

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 7012E
As of October 2, 2023

Subject: California Public Utilities Code Section 8386.3(d) Vegetation Management Revenue Requirements

Division Assigned: Energy

Date Filed: 08-30-2023

Date to Calendar: 09-11-2023

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	*08-30-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Michael Finnerty

(279) 789-6216

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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



August 30, 2023

Advice 7012-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: California Public Utilities Code Section 8386.3(d) Vegetation Management Revenue Requirements

Purpose

The purpose of this Advice Letter is to notify the California Public Utilities Commission (CPUC or Commission) that PG&E expects to incur costs exceeding its annual revenue requirement for its vegetation management activities, including its Enhanced Vegetation Management (EVM) Program¹ described in its 2022 Wildfire Mitigation Plan (WMP).

Background

The Legislature amended California Public Utilities Code Section 8386.3(d) through Senate Bill 247 in October 2019 to require an electrical corporation to notify the Commission by advice letter 30 days before the date when it projects that it will spend, or incur obligations to spend, its entire annual revenue requirement for vegetation management in its WMP.

Summary

The WMP does not authorize a revenue requirement for vegetation management activities. Vegetation management revenue requirements are authorized through PG&E's General Rate Case.² On December 3, 2020, the CPUC approved Decision (D).20-12-005 in PG&E's 2020 General Rate Case (GRC), approving a multi-party Settlement Agreement, with certain modifications, and adopting base revenue requirements for the 2020-2022 GRC period.³ D.20-12-005 adopted expense amount of \$663.1 million for both

¹ EVM focuses on reducing the risk of trees and branches contacting power lines and equipment to help keep customers and communities safe. EVM is performed on all overhead distribution lines in Tier 2 and Tier 3 High-Fire Threat District Areas.

² Vegetation management activities associated with PG&E's Electric Transmission assets are subject to the jurisdiction of the Federal Energy Regulatory Commission and are not a component of the reporting in this advice letter.

³ Decision Authorizing PG&E's General Rate Case Revenue Requirement for 2020-2022, D. 20-12-005, OP 1, December 11, 2020.

EVM and Routine Distribution Vegetation Management (Routine VM) for the year 2022.⁴

⁵ PG&E is authorized to recover 120% of the authorized amount in its revenue requirement.⁶ D.20-12-005 also required that expenses for PG&E's Tree Mortality vegetation management activities, historically recorded to the Catastrophic Event Memorandum Account (CEMA) be recorded to the Vegetation Management Balancing Account (VMBA).⁷ PG&E's vegetation management revenue requirement does not include an adopted amount for Tree Mortality VM activities as these activities were not forecast in the 2020 GRC.

In the absence of a final decision on PG&E's 2023 GRC⁸ which will provide adopted base revenue requirements for activities recorded to the Vegetation Management Balancing Account (VMBA) for 2023, PG&E is notifying the Commission that it estimates that its vegetation management expenses will exceed 120% of its imputed adopted amount for 2022, or \$795.7 million, in September of 2023.⁹

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **September 19, 2023**, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

⁴ See 2020 GRC SA Section 2.3.3 Table 3 for the adopted values.

⁵ The Routine Distribution VM Program is designed and implemented to ensure safe and reliable operation of distribution facilities and to prevent foreseeable vegetation outages. In addition, the Routine VM Program is designed to monitor compliance with state and federal laws and regulations including: CPUC General Order 95, Rule 35, Public Resource Codes §4292 and §4293.

⁶ D.20-12-005, p. 78, citing Settlement Agreement, Article 2.3.4.2.

⁷ On December 22, 2020, in accordance with D.20-12-005, PG&E filed Advice Letter 4344-G/6032-E, which included the following updates and revisions: Modified the VMBA (Electric Preliminary Statement BU) to become a two-way balancing account that records actual Routine and Enhanced Vegetation Management costs compared to amounts adopted in PG&E's GRC, and records costs for Tree Mortality and Fire Risk Reduction that were previously recovered through the Catastrophic Event Memorandum Account (CEMA).

⁸ GRC 2023, Phase I Application 21-06-021

⁹ Actual expenses up to 120% of the total adopted amount provided in 2020 GRC SA Section 2.3.3 Table 3 will be trued-up annually through the DRAM in the AET advice letter or through another Tier 2 advice letter as authorized by the Commission. PG&E is required to file an application seeking review and approval of actual expenses incurred exceeding 120%.



ADVICE LETTER SUMMARY

ENERGY UTILITY

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

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

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Michael Finnerty
 Phone #: (279) 789-6216
 E-mail: PGETariffs@pge.com
 E-mail Disposition Notice to: michael.finnerty@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) #: 7012-E

Tier Designation: 1

Subject of AL: California Public Utilities Code Section 8386.3(d) Vegetation Management Revenue Requirements

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

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

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

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date: 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 proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Contact Name:
Title:
Utility/Entity Name:

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

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

Clear Form

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
Braun Blaising Smith Wynne, P.C.
California 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