STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE

July 5, 2024

Advice Letter 7167-E

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

SUBJECT: Rejection of Advice Letter Requesting Exceptions from General Order 95, Rule 18 Electric Infrastructure Remediation Corrective Action Timelines

Dear Mr. Dietz:

This letter rejects without prejudice Pacific Gas and Electric Company's (PG&E) Advice Letter (AL) 7167-E, as supplemented in 7167-E-A. AL 7167-E details PG&E's request to be relieved of certain deadlines in Commission General Order 95 (GO 95), Rule 18, governing when electric infrastructure repairs and other corrective actions are due.[1] SPD finds that ALs 7167-E and 7167-E-A are not authorized by Decision (D.) 18-05-042 because the exceptions PG&E is seeking are for less well-defined conditions than what the Commission contemplated in that decision; this is inconsistent with Commission order, resulting in a condition for rejection pursuant to GO 96-B General Rule 7.6.1.

While SPD rejects AL 7167-E, SPD recognizes that the "Isolation Zone Bundling Approach," which PG&E states is a motivation for seeking the requested relief, holds promise for reducing wildfire risk while containing ratepayer costs and reducing service interruptions. Moreover, the Isolation Zone Bundling Approach is part of PG&E's approved 2023-2025 Wildfire Mitigation Plan (2023 WMP). Pursuant to Public Utilities Code 8386.1, CPUC may penalize PG&E for failing to substantially comply with its WMP. It remains PG&E's responsibility to operate its electrical infrastructure safely while charging just and reasonable rates.

Background

The Commission's GO 95 standardizes rules for the design, construction, inspection, maintenance, repair, and replacement of overhead electric utility facilities and communications utility facilities. The purpose of GO 95 is to "ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general."[2] Rule 18 of GO 95 requires the correction of overhead utility facilities that pose a risk to safety or reliability, or that otherwise do not comply with GO 95. To meet this requirement, every utility must also have

[1] Electric infrastructure conditions for corrective action may also be referred to as repairs, tags, electric correction (EC) notifications, and/or work orders.
[2] GO 95, Rule 11.

an auditable maintenance program for its overhead facilities that includes undertaking corrective action on identified safety hazards[3] and potential violations of its facilities within maximum time periods based on its priority level (Level 1 being the riskiest and Level 3 being the least risky) and other factors. In D.18-05-042, the Commission approved certain changes to Rule 18, including authorizing an AL process for utilities to seek specific exceptions to the required deadlines for the lowest risk asset repairs.

On March 27, 2023, PG&E filed its 2023 WMP with the Office of Energy Infrastructure Safety (OEIS). PG&E's initial 2023 WMP included no plan to address its backlog of asset repairs. OEIS responded to PG&E's 2023 WMP on June 22, 2023. OEIS found PG&E's response insufficient, identified eight critical issues, one of which centered on the backlog, and required PG&E to demonstrate how it will address its growing backlog of electric system repairs within 45 days. On August 7, 2023, PG&E responded with a proposal to bundle and work tags by isolation zone (the Isolation Zone Bundling Approach), instead of continuing a business-as-usual approach to address its maintenance backlog.[4] PG&E claims the Isolation Zone Bundling Approach aims "to address the growing backlog of distribution asset repairs in the HFTD by the end of 2029—three years sooner than [it] proposed in [its] March 2023 WMP submittal." In the fifth revision to its 2023-2025 WMP, PG&E included that electric correction (EC) notifications[5] "are bundled by isolation zone to maximize the number of notifications completed within a single outage and/or planned day of work. Isolation zones are circuit segments located between sectionalizing devices.[[6]] A bundle consists of all open notifications within a given isolation zone. Bundles are created across all EC types (pole, non-pole capital, non-pole expense). Bundles are developed through PG&E's annual planning process and are prioritized based on risk reduction and executability."[7] PG&E's revised 2023 WMP was approved by OEIS on December 29, 2023 and ratified by the Commission on February 15, 2024.

