

PUBLIC UTILITIES COMMISSION

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May 23, 2024

Advice Letter 7059-E/7059-E-A

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612
E-mail: PGETariffs@pge.com

SUBJECT: Procurement Transaction Quarterly Compliance Submittal (Q3 2023)

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 7059-E/7059-E-A is effective as of November 29, 2023.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

October 30, 2023

Advice 7059-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Submittal (Q3 2023)

Purpose

Pacific Gas and Electric Company (“PG&E”) hereby submits to the California Public Utilities Commission (“Commission” or “CPUC”) its compliance submittal for Q3 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 July 1, 2023 through September 30, 2023, (Q3 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: Q3 2023 Electric and Natural Gas Transactions
Attachment B: Q3 2023 Counterparty Information
Attachment C: Q3 2023 Electric Transactions Summary
Attachment D: Q3 2023 Natural Gas Transactions Summary
Attachment E: Q3 2023 Other Transactions
Attachment F: Q3 2023 Key Briefing Packages

Attachment G:	Q3 2023 Independent Evaluator (IE) Reports
Attachment H:	Q3 2023 Contracts Executed/Contracts Amended
Attachment I:	Q3 2023 Summary of Retained Generation Investments Completed
Attachment J:	Q3 2023 System Load Requirements/Conditions
Attachment K:	Q3 2023 Risk Management Strategy Communication and Management Disclosure
Attachment L:	Q3 2023 Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Attachment M:	Q3 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 November 20, 2023, which is 21 days¹ 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).

¹ 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 November 29, 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) #: 7059-E

Tier Designation: 2

Subject of AL: Procurement Transaction Quarterly Compliance Submittal (Q3 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: 11/29/23 No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Contact Name:
Title:
Utility/Entity Name:

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

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

Clear Form

Attachment 1

Narrative

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE THIRD QUARTER OF 2023

October 30, 2023

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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 July 1, 2023 through September 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) 6985-E: Update to Greenhouse Gas-Free Energy (Appendix P) submitted July 10, 2023, was approved August 16, 2023, effective August 9, 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 RFO – Phase 3 (issued February 7, 2023);
- d. Spring 2023 RRC RFO (issued May 16, 2023)
- e. Spring 2023 PG&E Solar Choice RFO (issued May 16, 2023)

- f. Summer 2023 Disadvantaged Communities (“DAC”) RFO (issued August 18, 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. *GHG 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. None for the Quarter.

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 executed three import energy transactions¹ during the quarter.

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).

¹ Consistent with O.P. 11, R. 20-11-003, Tier 1 Advice Letters do not require utilities to seek approval for 2022-2023 physical imports.

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;
- GHG 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 July 2023, August 2023, and September 2023, PG&E participated in the CAISO's monthly CRR allocation processes to procure CRRs for August 2023, September 2023, and October 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

PG&E participated in the 2024 Tier 1 and Long-Term Tier Allocation Processes. Awards from Tier 1 were posted on September 12, 2023 and for the Long-Term Tier on September 26, 2023. 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 September 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 a transaction consisting of the following product type: (1) Import Allocation Rights Sale.

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

- Electronic Solicitations issued by PG&E

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

PG&E held two e-solicitations this quarter – (1) the 2023 October – December RA and Import Energy E-Solicitation and (2) the 2024 Annual RA and Import Energy E-Solicitation Phase 1. The first e-solicitation did not result in any transactions. The final 2024 Annual RA and Import Energy IE Report will be available upon conclusion of Phase 2 of this Solicitation in Q4 2023. PG&E will supplement this Advice Letter filing with the final IE report. PG&E has included in this Advice Letter a Project Status Memo written by the IE regarding the transactions executed this Quarter.

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

- Market RFP

RA – None for the Quarter.

- GHG Free Energy Sales –None for the Quarter.
- E-Solicitation, Transparent Exchange, or Voice and On-Line Brokers

Electric Financial Transactions – None for the Quarter.

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 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 one bilateral transport/storage/park transactions during the quarter to help balance its positions. The details of this transaction 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 August 16, 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 September 19, 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 274 percent of average rainfall during the Quarter, which is approximately 5% of the normal season total; this is very early in the precipitation year and has very little bearing on hydro generation for the quarter.

There were no planned outages lasting longer than 72 hours at the Helms Pumped Storage Facility (Helms) during the Quarter. 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 1 (404 MW) and Helms Unit 2 (404 MW).

