

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 10, 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, CA 94177

Sent via email

SUBJECT: Approval of Pacific Gas and Electric Company Advice Letters 4170-G, 4170-G-A and 4170-G-B *Modifications to Gas Rate Schedules G-CFS and G-CT and related forms, and Proposal for Implementation of Gas Storage Inventory Monitoring Process and Quarterly Reporting to CPUC's Energy Division in Compliance with Ordering Paragraphs 21-26 of Decision 19-09-025*

Dear Mr. Jacobson,

This letter approves Pacific Gas and Electric Company (PG&E) Advice Letter (AL) 4170-G, Supplemental AL 4170-G-A and Supplemental AL 4170-G-B wherein the utility requests to modify certain gas tariff schedules and related items regarding its gas storage services authorized by Decision (D.) 19-09-025. The joint protest of The School Project for Utility Rate Reduction, Tiger Natural Gas, Inc., and United Energy Trading LLC is rejected based on the reasons below. PG&E AL 4170-G, Supplemental AL 4170-G-A and Supplemental AL 4170-G-B are effective November 22, 2019.

Background

The following summarizes recent changes to PG&E's storage services that are pertinent to AL 4170-G, Supplemental AL 4170-G-A and Supplemental AL 4170-G-B as well as the protest to AL 4170-G.

In D.16-06-056, the CPUC authorized the Self-Managed Storage program discontinuing PG&E's procurement and allocation of storage to Core Transport Agents (CTA)¹ pursuant to a seven-year transition period beginning April 2018. Implementation of the Self-Managed Storage program was through Resolution G-3537, which prohibited CTAs from using Alternate Resources² as a substitute for storage for at least the first two years of the transition period during which time an assessment of

¹ CTAs offer to procure gas for core customers as an alternative to the local utility. The entities protesting PG&E AL 4170-G are CTAs.

² Alternate Resources include firm backbone pipeline capacity with a supply contract, PG&E firm storage and withdrawal capacity, alternate firm storage and withdrawal capacity, and California production supply (See Attachment I in PG&E AL 4190-G). Alternate Resources may be less costly than storage but could also impact system reliability (See PG&E June 27, 2019 Resolution G-3537 Compliance Report at p.12).

the program would be undertaken that would involve workshops. Additionally, Resolution G-3537 directed PG&E, after the assessment of the Self-Managed Storage program, to file an AL extending the program for the remainder of the transition period and to include a proposal allowing CTAs to use Alternate Resources.³ Pursuant to the resolution, a workshop assessing the program was held by the Energy Division (ED) on December 3, 2019.

On December 11, 2019, following the required workshop and assessment of the Self-Managed Storage program, PG&E filed AL 4190-G seeking to continue the program and it included a proposal allowing CTAs to use Alternate Resources, as directed by Resolution G-3537.⁴ PG&E AL 4190-G is part of the review of this matter because, as discussed below, it addresses the issues raised in the protest of AL 4170-G.

Another change to PG&E's storage services was adopted in D.19-09-025. The decision approved, in large part, PG&E's proposal to reconfigure its gas storage operations and assets, called the Natural Gas Storage Strategy (NGSS). A major feature of the NGSS was that the utility was authorized to reduce the capacity of its storage fields.⁵ As a result, to meet their storage needs, CTAs and PG&E's Core Gas Supply (CGS) group were allowed to procure storage from Independent Storage Providers (ISP).⁶ D.19-09-025 also prohibited CTAs from using Alternate Resources as a substitute for the storage that would be obtained from ISPs.⁷ Furthermore, PG&E was ordered to develop a compliance mechanism designed to ensure CTAs hold enough gas in storage for reliability purposes as well as a method for reporting instances of non-compliances to ED. The utility was authorized to file the tariff changes to implement the new storage service and related items by a Tier 2 AL.⁸

On October 23, 2019, PG&E filed AL 4170-G intended to comply with the directives of D.19-09-025. The AL included proposed tariff revisions to establish the new NGSS related storage service as well as a compliance mechanism and a reporting process concerning the amount of gas CTAs hold in storage. In Supplemental AL 4170-G-A, filed December 18, 2019, PG&E modified the original AL concerning CTA gas storage levels and withdrawals as well as the CTA compliance reports. In Supplemental AL 4170-G-B, filed February 5, 2020, PG&E revised certain tariff pages to specify the sharing of storage related information to the appropriate parties, as directed in D.19-09-025.⁹

³ Resolution G-3537 Ordering Paragraph 5

⁴ The disposition of PG&E AL 4190-G is being addressed in draft Resolution G-3567, mailed January 27, 2020. It approves PG&E AL 4190-G and is currently scheduled to be voted on at the Commission's February 27, 2020 business meeting.

