

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 9, 2020

**Advice Letter 4190-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: Modifications to Gas Rate Schedule G-CT and Attachment I, Including Related Forms, and Proposal to Allow CTAs to Use Alternate Resources in Compliance with Ordering Paragraph 5 of Resolution G-3537 .**

Dear Mr. Jacobson:

Advice Letter 4190-G is approved as of February 27, 2020 per resolution G-3567 Ordering Paragraphs.

Sincerely,

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

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

December 11, 2019

**Advice 4190-G**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Modifications to Gas Rate Schedule G-CT and Attachment I, Including Related Forms, and Proposal to Allow CTAs to Use Alternate Resources in Compliance with Ordering Paragraph 5 of Resolution G-3537**

**Purpose**

This advice letter complies with Ordering Paragraph (OP) 5 in Resolution G-3537, issued February 9, 2018, requiring PG&E to seek approval for the third and subsequent years (2020 and beyond) of the Core Transport Agent (CTA) Self-Managed Storage program, including specific mechanisms to potentially allow CTAs to use Alternate Resources. In order to timely implement these changes, PG&E requests a disposition letter no later than February 15, 2020.

**Background**

Decision (D.)16-06-056 in PG&E's 2015 Gas Transmission & Storage (GT&S) Rate Case ordered the transition of the procurement of storage services from PG&E to the CTAs, to be carried out over a seven-year period (April 1, 2018 to March 31, 2025). Pursuant to D.16-06-056, PG&E's Advice 3884-G requested modifications to Gas Schedules G-CT and G-CFS, and associated forms to implement the CTA Self-Managed Storage program. On February 8, 2018, the CPUC issued Resolution G-3537 that approved PG&E Advice 3884-G with modifications as submitted, but limited to Year 1 and Year 2. PG&E submits this Advice Letter in compliance with OP 5 of the Resolution.

OP 5 directs PG&E to submit a "Tier 2 Advice Letter to update and seek approval for the subsequent years of the Core Transport Agent (CTA) Self-Managed Storage phase-in process (2020 and beyond), including specific mechanisms to potentially allow CTAs the use of alternate resources. These alternate resources would be in addition to storage capacity that CTAs shall procure from Pacific Gas and Electric or Commission-approved independent storage providers, for the Self-managed Storage program."

D.19-09-025 (2019 GT&S Rate Case Decision) expressly continued the seven-year phase-in process.<sup>1</sup> Accordingly, PG&E will continue this transition under the schedule ordered by the Commission. PG&E will continue to apply the annual reductions (10 percent in each of the first four years, 20 percent in each of the remaining three years) to PG&E's residual Core Storage Service quantities, as contemplated in Advice 4170-G, which is pending CPUC approval.<sup>2</sup> PG&E-Allocated Storage will continue to be phased out over the seven-year transition period as ordered in D.16-06-056 while CTA Self-Managed Storage will be simultaneously phased in.

### **December 3, 2019 CTA Self-Managed Storage Workshop – Summary of Proposal**

As directed in Resolution G-3537, at the CTA Self-Managed Storage Workshop hosted by the CPUC's Energy Division on December 3, 2019, PG&E provided an overview and assessment of the CTA Self-Managed Storage program for Years 1 and 2 as well as its recommendation for Years 3 through 7 of the program. As a result of discussions with the CTAs at the workshop, PG&E proposed a compromise proposal for the participants' consideration. PG&E requested CTAs to confirm their support of this compromise proposal by December 6, 2019.<sup>3</sup>

PG&E proposes to allow CTAs to use Alternate Resources in the third year (effective April 1, 2020) and subsequent years of the Self-Managed Storage program, as currently defined in PG&E's Attachment I – Certification of Alternate Resources for Rejected PG&E-Allocated Storage Withdrawal Capacity (Form 79-845I).<sup>4</sup>

PG&E may seek to suspend or modify the use of Alternate Resources under the CTA Self-Managed Storage program by submitting a Tier 2 Advice Letter applicable to the following storage season if the following two conditions exist:

1. Aggregate CTA elections of non-storage Alternate Resources under the Self-Managed Storage program reach or exceed 500,000 Dth Annual Inventory equivalent; and
2. PG&E can demonstrate a significant adverse impact to core reliability or system reliability.

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<sup>1</sup> D.19-09-025, p. 57, "We decline to eliminate the seven-year phase-out requirement set forth in D.16-06-056."

<sup>2</sup> PG&E will perform a clean-up Advice submittal of the related tariffs and forms that references Self-Managed Storage after PG&E receives Commission approval of the pending Advice 4170-G.

<sup>3</sup> On December 6, 2019, the following CTAs acknowledged their support of PG&E's proposal and agreed to not protest PG&E's advice letter: Tiger Energy, SPURR, Commercial Energy, Just Energy, Vista, and IGS. Shell Energy declined to support this proposal.

