

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



February 4, 2020

**Advice Letter 4161-G**

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: Gas Transmission and Storage (GT&S) Report Changes in Compliance  
with Ordering Paragraph 32 of Decision 19-09-025**

Dear Mr. Jacobson:

Advice Letter 4161-G is effective as of November 16, 2019.

Sincerely,

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

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



**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

October 17, 2019

**Advice 4161-G**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Gas Transmission and Storage (GT&S) Report Changes in Compliance with Ordering Paragraph 32 of Decision 19-09-025**

**Purpose**

This advice letter complies with Ordering Paragraph (OP) 32 and OP 83 in Pacific Gas and Electric's (PG&E) 2019 GT&S Decision (D.) 19-09-025 (the Decision).

**Background**

On November 17, 2017, PG&E filed an application requesting that the California Public Utilities Commission (CPUC or Commission) adopt its gas transmission and storage revenue requirement, cost allocation, and rate design for the period beginning 2019. During the proceeding, PG&E and the California Public Advocates Office (Cal Advocates) submitted a joint stipulation (JS-01) requesting that (1) the Commission adopt a new GT&S Report developed by PG&E and Cal Advocates (with input from other parties resulting from a workshop); (2) the Commission conduct a biennial workshop to determine if further updates are necessary; and (3) PG&E submit a Tier 2 Advice Letter to implement updates requested from the workshops. The Commission issued D.19-09-025 on September 23, 2019, adopting JS-01 and directing PG&E to submit an advice letter proposing modifications as described in Section 3.2 of the Decision.

PG&E submits this Advice Letter in compliance with OP 32 to "submit a Tier 2 Advice Letter, within 30 days of the date that this decision is final, to implement the report changes discussed in Section 3.2 of the instant decision."

**GT&S Report Implementation**

PG&E plans to implement the GT&S Report prototype reflected in JS-01, with the modifications discussed in Section 3.2 of the Decision, as described below.

Section 3.2 of the Decision requires PG&E to include additional information in the GT&S Report.<sup>1</sup> The table below lists these new requirements and the sections of the GT&S Report that will address them. PG&E provides an updated redline Table of Contents in Attachment A of this advice letter for reference to reflect the changes.

<b>Requirement</b>	<b>GT&amp;S Report Section</b>
1) Pin citations to information related to or required by Section 591 related to its gas transmission and storage system.	The initial GT&S Report will include a citation in the Executive Summary. Subsequent GT&S Reports will include citations in the Introduction.
2) Explanation of how imputed and budgeted amounts were derived and their relationship to Commission authorized amounts.	Tab 3: Financial Data Section 3-1 and Section 3-2 (including Tables 3-1, 3-2, 3-3, and 3-4).
3) Listing of long-term goals PG&E has established for various programs beyond the rate case period, and PG&E's progress toward meeting such goals.	Introduction Tab 2: Section 2-3, Section 2-4 and Section 2-6 In these sections, PG&E will discuss long-term goals for the following long-term programs: In-Line Inspection, Strength Testing, Pipeline Replacement, Valve Automation, and Storage. In addition, PG&E plans to include an update related to the Gas Gathering program following its initial Advice Letter in compliance with OP 78.
4) Report on the status of PG&E's Emergency Response programs, including the installation of automated valves and other forecast work.	Introduction Tab 2: Section 2-7 PG&E's Emergency Response Programs include Valve Automation, Public Awareness, and Valve Safety and Reliability.

In addition to the new requirements imposed by D.19-09-025, PG&E also plans to remove the now obsolete Pipeline Safety Enhancement Plan (PSEP) Appendix from the GT&S Report. All PSEP projects have been completed and PG&E submitted the Final PSEP Compliance Report providing information on PSEP costs and programs on March 6, 2019.

### **Submission Dates and Reporting Period**

The Decision adopts the GT&S Report prototype in JS-01; however, the Decision maintains the current semi-annual reporting frequency instead of the annual proposal in

---

<sup>1</sup> D.19-09-025, pp. 12-13.

JS-01.<sup>2</sup> Section 3.2 of the Decision directs PG&E to submit a proposal for providing the information in the new report on a semi-annual basis.<sup>3</sup>

GT&S Reports covering the January 1 through June 30 reporting period will be submitted on November 15 of each year. GT&S Reports covering the July 1 through December 31 reporting period will be submitted on May 15 of the following year and will reflect both six-month and full calendar year information.

PG&E will submit the initial semi-annual GT&S Report reflecting the adopted prototype, with adjustments described above, by May 15, 2020. The initial GT&S Report will cover the July 1 to December 31, 2019 reporting period, and 2019 full calendar year information.

