

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

February 5, 2020

Advice 4170-G-B

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Supplemental 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

Purpose

Pacific Gas and Electric Company (PG&E) is filing this supplement to Advice 4170-G-A to comply with Ordering Paragraph (OP). This supplemental advice letter supersedes original Advice 4170-G in part. While Gas Schedules G-CFS Sheet 1 and G-CT Sheet 4 are being replaced, the other tariff sheets and content contained in original Advice 4170-G and Advice 4170-G-A remain unchanged.

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. On December 18, 2019, PG&E filed Advice 4170-G-A Supplemental. On February 3, 2020, Energy Division requested PG&E to modify its proposed tariff Gas Schedule G-CFS to include specific language from OP 23. PG&E's Advice 4170-G-A is pending approval.

Supplement

In addition to the proposed tariff language in Schedule G-CFS that references the new adopted Residual PG&E Core Storage Capacity served by PG&E-owned storage facilities

and implementation of the new Total Core Storage Requirement to meet the Reliability Standard adopted in D.19-09-025, PG&E proposes to add the following language to Schedule G-CFS, Sheet 1, to comply with OP 23:

Total Core Storage Requirement (i.e., Core Gas Supply and CTAs) will be shared with CTAs, California Public Advocates Office, and The Utility Reform Network (TURN) on a confidential basis, as appropriate.

Also, similar language already exists in Footnote 7 of the Advice 4170-G and in Schedule G-CT. For clarification purposes, PG&E proposes to add the following language to Schedule G-CT, Sheet 4, Footnote 1:

PG&E will also share with California Public Advocates Office, and The Utility Reform Network (TURN) the total core storage requirement on confidential basis, as appropriate.

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 – Sheet 1

- See above description of changes.

Gas Schedule G-CT, Core Gas Aggregation Service – Sheet 4

- See above description of changes.

Protests

Energy Division has determined that the protest period has been waived for this submittal.

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

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) #: 4170-G-B

Tier Designation: 2

Subject of AL: Supplemental 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

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: 5

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
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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.
35646-G	GAS SCHEDULE G-CFS CORE FIRM STORAGE Sheet 1	35593-G
35647-G	GAS SCHEDULE G-CT CORE GAS AGGREGATION SERVICE Sheet 4	34645-G
35648-G	GAS TABLE OF CONTENTS Sheet 1	35642-G
35649-G	GAS TABLE OF CONTENTS Sheet 2	35643-G
35650-G	GAS TABLE OF CONTENTS Sheet 3	35644-G



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

Sheet 1

APPLICABILITY: This rate schedule* provides the rates and charges for core firm storage service taken by PG&E's Core Gas Supply Department (CGS), Core Transport Agents (CTAs) and others, pursuant to the core firm storage provisions of Schedule G-CT. It covers accepted PG&E-Allocated Storage, CTA Self-Managed Storage procured from PG&E, and assignments of the foregoing storage capacity to others.

This schedule also provides the methodology for determining the quantity of gas inventory that may be sold to or purchased from a CTA by CGS, as amounts of PG&E-Allocated Storage change during the Storage Year. In addition, this schedule describes the calculation of the prices to be paid when such gas inventory is transferred.

CTAs and CGS may also take storage service under Schedule(s), G-SFS, G-NFS and/or G-NAS in conjunction with service under this rate schedule.

TERRITORY: Schedule G-CFS applies to the firm use of PG&E's storage facilities.

STORAGE MONTHLY CHARGE: CTAs, CGS, and others holding core firm storage will be billed each month based upon the amount of storage held for all or a portion of the current month. The monthly charge is calculated by multiplying the applicable monthly rate, shown below, by the inventory capacity held that month.

Reservation Charge per Dth per month \$0.4157 (I) (T)

SHRINKAGE: In-kind storage shrinkage is applicable to all injection quantities in accordance with gas Rule 21.

SERVICE AGREEMENT: A Gas Transmission Service Agreement (GTSA) (Form No. 79-866) and applicable exhibit(s) and an Electronic Commerce System User Agreement (Form No. 79-982) are required for CTAs and CGS taking service under this Rate Schedule.

TERM: Core firm storage is allocated for a one-year term starting on April 1 and ending on March 31 of the following year (Storage Year), and may be assigned by CTA and CGS under the provisions of Assignment Of Storage, specified below.