⁵ The remaining amount of PG&E owned storage capacity available for core service is referred to as Residual Core Storage (see PG&E AL 4170-G, Gas Schedule G-CT, sheet 4)

⁶ ISPs are public utilities other than PG&E which specialize in offering gas storage services. The storage that CTAs will procure from ISPs pursuant to the NGSS is referred to as ISP Firm Storage Capacity (see PG&E AL 4170-G Form Attachment M).

⁷ D.19-09-025 at p. 56 and at p. 80.

⁸ D.19-09-025 Ordering Paragraph 26.

⁹ D.19-09-025, Ordering Paragraph 23.

Joint Protest

On November 12, 2019, the School Project for Utility Rate Reduction, Tiger Natural Gas, Inc. and United Energy Trading, LLC (collectively “Joint Parties”) submitted a joint protest to PG&E AL 4170-G. The Joint Parties argued that PG&E’s proposed tariff changes do not comply with the mandates for Alternate Resources as set forth in Resolution G-3537 regarding the Self-Managed Storage program. Specifically, they stated that PG&E ignored the required assessment of the program which the upcoming (at the time) workshop was to conduct. To remedy this situation, the Joint Parties recommended that the CPUC approve AL 4170-G under the proviso that using Alternate Resources for the Self-Managed Storage program would be governed by Resolution G-3537 requiring the utility to file an AL with a proposal for their use.

PG&E Protest Reply

On November 19, 2019, PG&E issued its reply to the joint protest. The utility asserted that it did not ignore the requirements of Resolution G-3537 for the Self-Managed Storage program because AL 4170-G only addresses implementation of the new NGSS related storage requirements adopted in D.19-09-025. Furthermore, PG&E stated that AL 4170-G does not change the existing requirements ordered by Resolution G-3537 for the Self-Managed Storage program and that the utility intends to address those issues in the upcoming (at the time) ED workshop and through a separate AL filing.

Discussion and Determination

ED’s review finds that PG&E’s assertion in its protest reply is correct and that AL 4170-G was not intended to meet the mandates of Resolution G-3537.¹⁰ This is clear from an examination of AL 4170-G showing that it only implements that requirements resulting from the adoption of the NGSS, as modified, in D. 19-09-025. Specifically, as directed by the decision, AL 4170-G included tariff revisions that establish the new storage NGSS related services. It also contained a proposed compliance mechanism and reporting methodology designed to ensure that CTAs have enough gas in storage to meet demand, as directed. Supplemental ALs 4170-G-A and 4170-G-B, which were not protested, contains additional modifications concerning levels of gas in storage and withdrawal procedures for CTAs and CGS, changes to the CTA compliance report, and the sharing of storage related information. This review of the content of AL 4170-G and accompanying Supplemental ALs confirms that the tariff revisions and other proposals comply with the requirements of D.19-09-025.

Furthermore, as PG&E stated in its protest reply, the utility proceeded to file another AL to address the Resolution G-3537 requirements. This was AL 4190-G and it was submitted after the ED workshop on the Self-Managed program was held, as PG&E intended. The AL included a request to continue the Self-Managed Storage program and a proposal to allow the use of Alternate Resources by CTAs for the program, as directed by Resolution G-3537. These were the items that the Joint Parties claimed that PG&E was ignoring and, therefore, the recommendation that the CPUC provide further direction to PG&E to address this matter is unnecessary. As a result of the filing of AL 4190-G, the Joint Parties’ protest is moot.

¹⁰ As discussed above, these requirements are for PG&E to file an AL to extend the Self-Managed Storage program and to include a proposal for the use of Alternate Resources by CTAs for that program (see Resolution G-3537, OP 5)

Therefore, ED finds PG&E AL 4170-G, Supplemental AL 4170-G-A and Supplemental AL 4170-G-B are reasonable, and they are approved. Pursuant to General Order 96-B Rule 7.6.1, the joint protest of the School Project for Utility Rate Reduction, Tiger Natural Gas, Inc. and United Energy Trading, LLC is hereby rejected.

