

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 8, 2019

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Sent via email

SUBJECT: Approval of PG&E Advice Letter 4128-G *Expedited Advice Letter Pre-Approval of Six Natural Gas Transport Contracts*

Dear Mr. Jacobson,

This letter approves the request of Pacific Gas and Electric Company (PG&E) in Advice Letter (AL) 4128-G to enter into long-term contract extensions with NOVA Gas Transmission Ltd. (NGTL), Foothills Pipe Line Ltd. (Foothills), and Gas Transmission Northwest (GTN). The protest of Shell Energy North America (US), L.P. (Shell Energy) and the other joining parties is rejected based on the reasons discussed below. PG&E AL 4128-G is effective October 8, 2019.

Background

On August 6, 2019, PG&E filed AL 4128-G seeking pre-approval to renew six existing firm interstate pipeline capacity contracts with several interstate pipeline operators to maintain its direct access to gas production basins in Western Canada to serve core customers.¹ That region is a significant source of gas PG&E procures on behalf of its bundled core customers. The proposed contracts are for a 7-year term. PG&E filed the contracts and related information on a confidential basis and would provide the material to Core Transport Agents (CTA) that executed a non-disclosure agreement (NDA).²

PG&E filed the contracts using the expedited AL procedure adopted in Decision (D.) 04-09-022. That process provided for the pre-approval of interstate pipeline contracts and authorized the California Public Advocates (Cal PA) and The Utility Reform Network (TURN), if they chose to participate, to evaluate the interstate pipeline contracts prior to their filing with the California Public Utilities Commission (CPUC). In AL 4128-G, PG&E stated that Cal PA supported the approval of the contracts and that TURN declined to be involved in the review. D.04-09-022 also

¹ NGTL and Foothills Pipe Line Ltd. operate in Canada connecting with GTN at the US border. GTN connects with PG&E's intrastate pipelines at Malin on the California/Oregon border. Together these pipelines enable gas PG&E procures in Western Canada for its bundled core customers to flow uninterrupted into the utility's system. Without this firm pipeline capacity, PG&E would have to buy Canadian gas at other hubs such as the California border or the citygate at potentially higher prices, provided the gas is available.

² CTAs offer to procure gas for PG&E core customers as an alternative to the utility.

stated that the acquisition of a diversified interstate pipeline capacity portfolio, with staggered terms, benefits core customers with enhanced supply reliability and gas price stability.³

The amount of interstate pipeline capacity PG&E is to procure is determined through the Core Interstate Pipeline Capacity Planning Range (Core Planning Range) process as updated and adopted in D.15-10-050. That decision also authorized PG&E to continue to acquire interstate pipeline capacity on behalf of CTAs. PG&E allocates a portion of the contracted interstate pipeline capacity to CTAs who would then be responsible to pay for the capacity whether they accepted the allocation or not.⁴

Joint Parties Protest

On August 16, 2019, Shell Energy, on its own behalf and on behalf of several CTAs and a core aggregation customer (Joint Parties), filed a protest to the AL on several grounds. The Joint Parties explained that CTAs have an interest in this matter as they are required to take and/or pay for a proportionate share of PG&E's interstate pipeline capacity used to serve core customers.

The Joint Parties argued that PG&E should not be allowed to maintain the contracts on a confidential basis. Although they acknowledged that CTAs can obtain the information by executing an NDA, the customers of CTAs do not have the same opportunity. The Joint Parties emphasized that knowledge of the amount of capacity PG&E seeks to contract for was important to determine if the capacity is necessary to meet the Core Planning Range. It was further noted that, under Federal Energy Regulatory Commission (FERC) rules, information about the contracts would be considered public and that the rates PG&E would pay for the pipeline capacity would be publicly posted once the agreements are finalized. Full disclosure of the contracts would enable all interested parties, including CTAs and their core aggregation customers, to determine if the contracts are just and reasonable. To implement this, the Joint Parties recommended that the CPUC convene an open public process to address the merits of the proposed contracts.

