

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 27, 2020

Advice Letter 4167-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: Establish New Preliminary Statements in Compliance with PG&E's 2019 Gas Transmission and Storage Decision 19-09-025 Related to Storage

Dear Mr. Jacobson:

Advice Letter 4167-G is effective as of March 20, 2020.

Sincerely,

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

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

October 23, 2019

Advice 4167-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Establish New Preliminary Statements in Compliance with PG&E's 2019 Gas Transmission and Storage Decision 19-09-025 Related to Storage

Purpose

Pursuant to California Public Utilities Commission (CPUC or Commission) Decision (D.)19-09-025 (the Decision), Ordering Paragraphs (OP) 16, 45, and 51, Pacific Gas and Electric (PG&E) seeks approval to establish gas preliminary statements included in this advice letter effective January 1, 2019. The affected tariff sheets are listed on the enclosed Attachment 1. Separate advice letters are being submitted on October 23, 2019 to make other tariff modifications required by D.19-09-025. These advice letters include Advice 4165-G, Advice 4166-G, Advice 4168-G, and Advice 4169-G.

Background

On November 17, 2017, PG&E filed an application at the CPUC requesting that the Commission adopt its gas transmission (GT&S) revenue requirement, cost allocation, and rate design for the period of 2019-2022. On September 23, 2019, the CPUC issued D.19-09-025 to address the issues before the Commission related to PG&E's application. PG&E submits this Advice Letter to implement the preliminary statement changes as directed by the Decision.

Tariff Revisions

PG&E submits changes to its tariff book to establish the following Gas Preliminary Statements as approved in OPs 16, 45, and 51:

- Gas Preliminary Statement Part EJ - Gas Storage Balancing Account (GSBA) in compliance with OP 51.

The purpose of the GSBA is to track and record actual expenses and capital revenue requirements based on actual capital additions during the rate case cycle

(2019-2022), compared to the adopted revenue requirements for PG&E's natural gas storage facilities, excluding Gill Ranch. The GSBA is a two-way balancing account.

- Gas Preliminary Statement Part EK – Sales of Cushion Gas Memorandum Account (SCGMA) in compliance with OP 16.

The purpose of the CGMA is to track the gain on sale of cushion gas from the Los Medanos and Pleasant Creek storage fields.¹

- Gas Preliminary Statement Part EN – Below-Ground Storage Decommissioning Balancing Account (BGSDBA) in compliance with OP 45.

The purpose of the BGSDBA is to record the difference between the adopted and actual expense related to below-ground storage well decommissioning activities for the Los Medanos and Pleasant Creek storage fields. The account is a one-way balancing account that records adopted and actual decommissioning expense.

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 12, 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, 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 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:

¹ Consistent with the Decision, PG&E shall submit a report of these transactions on an annual basis, starting on January 30, 2020.

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

PG&E requests that this Tier 2 advice submittal become effective January 1, 2019 in accordance with the Administrative Law Judge's December 11, 2018 Ruling making GT&S revenue requirements effective January 1, 2019.

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 U39 G)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 4167-G

Tier Designation: 2

Subject of AL: Establish New Preliminary Statements in Compliance with PG&E's 2019 Gas Transmission and Storage Decision 19-09-025 Related to Storage

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: 1/1/19

No. of tariff sheets: 6

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: See Attachment 1

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:

Cal P.U.C. Sheet No.	Title of Sheet	
35390-G	GAS PRELIMINARY STATEMENT PART EJ GAS STORAGE BALANCING ACCOUNT (GSBA) Sheet 1	
35391-G	GAS PRELIMINARY STATEMENT PART EK CUSHION GAS MEMORANDUM ACCOUNT (CGMA) Sheet 1	
35392-G	GAS PRELIMINARY STATEMENT PART EN BELOW-GROUND STORAGE DECOMMISSIONING BALANCING ACCOUNT (BGSDBA) Sheet 1	
35393-G	GAS TABLE OF CONTENTS Sheet 1	35310-G
35394-G	GAS TABLE OF CONTENTS Sheet 6	35322-G
35395-G	GAS TABLE OF CONTENTS Sheet 7	35195-G



GAS PRELIMINARY STATEMENT PART EJ
GAS STORAGE BALANCING ACCOUNT (GSBA)

Sheet 1

(N)
(N)

EJ. Gas Storage Balancing Account (*GSBA*)