Sincerely,



FOR

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

cc:

The School Project for Utility Rate Reduction
Tiger Natural Gas, Inc
United Energy Trading, LLC
Leah E. Capritta
180 California Street, Suite 5000
Denver, CO 80202
Email: leah.capritta@hklaw.com

December 18, 2019

Advice 4170-G-A

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Supplemental: Modifications to Gas Rate Schedules G-CFS and G-CT and Related Forms, and Proposal for Implementation of Gas Storage Inventory Monitoring Process and Quarterly Reporting to CPUC's Energy Division in Compliance with Ordering Paragraphs 21 – 26 of Decision 19-09-025

Purpose

Pacific Gas and Electric Company (PG&E) is filing this supplement to Advice 4170-G in response to feedback received from Core Procurement Groups (CPGs) and the California Public Utilities Commission (CPUC) Energy Division staff regarding PG&E's original advice letter submittal.

Background

On October 23, 2019, PG&E filed Advice 4170-G in compliance with the 2019 Gas Transmission and Storage (GT&S) Rate Case Decision (D.) 19-09-025, Ordering Paragraphs 21-26. On November 12, 2019, The School Project for Utility Rate Reduction, Tiger Natural Gas, Inc., and United Energy Trading, LLC (the CTA Parties) filed a timely protest. On November 18, 2019, the Energy Division suspended Advice 4170-G for up to 120 days. On November 19, 2019, PG&E replied to the protest of the CTA Parties. On December 3, 2019, the Energy Division hosted a public workshop that addressed various CTA issues, some of which were related to Advice 4170-G. Advice 4170-G is pending approval.

Supplement

PG&E has received feedback from CPGs and from the CPUC Energy Division staff regarding the characteristics of storage service procured to meet the Total Core Storage Requirement described in Schedule G-CFS, and the Proposed Quarterly Report Template described in Attachment 3 to Advice 4170-G. The suggested changes

generally increase flexibility for Core Procurement Groups, without adversely impacting core or system reliability, and clarify the Proposed Quarterly Report Template.

The first two changes are in the rate schedule G-CFS tariff (sheets 2-3) and the last change provides clarifications on the Proposed Quarterly Report Template as filed in Advice 4170-G:

1. Modify the Injection Period Month-End Minimum Inventory Target Levels for storage service procured from PG&E under Schedule G-CFS and Independent Storage Provider (ISP) Firm Storage service:

- Eliminate the April through June (Q2) minimum month-end inventory requirements;
- Reduce the July through September (Q3) minimum month-end inventory requirements; and
- Maintain the current October minimum month-end inventory target.

2. Modify the withdrawal ratio requirement for firm storage service procured from a Commission-certified ISP so it is comparable to storage service procured from PG&E under Schedule G-CFS:

CPGs may procure their firm storage service in aggregate from a Commission-certified ISP using the following minimum withdrawal capacity options: 1) a fixed withdrawal capacity ratio for November through March based on the Fixed Equivalent Withdrawal (FEW) capacity ratio ($0.06145 \cdot AI$); or 2) a variable withdrawal capacity profile for November through March as follows:

- Withdrawal Ratio (November) = 50% of the December-January requirements
- Withdrawal Ratio (December-January) = 100% of December-January requirements
- Withdrawal Ratio (February) = 75% of the December-January requirements
- Withdrawal Ratio (March) = 50% of the December-January requirements

The variable withdrawal capacity profile is the same as in G-CFS except for the lower requirement for February.

3. Clarify the Proposed Quarterly Report Template:

- Annotate template to specify formulas for calculated data cells;
- Add rows for CTA Storage Requirement (inventory and withdrawal); and
- Add row specifying Reason for Noncompliance.

Tariff Revisions

PG&E submits the following proposed supplemental revisions effective April 1, 2020, in compliance with D. 19-09-025.