Another issue raised by the Joint Parties was the 7-year term of the proposed contracts. They claimed that the duration of the proposed contracts was unprecedented and that the D.04-09-022 pre-approval procedures do not apply for contracts over 3 years in length. Moreover, the Joint Parties argued that such a commitment is problematic given PG&E's bankruptcy and the uncertainty of the utility's future status as a gas utility. Also, in I.15-08-015, the CPUC is currently considering changes to PG&E's structure including whether the utility will continue to be the default supplier of gas to core customers. In other proceedings, the CPUC is looking at ways to reduce greenhouse gas emission reductions and examining the role gas will play to meet the State's future energy needs. The Joint Parties indicated that these developments may potentially lead to the underutilization of the pipeline capacity and burden core customers with stranded costs for an extended period. All these factors, they say, support renewing the contracts for a shorter term.

³ D.04-09-022, pp.2,3.

⁴ D.15-10-050, pp. 7,8.

PG&E's Reply to Protest

On August 23, 2019, PG&E replied to the Joint Parties protest.

PG&E noted that the AL stated that CTAs, including the Joint Parties, can view the confidential information through an NDA, which is the current practice. The utility also mentioned that Commercial Energy, a CTA, executed an NDA, but the Joint Parties elected not to do so. Furthermore, PG&E asserted that, if the Joint Parties had pursued an NDA, most of their issues about the contracts would have been addressed. Although undisclosed in the public portion of the AL, the utility revealed that the approval of the contracts is necessary for it to comply with the Core Planning Range, which was a primary concern of the Joint Parties. PG&E also explained that the contract information was marked confidential because it is commercially sensitive and that publicly releasing any details of the utility's commitments or its intentions regarding gas purchases would provide other market participants with advantages that may be detrimental to its core customers. PG&E asserted that in contrast with FERC rules, which keep terms of Firm Transportation Service Agreements (FTSA's) confidential until the transaction is completed, PG&E's FTSA's with Canadian pipeline NGTL are kept confidential for three years past the execution of the contract execution. Finally, PG&E also cited Public Utilities Code Sections 454.5(g) and 583, D.06-06-066, and General Order 66-C as allowing utilities to file information with the CPUC as confidential.

On the length of the contracts, PG&E argued that the 7-year term was appropriate because of current market conditions and that the continued low prices of gas in Western Canada has led to a significant demand for pipeline capacity serving that region. As a result, it is the utility's understanding that there is currently no unsubscribed capacity available on the pipelines for gas deliveries to the California border. Failure to renew the contracts with NOVA and Foothills could result in those operators immediately marketing the released capacity which could then be lost to other shippers or result in PG&E reacquiring the capacity for a term much greater than 7 years; thus, resulting in a more expensive outcome. Furthermore, PG&E stated that GTN authorized the utility to disclose that a 7-year renewal was the minimum agreeable term for the operator, a further indication of the heightened demand for pipeline capacity to Western Canada. Another benefit from entering into the contracts with the requested duration is that the NGTL contract will provide a 10% reduction in reservation rates. PG&E also noted that the CPUC favored interstate pipeline contracts with staggered terms and that limiting the contract renewals to 1-2 years or until PG&E exits bankruptcy would impair the utility's ability to acquire the needed capacity on a cost-effective basis.

PG&E also disputed the Joint Parties' contention that proposed contracts with durations over 3 years in length cannot be presented to the CPUC through the expedited AL process. The utility stated that D.04-09-022 provided two potential paths for the approval of interstate pipeline capacity contracts. Contracts that are needed to meet the Core Planning Range, and which Cal PA and TURN approve should they chose to participate, may be submitted via an expedited AL. Contracts which need approval faster than 21-days, are under 100 million cubic feet per day (MMcfd), and have less than a 3-year term may be deemed pre-approved, without submitting an expedited AL.

