

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 14, 2019

**Advice Letter 4024-G/4024-G-A
and 5393-E/5393-E-A**

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: PG&E's 2019 Annual Low Carbon Fuel Standard Credit and Revenue
Estimate.**

Dear Mr. Jacobson:

Advice Letter 4024-G/4024-G-A and 5393-E/5393-E-A are effective as of October 28, 2018.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

January 30, 2019

Advice 4024-G-A/5393-E
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Supplemental: Pacific Gas and Electric Company's 2019 Annual Low Carbon Fuel Standard Credit and Revenue Estimate

I. Purpose

Pacific Gas and Electric Company (PG&E) responds to California Public Utilities Commission (CPUC or Commission) request for Supplemental Information for PG&E's Advice Letter 4024-G/5393E to provide an annual Low Carbon Fuel Standard credit and revenue estimate.

II. Background

On September 28, 2018, PG&E submitted Advice Letter 4024-G/5393E to supply the annual Low Carbon Fuel Standard credit and revenue estimate for 2019.

This supplemental Advice Letter amends PG&E's original request in response to the request from Audrey Neuman, CPUC Energy Division, dated January 15, 2019.

III. Supplemental Information

This supplemental information provides answers to the questions from CPUC Energy Division and amends previous submission to Attachment A: Pacific Gas and Electric Company's 2019 Annual Low Carbon Fuel Standard Credit and Revenue Estimate of Advice Letter 4024-G/5393E.

Electric Estimate

Marketing, Education, and Outreach (ME&O)

- *Why is PG&E requesting \$225,000 for "External marketing campaign"?*

As we anticipate to sunset the Clean Fuel Rebate (CFR) program if the statewide point-of-purchase EV rebate program is approved and launched in 2019, we would like to market the current program more heavily to increase participation and allow all eligible customers to apply before the program ends. The new statewide program will only be available for new EV purchases or leases, so current EV customers will be ineligible. Our program requirements don't have an application deadline; therefore, customers could still apply at any time in 2019 prior to the statewide program launch date.

Additionally, program participation is a slightly below our internal targets of 40% uptake rate of new EV registrations in PG&E territory. We want to increase exposure to the program with a dedicated marketing campaign.

- *What is included in this budget? How is this different from the email and social media marketing included in the \$50,000 budget?*

The \$225,000 would be used for a dedicated marketing campaign focused on events and ride and drives. The outreach would focus on customers considering EV ownership and existing EV owners. The events would serve as a platform to educate current owners on the LCFS CFR program, assist with applications, and increase awareness of other EV programs, including our EV rates. PG&E would contract with an external vendor to create marketing materials, messaging, and secure locations in select areas of our territories, focusing on DAC and low-income communities. Participant information would be collected to track the attribution of event participants to EV purchases and participation in the CFR program.

The \$50,000 budget is allocated to marketing efforts led by our internal marketing team. These include emails to existing EV owners and existing solar customers to increase awareness of CFR program, as well as paid social media efforts, newsletters, and marketing through the PG&E website. This budget also covers internal marketing labor.

IT

What software is the \$18,000 budget licensing?

Program Management, Application Management, and Customer Service Representatives use a Salesforce application to administer the CFR program. This software requires user licensing fees.

- *What does \$154,000 cover for O&M labor?*

The Salesforce instance also requires regular operation and maintenance labor. The \$154,000 covers IT labor.

Call Center

- *What's included in the training costs and analyst labor for the call center, and why does it cost so much more for calls through the EV call center as opposed to the general call center (over 10x as much)?*

Customer inquiries related to the CFR program are handled through the Solar Call Center. This team is much smaller and highly trained on a variety of specific programs that include Electric Vehicles, Solar, Storage, etc. to anticipate the needs of the typical electric vehicle owner. LCFS funds are only used to train service representatives on CFR program specifics during an annual training session. At that time program

changes are addressed, as well as a review of CFR rebate application requirements and processing workflow.

At the time of this filing, PG&E has no amendments to make to the forecasted budget filed for 2019 LCFS Electric expenditures.