Gas Schedule G-CFS, Core Firm Storage – Sheets 2-3

- See above description of changes.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 7, 2020, 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:

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

In conjunction with original Advice 4170-G, this supplemental Tier 2 advice letter is effective November 22, 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:

Attachment 1: Tariffs

Attachment 2: Redline Tariffs

Attachment 3: Proposed Quarterly Report Template (Rev01)

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 U39M)

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) #: 4170-G-A

Tier Designation: 2

Subject of AL: Supplemental: Modifications to Gas Rate Schedules G-CFS and G-CT, and its related forms, and Proposal for Implementation of Gas Storage Inventory Monitoring Process and Quarterly Reporting to CPUC's Energy Division in Compliance with Ordering Paragraphs 21 – 26 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: 11/22/19

No. of tariff sheets: 4

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	Cancelling Cal P.U.C. Sheet No.
35538-G	GAS SCHEDULE G-CFS CORE FIRM STORAGE Sheet 2	33710-G
35539-G	GAS SCHEDULE G-CFS CORE FIRM STORAGE Sheet 3	33711-G
35540-G	GAS TABLE OF CONTENTS Sheet 1	35527-G
35541-G	GAS TABLE OF CONTENTS Sheet 2	35528-G



**GAS SCHEDULE G-CFS
CORE FIRM STORAGE**

Sheet 2

ANNUAL
INVENTORY/
INJECTION/
WITHDRAWAL:
(Cont'd.)

Group's Annual Inventory (AI) = [(Groups Winter Season Usage)/(PG&E's Winter Season Forecast)] * (PG&E's Total Residual Core Storage Capacity Reservation) (T)

Group's Winter Season Usage and PG&E's Winter Season Forecast are specified in Schedule G-CT.

Firm injection is available from April 1 through October 31. Firm withdrawal is available from November 1 through March 31. (T)

For CTAs and CGS, the injection and withdrawal capacities will be fixed, as specified herein. The fixed injection and withdrawal capacities are as follows, in Dth.** (T)

Injection Capacity (April through October) = $\frac{AI * 25,000}{5,175,000}$ (T)
5,175,000 (T)

Withdrawal Capacity (November) = $(AI * 159,000) / 5,175,000$ (D)

Withdrawal Capacity (December - February) = $(AI * 318,000) / 5,175,000$ (N)

Withdrawal Capacity (March) = $(AI * 159,000) / 5,175,000$ (N)

CPGs may procure their firm storage service in aggregate from a Commission-certified ISP using the following minimum withdrawal capacity options: 1) a fixed withdrawal capacity ratio for November through March based on the Fixed Equivalent Withdrawal (FEW) capacity ratio $(0.06145 * AI)$; or 2) a variable withdrawal capacity profile for November through March as follows: (T)

Withdrawal Ratio (November) = 50% of the December-January requirements above (N)

Withdrawal Ratio (December-January) = 100% of December-January requirements above

Withdrawal Ratio (February) = 75% of the December-January requirements above

Withdrawal Ratio (March) = 50% of the December-January requirements above (N)

(Continued)



**GAS SCHEDULE G-CFS
CORE FIRM STORAGE**

Sheet 3

ANNUAL
INVENTORY/
INJECTION/
WITHDRAWAL:
(Cont'd.)

Injection Period Month-End Minimum Inventory Target Level

With the acceptance of the PG&E-Allocated Storage during the initial allocation of Core Firm Storage capacity, the CTAs and CGS must meet the storage inventory targets as set forth below. (In addition, CTA Self-Managed Storage procured from an ISP and ISP Firm Storage is subject to the same Month-End Minimum Inventory Target Levels for both Injection and Withdrawal Periods, as described in Schedule G-CT.) To the extent CGS/CTAs do not meet their minimum inventory targets, refer to Schedule G-CT.

(T)
(T)
(T)

Date	Injection Period Month-End Minimum Inventory Target Level
By July 31	Annual Inventory/214 days x 122 days x 50%
By August 31	Annual Inventory/214 days x 153 days x 60%
By September 30	Annual Inventory/214 days x 183 days x 70%
By October 31	Annual Inventory/214 days x 214 days x 75%

(D)
(T)
|
|
(T)
(D)

Withdrawal Period Month-End Minimum Inventory Target Level

Minimum storage inventories must be maintained by the CTAs and/or CGS during the firm withdrawal period. CTAs and/or CGS will not be permitted to withdraw gas below the following month-end inventory targets:

Date	Withdrawal Period Month-End Minimum Inventory Target Level
By November 30	80% x Annual Inventory
By December 31	50% x Annual Inventory
By January 31	15% x Annual Inventory
By February 28	5% x Annual Inventory
By March 31	0% x Annual Inventory

CURTAILMENT
OF SERVICE:

Service under this schedule may be curtailed. See Rule 14 for details.