Discussion and Determination

The Joint Parties raised the following issues about PG&E AL 4128-G: 1) the utility's designation of the proposed contracts and related information as confidential, 2) the 7-year duration of the contracts, and 3) the use of the expedited AL procedure to request approval of the contracts. The Energy Division (ED) examines each of these issues below. Before this discussion, an important consideration in our decision is that Cal PA, which represents utility ratepayers, including CTA customers, and who had access to the confidential material, endorsed the approval of the contracts.

ED disagrees with the Joint Parties recommendation that the contracts and related confidential information should be publicly released by PG&E. The utility's argument that market participants could glean information in the contracts to the disadvantage of core customers is plausible. For example, knowledge of the contract's price and pipeline quantity could prompt others in the marketplace to position themselves to create a situation where PG&E would pay more for the gas they seek to purchase or take a similar tactic. Also, weakening the Joint Parties' argument is the fact that CTAs are not prevented from obtaining the confidential information from PG&E and can do so by executing an NDA. While the NDA might not be extended to the customers of CTAs, one would expect that CTAs, which acquire the confidential information, would use it in the best interest of the customers that they serve. Moreover, Cal PA, which represents the customers of CTAs, reviewed the confidential information. The Joint Parties also stated that under FERC's rules some of the contract information would be considered public. However, PG&E is subject to the CPUC's jurisdiction, which provides for the confidentiality of material under General Order 66-C, Public Utilities Code section 583 and various decisions. PG&E also revealed in its protest reply that the capacity is needed for the Core Planning Range, which addresses a concern of the Joint Parties.⁵

ED finds that PG&E has justified the 7-year term of the contracts. The utility explained that current market conditions have created a heightened demand for pipeline capacity from Western Canada. An assessment by Canada's energy regulator supports PG&E's view as it indicates that the relatively low price of gas produced in Western Canada will continue.⁶ Given this backdrop, it is reasonable to endorse PG&E's assumption that regaining any lost pipeline capacity by rejecting the AL would cause the utility to enter into contracts of an even longer duration, or at a higher price, if the capacity is still available. Also, confirming the proposition that the constrained availability of pipeline capacity has provided operators with more negotiating leverage is the statement that GTN would only agree to a minimum 7-year term to renew its contracts. Additionally, a benefit from the longer term to renew the contracts is the savings to core customers from the 10% discount on the NGTL capacity. The consequences of losing the pipeline capacity due to the rejection of the AL could be higher costs to serve core customers as PG&E would likely need to purchase gas at alternate hubs such as the California border and citygate, assuming the gas is available. Avoiding such an outcome was the CPUC's rationale for

⁵ ED notes that PG&E included an analysis in the Confidential Appendix to PG&E AL 4128-G demonstrating that the contracts are needed to comply with the Core Planning Range.

⁶ National Energy Board, Canada's Energy Future 2018, An Energy Market Assessment, <https://www.cer-rec.gc.ca/nrg/ntgrtd/ft/2018/index-eng.html> p. 28

establishing the Core Planning Range and prompting its recognition on the importance of firm interstate pipeline capacity for service reliability and price stability.⁷

Furthermore, the arguments made by the Joint Parties for shorter term contracts are unpersuasive. While various CPUC proceedings may result in significantly reducing gas demand in the future, it is extremely unlikely that gas consumption would fall to such an extent within 7 years leading to the underutilization of the pipeline capacity. This view is bolstered by the 2018 California Gas Report, which forecasts an approximate 8.5% drop in core gas demand for Northern California over the next 10 years.⁸ Also, the impact of PG&E's bankruptcy and the possibility that the utility would exit the gas business is mere speculation that does not deter the importance of PG&E acquiring the capacity in order to meet the Core Planning Range requirement. The prospect that gas from Western Canada would not be needed to serve customers in Northern California over the next 7 years is remote.