NOMINATIONS: Nominations are required for injections and withdrawals. See Rule 21 for details.

ANNUAL INVENTORY/ INJECTION/ WITHDRAWAL: This schedule provides the Annual Inventory including the firm injection and withdrawal capacities for CTAs and CGS. It also specifies month-end minimum inventory targets for CTAs and CGS. The Residual PG&E Core Storage Capacity is that portion of the Total Core Storage Requirement served by PG&E-owned storage facilities. (T) (T) (N)

Total Core Storage Requirement (i.e., Core Gas supply and CTAs) will be shared with CTAs, California Public Advocates Office, and The Utility Reform Network (TURN) on a confidential basis, as appropriate. (N)

Annual Inventory (AI)

PG&E's current Residual Core Storage Capacity Reservation is: (T)

Annual Inventory 5,175,000 Dth (T)

As described in Schedule G-CT, this quantity will decline during the seven-year period in which CTAs transition to Self-Managed Storage.

A CTA Group's Annual Inventory is calculated as follows:

Calculations are in Dth.

* PG&E's gas tariffs are available on-line at www.pge.com.

(Continued)



GAS SCHEDULE G-CT
CORE GAS AGGREGATION SERVICE

Sheet 4

**FIRM WINTER
CAPACITY
REQUIREMENT**

As a condition of a CTA providing gas aggregation services to Customers in a Group, during the Winter Season, November 1 through March 31, CTAs are required to meet the Firm Winter Capacity Requirement as specified below. The Firm Winter Capacity Requirement requires that the CTA contract for firm Backbone pipeline capacity or firm PG&E storage capacity and withdrawal rights equal to the Group's pro rata share of firm Backbone pipeline capacity PG&E has reserved for Core End-Use Customers.

The CTA may satisfy such Firm Winter Capacity Requirement in any combination of the following:

1. Under the terms of Schedules G-SFT or G-AFT, contract with PG&E for all or part of the CTA's path-specific proportionate share of firm Backbone pipeline capacity PG&E has reserved for Core End-Use Customers.
2. Contract with a party other than PG&E for guaranteed use of that party's firm Backbone pipeline capacity or for guaranteed use of that party's firm PG&E storage capacity and withdrawal rights in conjunction with Mission Path capacity under Schedules G-AA or G-NAA or use of third-party firm storage capacity.
3. Contract with PG&E for firm Backbone pipeline capacity or firm storage capacity and withdrawal rights in conjunction with Mission Path capacity under Schedules G-AA or G-NAA or use of third-party firm storage capacity.
4. A CTA may meet the Firm Winter Capacity Requirement by contracting with a party other than PG&E demonstrating firm gas delivery to the PG&E Citygate. 'Demonstrating firm gas delivery' cannot be met by providing a letter from the firm gas supplier guaranteeing Citygate delivery.

Capacity held to satisfy core firm storage requirements may not simultaneously be used to satisfy the Firm Winter Capacity requirement.

Should the CTA exercise Option 2, 3, or 4, above to satisfy the Firm Winter Capacity requirements for any winter month, the CTA shall be required to submit, within five (5) days of notification, an executed Declaration of Alternate Winter Capacity (Form No. 79-845, Attachment J).

If a CTA has fulfilled this Firm Winter Capacity Requirement and has A) incurred no instances of non-compliance with an Emergency Flow Order (EFO), and B) no more than one (1) such instance with a Low Inventory Operational Flow Order (OFO) as specified in Rule 14 for a two-year period, the CTA will no longer be required to meet this Firm Winter Capacity Requirement provided that the Firm Winter Capacity Requirement shall be reinstated for any CTA that subsequently fails to meet the requirements set forth in A) and B) of this paragraph.

**TOTAL CORE
STORAGE
REQUIREMENT.
RESIDUAL PG&E
CORE STORAGE,
AND CTA
STORAGE
REQUIREMENT**

The Total Core Storage Requirement is the amount of storage capacity (or allowed alternate resources) that PG&E Core Gas Supply (CGS) and all CTAs must hold to meet core reliability requirements. The Residual PG&E Core Storage Capacity is that portion of the Total Core Storage Requirement served by PG&E-owned storage facilities.