CNG Estimate

- *What is PG&E's justification for proposing more LCFS funds going to admin costs than actually being returned to customers?*

CNG credits have been decreasing over time as external fleets that used our fueling stations are installing their own. This has led to a decrease in funds available to return to customers. 2018 marked the first year that the return was calculated based on one year's consumption volume. The first return, administered in 2017, was calculated for 5 years' worth of usage and corresponding LCFS credits, and thus allowed for much larger pool of revenue to be distributed to customers.

The revenue return process includes many fixed costs, outlined below. These have been revised from previously filed based on 2018 actuals, which we expect to be similar to 2019 values. In addition, the administrative costs never exceeded the estimated revenue return of at least \$272,704, and the revised administrative costs shown here are much lower than the estimated revenue return.

At the time of revenue disbursement calculation, the actual administrative costs are subtracted from the LCFS CNG budget and the remainder disbursed to customers.

- *Please provide a detailed breakdown of the proposed admin costs in all categories described in the advice letter.*

Item	Original Filed Costs	Revised Costs
Marketing and Customer Outreach	\$5,000	\$2,500.00
IT Systems	\$51,000	\$0
Program Management	\$175,000	\$87,500.00
Credit Sales	\$16,636	\$9,932.00
TOTALS	\$247,635.87	\$99,932.00

The reduction to the budget includes:

Marketing and customer outreach costs - We will limit our marketing for the program to existing resources and a one-time outreach to customers prior to the annual on-bill credit disbursement.

IT Systems – the proposed enhancements have been eliminated. Internal IT resources are limited, and given the small numbers of customers impacted, this project has been de-prioritized.

Program Management – the revised budget is in-line with actuals incurred in 2018.

Credit Sales – labor estimates have been updated to more accurately reflect estimates based on 2018 actuals.

IV. Annual Forecast

PG&E's revised annual forecast of LCFS program and financial data for 2019 is provided in CONFIDENTIAL Attachment A of this filing. As described above, the CNG administrative cost budget has been revised and no changes were made to the Electric portion.

V. Protests

PG&E asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 4024-G/5393-E and not reopen the protest period as the information in this advice letter reflects the direction of Energy Division.

VI. Confidentiality

PG&E requests confidential treatment of the redacted information in this AL. Pursuant to D.16-08-024, a confidentiality declaration describing the information in this advice filing for which PG&E requests confidential treatment and the justification for protecting the confidentiality of the information is provided in Public Attachment B.

The confidential material in this advice filing will be made available to non-market participants in accordance with and upon execution of PG&E's Proposed Non-Disclosure Certificate Agreement. Parties wishing to obtain access to the confidential material of this advice filing may contact Christopher J. Warner in PG&E's Law Department at cjw5@pge.com to obtain a non-disclosure agreement.

VII. Tier Designation

Pursuant to D.14-12-083, this advice filing is submitted with a Tier 2 designation.

VIII. Effective Date

PG&E requests that this Tier 2 advice filing become effective concurrent with original Advice Letter 4024-G/5393-E, which is October 28, 2018.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.11-03-012. 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/

Erik Jacobson
Director, Regulatory Relation

Attachments

Attachment A: Pacific Gas and Electric Company's 2019 Annual Low Carbon Fuel Standard Credit and Revenue Estimate

Attachment B: Declaration Supporting Confidential Designation on Behalf of Pacific Gas and Electric Company Pursuant to D.16-08-024

cc: Service List R.11-03-012



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 U39M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: OXY1@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) #: 4024-G-A/5393-E-A

Tier Designation: 2

Subject of AL: Supplemental: Pacific Gas and Electric Company's 2019 Annual Low Carbon Fuel Standard Credit and Revenue Estimate

Keywords (choose from CPUC listing): Compliance, Agreements

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.14-12-083

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: Yes, see attached matrix that identifies the confidential information. Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Weiner, Carolyn, (415)973-2391

Resolution required? Yes No

Requested effective date: 10/28/18

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CONFIDENTIAL

Market Sensitive Information Protected Under General Order 66-C,
Public Utilities Code Section 454.5(g), Government Code Section 6254(k), and
Decisions 06-06-066 and 08-04-023