PG&E submitted a letter to Commission Executive Director Rachel Peterson on September 26, 2023, requesting a "stay of application" or waiver[8] of the deadlines in GO 95, Rule 18 to complete corrective actions for certain Level 2 and Level 3 conditions found on its electric infrastructure. On December 15, 2023, SCE submitted AL 5171-E requesting similar, but not identical relief. In order to provide a consistent and transparent process for addressing both requests, Commission staff directed PG&E to file its request as an AL. PG&E filed AL 7167-E on February 5, 2024, and a supplemental AL 7167-E-A on April 5, 2024. In the AL, PG&E reiterated its request for a waiver of

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[3] Safety hazard is a condition that poses a significant threat to human life or property per GO 95, Rule 18.

[4] PG&E 2023-2025 WMP R2, August 7, 2023, p. 515-539. "Through bundling in isolation zones, PG&E's asset maintenance teams coordinate with other lines of business so that customers only experience one planned outage while we complete all the work needed in that zone at one time. When we bundle work, we show up as one team, we eliminate waste, and we improve customer satisfaction." "We will accelerate our program by bundling and working tags by isolation zone instead of working newly created tags to meet current GO95 time requirements, described as Steady State previously. Bundling by isolation zone provides us the flexibility to address the most risk first through a risk spend efficiency (RSE) approach and will provide nearly $1 billion in execution efficiency through 2029 with equivalent risk reduction."

[5] PG&E uses EC notifications to inform the need for work on its infrastructure. For the purposes of this letter, the terms "conditions," "notifications," and "tags" are used interchangeably and have the same meaning.

[6] Sectionalizing devices separate portions of the electric grid into smaller parts, which allow the impact of turning power off to be limited to customers on a smaller part of the grid.

[7] PG&E 2023-2025 WMP R5, April 2, 2024, p. 542-545.

[8] PG&E uses the phrase "stay of application"; we are unable to discern any meaningful difference between "stay of application," and "waiver" for the purposes of analyzing this request.

certain GO 95 Rule 18 deadlines. In its reply to a protest (described below), PG&E clarified that the scope of the requested waiver includes all Level 2 and Level 3 conditions.

PG&E provides two primary reasons for requesting the waiver: 1) revisions to GO 95 are under consideration by the Commission, PG&E, and others; 2) to help PG&E address its maintenance backlog. PG&E refers to the GO 95 Rule 18 exception process approved by D.18-05-042 as a basis for why its request could be approved via AL.

Protest

On February 26, 2024, the California Public Advocates Office (Cal Advocates) submitted a protest to AL 7167-E. Cal Advocates asserted that:

1. **Procedural Impropriety:** PG&E's request in AL-7167-E to be relieved of the deadlines in GO 95, Rule 18 is a material change to GO 95 that requires a Petition for Modification (PFM) of D.18-05-042. PG&E's attempt to be relieved of electric infrastructure repair deadlines under an "exceptions" process misinterprets that process by asking for wholesale relief from Level 2 and Level 3 deadlines.[9]
2. **Scale is Beyond Scope:** Requesting 97 percent stay of deadlines is beyond the scope of an AL.
3. **Request Undermines Reporting Requirements:** The request would undermine Rule 18 reporting requirements and interfere with the Commission's ability to hold utilities accountable for safe operations and timely maintenance.
4. **Material Omissions:** The AL fails to quantify the scale of the requested relief.
5. **System Safety and Reliability Improvement Proof:** The AL fails to prove the request would improve system safety and reliability.