Total Core Storage Requirement Inventory Capacity: CONFIDENTIAL¹

(T)
|
(T)
(T)

¹ Pursuant to Decision (D.)19-09-025, the Total Core Storage Requirement will be shared on a confidential basis with CTAs that execute nondisclosure agreements. PG&E will also share with California Public Advocates Office and The Utility Reform Network (TURN) the total core storage requirement on confidential basis, as appropriate.

(N)
|
(N)

(Continued)



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Advice 4170-G-B
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 5, 2020
November 22, 2019



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(T)

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Advice 4170-G-B
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 5, 2020
November 22, 2019



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Advice 4170-G-B
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 5, 2020
November 22, 2019

Advice 4170-G-B
February 5, 2020

Attachment 2

Redline Tariffs



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

Sheet 1

APPLICABILITY: This rate schedule* provides the rates and charges for core firm storage service taken by PG&E's Core Gas Supply Department (CGS), Core Transport Agents (CTAs) and others, pursuant to the core firm storage provisions of Schedule G-CT. It covers accepted PG&E-Allocated Storage, CTA Self-Managed Storage procured from PG&E, and assignments of the foregoing storage capacity to others.

This schedule also provides the methodology for determining the quantity of gas inventory that may be sold to or purchased from a CTA by CGS, as amounts of PG&E-Allocated Storage change during the Storage Year. In addition, this schedule describes the calculation of the prices to be paid when such gas inventory is transferred.

CTAs and CGS may also take storage service under Schedule(s), G-SFS, G-NFS and/or G-NAS in conjunction with service under this rate schedule.

TERRITORY: Schedule G-CFS applies to the firm use of PG&E's storage facilities.

STORAGE MONTHLY CHARGE: CTAs, CGS, and others holding core firm storage will be billed each month based upon the amount of storage held for all or a portion of the current month. The monthly charge is calculated by multiplying the applicable monthly rate, shown below, by the inventory capacity held that month.

Reservation Charge per Dth per month \$0.4157~~\$0.3424~~ (I) (T)

SHRINKAGE: In-kind storage shrinkage is applicable to all injection quantities in accordance with gas Rule 21.

SERVICE AGREEMENT: A Gas Transmission Service Agreement (GTSA) (Form No. 79-866) and applicable exhibit(s) and an Electronic Commerce System User Agreement (Form No. 79-982) are required for CTAs and CGS taking service under this Rate Schedule.

TERM: Core firm storage is allocated for a one-year term starting on April 1 and ending on March 31 of the following year (Storage Year), and may be assigned by CTA and CGS under the provisions of Assignment Of Storage, specified below.

NOMINATIONS: Nominations are required for injections and withdrawals. See Rule 21 for details.

ANNUAL INVENTORY/ This schedule provides the Annual Inventory including the firm injection and withdrawal capacities for CTAs and CGS. It also specifies month-end minimum inventory targets for CTAs and CGS. The Residual PG&E Core Storage Capacity is that portion of the Total Core Storage Requirement served by PG&E-owned storage facilities. (T)

INJECTION/ WITHDRAWAL: Total Core Storage Requirement (i.e., Core Gas supply and CTAs) will be shared with CTAs, California Public Advocates Office, and The Utility Reform Network (TURN) on a confidential basis, as appropriate. (T)
(N)
|
(N)

Annual Inventory (AI)

PG&E's current Residual Total Core Storage Capacity Reservation is: (T)

Annual Inventory 5,175,000~~3,477,700~~ Dth (T)

As described in Schedule G-CT, this quantity will decline during the seven-year period in which CTAs transition to Self-Managed Storage.

A CTA Group's Annual Inventory is calculated as follows:

Calculations are in Dth.

* PG&E's gas tariffs are available on-line at www.pge.com.

(Continued)



**GAS SCHEDULE G-CT
CORE GAS AGGREGATION SERVICE**

Sheet 4

**FIRM WINTER
CAPACITY
REQUIREMENT**

As a condition of a CTA providing gas aggregation services to Customers in a Group, during the Winter Season, November 1 through March 31, CTAs are required to meet the Firm Winter Capacity Requirement as specified below. The Firm Winter Capacity Requirement requires that the CTA contract for firm Backbone pipeline capacity or firm PG&E storage capacity and withdrawal rights equal to the Group's pro rata share of firm Backbone pipeline capacity PG&E has reserved for Core End-Use Customers.