<sup>4</sup> The proposed revisions on Attachment I allow CTAs to use their Firm Backbone Pipeline Capacity (PG&E's Firm Transport) with their gas supply contract to fulfill their CTA Self-Managed Storage requirement.

Additionally, PG&E is amenable to providing the additional information as discussed in the Annual reports on the CTA Self-Managed Storage Program to be submitted to the Energy Division. A copy of the CTA Self-Managed Storage Annual Report will be served on the service lists to PG&E's 2015 and 2019 Gas Transmission and Storage proceedings. (A.13-12-012 and A.17-11-009).

### **Tariff Revisions**

PG&E submits the following proposed tariff revisions effective April 1, 2020, in compliance with Resolution G-3537, OP 5.

1. *Gas Schedule G-CT, Core Gas Aggregation Service.*
  - The revisions are consistent with this compromise proposal discussed at the December 3, 2019 CTA Workshop hosted by Energy Division.
2. *Form 79-845I, Core Gas Aggregation Service Agreement -- ATTACHMENT I - Certification of Alternate Resources for Rejected PG&E-Allocated Storage Withdrawal Capacity and Self-Managed Storage Capacity*
  - Added Self-Managed Storage Capacity to the existing Attachment I.

### **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 31, 2019, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-3582  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

### **Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 5 of Resolution G-3537, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on April 1, 2020. In order to timely implement these changes, PG&E requests a disposition letter no later than February 15, 2020.

### **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.13-12-012 and 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.13-12-012 and 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) #: 4190-G

Tier Designation: 2

Subject of AL: Modifications to Gas Rate Schedule G-CT and Attachment I, Including Related Forms, and Proposal to Allow CTAs to Use Alternate Resources in Compliance with Ordering Paragraph 5 of Resolution G-3537

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 #: G-3537

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: 4/1/20

No. of tariff sheets: 9

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: Gas Schedule G-CT, Gas Form 79-845I

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
35529-G	Gas Sample Form No. 79-845I Core Gas Aggregation Service Agreement ATTACHMENT I - Certification of Alternate Resources for Rejected PG&E Allocated Storage Withdrawal Capacity Sheet 1	33707-G
35530-G	GAS SCHEDULE G-CT CORE GAS AGGREGATION SERVICE Sheet 8	34649-G
35531-G	GAS SCHEDULE G-CT CORE GAS AGGREGATION SERVICE Sheet 9	34650-G
35532-G	GAS SCHEDULE G-CT CORE GAS AGGREGATION SERVICE Sheet 10	34651-G
35533-G	GAS SCHEDULE G-CT CORE GAS AGGREGATION SERVICE Sheet 11	34652-G
35534-G	GAS SCHEDULE G-CT CORE GAS AGGREGATION SERVICE Sheet 12	34653-G
35535-G	GAS TABLE OF CONTENTS Sheet 1	35527-G
35536-G	GAS TABLE OF CONTENTS Sheet 3	35521-G
35537-G	GAS TABLE OF CONTENTS Sheet 11	34641-G



**Gas Sample Form No. 79-845I**

Sheet 1

Core Gas Aggregation Service Agreement

ATTACHMENT I - Certification of Alternate Resources for Rejected PG&E Allocated Storage  
Withdrawal Capacity

**Please Refer to Attached  
Sample Form**

# CORE GAS AGGREGATION SERVICE AGREEMENT



## ATTACHMENT I CERTIFICATION OF ALTERNATE RESOURCES FOR REJECTED PG&E-ALLOCATED STORAGE WITHDRAWAL CAPACITY and SELF-MANAGED STORAGE CAPACITY

<b>CTA Name:</b>	<b>CTA Group No.:</b>	<b>For (Month/Year):</b>
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This Attachment to the Core Gas Aggregation Service Agreement (CTA Agreement) is made subject to its terms and provisions and is a legally binding document.

In accordance with Schedule G-CT and the CTA's Attachment D – Core Firm Storage Requirement – currently in effect, this Attachment to the CTA Agreement represents Certification by the CTA of Alternate Resources for PG&E-Allocated Storage and Self-Managed Storage Program. This form is required to the extent that the CTA rejects all or part of either an Initial Storage Allocation or a Mid-Year Storage Allocation Adjustment. The CTA must provide this executed form to PG&E prior to each Winter Season month, indicating the Alternate Resources held by the CTA, in amounts and delivery reliability at least equal to the storage withdrawal capacity associated with amounts of capacity for the month(s) that the CTA has rejected.

### TERM and QUANTITY

	1	2	3	4 (=1- 2 + 3)
<b>Allocation Period</b>	<b>PG&amp;E-Allocated Storage and Self-Managed Storage - Firm Withdrawal Capacity Requirement (Dth/day)</b>	<b>CTA Contracted Withdrawal Capacity (Dth/day)</b>	<b>CTA Contracted Withdrawal Capacity &amp; Assigned by CTA (Dth/day)</b>	<b>Remaining Firm Withdrawal Capacity Requirement (Dth/day)<sup>1</sup></b>
Initial Allocation:				
Mid-Year Adjustment:				
Total:				

<sup>1</sup> If the Remaining Firm Withdrawal Capacity Requirement is zero, this form will not be required.