On March 4, 2024, PG&E filed a reply to the Cal Advocates' protest. In its reply, PG&E disagreed with Cal Advocates' arguments, noting that:

1. PG&E has a plan to reduce the corrective action backlog through its Isolation Zone Bundling Approach,
2. The "exceptions" language in GO 95, Rule 18 allows PG&E to seek relief via AL per GO 95, Rule 18 and GO 96-B, General Rule 3.1,
3. PG&E has not asked to modify its reporting obligations, contrary to Cal Advocates allegation that the request could "potentially affect the efficacy of Rule 18 reporting" and thereby "the ability of the Commission to hold PG&E… accountable for safe operations and timely maintenance,"[10] and

[9] Cal Advocates Protest, February 26, 2024, p. 4. "PG&E Priority E and F notifications, which are the subject of the Advice Letter, represent 902,280 of 921,117 (97%) of the open notifications reported to the Office of Energy Infrastructure Safety reported at the end of December 2023. PG&E is effectively stating that it can guarantee compliance with Rule 18 for only 3% of its open notifications; and is requesting a stay that could change the prioritization and reporting of up to 97% of its open notifications."
[10] PG&E's March 4, 2024, Reply to Cal Advocates' Protest to AL 7167-E, p. 3

4. PG&E's request should not be denied simply because its AL does not specify the number of tags requiring corrective action; PG&E clarified that the request covers all GO 95, Rule 18 Level 2 and Level 3 notifications for corrective action, which fluctuates daily.

Discussion

SPD agrees with Cal Advocates that the relief PG&E seeks here is not appropriate for the AL process. D.18-05-042 does not authorize the use of an AL process for seeking exceptions of the nature that PG&E requests. The AL process authorized in D.18-05-042 is for individual, specific conditions that can be evaluated on a case-by-case basis, and only applies to conditions that are considered "Level 3," the lowest priority level in the risk classification system codified in GO 95, Rule 18.[11] In contrast, PG&E seeks an exception for an indeterminate number of poorly defined conditions, including "Level 2" conditions, which are considered riskier than Level 3 conditions.

Disposition

PG&E's AL is rejected because:

1. The relief PG&E seeks is broader than what D.18-05-042 authorized for review via an AL process–a clear inconsistency with Commission order, resulting in a condition for rejection pursuant to GO 96-B General Rule 7.6.1.

In closing, SPD rejects without prejudice AL 7167-E and 7167-E-A pursuant to General Order 96-B, Rule 7.6.1.

Sincerely,

/s/
Danjel Bout
Director
Safety Policy Division

cc: Service Lists for R.16-12-001, A.21-06-021
Nathaniel Skinner, Iain Fisher, and Benjamin Katzenberg, Cal Advocates
Leslie Palmer, Director; Nika Kjensli, Safety & Enforcement Division

[11] D.18-05-042, OP 7; see list of approved, specific exceptions in GO 95, Appendix J.

Pacific Gas and Electric Company

Sidney Bob Dietz II
Director
Regulatory Relations

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

February 5, 2024

Advice 7167-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

<u>Subject:</u> **Advice Letter Requesting a Partial Stay of Application of the General Order 95, Rule 18 Maintenance Tag Correction Action Timelines**

Purpose

Pacific Gas and Electric Company (PG&E) respectfully submits this Advice Letter to the Safety and Policy Division (SPD) of the California Public Utilities Commission (CPUC or Commission) requesting a stay of application of the corrective action timelines in General Order (GO) 95, Rule 18 for Level 2 and Level 3 notifications while the CPUC, PG&E, and others evaluate GO 95 for potential updates on various items, including whether to adopt a more risk-based approach for remedying corrective actions. The stay will also help PG&E address its distribution maintenance tag log more quickly through the isolation zone bundling approach described in PG&E's 2023-2025 Wildfire Mitigation Plan (WMP), which was approved by the Office of Energy Infrastructure Safety (Energy Safety) on December 29, 2023. PG&E does not seek a stay for Level 1 notifications, which PG&E defines as Priority A tags. PG&E will also continue addressing Priority B tags, which are a subset of Level 2 notifications that create a fire risk in HFTD Tier 2 and Tier 3 locations, within 3 months. The stay would only apply to PG&E Priority E and F tags.[1]

While PG&E's maintenance tag plan described in its 2023-2025 WMP will result in some lower-risk maintenance tags exceeding the current GO 95, Rule 18 timelines, the plan is prudent because it will allow PG&E to reduce the maintenance tag log more quickly while providing nearly $1 billion in execution efficiency through 2029. Using this plan, PG&E reduced the wildfire risk associated with ignition risk backlog tags by more than 50% in 2023.[2] Finally, the requested stay will not compromise public safety, as PG&E monitors and manages the risk associated with open tags through our portfolio of comprehensive monitoring and data collection and operational mitigations.