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Bucks Creek PH Unit #1 (33 MW), Bucks Creek PH Unit #2 (32 MW), Cresta Powerhouse Unit #2 (35 MW), Drum Powerhouse #2, Unit #5 (49.5 MW), Haas PH Unit 1 (72 MW), Salt Springs PH Unit #1 (11 MW).

Maintenance outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Drum Powerhouse #1, Unit #3 (13.1 MW) and Drum Powerhouse #1, Unit #4 (14.5 MW).

Forced outages lasting longer than 24 hours on conventional hydro facilities greater than 30 MW during the Quarter included: Balch PH 1 Unit #1 (34 MW), Belden Powerhouse (125 MW), Bucks Creek PH Unit #1 (33 MW), Caribou #1 Powerhouse Unit #1 (25 MW), Drum Powerhouse #1, Unit #4 (14.5 MW), Pit PH 3 Units 3 (23.4 MW), Salt Springs PH #2 (33 MW), Caribou #2 Powerhouse Unit #5 (60 MW).

Planned outages lasting longer than 72 hours at Humboldt during the Quarter included Unit 2. Maintenance outages lasting longer than 72 hours at Humboldt during the Quarter included: Unit 2, Unit 3, Unit 4, Unit 6, Unit 9, and Unit 10. Forced outages lasting longer than 24 hours at Humboldt during the Quarter included Unit 6.

At PG&E's fossil combined cycle facilities, there were no planned outages lasting longer than 72 hours during the Quarter. There were no maintenance outages longer than 72 hours during the Quarter. Forced outages longer than 24 hours during the Quarter included Gateway Generating Station (580 MW).

During the 3rd quarter 2023, Diablo Canyon Power (DCPP) Unit 1 started their planned refueling outage 1R24 on September 30. During the 3rd 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 import firm energy² transactions resulting from PG&E’s Summer 2023 procurement efforts.

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.

² Consistent with O.P. 11, R. 20-11-003, Tier 1 Advice Letters do not require utilities to seek approval for 2022-2023 physical imports.

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)



Memo Report

Subject	2024 Annual Resource Adequacy and Import Energy Electronic Solicitation – Phase I
To	Pacific Gas & Electric
From	Charles Janecek and Lillianne Farih
Date	September 27, 2023

PA Consulting Group, Inc. (PA) is serving as the Independent Evaluator (IE) for the Pacific Gas & Electric (PG&E) 2024 Annual Resource Adequacy and Import Energy Electronic Solicitation (2024 Annual RA and Import Energy Electronic Solicitation or the E-Solicitation). This memo report provides a summary of PA's evaluation of Phase I of the E-Solicitation from the drafting of the E-Solicitation documents through the recommendation of the selected bids and offers and through the negotiations of the confirms that were ultimately executed.

Overview of the E-Solicitation

Anticipating the likely uncertainty and complexity of the E-Solicitation, PG&E planned to conduct it in two phases. Phase I was intended to address market needs after the release of the Draft 2024 Net Qualifying Capacity (NQC) values; Phase II is intended to finalize procurement upon the release of the final 2024 NQC and Effective Flexible Capacity (EFC) lists.

[REDACTED]

Phase I activities were launched on August 15, 2023 and bids and offers were due on August 22, 2023. The Phase I E-Solicitation activities were concluded with PG&E executing transactions with [REDACTED]

[REDACTED]

[REDACTED] Phase II of the E-Solicitation was launched on September 25,



2023 with bids and offers due¹ October 2, 2023. At the time of the writing of this report the bid and offer submission deadline had not yet closed.

IE Activities During the E-Solicitation

PA's role in Phase I of the E-Solicitation has been one of continuous involvement from August 2023 through the transaction executions in September 2023. PA performed the role of IE beginning with PG&E's development of the Market Notice and E-Solicitation materials and continuing through the bid evaluation and shortlisting, confirm negotiations, and final execution of confirms. PA ensured that the procedures followed by PG&E were aligned with the process it established in the E-Solicitation protocol and provided fair and equitable treatment of all bids and offers.

A complete description of all IE activities conducted during the E-Solicitation will be included in the final Independent Evaluator report upon conclusion of the Phase II activities.