ED agrees with PG&E that it could file the proposed contracts via an expedited AL. The Joint Parties misinterpreted D.04-09-022. The pages they cited in the decision refer to the authority utilities have to seek pre-approval of contracts with a duration no more than 3 years and capacity amounts of 100 MMcf or less via a letter to the ED director.⁹ The expedited AL process specified in D.04-09-022 does not have these requirements and may be used if Cal PA or TURN, if they chose to participate, approve the contracts.¹⁰ However, we remind PG&E that D.04-09-022 stated that ED should be involved in the consultation process with Cal PA and TURN.¹¹ PG&E neglected to do this for the contracts under consideration here, and ED expects the utility to honor that for future contract pre-approvals. PG&E should be proactive in notifying ED of its negotiations with interstate and international firm transportation providers as they are commencing and ongoing.

Based on the foregoing reasons, ED finds PG&E AL 4128-G reasonable, and it is approved. The protest of the Joint Parties is rejected under General Order 96-B Rule 7.6.1, as we find that PG&E is complying with the requirements of D.04-09-022 and D.15-10-050 to obtain interstate pipeline capacity needed to serve its core customers.

Sincerely,



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

⁷ D.04-09-022, pp.2,3.

⁸ 2018 California Gas Report Average Demand Year p. 58,
https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

⁹ The Joint Parties cited pages 25-26 in D.04-09-022.

¹⁰ D.04-09-022 pp.27-28

¹¹ D.04-09-022 p. 28

cc: John Leslie
Dentons US LLP
John.leslie@dentons.com

Nika Kjensli
California Public Advocates Office
nlr@cpuc.ca.gov



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

August 6, 2019

Advice 4128-G
(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Expedited Advice Letter Pre-Approval of Six Natural Gas Transport Contracts

Pacific Gas and Electric Company (PG&E) respectfully requests California Public Utilities Commission (Commission or CPUC) pre-approval of six existing firm transportation service agreements (FTSA) with TransCanada's NOVA Gas Transmission Ltd. (NGTL), Foothills Pipe Line Ltd. (Foothills) and Gas Transmission Northwest (GTN) pipelines which connect the supply basins in Western Canada to the California/Oregon border at Malin, Oregon for a period of 7-years.

Purpose

The purpose of this expedited advice letter is to request pre-approval for pipeline transportation contracts under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022.¹ Under these procedures, pipeline contracts endorsed by the CPUC Public Advocates Office (Cal PA) and The Utility Reform Network (TURN) may be submitted for pre-approval to the Commission by an Expedited Advice Letter. TURN's participation in the approval process is voluntary, and TURN has declined to participate in the review of these contracts. PG&E has consulted with Cal PA and they have confirmed their support for the proposed pipeline contracts.

Under D.04-09-022, contracts for pipeline capacity may be submitted by expedited advice letter, seeking Commission pre-approval within 21 days of the advice letter submittal date. PG&E requests that the Commission approve this advice letter by August 27, 2019.

Description of Contract

The terms of the proposed contracts are confidential as described in the accompanying Declaration dated August 6, 2019 and are described in Confidential Appendix A.

¹ Order Instituting Rulemaking to Establish Policies and Rules to Ensure Reliable, Long-Term Supplies of Natural Gas to California (Gas Capacity OIR), R.04-01-025.

Confidential Appendix A is submitted to the Energy Division, Legal Division and Cal PA and is also confidential as described in the accompanying Declaration dated August 6, 2019.

In addition, the confidential contract terms will be provided to PG&E's Core Transport Agents (CTAs) who agree to the terms of a nondisclosure agreement.

All costs associated with the contracts will continue to be recovered from PG&E's core gas customers, in accordance with the interstate pipeline capacity contract procedures established in D.04-09-022 and D.15-10-050, through PG&E's Core Pipeline Demand Charge Account, and PG&E's gas tariffs, and from CTAs through the provisions of Tariff G-CT.