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than November 6, 2019, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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 shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

---

<sup>2</sup> JS-01 proposed an annual report be submitted in September of each year, nine months following the reporting period.

<sup>3</sup> D.19-09-025, p. 13.

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, 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**

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 32 of D.19-09-025, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, November 16, 2019 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 and via U.S. mail to parties shown on the attached list and the parties on the service list for A.17-11-009. 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 Relations

Attachments

cc: Service List A.17-11-009



# 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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4161-G

Tier Designation: 2

Subject of AL: Gas Transmission and Storage (GT&S) Report Changes in Compliance with Ordering Paragraph 32 of Decision 19-09-025

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 19-09-025

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:

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:

Resolution required?  Yes  No

Requested effective date: 11/16/19

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto:PGETariffs@pge.com)

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

Advice 4161-G  
October 17, 2019

# **Attachment A**

## **Redline Table of Contents**

*\* Data provided is a combination of various unverified data pulls, “dummy” data, incomplete excerpts, etc. and should not be relied upon in any fashion. The data is presented only to show examples of how this report will look, table formatting, and magnitude of information provided in the report.*

---

**PACIFIC GAS AND ELECTRIC COMPANY**  
**GAS TRANSMISSION AND STORAGE COMPLIANCE REPORT**  
**NO. 20XX-01**

**REPORTING PERIOD**  
**JANUARY 1, 20XX – ~~DECEMBER 31~~JUNE 30, 20XX**

**IN COMPLIANCE WITH CPUC DECISION ~~XX-XX-XXX~~19-09-025**

**SUBMITTED ~~SEPTEMBER~~MAY~~NOVEMBER~~ 20XX**

---

**[ADJUSTED DRAFT DATE SEPTEMBER 2019]**  
**[PROTOTYPE DRAFT DATE JULY 2018]**



*\* Data provided is a combination of various unverified data pulls, “dummy” data, incomplete excerpts, etc. and should not be relied upon in any fashion. The data is presented only to show examples of how this report will look, table formatting, and magnitude of information provided in the report.*

PACIFIC GAS AND ELECTRIC COMPANY  
GAS TRANSMISSION AND STORAGE  
COMPLIANCE REPORT  
NO. 20XX-01  
REPORTING PERIOD  
JANUARY 1, 20XX – ~~DECEMBER 31~~JUNE 30, 20XX  
IN COMPLIANCE WITH CPUC DECISION ~~XX-XX-XXX~~19-09-025  
SUBMITTED ~~SEPTEMBER~~MAY~~NOVEMBER~~ 20XX

TABLE OF CONTENTS

Tab 1: Executive Summary .....	1
Section 1-1: Introduction .....	1
Section 1-2: Summary of Safety Developments .....	1
Section 1-3: Strategic Planning and Prioritization of Work.....	2
Section 1-4: Summary of Financial Information .....	3
Tab 2: Safety.....	4
Section 2-1: Safety Developments.....	4
Section 2-2: Pipeline Inspection Plan .....	4
Section 2-3: Storage .....	10
Section 2-4: Safety Related Developments Specific to ILLI, Pipe Replacement, and Strength Test.....	10
Section 2-4(a) Pipeline Piggability Status .....	10
Section 2-4(b) Adopted vs. Actual Mileage for Pipe Replacement .....	13
Section 2-4(c) Adopted vs. Actual Mileage for Strength Test .....	16
Section 2-5 Status Compliance with Federal Code on Pipeline Integrity Management .....	19
<u>Section 2-6 Valve Automation and Gas Gathering Programs .....</u>	<u>XX</u>
<u>Section 2-7 Emergency Response Programs .....</u>	<u>XX</u>
Tab 3: Financial Data .....	20
Section 3-1: Explanation of Funds Budgeted, Adopted, and Spent for Each Major Work Category and Maintenance Activity Type (MAT) Code.....	20

*\* Data provided is a combination of various unverified data pulls, “dummy” data, incomplete excerpts, etc. and should not be relied upon in any fashion. The data is presented only to show examples of how this report will look, table formatting, and magnitude of information provided in the report.*