Adequacy of PG&E's Outreach

PG&E's outreach included Market Notices via email to PG&E's RA E-Solicitation distribution list of approximately 500 email addresses. PA is aware that many entities are currently engaged in RA solicitations and understands that most, if not all, market participants with RA obligations were aware of PG&E's E-Solicitation. PG&E understood its RA positions clearly and made attempts to cast a wide net to seek counterparties for both sales and purchases of RA during this phase of the E-Solicitation. PA believes that PG&E extended adequate outreach for Phase I of the 2024 Annual RA and Import Energy Electronic Solicitation.

PG&E's Bid Evaluation and Shortlisting Methodology

In this E-Solicitation, the bid and offer evaluations were necessarily complex, as PG&E was evaluating bids and offers for the purchase, sale, and swaps of similar RA volumes from multiple counterparties. PG&E primarily relied on a quantitative evaluation and used its internally developed RA Bid Evaluation Tool (RABET). RABET is a bid optimization model which seeks to optimize value for PG&E ratepayers across all conforming bids and offers by evaluating each bidder's proposed volumes of RA desired and the bidder's proposed price for each product. [REDACTED]

PG&E selected a shortlist for each product type in Phase I of the E-Solicitation following its bid evaluation methodology. PA manually reconciled all of PG&E's shortlisting decisions for Phase I of the E-Solicitation and found PG&E's bid evaluation methodology and shortlisting decisions to be reasonable.

PG&E Shortlisting and Negotiations of Confirms

PG&E received over [REDACTED] individual monthly bids and offers in response to Phase I of the E-Solicitation and ultimately shortlisted [REDACTED] counterparties.

The Market Notice for this E-Solicitation had specified that PG&E would only contract with bidders under an EEI Master Agreement and provided a standard RA Confirm and Import Allocation Rights Confirm. During the confirm negotiations, PG&E provided draft confirms to counterparties specific to their awarded price and volume. The Market Notice also specified that Import Energy offers should be for WSPSP 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 that IE product should not be sourced from resources internal to the CAISO Balancing Authority Area.

Further, PG&E proposed updates to its standard confirm. These updates were generally related to hold-back and substitution rights, the possibility of additional flex capacity if PG&E supplies any resource that has twice the amount of flex attributes as generic RA capacity, and PG&E's ability to claim Mid-term Reliability

¹ PG&E stated in its Market Notice for Phase II of the E-Solicitation that PG&E may delay the deadlines associated with the E-Solicitation on a daily basis if the Final 2024 NQC and EFC lists are not released by September 29, 2023.



(MTR) attributes associated with the RA product in the confirm. PA has found that while the 2019 Multi-Year Phase I RA Solicitation involved several negotiations between PG&E and potential counterparties related to executing an EEI Master Agreement, the 2024 Annual RA and Import Energy Electronic Solicitation required no such negotiations as all transacting counterparties already had an executed EEI Master Agreement.

Summary of PA's Findings

Overall, PA confirms that PG&E conducted a fair and equitable Phase I 2024 Annual RA and Import Energy Electronic Solicitation.

PA's 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 conducting of the Independent Evaluation.
- PA finds that PG&E's outreach for this E-Solicitation was adequate and that the Market Notice materials were clear and concise related to the E-Solicitation.
- Based on PA's review of PG&E's analysis, our participation in calls and meetings and other IE activities, PA finds that PG&E conducted Phase I of the 2024 Annual RA and Import Energy Electronic Solicitation fairly.

Attachment 3

Attachment H (Public Version)

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 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
3 Phases Renewables, Inc. (33B113V03)	7/18/2023	Import Allocation Rights (Sale)	N/A		25			Q3 2023 Bilateral

**Confidential Attachment H
 Pacific Gas and Electric Company
 Procurement Transaction Quarterly Compliance Report
 Q3 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)	Notional Value (\$)	Confirm File Name
Central Coast Community Energy (33B236V04)	7/7/2023	System RA (Sale)	N/A		190			Q3 2023 Broker
San Diego Community Power (33B278V11)	7/19/2023	System RA (Sale)	N/A		97.5			Q3 2023 Broker
NRG Business Marketing, LLC (33B241V07)	9/25/2023	System, Flexible RA (Sale)	N/A		97			Q3 2023 Broker

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 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