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[1] For a chart aligning PG&E's electric notification priority levels with GO 95, Rule 18 designations, please see PG&E's 2023-2025 WMP (R4), Section 8.1.7.2, pp. 534-535.

[2] Please see Target GM-03 in PG&E's 2023-2025 WMP Fourth Quarter Data Report located at Community Wildfire Safety Program (pge.com).

Background

General Order 95

Under GO 95, Rule 18, Level 1 notifications posing an immediate risk of high potential impact to safety or reliability must be addressed immediately by a utility.[3] Level 2 notifications involving moderate potential impacts to safety or reliability must be addressed between 6 and 36 months, depending on the location.[4] And Level 3 notifications reflecting low potential impacts to safety and reliability must be addressed within 60 months, subject to certain exceptions.[5] These notification correction times may be extended under reasonable circumstances (e.g. permits required, no access etc.).[6] In addition, Rule 18 provides that an exception to the corrective action timelines for certain Level 3 notifications may be granted through an advice letter process.[7]

As discussed, PG&E's proposed stay of application of the GO 95, Rule 18 corrective action timelines only applies to Level 2 and Level 3 notifications, for the reasons described below. Level 1 notifications will continue to be timely addressed under Rule 18.

Review and Update of General Order 95

A stay of application of the GO 95, Rule 18 corrective action timelines for Level 2 and 3 notifications is prudent because there is interest from stakeholders and the CPUC in updating GO 95 as parties evolve in their utility risk understanding. The CPUC is considering updates to the General Orders as part of Phase 2 of the Order Instituting Rulemaking to Consider Strategies and Guidance for Climate Change Adaptation Proceeding.[8] Other stakeholders have commented on the need for updates to the General Orders. In its Root Cause Analyses of the 2017-18 Wildfires, Envista Forensics recommended various changes to GO 95.[9] In addition, PG&E has agreed to provide $3 million of shareholder funds for the Safety and Enforcement Division (SED) to retain a consultant to review and update GO 95 as part of its settlement of the Zogg Fire

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[3] General Order 95, Rule 18(B)(1)(a)(i).

[4] General Order 95, Rule 18(B)(1)(a)(ii).

[5] General Order 95, Rule 18(B)(1)(a)(iii).

[6] General Order 95, Rule 18(B)(1)(b).

[7] See General Order 95, Rule 18(B)(1)(a)(iii).

[8] Rulemaking 18-04-019, Phase 2 Scoping Memo, June 2, 2023, p. 15.

[9] Root Cause Analyses 2017-2018 Wildfires, *Root Cause Analyses of the 2017-18 Wildfires found to have been ignited by PG&E & Corrective Action Report*, Envista Forensics, July 6, 2022, p. 11.

Administrative Enforcement Order.[10] PG&E believes that an important element of this review will be evaluating whether the GO 95, Rule 18 corrective action timelines should be updated to include additional risk-based considerations.