Section 3-2: Explanation of Any Variances for Budgeted Expense and Capital.....	23
Tab 4 Appendix .....	26
Introduction Appendix .....	27
Safety Appendix.....	28
Table 2-1 Inspection Records Discrepancies Report.....	29
Table 2-5 Integrity Management Procedures Published in the Reporting Year .....	30
Table 2-6: GT&S RAMP Risks.....	31
Financial Appendix .....	32
Transmission Pipeline Programs Appendix .....	33
1. Resource Planning and Contractor Selection Process .....	33
2. Quality Assurance .....	33
3. Procurement Policy and Practices.....	33
4. Pipeline Disposition Procedures and Costs.....	33
5. Public Outreach Costs.....	33
6. Service Outage Performance .....	33
7. Shareholder Costs Absorbed .....	34
<b>Pipeline Safety Enhancement Plan Appendix.....</b>	<b>36</b>
<b>PSEP Costs.....</b>	<b>37</b>
<b>PSEP Project Status.....</b>	<b>39</b>

*\* Data provided is a combination of various unverified data pulls, “dummy” data, incomplete excerpts, etc. and should not be relied upon in any fashion. The data is presented only to show examples of how this report will look, table formatting, and magnitude of information provided in the report.*

---

**PACIFIC GAS AND ELECTRIC COMPANY**  
**GAS TRANSMISSION AND STORAGE COMPLIANCE REPORT**

**NO. 20XX-~~0102~~**

**REPORTING PERIOD**  
**~~JANUARY~~ JULY 1, 20XX – ~~JUNE~~ DECEMBER ~~30~~31, 20XX**

**IN COMPLIANCE WITH CPUC DECISION 19-09-025**

**SUBMITTED ~~NOVEMBER~~ MAY 20XX**

---

**[ADJUSTED DRAFT DATE SEPTEMBER 2019]**



*\* Data provided is a combination of various unverified data pulls, “dummy” data, incomplete excerpts, etc. and should not be relied upon in any fashion. The data is presented only to show examples of how this report will look, table formatting, and magnitude of information provided in the report.*

PACIFIC GAS AND ELECTRIC COMPANY  
GAS TRANSMISSION AND STORAGE  
COMPLIANCE REPORT  
NO. 20XX-~~0102~~  
REPORTING PERIOD  
~~JANUARY-JULY~~ 1, 20XX – ~~JUNE-DECEMBER 3031~~, 20XX  
IN COMPLIANCE WITH CPUC DECISION 19-09-025  
SUBMITTED ~~NOVEMBER-MAY~~ 20XX

TABLE OF CONTENTS

Tab 1: Executive Summary .....	1
Section 1-1: Introduction .....	1
Section 1-2: Summary of Safety Developments .....	1
Section 1-3: Strategic Planning and Prioritization of Work.....	2
Section 1-4: Summary of Financial Information .....	3
Tab 2: Safety.....	4
Section 2-1: Safety Developments.....	4
Section 2-2: Pipeline Inspection Plan .....	4
Section 2-3: Storage .....	10
Section 2-4: Safety Related Developments Specific to ILLI, Pipe Replacement, and Strength Test.....	10
Section 2-4(a) Pipeline Piggability Status .....	10
Section 2-4(b) Adopted vs. Actual Mileage for Pipe Replacement .....	13
Section 2-4(c) Adopted vs. Actual Mileage for Strength Test .....	16
Section 2-5 Status Compliance with Federal Code on Pipeline Integrity Management .....	19
<u>Section 2-6 Valve Automation and Gas Gathering Programs .....</u>	<u>XX</u>
<u>Section 2-7 Emergency Response Programs .....</u>	<u>XX</u>
Tab 3: Financial Data .....	20
Section 3-1: Explanation of Funds Budgeted, Adopted, and Spent for Each Major Work Category and Maintenance Activity Type (MAT) Code.....	20

*\* Data provided is a combination of various unverified data pulls, “dummy” data, incomplete excerpts, etc. and should not be relied upon in any fashion. The data is presented only to show examples of how this report will look, table formatting, and magnitude of information provided in the report.*

Section 3-2: Explanation of Any Variances for Budgeted Expense and Capital.....	23
Tab 4 Appendix .....	26
Introduction Appendix .....	27
Safety Appendix.....	28
Table 2-1 Inspection Records Discrepancies Report.....	29
Table 2-5 Integrity Management Procedures Published in the Reporting Year .....	30
Table 2-6: GT&S RAMP Risks.....	31
Financial Appendix .....	32
Transmission Pipeline Programs Appendix .....	33
1. Resource Planning and Contractor Selection Process .....	33
2. Quality Assurance .....	33
3. Procurement Policy and Practices.....	33
4. Pipeline Disposition Procedures and Costs.....	33
5. Public Outreach Costs.....	33
6. Service Outage Performance .....	33
7. Shareholder Costs Absorbed .....	34
<b>Pipeline Safety Enhancement Plan Appendix.....</b>	<b>36</b>
<b>PSEP Costs.....</b>	<b>37</b>
<b>PSEP Project Status.....</b>	<b>39</b>

**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		