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
Silicon Valley Clean Energy Authority (33B230W01)	9/18/2023	System, Flexible RA (Sale)	N/A		75			Q3 2023 E-Solicitation
					125			
					50			
					100			
Clean Power Alliance of Southern California (33B240W01)	9/19/2023	System RA (Sale)	N/A		204.85		Q3 2023 E-Solicitation	
Commercial Energy of Montana (33B202W01)	9/19/2023	System, Flexible RA (Sale)	N/A		7			Q3 2023 E-Solicitation
					8			
					7			
					3			
					7			
					6.44			
The Energy Authority, Inc. (33B234W01)	9/19/2023	System RA (Sale)	N/A		12			Q3 2023 E-Solicitation
					6			
					12			
					7			
					19			
					5			
					9			
					7			
					9			
					1			
4								
Pioneer Community Energy (33B245W01)	9/19/2023	System RA (Purchase)	N/A		26			
Central Coast Community Energy (33B236W01)	9/20/2023	System, Flexible RA (Sale)	N/A		75			Q3 2023 E-Solicitation
					75			
					75			
					55			
					60			
					25			
					35			
					5			
		System RA (Sale)	N/A		9.15			
		30						

Contract/ Counterparty Name	Executed/ Signed Date	Product	Local Area	Term	Volume (MW)	Price (kW-mo) or (MW- day)	Notional Value (\$)	Confirm File Name
		(Sale)			70			
Central Coast Community Energy (33B236W02)	9/20/2023	System, Flexible RA (Sale)	N/A		25			Q3 2023 E-Solicitation
					50			
					25			
					50			
					25			
					50			
Shell Energy North America (US), L.P. (33B022W01)	9/20/2023	System, Flexible RA (Sale)	N/A		33		Q3 2023 E-Solicitation	
Pilot Power Group, LLC (33B239W01)	9/21/2023	System, Flexible RA (Sale)	N/A		8		Q3 2023 E-Solicitation	
High Desert Power Project, LLC/Middle River Power (33B273W01)	9/25/2023	System, Flexible RA (Sale)	N/A		100			Q3 2023 E-Solicitation
					200			
NRG Business Marketing, LLC (33B241W01)	9/25/2023	System, Flexible RA (Sale)	N/A		10			Q3 2023 E-Solicitation
					11			
					10			
					20			
San Jose Clean Energy (33B247W01)	9/26/2023	System, Flexible RA (Sale)	N/A		44			Q3 2023 E-Solicitation
					54			
					57			
		System RA (Sale)			4			
					9			
					26			

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 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.

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

**Confidential Attachment H
 Pacific Gas and Electric Company
 Procurement Transaction Quarterly Compliance Report
 Q3 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.

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

**Confidential Attachment H
 Pacific Gas and Electric Company
 Procurement Transaction Quarterly Compliance Report
 Q3 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 Q3 2023 QCR Public Narrative and Confidential Attachment F.

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Type of Transaction	Date Filed	Regulatory Reporting or Approval Process¹
ConocoPhillips (6697922, 6658113)	7/25/2023	Import Energy	2 months	Contract	N/A	D. 21-02-028 D. 21-03-056 D. 21-12-015
Bonneville Power (6658922)	7/26/2023	Import Energy	1 month	Contract		
Bonneville Power (6659054)	7/27/2023	Import Energy	1 month	Contract		

¹ Decisions refer to the 2021-2023 Emergency Reliability rulemaking (Rulemaking 20-11-003) to make more resources available on an expedited basis to prevent a recurrence of blackouts. These decisions do not require utilities to seek approval for 2022-2023 physical imports.

**Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 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:

Contract/ Counterparty Name	Executed/ Signed Date	Product	Term	Contract	Date Filed	Regulatory Reporting or Approval Process
Northern Orchard Solar (33R551-H01)	7/7/2023	RPS	15 years	Contract	9/13/2023	Advice Letter 7022-E
Northern Orchard Battery Storage (40S044-H01)		Energy Storage				
AV Solar Ranch One (33R073)	7/13/2023	RPS	N/A	Consent to Assignment Financing	N/A	2023 ERR Compliance
PatMar Land Co (33R549BIO)	7/17/2023	BioMAT	20 years	Contract	N/A	2023 ERR Compliance
Tesoro Commons LLC (33R550RM)	7/24/2023	ReMAT	20 years	Contract	N/A	2023 ERR Compliance
The Regents of the University of California (33B261)	7/26/2023	EEI Master	N/A	Non-Routine Amendment to Existing Agreement	N/A	2023 ERR Compliance
Cascade Energy Storage (40S009)	7/28/2023	Energy Storage	N/A	Consent to Assignment Financing	N/A	2023 ERR Compliance
Sierra Energy Storage (40S008)	7/28/2023	Energy Storage	N/A	Consent to Assignment Financing	N/A	2023 ERR Compliance
Sierra Energy Storage (40S008)	8/10/2023	Energy Storage	N/A	Letter Agreement	N/A	2023 ERR Compliance
Blue Mountain Electric Company LLC (33R552BIO)	9/1/2023	BioMAT	20 years	Contract	N/A	2023 ERR Compliance
Southern California Edison Company (33B217V03)	9/25/2023	Resource Adequacy	N/A	Routine Amendment to Existing Agreement	N/A	2023 ERR Compliance