ASSIGNMENT OF
STORAGE:

CTAs and CGS holding storage may assign all or part of their storage to a qualified Assignee for all or the remaining portion of the current Storage Year. An Assignee must have a current GTSA and applicable exhibits and an ECS in place and must have met the creditworthiness requirements of Rule 25 prior to PG&E consenting to an assignment.

The CTA must submit an executed Assignment of PG&E Backbone Pipeline and Firm Storage Capacity Allocation (Form 79-867) to PG&E at least three (3) business days prior to the requested capacity utilization date. The assignment start date may be any date during the Storage Year, but the term of the assignment must conclude at the end of the current Storage Year, March 31. If the CTA has gas in inventory, they can request an inventory transfer of all or part of the commodity to the Assignee. PG&E will

(Continued)



GAS TABLE OF CONTENTS

Sheet 1

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Preliminary Statements, Rules	35245-G	
Rules, Maps, Contracts and Deviations.....	35195-G	
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(Continued)

Advice 4170-G-A
Decision D.19-09-025

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted December 18, 2019
Effective April 1, 2020
Resolution



GAS TABLE OF CONTENTS

Sheet 2

SCHEDULE TITLE OF SHEET CAL P.U.C. SHEET NO.

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G1-NGV	Residential Natural Gas Service for Compression on Customers' Premises	35508,23734-G
GL-1	Residential CARE Program Service.....	35509,35444-G
GL1-NGV	Residential CARE Program Natural Gas Service for Compression on Customers' Premises	35510,23740-G
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GML	Master-Metered Multifamily CARE Program Service	34980,35512,35449-G
GS	Multifamily Service	35513,32347,35451-G
GSL	Multifamily CARE Program Service.....	35514,35515,35454-G
GT	Mobilehome Park Service	35516,32351,35456-G
GTL	Mobilehome Park CARE Program Service.....	35517,35518,35459,35460-G
G-10	Service to Company Employees	11318-G
G-EFLIC	Energy Financing Line Item Charge (EFLIC) Pilot	32214,32215,32216,32217,32218-G
G-MHPS	Master-Metered Mobilehome Park Safety Surcharge	22034-G

Rate Schedules Non-Residential

G-NR1	Gas Service to Small Commercial Customers	35150,35506-G
G-NR2	Gas Service to Large Commercial Customers	34151,35507-G
G-CP	Gas Procurement Service to Core End-Use Customers	35503-G
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G-NT	Gas Transportation Service to Noncore End-Use Customers.....	35302,35303,34357,22038-G
G-EG	Gas Transportation Service to Electric Generation	34346,35298,34348,34349,34350-G
G-ESISP	Exchange Service Through ISP Facilities	24364,24365-G
G-WSL	Gas Transportation Service to Wholesale/Resale Customers	35306,35307,22045-G
G-BAL	Gas Balancing Service for Intrastate Transportation Customers	29782,24457, 29783,35296,22048,24458,24459,24460,26610,24461,20042,24462,24463,27708-G
G-SFS	Standard Firm Storage Service.....	35304,22140,30677,22300-G
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G-NAS	Negotiated As-Available Storage Service	33947-G
G-CFS	Core Firm Storage	35297, 35538, 35539 ,32820-G
G-AFT	Annual Firm Transportation On-System.....	30655,35294,30656-G

(T)

(Continued)

Advice 4170-G-A
December 18, 2019

Attachment 2

Redline Tariffs



**GAS SCHEDULE G-CFS
CORE FIRM STORAGE**

Sheet 2

ANNUAL INVENTORY/ INJECTION/ WITHDRAWAL: (Cont'd.)

Group's Annual Inventory (AI) = [(Groups Winter Season Usage)/(PG&E's Winter Season Forecast)] * (PG&E's Total Residual Core Storage Capacity Reservation)

Group's Winter Season Usage and PG&E's Winter Season Forecast are specified in Schedule G-CT.