PG&E's Plan to Reduce Its Distribution Maintenance Tag Log

A partial stay of application of the GO 95, Rule 18 corrective action timelines will also facilitate PG&E's effort to close its distribution maintenance tag log. At the end of 2022, PG&E had approximately 260,000 notifications in its distribution maintenance tag log in High Fire Threat Districts (HFTDs)/High Fire Risk Areas (HFRAs). In its approved 2023-2025 WMP, PG&E proposed a plan to eliminate the HFTD/HFRA distribution maintenance tag log by 2029—three years earlier than originally forecasted in the approved 2022 WMP—by prioritizing higher risk spend efficiency corrective actions in isolation zones to achieve the most risk reduction possible with available resources. PG&E's Priority E and F distribution maintenance tags (*i.e.*, Level 2 or Level 3 corrective actions under GO 95, Rule 18) will be bundled together to allow PG&E to correct the tags more efficiently by reducing the number of times PG&E performs corrective work on the same circuit, executing more tags with the same resources, and reducing the number of clearances required to close tags, which will improve customer experience/reliability.[11] This approach will provide flexibility to address higher risk work first and nearly $1 billion in execution efficiency through 2029 with equivalent risk reduction to the plan PG&E proposed in its approved 2022 WMP.[12] It will also lower the average age of outstanding maintenance tags at a faster rate as more pre-2023 E & F tags are addressed. Additional plan details are included in Section 8.1.7.2 of PG&E's 2023-2025 WMP (R4).

While PG&E believes the plan in its approved 2023-2025 WMP will most efficiently reduce risk and eliminate the HFTD/HFRA distribution maintenance tag log, executing the plan will result in some PG&E Priority E and F maintenance tags (*i.e.*, Level 2 or Level 3 corrective actions under GO 95, Rule 18) not being worked according to the timelines set forth in GO 95 in order to fully take advantage of bundling opportunities. Additionally, if execution teams encounter constraints, PG&E may bypass an isolation zone and execute work in a different zone with a lower risk spend efficiency to continue reducing the number of tags.[13] We will monitor and manage the risk associated with any open tags using our portfolio of comprehensive monitoring and data collection and operational mitigations.[14] And higher-risk, Priority A and B maintenance tags (*i.e.*, Level 1 and some Level 2

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[10] Resolution ALJ-439, Resolving Request for Hearing (H.) 22-11-015 on Administrative Enforcement Order regarding the Involvement of Pacific Gas and Electric Company's Electric Facilities in the 2020 Zogg Fire, May 24, 2023, p. 5.

[11] See PG&E's 2023-2025 WMP (R4), Section 8.1.7.2, pp. 536-539.

[12] See PG&E's 2023-2025 WMP (R4), Section 8.1.7.2, pp. 536-539.

[13] See PG&E's 2023-2025 WMP (R4), Section 8.1.7.2, pp. 545-547.

[14] For a discussion on PG&E's comprehensive monitoring and data collection and operational mitigations, please see sections 7.1.1, 7.1.4.2-3, and 7.2.1 of PG&E's 2023-2025 WMP (R4).

corrective actions under GO 95, Rule 18) are not affected by this plan and will continue to be worked pursuant to the current GO 95 timelines.

PG&E's Request for a Partial Stay of Application of GO 95, Rule 18 Timelines

Given the interest in updating GO 95, as well as PG&E's proposal for addressing its distribution maintenance tag log through isolation zone bundling plan described in its approved 2023-2025 WMP, PG&E believes that a stay of application of GO 95, Rule 18 timelines for addressing Level 2 and Level 3 notifications is prudent. PG&E is willing to provide additional information to the CPUC regarding the work it is performing to address the distribution maintenance tag log if requested.

Advice Letter Submission

Based on direction from Commission Staff, PG&E submits this Advice Letter requesting a partial stay of application of the GO 95, Rule 18 maintenance tag correction action timelines to SPD.[15] As indicated, Rule 18 notification correction times may be extended under reasonable circumstances.[16] Further, Rule 18 provides that an exception to the corrective action timelines for certain Level 3 notifications may be granted through an advice letter process.[17]

PG&E believes this Advice Letter is subject to disposition by SPD. General Rule 7.6.1 of GO 96-B states that the CPUC intends "to make advice letters subject to Industry Division disposition in all instances where the Commission has lawfully assigned this task to the Industry Division." General Rule 7.6.1 requires the Industry Division to issue a written disposition if it "concludes the advice letter is subject to disposition under this Rule," to notify the utility of the disposition, and report the disposition on the CPUC's website. Under the General Orders, the term "Industry Division" includes SPD.[18]