ATTACHMENT A

**PACIFIC GAS AND ELECTRIC COMPANY'S 2019 ANNUAL LOW
CARBON FUEL STANDARD CREDIT AND REVENUE ESTIMATE**

**PACIFIC GAS AND ELECTRIC COMPANY’S 2019 ANNUAL LOW CARBON FUEL
STANDARD CREDIT AND REVENUE ESTIMATE**

I. INTRODUCTION

Pursuant to Ordering Paragraph (OP) 5 and Appendix C of Decision (D.) 14-12-083, Pacific Gas and Electric Company (PG&E) presents the following annual estimate for the calendar year 2019 for the sale of Low Carbon Fuel Standard (LCFS) credits and return of associated revenue to eligible electric and natural gas customers.

The estimated values presented below rely on several input variables, each of which can potentially have a large range of possible values and can significantly influence the resulting estimates. These input variables include changes to LCFS regulation,¹ electric vehicle adoption within PG&E’s service territory, natural gas fuel consumption, the price of LCFS credits, program administrative costs, and the number of electric vehicle rebate applicants, among others. For the purpose of this estimate, PG&E provides figures based on reasonable assumptions of values for each of the input variables. The actual values of the input variables, and therefore, the resulting revenues and rebate amounts, could differ significantly from the figures provided in this 2019 Annual Estimate.

II. 2019 ELECTRIC ESTIMATE

A. Credit Estimate. *An estimate of the number of credits the utility expects to generate for the following year.*

As described in its March 18, 2015 Advice Letter (AL) 3575-G/4604-E containing plans for the sale of LCFS credits and return of revenue to customers (“Implementation Plan”), PG&E receives LCFS credits from the California Air Resources Board (ARB) for the use of electricity as a transportation fuel. In addition, PG&E expects to continue to receive electric forklift credits in 2019 but has not determined a forecast for them at this time.² For the purpose of this filing, “Electric Credits” shall be defined as LCFS credits received for residential electric vehicle charging.³

PG&E estimates it will receive [REDACTED] Electric Credits from ARB during calendar year 2019, based on assumptions about the number of electric vehicles in

¹ Per changes to the current LCFS regulation, PG&E anticipates that its current Clean Fuel Rebate program will transition to a statewide point-of-purchase rebate program, subject to CPUC approval. Please see Section E below for more details.

² [REDACTED]

³ Implementation Plan, pp. 11-12. PG&E receives Electric Credits quarterly for the immediately preceding quarter for separately metered residential electric vehicle charging, and non-separately metered residential electric vehicle charging.

PG&E's territory, ARB's credit estimation methodology, and the inputs to that methodology.⁴

B. Revenue Estimate. *An estimate of the amount of revenue the utility expects to generate from the sale of those credits.*

For the purpose of this estimate, in 2019 PG&E assumes [REDACTED]. PG&E estimates a LCFS credit price of \$125.⁵ At this price, the market value of [REDACTED].

C. Balancing Account Estimate as of January 1, 2019. *An estimate of the balance that will be in the utility's balancing account on January 1 of the following year.*

PG&E's March 18, 2015 AL 3575-G/4604-E created LCFS subaccounts for electricity and natural gas in its existing Greenhouse Gas Revenue Balancing Account (GHGRBA) and Gas Programs Balancing Account (GPBA), respectively, to track and record the proceeds from the sale of LCFS credits, any approved program costs, and the LCFS revenues returned to customers.⁶

For the purpose of this estimate, the balance in the LCFS subaccount in PG&E's Greenhouse Gas Revenue Balancing Account (GHGRBA) on January 1, 2019 is calculated as the balance in the account at the start of 2018, plus the revenue from the sale of Electric Credits in 2018, less administrative costs in 2018, less any contingency amount, less any revenue distributed to customers in 2018.

PG&E plans to [REDACTED]. At a credit price of \$125, PG&E estimates it will [REDACTED].

As of September 2018, [REDACTED]. PG&E expects to [REDACTED] and incur an additional \$300,000 in administrative tasks. [REDACTED]

⁴ Since credits are received in later periods than the periods in which the fuel is dispensed, this figure reflects the number of credits that PG&E estimates it will actually receive from ARB in 2019 and not the number of credits that would result from the total electric fuel PG&E dispenses in 2019.