The CTA may satisfy such Firm Winter Capacity Requirement in any combination of the following:

1. Under the terms of Schedules G-SFT or G-AFT, contract with PG&E for all or part of the CTA's path-specific proportionate share of firm Backbone pipeline capacity PG&E has reserved for Core End-Use Customers.
2. Contract with a party other than PG&E for guaranteed use of that party's firm Backbone pipeline capacity or for guaranteed use of that party's firm PG&E storage capacity and withdrawal rights in conjunction with Mission Path capacity under Schedules G-AA or G-NAA or use of third-party firm storage capacity.
3. Contract with PG&E for firm Backbone pipeline capacity or firm storage capacity and withdrawal rights in conjunction with Mission Path capacity under Schedules G-AA or G-NAA or use of third-party firm storage capacity.
4. A CTA may meet the Firm Winter Capacity Requirement by contracting with a party other than PG&E demonstrating firm gas delivery to the PG&E Citygate. 'Demonstrating firm gas delivery' cannot be met by providing a letter from the firm gas supplier guaranteeing Citygate delivery.

Capacity held to satisfy core firm storage requirements may not simultaneously be used to satisfy the Firm Winter Capacity requirement.

Should the CTA exercise Option 2, 3, or 4, above to satisfy the Firm Winter Capacity requirements for any winter month, the CTA shall be required to submit, within five (5) days of notification, an executed Declaration of Alternate Winter Capacity (Form No. 79-845, Attachment J).

If a CTA has fulfilled this Firm Winter Capacity Requirement and has A) incurred no instances of non-compliance with an Emergency Flow Order (EFO), and B) no more than one (1) such instance with a Low Inventory Operational Flow Order (OFO) as specified in Rule 14 for a two-year period, the CTA will no longer be required to meet this Firm Winter Capacity Requirement provided that the Firm Winter Capacity Requirement shall be reinstated for any CTA that subsequently fails to meet the requirements set forth in A) and B) of this paragraph.

**TOTAL CORE
STORAGE
REQUIREMENT,
RESIDUAL PG&E
CORE STORAGE,
AND CTA
STORAGE
REQUIREMENT**

The ~~†~~Total ~~ε~~Core Storage Requirement is the amount of storage capacity (or allowed alternate resources) that PG&E Core Gas Supply (CGS) and all CTAs must hold to meet core reliability requirements. The Residual PG&E Core Storage Capacity is that portion of the Total Core Storage Requirement served by PG&E-owned storage facilities.

Total Core Storage Requirement Inventory Capacity: CONFIDENTIAL¹

(T)
|
(T)
(T)

¹ Pursuant to Decision (D.)19-09-025, the Total Core Storage Requirement will be shared on a confidential basis with CTAs that execute nondisclosure agreements. PG&E will also share with California Public Advocates Office and The Utility Reform Network (TURN) the total core storage requirement on confidential basis, as appropriate.

(Continued)

**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	IGS Energy	San Francisco Water Power and Sewer
California Energy Commission	International Power Technology	Seattle City Light
California Public Utilities Commission	Intestate Gas Services, Inc.	Sempra Utilities
California State Association of Counties	Kelly Group	Southern California Edison Company
Calpine	Ken Bohn Consulting	Southern California Gas Company
	Keyes & Fox LLP	Spark Energy
Cameron-Daniel, P.C.	Leviton Manufacturing Co., Inc. Linde	Sun Light & Power
Casner, Steve	Los Angeles County Integrated	Sunshine Design
Cenergy Power	Waste Management Task Force	Tecogen, Inc.
Center for Biological Diversity	Los Angeles Dept of Water & Power	TerraVerde Renewable Partners
	MRW & Associates	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	Manatt Phelps Phillips	
City of Palo Alto	Marin Energy Authority	TransCanada
	McKenzie & Associates	Troutman Sanders LLP
City of San Jose	Modesto Irrigation District	Utility Cost Management
Clean Power Research	Morgan Stanley	Utility Power Solutions
Coast Economic Consulting	NLine Energy, Inc.	Utility Specialists
Commercial Energy	NRG Solar	
County of Tehama - Department of Public Works	Office of Ratepayer Advocates	Verizon
Crossborder Energy	OnGrid Solar	Water and Energy Consulting Wellhead Electric Company
Crown Road Energy, LLC	Pacific Gas and Electric Company	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	Peninsula Clean Energy	Yep Energy
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		