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 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:

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

Confidential Attachment H
Pacific Gas and Electric Company
Procurement Transaction Quarterly Compliance Report
Q3 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:

Contract/ Counterparty Name	Termination or Expiration ¹	Date	Product	Volume (MW)
Calpine Russell City Energy Center (33B075)	Expiration	7/31/2023	Tolling	600.7
El Nido Biomass Facility (33R016)	Termination	8/10/2023	RPS	9
Chowchilla Biomass Facility (33R017)	Termination	8/10/2023	RPS	9
Calpine Los Esteros Critical Energy Facility, LLC (33B099)	Expiration	8/31/2023	Tolling	294
ABEC Bidart-Stockdale LLC (33R284)	Expiration	9/11/2023	RPS	0.6
Still Water Power LLC (33R442BIO)	Termination	9/16/2023	BioMAT	1
Wind Resource II (33R276)	Expiration	9/30/2023	RPS	19.9

¹ 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 7059-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 October 30, 2023, Advice Letter 7059-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 October 30, 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 7059-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 October 30, 2023 Advice Letter 7059-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

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

**PACIFIC GAS AND ELECTRIC COMPANY
QUARTERLY COMPLIANCE REPORT FILING ADVICE LETTER 7059-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.

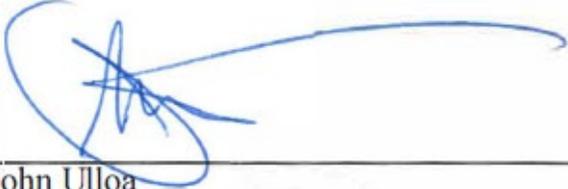
2. Based on my knowledge and experience, and in accordance with Decisions (“D.”) 06-06-066, 14-10-033 and relevant Commission rules, I make this declaration seeking confidential treatment of PG&E’s October 30, 2023 Advice Letter 7059-E, Confidential Attachments A, B, D, J, and L.

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 October 30, 2023, at Oakland, California.



John Ulloa

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 QUARTERLY COMPLIANCE REPORT ADVICE LETTER 7059-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF Q3 2023
 OCTOBER 30, 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
Document: Quarterly Compliance Report			
Confidential Attachment E, Q3 2023 GHG Materials folder: File name: 07_PGE PRG PRES GHG Position Upd_091923.pdf, "Market Data Review, GHG Dispatch Curve", page 4 File name: 05_2023 Q3_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 Qtr3 2023 zip file: File name: PGE PRG PRES GHG Position Update_091923.pdf, "Market Data Review, GHG Dispatch Curve", page 4 Confidential Attachment F, Confid Attachment F, PRG Meeting Materials and Summaries, September 19, 2023 folder: File name: PGE PRG PRES GHG Position Update_091923.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

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Document: Quarterly Compliance Report			
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&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</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>

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Document: Quarterly Compliance Report			
Attachment B – in its entirety: Counterparty Information, including non-investment grade counterparties table: List of Non-Investment Grade Counterparties (Electric and Natural Gas Transactions, GHG 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

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Document: Quarterly Compliance Report			
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.

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Document: Quarterly Compliance Report			
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

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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
Document: Quarterly Compliance Report			
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&E's customers, and put PG&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

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 OCTOBER 30, 2023**

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Document: Quarterly Compliance Report			
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.

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Document: Quarterly Compliance Report			
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 H - Executed Contracts – Nuclear Fuels	Public Utilities Code §454.5(g)	Information concerning nuclear fuel procurement strategy, transactions, and/or costs. Release of this market sensitive information could put PG&E at a competitive disadvantage with regards to other market participants and could detrimentally impact PG&E customers.	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

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Document: Quarterly Compliance Report			
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

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Document: Quarterly Compliance Report			
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

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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