

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 29, 2023

PG&E Advice Letter 7073-E

Sidney Bob LDietz II
Director of Regulatory Relations
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: PG&E's Request for Approval to Not Issue Competitive Solicitations for Distributed Energy Resource Procurement for Electric Distribution Deferral Opportunities

Dear Mr. Dietz:

The California Public Utilities Commission (CPUC) Energy Division (ED) approves Advice Letter (AL) 7073-E with an effective date of December 15, 2023. ED reviewed the protest by Clean Coalition and PG&E's response, and finds that the protest should be rejected. Therefore, AL 7073-E is approved.

PG&E Advice Letter 7073-E

On November 15, 2023, PG&E submitted AL-7073-E requesting not to pursue additional solicitations for distributed energy resource (DER) procurement for the Fall 2023 Distribution Investment Deferral Framework Request for Offers (DIDF RFO). In their 2023 Distribution Deferral Opportunity Report, and as presented at their Distribution Planning Advisory Group (DPAG) meeting, PG&E identified six deferral opportunities that will be pursued via the DIDF RFO and Partnership Pilot. Other deferral opportunities were also considered but deemed unlikely to produce successful deferral results. AL 7073-E is PG&E's requests for approval to not solicit *additional* DER distribution deferral projects for the Fall 2023 DIDF RFO, outside of the six previously proposed projects.

Protest

Clean Coalition's Protest argues that two of the Tier III deferral opportunities, Millbrae Station, and Semitropic Bank 4, should be pursued for deferral because they were scored as high forecast certainty and reasonable cost effectiveness. The protest argues that even though these opportunities are correctly identified as Tier III due to long term needs and greater than three grid needs, the projects should still undergo solicitation. Clean Coalition also raises concerns over the lack of concrete evidence for the Independent Professional Engineer's (IPE's) belief that too many opportunities may diffuse attention and reduce the number of cost-effective bids. Clean Coalition argues that adding two additional solicitations should have no meaningful negative impact on the financial and workforce burdens for potential project bidders, and thus should be pursued.

Reply

In their reply to protest, PG&E addresses their reasoning for not pursuing the identified opportunities. PG&E points out that the IPE, in their November 8, 2023 report, believed that while Millbrae Station was previously considered, it may not be a good project because of large need size, long duration of the need, as well as the number of grid needs being greater than three. PG&E goes on to explain that Semitropic Bank faces the same concerns, and that both projects were identified as Tier III opportunities, which are opportunities not recommended for deferral per the approved prioritization methodology. PG&E also references that they presented the Tier lists of identified deferral opportunities at their September 25, 2023 DPAG meeting, and there were no arguments or protests to move the Millbrae Station or Semitropic Bank projects to a different tier. PG&E argues that pursuing the Millbrae Station and Semitropic Bank projects is unwise. Therefore, PG&E requests not pursuing the projects due to their identified concerns and Tier III status, and that the number of pursued projects had no bearing on this request.

Discussion and Conclusion

Energy Division staff find that PG&E's response satisfactorily addresses all protests. PG&E followed an approved methodology for project identification, which the IPE validated. Given the reasoning and processes followed by PG&E, AL-7073-E is approved effective December 15, 2023.

Please contact Raymond Breault of the Energy Division Staff at raymond.breault@cpuc.ca.gov if you have any questions.

Sincerely,

 FOR

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

CC:
Ben Schwartz, Clean Coalition (ben@clean-coalition.org)
Service List R.21-06-017

November 15, 2023

Advice 7073-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Request for Approval to Not Issue Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunities

Purpose

In accordance with Reform #40 in the Administrative Law Judge's (ALJ) Ruling Modifying the Distribution Investment Deferral Framework (DIDF)-Filing and Process Requirements (Ruling), issued May 11, 2020¹, and Revised Reform #40 in the June 21, 2021 ALJ's Ruling Modifying the DIDF- Filing And Process Requirements (June 2021 ALJ Ruling)² in Rulemaking (R.) 14-08-013, Pacific Gas and Electric Company (PG&E) respectfully submits this Tier 2 advice letter seeking the California Public Utilities Commission's (Commission's or CPUC's) approval to not issue competitive solicitations in the 2023-2024 DIDF Request for Offer (RFO) to procure distributed energy resource (DER) solutions for identified electric distribution deferral opportunities in PGE's 2023 Distribution Deferral Opportunities Report (DDOR).