⁵ Based on ARB's forecasted LCFS credit price documented in the Proposed Amendments Scenario in the Initial Statement of Reasons (ISOR) staff report, March 6, 2018, page EX-10 <https://www.arb.ca.gov/regact/2018/lcfs18/isor.pdf>.

⁶AL 3575-G/4604-E, Appendices B, C.

⁷ [REDACTED]



D. Administrative Cost Estimate. *An estimate of the cost of administering the Low Carbon Fuel Standard credit program in the following year, including customer outreach expenses.*

PG&E estimates that its total administrative costs in 2019 will be approximately \$1.8 million. The costs of administering the LCFS credit program in 2019 include the following categories – marketing and customer outreach to promote the Clean Fuel Rebate (CFR) program and transition to the statewide point-of-purchase rebate program,⁸ development and maintenance of supporting IT systems, and ongoing labor for program management, credit sales, processing rebates, and call center operations. A brief description of each category of administrative cost is provided:

- Marketing. Outreach to current and potential electric vehicle owners to create awareness of PG&E’s LCFS rebate program for electricity through the use of direct and indirect (third-party) channels, utilizing a variety of tactics including email, PG&E’s website, public events, and earned and paid digital media. PG&E expects to increase marketing efforts in 2019 to ensure more customers have the opportunity to apply for the existing Clean Fuel Rebate before transitioning to the statewide point-of-purchase rebate program.
- IT Systems. Development and maintenance of IT systems that support the intake, verification, and processing of customer rebate applications online.
- Program Management. Personnel to manage PG&E’s LCFS program, including LCFS reporting to ARB for credit generation and the implementation of the revenue return program.
- Credit Sales. Personnel to implement PG&E’s sale of Electric Credits.
- Processing Rebate Applications. Personnel to verify customer-provided information in rebate applications and process those rebate applications. PG&E expects an increase in rebate applications processed and paid based on increased eligible applicant pool, increased rebate amount, and program sunset.
- Call Center. Personnel to address questions and inquiries from customers contacting PG&E call centers regarding the LCFS rebate program or application process.

⁸ Per changes to the current LCFS regulation, PG&E anticipates that its current Clean Fuel Rebate program will transition to a statewide point-of-purchase rebate program, subject to CPUC approval. Please see Section E below for more details.

For the purpose of this estimate, PG&E provides the following estimated administrative costs for the electric portion of the LCFS program:

Table 1 – 2019 Electric Administrative Costs

Item	Fixed Cost	Variable Cost	Total Cost
Marketing and Customer Outreach	\$275,000	\$0	\$275,000
IT Systems	\$172,000	\$0	\$172,000
Program Management	\$175,000	\$0	\$175,000
Credit Sales	\$188,713	\$0	\$188,713
Processing Rebate Applications	\$55,800	\$770,000	\$825,800
Call Center		\$159,434	\$159,434
TOTALS	\$866,513	\$929,433	\$1,795,946

E. Revenue to be Distributed to Customers. *An estimate of the amount of revenue that will be distributed to customers in the following year*

In its Implementation Plan, PG&E described its proposed method for calculating the amount of revenue that will be distributed to customers:

PG&E will calculate in advance the rebate amount to be distributed in a given period of the program. The total Electric Revenue amount for a given period would be forecasted as approximately (a) the expected revenue available from the sale of Electric Credits in that period less (b) the expected administrative costs in that period, less (c) any contingency amount for the period. The resulting value would then be divided by the expected number of qualified applicants in that period to determine the rebate amount offered to Electric Eligible Customers. If there are revenues remaining after all rebates are paid during a period, including any unused contingency amounts, the remaining revenue amount would be carried over into the revenue pool for the subsequent period.⁹

For the purpose of this estimate, in 2019 PG&E assumes [REDACTED]

⁹ Implementation Plan, p. 14.

[REDACTED]. As discussed above, PG&E [REDACTED] and incurring approximately \$1.8 million in administrative costs for the LCFS program for electricity in 2019. For the purpose of this estimate, PG&E does not include any contingency amount in 2019. Therefore, using a price of \$125 per credit, [REDACTED].

