6/30/2023	Advice Letter 6977-E
San Diego Community Power (VM00014M)	5/12/2023	Voluntary Allocation	20 years	New Contract	6/30/2023	Advice Letter 6977-E
Cascade Energy Storage, LLC (40S009)	5/15/2023	Energy Storage	20 years	Routine Amendment to Existing Agreement	N/A	2023 ERRAs Compliance
Central Coast Community Energy (VM00015M)	5/17/2023	Voluntary Allocation	18 months	New Contract	6/15/2023	Advice Letter 6961-E
San Diego Community Power (VM00016M)	5/17/2023	Voluntary Allocation	18 months	New Contract	6/15/2023	Advice Letter 6961-E
Cascade Energy Storage, LLC (40S009)	5/17/2023	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2023 ERRAs Compliance
Blythe Solar 110, LLC (40S021)	5/18/2023	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2023 ERRAs Compliance
Moss Landing Energy Storage 3, LLC (40S032)	5/18/2023	Energy Storage	N/A	Routine Amendment to Existing Agreement	N/A	2023 ERRAs Compliance
City of San Jose (VM00017M)	5/22/2023	Voluntary Allocation	20 years	New Contract	6/30/2023	Advice Letter 6977-E
Central Coast Community Energy (VM00018M)	5/24/2023	Voluntary Allocation	20 years	New Contract	6/30/2023	Advice Letter 6977-E
Calpine Energy Services (VM00019M)	5/31/2023	Voluntary Allocation	20 years	New Contract	6/30/2023	Advice Letter 6977-E
City of Lancaster (VM00020M)	6/2/2023	Voluntary Allocation	18 months	New Contract	6/15/2023	Advice Letter 6961-E
East Bay Community Authority (VM00021M)	6/5/2023	Voluntary Allocation	20 years	New Contract	6/30/2023	Advice Letter 6977-E
Nighthawk Energy Storage (40S037)	6/23/2023	Energy Storage	N/A	Non-Routine Amendment to Existing Agreement	N/A	Advice Letter 6972-E
North Fork Community Power (33R433BIO)	6/23/2023	BioMAT	N/A	Routine Amendment to Existing Agreement	N/A	2023 ERRAs Compliance
Pittsburg RV and Boat Storage (33R548RM)	6/28/2023	ReMAT	10 years	New Contract	N/A	2023 ERRAs Compliance
Nextera Energy Montezuma Wind II, LLC (33R152)	6/30/2023	RPS	N/A	Consent to Assignment - Financing	N/A	2023 ERRAs Compliance

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q2 2023**

**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:

<b>Contract/ Counterparty Name</b>	<b>Executed/ Signed Date</b>	<b>Product</b>	<b>Term</b>	<b>Type of Transaction</b>	<b>Date Filed</b>	<b>Regulatory Reporting or Approval Process</b>
None for the Quarter						

**Confidential Attachment H**  
**Pacific Gas and Electric Company**  
**Procurement Transaction Quarterly Compliance Report**  
**Q2 2023**

**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:

<b>Contract/ Counterparty Name</b>	<b>Termination or Expiration <sup>1</sup></b>	<b>Date</b>	<b>Product</b>	<b>Volume (MW)</b>
Open Sky Dairy Digester #2 (33R434BIO)	Termination	4/22/2023	BioMAT	0.80
Marsh Landing, LLC (33B093)	Expiration	4/30/2023	Tolling	801.20
Frito Lay Cogen (25C063QPA2)	Termination	5/31/2023	QF/CHP	2
Blue Mountain Electric Company (33R436BIO)	Termination	6/14/2023	BioMAT	3

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

## **Attachment 4**

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 7001-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 July 31, 2023, Advice Letter 7001-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 July 31, 2023, at Oakland, California.

  
\_\_\_\_\_  
Marianne Aikawa

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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 7001-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 July 31, 2023 Advice Letter 7001-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;



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

**PACIFIC GAS AND ELECTRIC COMPANY  
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 7001-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.

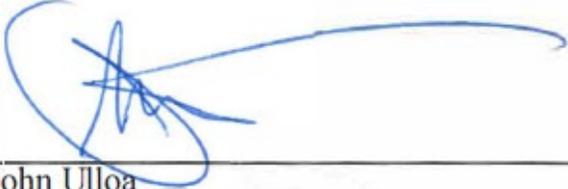
2. Based on my knowledge and experience, and in accordance with Decisions (“D.”) 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s July 31, 2023 Advice Letter 7001-E, Confidential Attachments A, B, D, J, and L.

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-

066, 14-10-033 and 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 July 31, 2023, at Oakland, California.



John Ulloa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
Confidential Attachment E, Q2 2023 GHG Materials folder:  File name: 08_PGE PRG PRES GHG Position Upd_062723.pdf, "Market Data Review, GHG Dispatch Curve", page 4  File name: 04_2023 Q2_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 Qtr02 2023 zip file:  File name: PGE PRG PRES GHG Position Update_06273.pdf, "Market Data Review, GHG Dispatch Curve", page 4  Confidential Attachment F, Confid Attachment F, PRG Meeting Materials and Summaries, June 27, 2023 folder:  File name: PGE PRG PRES GHG Position Update_06273.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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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		<p>Each financial transaction is a factor in PG&amp;E's long term buying and hedging strategies. With the entire set of transactions PG&amp;E's counterparties could reconstruct PG&amp;E's gas buying and hedging plans</p> <p>Actual quantity and cost of procured physical gas are protected.</p> <p>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</p>	<p>Financial transactions are confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8)</p> <p>Utility recorded physical gas procurement and cost information is confidential for one year.</p> <p>Monthly procurement costs (ERRA Filings) are confidential for 3 years.</p>

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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&amp;E's customers, and put PG&amp;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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 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
<b>Document: Quarterly Compliance Report</b>			
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 7001-E  
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q2 2023  
 JULY 31, 2023**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b>Redaction Reference</b>	<b>Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order that Data Corresponds To</b>	<b>Justification for Confidential Treatment</b>	<b>Length of Time Date To Be Kept Confidential</b>
<b>Document: Quarterly Compliance Report</b>			
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 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

Electrical Power Systems, Inc.  
Fresno  
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  
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