Firm injection is available from April 1 through October 31. Firm withdrawal is available from November 1 through March 31. ~~In addition, firm summer withdrawal and winter injection are also available, as specified below.~~

For CTAs and CGS, the injection and withdrawal capacities will be fixed variable, as specified herein. ~~Maximum injection and withdrawal will be based upon the amount of gas in inventory at the time of injection or withdrawal (Current Inventory, CI). Maximum withdrawal capacity also depends on the time period during winter. Withdrawal Adjustment is used to provide additional withdrawal capacity during December and January when high loads are more likely to occur. Offsetting this increase in withdrawal capacity is a decrease in withdrawal capacity during February and March. The calculation for fixed variable injection and withdrawal capacities are as follows, in Dth.**~~

$$\text{Injection Capacity (April through October)} = \frac{(AI * 207) - (CI * 92) 25,000}{5,175,000} 33,478$$

~~Use the Withdrawal Adjustment (WA) values in the table below with the Withdrawal Capacity equation to determine maximum withdrawal capacity for the corresponding time periods.~~

$$\text{Withdrawal Capacity (November through March)} = \frac{[AI * (970 + WA)] + (CI * 283)}{33,478}$$

$$\text{Withdrawal Capacity (November)} = (AI * 159,000) / 5,175,000$$

$$\text{Withdrawal Capacity (December - February)} = (AI * 318,000) / 5,175,000$$

$$\text{Withdrawal Capacity (March)} = (AI * 159,000) / 5,175,000$$

Withdrawal Adjustment Table	
Time Period	Withdrawal Adjustment (WA)
November 1 through November 30	0
December 1 through January 15	122
January 16 through January 31	100
February 1 through February 14	(50)
February 15 through February 28/29	(100)
March 1 through March 31	(250)

(N)
I
(N)

(T)

~~(For CTA Self Managed Storage procured from an ISP, the calculation for the Fixed Equivalent Withdrawal (FEW) capacity rights is as follows (in Dth): $W_{FEW} = (0.039) * AI$.)~~

~~Firm Injection and Withdrawal Rights for Other Months for All CTAs and CGS~~

~~Firm withdrawal is available every day during the months of April through October for all CTAs and/or CGS. Firm injection is available every day during the months of November through March. The amount of injection or withdrawal capacity available to CTAs and/or~~

(Continued)

Advice	3884-G	Issued by	Date Filed	September xx21, 20197
Decision	16-06-056	Robert S. Kenney	Effective	<u>April 1</u> February 8, 202048



**GAS SCHEDULE G-CFS
CORE FIRM STORAGE**

Sheet 2

~~CGS is dependent upon the storage held by a CTA or CGS. The calculation for capacity is shown below in Dth.~~

~~Injection or Withdrawal Capacity = (AI/33,477,700) * 50,000~~

~~CPGs may procure their firm storage service in aggregate from a Commission-certified ISP using the following minimum withdrawal capacity options: 1) a fixed withdrawal capacity ratio for November through March based on the Fixed Equivalent Withdrawal (FEW) capacity ratio (0.06145*AI); or 2) a variable withdrawal capacity profile for November through March as follows:~~

~~Withdrawal Ratio (November) = 50% of the December-January requirements above~~

~~Withdrawal Ratio (December-January) = 100% of December-January requirements above~~

~~Withdrawal Ratio (February) = 75% of the December-January requirements above~~

~~Withdrawal Ratio (March) = 50% of the December- January requirements above~~

~~** These formulas specify that as gas is injected or withdrawn throughout the seasons, the capability to inject or withdraw declines due to the physical operation of the storage fields.~~

(Continued)

<i>Advice</i>	3884-G	<i>Issued by</i>	<i>Date Filed</i>	September xx21, 2019 7
<i>Decision</i>	16-06-056	Robert S. Kenney	<i>Effective</i>	April 1 February 8, 2020 48



**GAS SCHEDULE G-CFS
CORE FIRM STORAGE**

Sheet 3

ANNUAL
INVENTORY/
INJECTION/
WITHDRAWAL:
(Cont'd.)

Injection Period Month-End Minimum Inventory Target Level

With the acceptance of the PG&E-Allocated Storage during the initial allocation of Core Firm Storage capacity, the CTAs and CGS must meet the storage inventory targets as set forth below. (In addition, CTA Self-Managed Storage procured from an ISP and ISP Firm Storage is subject to the same Month-End Minimum Inventory Target Levels for both Injection and Withdrawal Periods, as described in Schedule G-CT.) To the extent CGS/CTAs do not meet their minimum inventory targets, refer to Schedule G-CT.