1. Regulatory Background

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

In July 2015, California IOUs each submitted their respective DRP proposals to the Commission. The Commission organized the review of the DRP filing content into three

¹ May 11, 2020, Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework – Filing and Process Requirements, Attachment A, pp. 96. Attachment A was subsequently revised on June 12, 2020

² June 21, 2021, Administrative Law Judge's Ruling on recommended reforms for the Distribution Investment Deferral Framework Process, Revised Reform #40. pp. 9

tracks: Track 1 – Tools and Methodologies, Track 2 – Field Demonstration Projects, and Track 3 – Policy Issues. Various DRP working group meetings and workshops were held to inform the Commission and stakeholders, which ultimately led to several decisions in R.14-08-013.

In February 2018 the Commission issued D.18-02-004 on Track 3 Policy Issues, sub-track 1 (Growth Scenarios) and sub-track 3 (Distribution Investment and Deferral Process). This decision directed the IOUs to file a Grid Needs Assessment (GNA) by June 1 of each year, and a DDOR by September 1 of each year. Subsequently, the May 2019 ALJ Ruling modified the DIDF to align the submission of both GNA and DDOR reports to August.

There were two improvement rulings modifying the DIDF process by ALJ Mason in 2020. The April 13, 2020 ALJ's Ruling Modifying the DIDF Process (April 2020 ALJ Ruling) updated the Independent Professional Engineer (IPE) scope of work for the DIDF process and provided the 2020-2021 DIDF cycle schedule. The May 2020 ALJ Ruling further modifies the DIDF process and filings requirements by focusing on the comments and reforms related to aspects of the DIDF.

In June 2021, the assigned ALJ issued a ruling on recommended reforms to the DIDF process and addressed alignment with requirements adopted by Decision D. 21-02-006. Specifically, the ruling introduced eight new reforms and amended eight reforms. As a result of this ruling, the Partnership and Standard Offer Contract (SOC) Pilots will align within the current DIDF process and are subject to DIDF reforms while pilots are active.

In November 2021, the Order Instituting Rulemaking (OIR) to Modernize the Electric Grid for a High Distributed Energy Resources Future (R.21-06-017) was filed to replace the 2014 DRP and now stands as the OIR home for GNA and DDOR compliance. In June 2022 and May 2023, the assigned ALJ issued a ruling on recommended reforms for the DIDF process, the Partnership and SOC Pilots. In this Advice Letter, PG&E is seeking approval for no additional RFO for distribution deferral projects in compliance with Revised Reform No. 40 in the June 2021 and June 2022 ALJ Rulings.

2. Overview of the Distribution Investment Deferral Framework Process

Pursuant to the DIDF as specified in D.18-02-004, the ALJ Rulings between 2019-2023, PG&E has completed the following:

- August 15, 2023: Submitted PG&E's 2023 GNA Report
- August 15, 2023: Submitted PG&E's 2023 DDOR
- September 25, 2023: Hosted PG&E's Distribution Planning Advisory Group (DPAG) Meeting via Webinar
- September 15, 2023: Submitted Supplement to PG&E's 2023 DDOR on Known Load Metrics

- October 20, 2023: Hosted joint IOU Follow up DPAG Meeting via Webinar to respond to PAO questions.
- November 30, 2023³: Supplement to PG&E's 2023 GNA and DDOR on Line Section

3. Proposal to Not Solicit Candidate DER Distribution Deferral Projects

PG&E recommended 6 Candidate deferral projects that have the best likelihood of success via the 2 DER sourcing mechanisms (DIDF RFO and Partnership pilot). PG&E published the recommendations in the 2023 DDOR⁴ and presented during the DPAG. The Standard Offer Contract (SOC) pilot has been off-ramped (discontinued) moving forward after the midstream evaluation in 2023⁵ per the May 19, 2023, ALJ ruling in R.21-06-017⁶.

PG&E is requesting approval to not solicit additional DER distribution deferral projects for the Fall 2023 DIDF RFO. PG&E does not currently recommend pursuing competitive solicitations of DER for additional projects due to their low likelihood of achieving a successful outcome. Moreover, focusing developer efforts on only the 6 selected projects may improve their probability of success.⁷ There were no Tier 2 Candidate Deferral Opportunities this year, and the remaining Tier 3 Candidate Deferral Opportunities include characteristics that decrease their likelihood of success, thus are not recommended for solicitation.

³ As per "R2106017 Email Ruling Granting PG&E Motion for Extension of Time and Tentatively Cancelling Annual Primer Workshop" on August 11, 2023.

⁴ [2023 PG&E DDOR Report - Narrative & Data](#), Table14, Section 8.2

⁵ Resolution E-5190, refer to the mid-stream evaluation of SOC Ordering Paragraph 3 and Attachment B

⁶ May 19, 2023, Administrative Law Judge's ruling on recommended reforms for the Distribution Investment Deferral Framework process, the Partnership Pilot, and the Standard-Offer-Contract Pilot in R.21-06-017.