Per changes in the LCFS regulation, PG&E has been actively working with other utilities and automakers to create a statewide point-of-purchase rebate program for new electric vehicles. As such, PG&E anticipates transitioning its current Clean Fuel Rebate program to participation in the statewide program, subject to CPUC approval. Therefore, PG&E expects that its current Clean Fuel Rebate will be available for customers through September 2019. A portion of PG&E's available LCFS revenue will be contributed to the start of the statewide point-of-purchase rebate program in 2019 and will not be available to customers via the Clean Fuel Rebate.

F. Estimate of Number of Revenue Recipients. *An estimate of the number of drivers to whom credits will be distributed and the value that will be distributed to each driver.*

For the purpose of this estimate, PG&E assumes that owners of at least 40% of the vehicles eligible for the rebate in 2019 will apply for the rebate – i.e., approximately [REDACTED] rebate applications.¹⁰ This estimate is based on PG&E's experience with the program in the past year, other customer programs, and data regarding existing electric vehicle rebate programs.

PG&E currently estimates that it will increase the rebate amount to [REDACTED] for each applicant in 2019. [REDACTED]

¹⁰ [REDACTED]

III. 2019 NATURAL GAS ESTIMATE

A. Credit Estimate. An estimate of the number of credits the utility expects to generate for the following year.

As described in its Implementation Plan, PG&E receives LCFS credits from ARB on a quarterly basis for metered compressed natural gas (CNG) vehicle fueling at PG&E's CNG fueling stations ("Gas Credits").¹¹

[Redacted] 12, 13

B. Revenue Estimate. An estimate of the amount of revenue the utility expects to generate from the sale of those credits.

In 2019, PG&E [Redacted] .¹⁴ At a credit price of \$125, [Redacted] .¹⁵

C. Balancing Account Estimate as of January 1, 2019. An estimate of the balance that will be in the utility's balancing account on January 1 of the following year.

PG&E's March 18, 2015 AL 3575-G/4604-E created LCFS subaccounts for electricity and natural gas in its existing Greenhouse Gas Revenue Balancing Account (GHGRBA) and Gas Programs Balancing Account (GPBA), respectively, to track and record the proceeds from the sale of LCFS credits, any approved program costs, and the LCFS revenues returned to customers.

¹¹ Implementation Plan, pp. 21-22. PG&E receives Gas Credits quarterly for the immediately preceding quarter for metered CNG fuel dispensed to public and PG&E fleet fueling customers.

¹² [Redacted]

¹³ [Redacted]

¹⁴ [Redacted]

¹⁵ For the purpose of the estimates provided in this filing, broker commission amounts, if any, are considered to be de minimis relative to the price of LCFS credits. As such, PG&E's expectation of revenues from the sale of LCFS credits as presented here is net of broker commissions.

For the purpose of this estimate, the balance in the LCFS subaccount in PG&E's GPBA on January 1, 2019 is calculated as the revenue from the sale of Gas Credits in 2019, less administrative costs in 2019, less any Gas Revenue distributed to customers in 2019.

[REDACTED] PG&E estimates it will incur and additional \$50,000 in administrative costs through 2018.

In addition, [REDACTED].¹⁶ At the price of \$125, [REDACTED]

In 2018, [REDACTED].

PG&E estimates [REDACTED].

D. Administrative Cost Estimate. *An estimate of the cost of administering the Low Carbon Fuel Standard credit program in the following year, including customer outreach expenses.*

The costs of administering the LCFS credit program include the following categories – marketing and customer outreach, development and maintenance of supporting IT systems, and ongoing labor for program management and credit sales.¹⁷ A brief description of each activity is provided:

- Marketing. Outreach to PG&E's current CNG fuel account holders, via direct mail and PG&E's website, to inform them about PG&E's LCFS rebate program for natural gas.
- IT Systems. IT enhancements have been eliminated due to internal IT resources being limited, and given the small number of customers impacted; potential improvements have been de-prioritized.
- Program Management. Personnel to manage PG&E's LCFS program, including LCFS reporting to ARB for credit generation and the implementation of the revenue return program.
- Credit Sales. Personnel to implement PG&E's sale of Gas Credits.

¹⁶ Credits received by Q3 2018.