In D.18-05-042, the CPUC approved General Order 95, Rule 18 variance requests via the advice letter process. In that case, the Commission stated that Energy Division was the appropriate Industry Division to grant requests for GO 95, Rule 18 Level 3 exceptions via a Tier 2 Advice Letter. The Commission approved a settlement agreement entered into by multiple entities, including SED, that created a general, 60-month remediation timeline for Level 3 notifications, created exceptions to that remediation timeline for

[15] PG&E previously submitted this request in a letter to Executive Director Rachel Peterson of the CPUC on September 26, 2023. The letter was also served on PG&E's General Rate Case Service List A.21-06-021.

[16] General Order 95, Rule 18(B)(1)(b).

[17] See General Order 95, Rule 18(B)(1)(a)(iii).

[18] General Order 96-B, General Rule 3.8 ("Industry Division" means the Energy, Telecommunications, Rail Safety, Safety Policy, Water, Safety and Enforcement or Consumer Protection and Enforcement Division (or their successors) when acting in an advisory capacity….")

certain Level 3 notifications, and authorized the grant of additional exceptions through a Tier 2 Advice Letter. In the decision, the Commission instructed "electric utilities to submit these Tier 2 Advice Letters to the Energy Division's Tariff Unit" and directed the Energy Division's Tariff Unit to "handle the administrative processing of the advice letters[.]"[19] The CPUC also stated that the Director of Energy Division "may allocate responsibilities within their own Division and shall consult with the Director of SED to obtain appropriately knowledgeable SED advisory staff to assist with the review of the advice letters."[20]

PG&E requests that SPD apply a procedure similar to the one provided for Energy Division in D.18-05-042 to SPD's review of this Advice Letter, which requests a broader stay of application of General Order 95, Rule 18 maintenance tag correction timelines for Level 2 and Level 3 notifications.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than February 26, 2024, which is 21[21] days after the date of this submittal. Protests must be submitted to:

CPUC Safety Policy Division
SPD Admin Unit
E-mail: SPDAdminUnit1@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).

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[19] D.18-05-042, p. 41.

[20] D.18-05-042, p. 41.

[21] Pursuant to Rule 1.5 of General Order 96-B, PG&E requests to extend the protest period by one additional day because twenty days following submission of this advice letter is Sunday, February 25, 2024.

Effective Date

PG&E requests that this advice submittal become effective on regular notice, March 6, 2024, 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 list for A-21-06-021. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: http://www.pge.com/tariffs/.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations
CPUC Communications

cc: Service List A-21-06-021

Advice Letter Summary | Energy Utility

CPUC Safety Policy Division

California Public Utilities Commission

To be completed by utility

(Attach additional pages as needed)

Email completed form to:

California Public Utilities Commission Safety Policy Division Admin Unit Email: SPDAdminUnit1@cpuc.ca.gov

Please download this form before filling out.

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

Utility Type: ☑ Electric (ELC) ☐ Pipeline (PLC) ☐ Gas ☐ Heat ☐ Water

Contact Person: Stuart Rubio Phone: 279-789-6210

Email: Stuart.rubio@pge.com Email Disposition Notice to: PGETariffs@pge.com

Advice Letter #: 7167-E

☐ Disposition by Resolution ◉ Disposition by Division

Subject of AL: Advice Letter Requesting a Partial Stay of Application of the General Order 95, Rule 18 Maintenance Tag Correction Action Timelines

Keywords: Compliance

choose from list on page 3

AL Type:
☐ Monthly ☐ Quarterly ☐ Annually ◉ One-Time ☐ Other:

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:
N/A

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

N/A

Confidential treatment requested? ☐ Yes ◉ No

If yes, specification of confidential information: N/A

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:

N/A

Date Submitted/ Received Stamp by CPUC

Resolution required? ☐ Yes ◉ No Requested effective date: 3/6/2024

No. of tariff sheets: N/A

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

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

continued

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