(N)

1. **PURPOSE:** The purpose of the Gas Storage Balancing Account (GSBA) is to track and record actual expenses and capital revenue requirements based on actual capital expenditures over the 2019 Gas Transmission and Storage (GT&S) rate case cycle (2019-2022), compared to the revenue requirements based on the adopted capital expenditures for PG&E's natural gas storage facilities, excluding Gill Ranch. The GSBA is a two-way balancing account. The account is subject to a reasonableness review in PG&E's next GT&S Rate Case.
2. **APPLICABILITY:** The GSBA applies to all customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Upon completion of a reasonableness review in PG&E's next GT&S Rate Case, disposition of the balances in this account will be determined through the CFCA and NCA in the Annual Gas True-Up, or as otherwise authorized by the Commission.
4. **RATES:** The GSBA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** The following entries will be made at the end of each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense:
 - a. A credit entry equal to one-twelfth of the adopted annual revenue requirements;
 - b. A debit entry equal to the actual expenses incurred, including applicable benefits burden;
 - c. A debit or credit entry equal to the capital revenue requirement associated with the actual capital expenditures incurred. Capital-related revenue requirements include depreciation expense, return on rate base at the authorized cost of capital, federal and state income taxes, and property taxes, associated with the capital asset additions;
 - d. An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
 - e. An entry equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries at a rate equal to one-twelfth the interest rate on three month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

(N)



GAS PRELIMINARY STATEMENT PART EK
CUSHION GAS MEMORANDUM ACCOUNT (CGMA)

Sheet 1

(N)
(N)

EK. Cushion Gas Memorandum Account (CGMA)

(N)

1. **PURPOSE:** The purpose of the Cushion Gas Memorandum Account (CGMA) is to track the gain on sale of cushion gas from the Los Medanos and Pleasant Creek storage fields. PG&E shall submit a report of these transactions annually, starting on January 30, 2020.
2. **APPLICABILITY:** The CGMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account will be considered in the next GT&S rate case or as otherwise directed by the Commission.
4. **RATES:** The CGMA does not have a separate rate component.
5. **ACCOUNTING PROCEDURE:** The following entries will be made to the account each month or as applicable:
 - a. A credit entry equal to the sale of cushion gas from the Los Medanos and Pleasant Creek storage fields;
 - b. A debit entry equal to the original cost for the purchase of cushion gas for the Los Medanos and Pleasant Creek storage fields;
 - c. An entry to record the transfer of amounts to or from other accounts as approved by the Commission, and;
 - d. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

(N)



GAS PRELIMINARY STATEMENT PART EN

Sheet 1

(N)

BELOW-GROUND STORAGE DECOMMISSIONING BALANCING ACCOUNT (BGSDBA)

(N)

EN. Below-Ground Storage Decommissioning Balancing Account (BGSDBA)

(N)

1. **PURPOSE:** The purpose of the Below-Ground Storage Decommissioning Balancing Account (BGSDBA) is to record the difference between the adopted and actual expenses of below-ground storage well decommissioning activities for Los Medanos and Pleasant Creek storage fields. The BGSDBA is a one-way balancing account, that records the adopted expense and recorded expense for decommissioning on an aggregate basis over the Gas Transmission and Storage (GT&S) rate case cycle (2019-2022).
2. **APPLICABILITY:** The BGSDBA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Upon completion of decommissioning activities, PG&E will return to customers any unspent funding. Disposition of the balance in this account will be through the Annual Gas True-up advice letter process.
4. **RATES:** The BGSDBA does not have a separate rate component.
5. **ACCOUNTING PROCEDURE:** The following entries shall be made to the account each month or as applicable:
 - a. A credit entry equal to one-twelfth of the annual adopted Below-Ground Storage Decommissioning expense.
 - b. A debit entry equal to the actual Below-Ground Storage Decommissioning expense.
 - c. An entry to transfer amounts to or from another account as authorized by the Commission.
 - d. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

(N)



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Advice 4167-G
Decision 19-09-025

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted October 23, 2019
Effective January 1, 2019
Resolution



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(Continued)

<i>Advice</i>	4167-G	<i>Issued by</i>	<i>Submitted</i>	<u>October 23, 2019</u>
<i>Decision</i>	19-09-025	Robert S. Kenney	<i>Effective</i>	<u>January 1, 2019</u>
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	

**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		