

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



February 4, 2020

**Advice Letter 4177-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: Status of Gas Gathering Program in Compliance with Ordering  
Paragraph 78 of Decision 19-09-025**

Dear Mr. Jacobson:

Advice Letter 4177-G is effective as of November 8, 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

November 8, 2019

**Advice 4177-G**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Status of Gas Gathering Program in Compliance with Ordering  
Paragraph 78 of Decision 19-09-025**

**Purpose**

This advice letter complies with Ordering Paragraph (OP) 78 in Pacific Gas and Electric's (PG&E) 2019 Gas Transmission and Storage (GT&S) Decision (D.) 19-09-025 (the Decision).

**Background**

On November 17, 2017, PG&E filed an application at the California Public Utilities Commission (CPUC or Commission) requesting that the Commission adopt its GT&S revenue requirement, cost allocation, and rate design for the period of 2019-2022. On September 12, 2019, the CPUC voted to adopt the Decision and address the issues before the Commission related to PG&E's application.<sup>1</sup> In the Decision, the CPUC found PG&E's forecast for the Gas Gathering program just and reasonable and agreed with Cal Advocates' recommendation that PG&E should submit a Tier 1 Advice Letter to provide a status update of its progress with the Gas Gathering program.<sup>2</sup>

PG&E submits this Advice Letter in compliance with OP 78 which requires PG&E to "submit a Tier 1 Advice Letter, within 60 days of the issue date of the instant decision, to provide the status of retiring its remaining gas gathering assets."

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<sup>1</sup> The CPUC issued the decision on September 23, 2019.

<sup>2</sup> D.19-09-025, pp. 182-183.

**Status of Gas Gathering Program**

As of December 31, 2018, PG&E had 111<sup>3</sup> idle gas gathering meters that should be retired; in the 2019 GT&S Rate Case, PG&E estimated that it will retire approximately 6 idle meters each year of the rate case period.

As of October 31, 2019, PG&E has retired an additional 2 idle gas gathering meters and 3.28 miles of associated pipeline at a total cost of \$3.9 million, resulting in 109 idle gas gathering meters remaining in its system. PG&E plans to retire 3 additional gas gathering meters and approximately 9 miles of associated pipeline by year-end 2019.

PG&E plans to include subsequent updates on the Gas Gathering Program in its semi-annual GT&S Reports as described in Advice Letter 4161-G.

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 December 2, 2019, which is 24 days<sup>4</sup> 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:

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<sup>3</sup> PG&E expected to have approximately 103 idle gas gathering meters left to retire by the beginning of the 2019 rate case period (A.17-11-009, Exhibit PG&E-1, Chapter 5, p. 5-110). The number of idle gas gathering meters may continue to fluctuate based on the ability of the producer to fulfill their contractual agreement.

<sup>4</sup> The 20-day protest period concludes on a holiday, therefore, PG&E is moving this date to the following business day.

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 5.1, and OP 78 of D.19-09-025, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is November 8, 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](mailto: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/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

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) #: 4177-G

Tier Designation: 1

Subject of AL: Status of Gas Gathering Program in Compliance with Ordering Paragraph 78 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: 11/8/19

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:

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