(T)
(N)
(N)
(N)

Date	Injection Period Month-End Minimum Inventory Target Level
By April 30	Annual Inventory/214 days x 30 days x 75%
By May 31	Annual Inventory/214 days x 61 days x 75%
By June 30	Annual Inventory/214 days x 91 days x 75%
By July 31	Annual Inventory/214 days x 122 days x 75 50%
By August 31	Annual Inventory/214 days x 153 days x 75 60%
By September 30	Annual Inventory/214 days x 183 days x 75 70%
By October 31	Annual Inventory/214 days x 214 days x 75%

(T)

~~If, by the end of a calendar month, a CTA or CGS fails to nominate and inject gas into accepted PG&E-Allocated Storage or CTA Self-Managed Storage procured from PG&E to meet the Injection Period Month-End Minimum Inventory Target Level, gas to meet the inventory target will become a negative supply transaction on the CTA's and/or CGS' Cumulative Imbalance Statement for that calendar month, as specified in Schedule G-BAL.~~

Withdrawal Period Month-End Minimum Inventory Target Level

Minimum storage inventories must be maintained by the CTAs and/or CGS during the firm withdrawal period. CTAs and/or CGS will not be permitted to withdraw gas below the following month-end inventory targets:

Date	Withdrawal Period Month-End Minimum Inventory Target Level
By November 30	80% x Annual Inventory
By December 31	50% x Annual Inventory
By January 31	15% x Annual Inventory
By February 28	5% x Annual Inventory
By March 31	0% x Annual Inventory

CURTAILMENT
OF SERVICE:

Service under this schedule may be curtailed. See Rule 14 for details.

ASSIGNMENT OF
STORAGE:

CTAs and CGS holding storage may assign all or part of their storage to a qualified Assignee for all or the remaining portion of the current Storage Year. An Assignee must have a current GTSA and applicable exhibits and an ECS in place and must have met the creditworthiness requirements of Rule 25 prior to PG&E consenting to an assignment.

(T)

(Continued)



**GAS SCHEDULE G-CFS
CORE FIRM STORAGE**

Sheet 3

The CTA must submit an executed Assignment of PG&E Backbone Pipeline and Firm Storage Capacity Allocation (Form 79-867) to PG&E at least three (3) business days prior to the requested capacity utilization date. The assignment start date may be any date during the Storage Year, but the term of the assignment must conclude at the end of the current Storage Year, March 31. If the CTA has gas in inventory, they can request an inventory transfer of all or part of the commodity to the Assignee. PG&E will

(L)

(Continued)

<i>Advice</i>	3884-G	<i>Issued by</i>	<i>Date Filed</i>	September 21, 2017
<i>Decision</i>	16-06-056	Robert S. Kenney	<i>Effective</i>	February 8, 2018
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	

Advice 4170-G-A
December 18, 2019

Attachment 3

Proposed Quarterly Report Template (Rev01)

ATTACHMENT 3

PROPOSED QUARTERLY REPORT TEMPLATE: (to be filed CONFIDENTIAL)

No.	Description	Source of Data	SAMPLE Data for ISP Storage	SAMPLE Data for PG&E Storage
1.	Quarterly Report (Quarter-Year)	Current Quarter	Q2-2020	Q2-2020
2.	Date of Report	Current Date	6/5/2020	6/5/2020
3.	Verification Month	Month that PG&E verifies the previous month-end inventory	May 2020	June 2020
4.	Customer Name	ISP contract & monthly inventory report; PG&E CFS Exhibit	Core Procurement Group legal name	Core Procurement Group legal name
5.	Total Storage Requirement – Inventory	From CTA's Attachment D	45,000	45,000
6.	Total Storage Requirement – Withdrawal	From CTA's Attachment D	1,755	1,755
7.	Storage Provider Name (PG&E Storage or ISP Firm Storage)	ISP contract & monthly inventory report; PG&E CFS Exhibit	ISP legal name	PG&E Storage
8.	Certification Source (Attachment M, Minimum Inventory Check)	ISP contract & monthly inventory report; PG&E CFS Exhibit	Attachment M	Results from Minimum Inventory Check Process
9.	Contract Start Date	ISP contract & monthly inventory report; PG&E CFS Exhibit	4/1/2020	4/1/2020
10.	Contract End Date	ISP contract & monthly inventory report; PG&E CFS Exhibit	3/31/2021	3/31/2021
11.	Service Schedule Type/Rate Schedule	ISP contract & monthly inventory report; PG&E CFS Exhibit	FSS	G-CFS
12.	Inventory Account / Contract Number	ISP contract & monthly inventory report; PG&E CFS Exhibit	xxxHUBxxx	xxxxCFSxxx