⁷ In the August 30, 2021 Independent Evaluation Report for Pacific Gas & Electric's 2021 Distribution Investment Deferral Framework Request for Offers, the Individual Evaluator (IE) considers that while providing many opportunities may develop a wide array of offers, it may have a negative effect in providing too many options, diffusing the bidding community's attention, and decreasing the likelihood of Participants submitting enough offers at any one location to meet the location's needs.

4. Candidate Deferral Opportunities

4.1 Candidate Deferral Opportunities Recommended for Solicitation

PG&E is pursuing competitive solicitations for the Candidate Deferral Opportunities listed in [Table 1](#). This was presented in PG&E's 2023 DDOR and DPAG. Per D.21-02-006⁸ and revised reform #40⁹, Tier 2 Advice letter seeking approval to launch the RFO was eliminated. PG&E launched the RFO for the DIDF RFO on Sept 15, 2023. Additional details are provided on the respective websites for the Fall 2023 DIDF RFO¹⁰, PG&E will file a separate advice letter requesting approval to launch the three candidate deferral opportunities recommended as Partnership Pilots. PG&E's partnership pilot website¹¹ provides additional details on all partnership pilots currently under active solicitation.

Table 1: Candidate Deferral Opportunities Recommended for Solicitation

Tier	DDOR ID	Candidate Deferral	In-Service Date	Deficiency (MW)	Sourcing Mechanism
Tier 1	DDOR1001	CAMDEN 1106	5/3/2026	8.9	Partnership Pilot (PP)
Tier 1	DDOR1022	CORRAL 1104	6/1/2026	2.3	DIDF RFO
Tier 1	DDOR075	GIFFEN BANK 2	4/1/2026	CC	Partnership Pilot (PP)
Tier 1	DDOR080	GREEN VALLEY BANK 4	5/1/2026	11.1	Partnership Pilot (PP)
Tier 1	DDOR1003	LEMOORE 1106	5/31/2026	3.9	DIDF RFO
Tier 1	DDOR077	STOREY 1103	5/1/2026	13	DIDF RFO

4.2. Candidate Deferral Opportunities Not Recommended for Solicitation

PG&E seeks approval to not pursue competitive solicitations for the Tier 3 candidate deferral opportunities listed in [Table 2](#).

⁸ February 11, 2021, Decision adopting pilots to test two frameworks for procuring distribution energy resources that avoided or defer utility capital investment Decision 21-02-006, Ordering Paragraph 11. pp. 84

⁹ June 21, 2021, Administrative Law Judge's Ruling on recommended reforms for the Distribution Investment Deferral Framework Process, Revised Reform # 40. pp. 9

¹⁰ [Fall 2023 Distribution Investment Deferral Framework \("DIDF"\) RFO \(pge.com\)](#)

¹¹ [Distribution Investment Deferral Framework \("DIDF"\) Partnership Pilot \(pge.com\)](#)

Table 2: Candidate Deferral Opportunities Not Recommended for Solicitation

Tier	DDOR ID	Candidate Deferral	In-Service Date	Deficiency (MW)	Sourcing Mechanism
Tier 3	DDOR1029	7TH STANDARD BANK 2	5/1/2026	CC	Not Recommended
Tier 3	DDOR081	AIRWAYS BANK 3	5/1/2026	CC	Not Recommended
Tier 3	DDOR083	BELLE HAVEN BANK 4	4/23/2026	CC	Not Recommended
Tier 3	DDOR1027	MILLBRAE SUBSTATION	5/2/2026	CC	Not Recommended
Tier 3	DDOR085	RIPON 1705	5/1/2026	33.1	Not Recommended
Tier 3	DDOR1031	SEMITROPIC BANK 4	5/1/2026	CC	Not Recommended
Tier 3	DDOR087	VIERRA BANK 3	5/1/2027	38.6	Not Recommended
Tier 3	DDOR1033	WEBER BANK 7	5/1/2026	CC	Not Recommended
Tier 3	DDOR1002	WEST FRESNO 1113	5/31/2026	CC	Not Recommended
Tier 3	DDOR096	WOLFE 1111 AND 1112	6/1/2026	CC	Not Recommended

Tier 3 Candidate Deferral Opportunities:

PG&E does not recommend pursuing competitive solicitations for Tier 3 candidate deferral opportunities. The Tier 3 projects have one or more flagged attributes that have been identified and/or achieved a negative Red-Amber-Green (RAG) score, which indicate that it is unlikely a DER deferral solution can successfully be sourced.