This advice letter will not affect any other rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

Protests – Ten Day Expedited Period

Anyone wishing to protest this advice letter may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 16, 2019, which is ten (10) days from the date of this submittal, in accordance with the expedited protest period authorized in D.04-09-022. Protests should be mailed to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
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, telephone number, postal address, and (where appropriate) 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

In accordance with the comment and evaluation period provided in D.04-09-022, PG&E submits this advice letter as a Tier 2, and requests Commission approval of this submittal effective August 27, 2019, which is 21 days after the date of this submittal.

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 service lists for R.04-01-025 and A.13-06-011. Address changes to the General Order 96-B service list should be directed to email PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at <http://www.pge.com/tariffs>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: **Confidential Version (with Confidential Appendix A)**

Franz Cheng - Energy Division
Belinda Gatti - Energy Division
Eugene Cadenasso – Energy Division
Jonathon Bromson - Legal Division
R. Mark Pocta – Public Advocates Office
Nika Kjensli– Public Advocates Office
Pearlie Sabino - Public Advocates Office

Public Version (without Confidential Appendix A)

Marcel Hawiger - The Utility Reform Network
Service list for R.04-01-025
Service list for A.13-06-011



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 U39G)

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: Yvonne.Yang@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) #: 4128-G

Tier Designation: 2

Subject of AL: Expedited Advice Letter Pre-Approval of Six Natural Gas Transport Contracts

Keywords (choose from CPUC listing): Contracts

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.04-09-022

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 attached confidential 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: Dennis Gee, DLG3@pge.com, 415-973-4337

Resolution required? Yes No

Requested effective date: 8/27/19

No. of tariff sheets: 0

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

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

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

Tariff schedules affected:

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:

**DECLARATION SUPPORTING
CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY**

1. I, Dennis Gee, am a Principal of Core Gas Supply of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President of Energy Procurement 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
Mailstop B5A
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: Advice Letter 4128-G

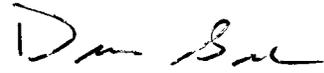
3. Title and description of document: Expedited Advice Letter Pre-Approval of Six Natural Gas Transport Contracts, dated August 6, 2019
4. This document contains confidential information that, based on my information and belief, has not been publicly disclosed. This document has been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the document is identified on the following chart:

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 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; and General Order (G.O.) 77-M)</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> and G.O. 66-C)</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 type="checkbox"/>	<p>Accident reports</p> <p>(Protected under PUC § 315 and G.O. 66-C, 2.1)</p>	
<input checked="" type="checkbox"/>	<p>Commercial records that, if revealed, would place PG&E at an unfair business disadvantage, including market-sensitive data; business plans and strategies; long-term fuel buying and hedging plans; price, load, or demand forecasts; power purchase agreements within three years of execution; and internal financial information</p> <p>(Protected under Govt Code §§ 6254, 6276.44; Evid Code § 1060; Civ. Code § 3426 <i>et seq.</i>; and G.O. 66-C, 2.2 (b))</p>	Confidential Appendix A
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property</p> <p>(Protected under Civ. Code § 3426 <i>et seq.</i>; Govt Code § 6254.15)</p>	
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Govt Code § 6254.15)</p>	

Third-Party information subject to non-disclosure or confidentiality agreements
(See, eg., D.11-01-036)

Other basis: _____

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 6th day of August, 2019 at San Francisco, California.



Dennis Gee
Principal
Pacific Gas and Electric
Company

Confidential Appendix A

Advice 4128 – G

Proposed Capacity Contracts

Between Pacific Gas and Electric Company and

Nova Gas Transmission Ltd. (NGTL), Foothills Pipe Lines Ltd. (Foothills),

and Gas Transmission Northwest (GTN)

CONFIDENTIAL MATERIAL

Confidential in its Entirety as Described in the Accompanying Declaration Dated

August 6, 2019

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