No.	Description	Source of Data	SAMPLE Data for ISP Storage	SAMPLE Data for PG&E Storage
13.	Inventory Capacity (Dth)	Attachment M for ISP Storage and Minimum Inventory Check for PG&E Storage	45,000	45,000
14.	Max Daily Inj Qty (Dth/day/month)	ISP contract & monthly inventory report; PG&E CFS Exhibit	278	278
15.	Max Daily Wdl Qty (Dth/day/month)	ISP contract & monthly inventory report; PG&E CFS Exhibit	1,755	1,755
16.	Current Inventory Account - Gas Balance (Dth)	ISP contract & monthly inventory report; PG&E CFS Exhibit	4,300	7,500
17.	Out of Compliance Month / End of Month	ISP contract & monthly inventory report; PG&E CFS Exhibit	Apr-2020	May-2020
18.	Month-End Target Level	Obtained from Rate Schedule G-CFS (rounded)	11%	21%
19.	Inventory Account - Month-End Minimum Target Level Gas Balance (Dth)	(Row 13 * Row 18)	4,731	9,620
20.	Compliance (Yes/No)	Decision Formula	No	No
21.	Reason for Noncompliance	Feedback from Core Procurement Group	Insufficient Injection	Force Majeure
22.	Total Shortfall Volume (Dth)	(Row 16 - Row 19)	431	2,120
23.	Shortfall Volume - % of Month-End Minimum Target Level	(Row 22 / Row 19, rounded)	9%	22%
24.	Shortfall Volume - Under Tier 1 (G-BAL)	If (Row 22 < 10%, enter Row 22; if not then enter Row 19*10%)	431	962
25.	Shortfall Volume - Under Tier 2 (G-BAL)	If (Row 23 > 10%, then Row 22 - Row 24, if not then enter 0)	0	1,158
26.	Out of Compliance Month Noncompliance Fee for Tier 1 - < = 10% (G-BAL)	Obtained from Schedule G-BAL (WUD)	\$2.73210	\$2.77150

No.	Description	Source of Data	SAMPLE Data for ISP Storage	SAMPLE Data for PG&E Storage
27.	Noncompliance Fee for Tier 1 - < = 10% (WUD*25%)	(Row 26 * 25%)	\$ 0.6830	\$ 0.6929
28.	Out of Compliance Month Noncompliance Fee for Tier 2 - > 10% (G-BAL)	Obtained from Schedule G-BAL (UD)	\$3.43800	\$4.24950
29.	Noncompliance Fee for Tier 2 - > 10% (UD*50%)	(Row 28 * 50%)	\$1.71900	\$2.12475
30.	Total Noncompliance Charge (\$) (Tier 1 Dth*WUD*25%) + (Tier 2 Dth*UD*50%)	(Row 24 * Row 27) + (Row 25 * Row 29)	\$294.38	\$3,127.01
31.	Resolution - CTA Met Minimum Inventory Compliance (Month/Year Resolved)	Obtained from next month's gas storage inventory verification	Jun-20	Jul-20

Legend:

G-BAL: Gas Schedule for Gas Balancing Service for Intrastate Transportation Customers.

WUD: Weighted Under Delivery from Sheet 11 of gas schedule G-BAL.

UD: Under Delivery from Sheet 11 of gas schedule G-BAL.

**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
	Marin Energy Authority	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	McKenzie & Associates	
City of Palo Alto	Modesto Irrigation District	TransCanada
	Morgan Stanley	Troutman Sanders LLP
City of San Jose	NLine Energy, Inc.	Utility Cost Management
Clean Power Research	NRG Solar	Utility Power Solutions
Coast Economic Consulting		Utility Specialists
Commercial Energy	Office of Ratepayer Advocates	
County of Tehama - Department of Public Works	OnGrid Solar	Verizon
Crossborder Energy	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Crown Road Energy, LLC	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP		Yep Energy
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		