Table 3: Tier 3 Prioritization Metrics Tiering Summary

Tier	DDOR ID	Candidate Deferral	In-Service Date	Deficiency (MW)	Cost Effectiveness	Forecast Certainty	Market Assessment
Tier 3	DDOR1029	7TH STANDARD BANK 2	5/1/2026	CC	-1	0	FLAG
	DDOR081	AIRWAYS BANK 3	5/1/2026	CC	0	0	FLAG
	DDOR083	BELLE HAVEN BANK 4	4/23/2026	CC	-1	0	-1
	DDOR1027	MILLBRAE SUBSTATION	5/2/2026	CC	0	1	FLAG
	DDOR085	RIPON 1705	5/1/2026	33.1	-1	-1	FLAG
	DDOR1031	SEMITROPIC BANK 4	5/1/2026	CC	0	1	FLAG
	DDOR087	VIERRA BANK 3	5/1/2027	38.6	0	0	FLAG
	DDOR1033	WEBER BANK 7	5/1/2026	CC	0	-1	FLAG
	DDOR1002	WEST FRESNO 1113	5/31/2026	CC	-1	-1	FLAG
	DDOR096	WOLFE 1111 AND 1112	6/1/2026	CC	0	0	-1

As discussed during PG&E's DPAG workshop, both Millbrae substation and Semitropic Bank 4 had scored well in forecast certainty metric but had long duration needs and grid needs greater than the threshold of 3 grid needs. Both candidates have relatively large grid needs with high overloads.

A summary of the primary reasons the Tier 3 Candidate Deferral projects scored poorly is listed below:

- **Cost Effectiveness Metrics**
 - 7th Standard Bank 2, Belle Haven Bank 4, Ripon 1705, and West Fresno 1113 candidate deferral projects scored poorly in the cost effectiveness metrics.
 - Sums of normalized LNBA values fall within bottom quartile.
 - All four candidates have very low LNBA (\$/MW-yr) values.
 - Average of all four candidates is \$0.03/MW-yr.
 - 7th Standard Bank 2 and Belle Haven Bank 4 have very low LNBA (\$/MWh-yr) values.
 - Average of all four candidates is \$11/MWh-yr.
- **Forecast Certainty Metrics**
 - Ripon 1705, Weber Bank 7 and West Fresno 1113 candidate deferral projects scored poorly in the forecast certainty metrics.
 - Sums of normalized and scaled Grid Need Certainty fell within bottom quartile.
 - All three have high asset health risk.
 - All three have significant spatial load growth for Agriculture, Commercial, Domestic, Electric Vehicle, and Industrial sectors.
- **Market Assessment Metrics**
 - 7th Standard Bank 2, Airways Bank 3, Millbrae Substation, Ripon 1705, Semitropic Bank 4, Vierra Bank 3, Weber bank 7, and West Fresno 113 candidate deferral projects scored poorly in the market assessment metrics.
 - Sums of normalized Duration and Capacity Need per Circuit fell within bottom quartile.
 - All have long durations (12-24 hours per day)
 - High-capacity needs per circuit (Belle Haven Bank 4 and 7th Standard Bank 2).
 - 8 out of 10 Tier 3 Candidates were flagged for high number of grid needs (3+).

5. Commission Action Requested

For the reasons stated herein, PG&E respectfully requests approval for no additional candidate deferrals or planned investments for the Fall 2023 DIDF RFO.

Tariff Revisions

The submittal would 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 December 5, 2023, which is 20 days after the date of this submittal. Protests must be submitted to:

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

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

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 2.w and 2.x of D.18-02-004, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, December 15, 2023, which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service lists for R.14-08-013, R.14-10-003 and R.21-06-017. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.



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) #: 7073-E

Tier Designation: 2

Subject of AL: Request for Approval to Not Issue Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunities

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-02-004

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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

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

Resolution required? Yes No

Requested effective date: 12/15/23

No. of tariff sheets: N/A

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:

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

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

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

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

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

Contact Name:
Title:
Utility/Entity Name:

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

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

Clear Form

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

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

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

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

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.
Name or Docket No. of CPUC Proceeding (if applicable): R.21-06-017
3. Title and description of document(s): DIDF Non-Solicitation Advice Letter;
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart.

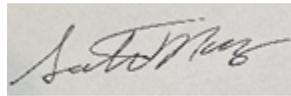
Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	<p>Grey-shaded Information in Advice Letter 7073-E;</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	
<input type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

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

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

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

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



Satvir Nagra
Director, Asset Planning
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

R.21-06-017

ATTACHMENT TO DECLARATION

11/15/2023

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Advice Letter 7073-E	Advice Letter requesting approval to not include in the DIDF RFO process any remaining candidate deferral opportunities or other planned investments	Customer-specific data	Marked as “Customer Confidential” or “CC” in the Advice Letter 7073-E

**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
Buchalter
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