¹⁷ Since customers do not need to apply for the natural gas LCFS rebate, call center costs are expected to be de minimis for the natural gas LCFS revenue return program.

For the purpose of this estimate, PG&E provides the following estimated administrative costs for the natural gas portion of the LCFS program:

Table 2 – 2019 Natural Gas Administrative Costs

Item	Fixed Cost	Variable Cost	Total Cost
Marketing and Customer Outreach	\$2,500	0	\$2,500
IT Systems	\$0	0	\$0
Program Management	\$87,500	0	\$87,500
Credit Sales	\$9,932	0	\$9,932
TOTALS	\$99,932	0	\$99,932

E. Revenue to be Distributed to Customers. *An estimate of the amount of revenue that will be distributed to customers in the following year.*

In its Implementation Plan, PG&E described its proposed method for calculating the amount of revenue that will be distributed to customers:

To calculate the amount of revenue to be distributed to each Gas Recipient, PG&E plans to take the total amount of Gas Revenue determined to be distributed for a given Rebate Period and divide it pro rata among each Gas Recipient based on each customer’s total CNG fuel consumption during the Rebate Period.¹⁸

For the purpose of this estimate, [REDACTED]
[REDACTED] for the purpose of providing a rebate in Q2 2019.
Using a price of \$125 per credit, PG&E [REDACTED]
[REDACTED]. PG&E estimates [REDACTED]
[REDACTED].¹⁹

¹⁸ Implementation Plan, p. 23.

¹⁹ [REDACTED]

ATTACHMENT B

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION ON
BEHALF OF PACIFIC GAS AND ELECTRIC COMPANY PURSUANT TO
D.16-08-024**

**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, Carolyn Weiner, am the Manager of Electric Vehicles of Pacific Gas and Electric Company (“PG&E”), a California corporation. Vincent Davis, the Vice President of Customer Energy Solutions of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street, Mail Code B9F
San Francisco, CA 94105

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: *(R.)11-03-012, Order Instituting Rulemaking to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emissions*

3. Title and description of document: *Advice Letter 4024-G/5393-E, Pacific Gas and Electric Company’s 2019 Annual Low Carbon Fuel Standard Credit and Revenue Estimate*
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, (with further detail provided in Appendix A, which is incorporated into this declaration]:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input 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>	
<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 energy 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</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" 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>	<p>Gray shaded areas on pages 1-9 of Attachment A</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 28th day of January, 2019 at San Francisco, California.



Carolyn Weiner
Manager, Electric Vehicles
Pacific Gas and Electric Company

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Evaluation + Strategy for Social	
Anderson & Poole	Innovation	
	GenOn Energy, Inc.	SCE
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz &	SDG&E and SoCalGas
BART	Ritchie	
	Green Charge Networks	SPURR
Barkovich & Yap, Inc.	Green Power Institute	San Francisco Water Power and Sewer
P.C. CalCom Solar	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	ICF	Sempra Utilities
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
	Keyes & Fox LLP	Sunshine Design
Cameron-Daniel, P.C.	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Casner, Steve	Linde	TerraVerde Renewable Partners
Cenergy Power	Los Angeles County Integrated Waste	Tiger Natural Gas, Inc.
Center for Biological Diversity	Management Task Force	
City of Palo Alto	Los Angeles Dept of Water & Power	TransCanada
	MRW & Associates	Troutman Sanders LLP
City of San Jose	Manatt Phelps Phillips	Utility Cost Management
Clean Power Research	Marin Energy Authority	Utility Power Solutions
Coast Economic Consulting	McKenzie & Associates	Utility Specialists
Commercial Energy		
County of Tehama - Department of Public	Modesto Irrigation District	Verizon
Works	Morgan Stanley	Water and Energy Consulting
Crossborder Energy	NLine Energy, Inc.	Wellhead Electric Company
Crown Road Energy, LLC	NRG Solar	Western Manufactured Housing
Davis Wright Tremaine LLP		Communities Association (WMA)
Day Carter Murphy	Office of Ratepayer Advocates	Yep Energy
	OnGrid Solar	
Dept of General Services	Pacific Gas and Electric Company	
Don Pickett & Associates, Inc.		
Douglass & Liddell		