### ALTERNATE RESOURCES

As the representative of the indicated CTA, the undersigned declares and certifies that CTA holds the following resources satisfying the requirement for Alternate Resources for the month specified above. These resources shall be held for the use of the CTA's Core Group and shall not be assigned or otherwise encumbered for the indicated month. Each of these resources is available to meet loads on the peak load days for the volume and month specified above, and all are available for coincident supply.

Held by CTA in addition to total amount in Column 2 minus Column 3 above:

Alternate Resources	Contract/Exhibit No.	Contract/Exhibit MDQ (Dth/day)
Firm Backbone Pipeline Capacity:* (must include equivalent gas supply contract)	Gas Supply Contract:	
PG&E Firm Storage and Withdrawal Capacity:* (must meet minimum gas supply pursuant to G-CFS)	Current Gas Inventory (Dth):	
Alternate Firm Storage and Withdrawal Capacity:* (Storage Provider other than PG&E) (must meet minimum gas supply pursuant to G-CFS)	Mission to On-System:	
	Current Gas Inventory (Dth):	
California Production Supply: (must include firm Silverado Path Transportation Exhibit)	Silverado to On-System:	
<b>Total:</b>		

**\*Backbone Pipeline Capacity held to satisfy the Firm Winter Season Storage requirements may not simultaneously be used to fulfill this Remaining Firm Withdrawal Capacity Requirement.**

**CORE GAS AGGREGATION SERVICE AGREEMENT**



**ATTACHMENT I**

**CERTIFICATION OF ALTERNATE RESOURCES FOR  
REJECTED PG&E-ALLOCATED STORAGE WITHDRAWAL  
CAPACITY and SELF-MANAGED STORAGE CAPACITY**

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**Core Transport Agent**

Name of Authorized Representative: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_



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

Sheet 8

CTA SELF-MANAGED STORAGE (Cont'd.)

Year	Transition Period Year	Percentage of CTA Storage Requirement that is PG&E-Allocated Storage	Percentage of CTA Storage Requirement that is Self-Managed--procured from PG&E or ISPs	Percentage of CTA Storage Requirement that is Self-Managed and that CTA may Procure from PG&E, to the extent available (in 10% increments)
1	April 2018 – March 2019	90%	10%	0% - 10%
2	April 2019 – March 2020	80%	20%	0% - 20%
3	April 2020 – March 2021	70%	30%	0% - 30%
4	April 2021 – March 2022	60%	40%	0% - 40%
5	April 2022 – March 2023	40%	60%	0% - 60%
6	April 2023 – March 2024	20%	80%	0% - 80%
7	April 2024 – March 2025 & Beyond	0%	100%	0% - 100%

As specified in the *Mid-Year Core Firm Storage Allocation Adjustment* section above, PG&E will provide to the CTAs recalculated CTA Storage Requirements, including each CTA's Self-Managed Storage. Any mid-year storage adjustment, either an increase or a decrease in capacity, will be apportioned between the CTA's PG&E-Allocated Storage and its Self-Managed Storage.

CTAs that are subject to a mid-year increase in their Storage Requirement must procure additional Self-Managed Storage from either PG&E (to extent available) or ISPs and filled to meet the same Month-end Minimum Inventory target level for the Injection Period as specified in gas rate schedule G-CFS.

CTAs that are subject to a mid-year decrease in their Storage Requirement may not reduce their Self-Managed Storage procured from PG&E.

CTAs that decline to procure Self-Managed Storage have the option to use Alternate Resources in the third and subsequent years of the Self-Managed Storage by submitting Attachment I – Certification of Alternate Resources (Form 79-845I).

(T)  
I  
(T)

PG&E reserves the option to submit a Tier 2 Advice submittal to suspend or modify the use of Alternate Resources under the CTA Self-Managed Storage program for the following storage season if the following two conditions exist:

(N)  
I  
(N)

(Continued)



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

Sheet 9

- |                                    |   |                   |
|------------------------------------|---|-------------------|
| CTA SELF-MANAGED STORAGE (Cont'd.) | 1. Aggregate CTA elections of non-storage Alternate Resources under the Self-Managed Storage program reach or exceed 500,000 Dth Annual Inventory equivalent; and | (N)<br> <br> <br> |
|                                    | 2. PG&E can demonstrate a significant adverse impact to core reliability or system reliability.   | <br>(N)           |

In Year 7 and each year after, PG&E shall continue to provide calculation of CTAs' Storage Requirements during the annual and mid-year storage processes. There will be no more PG&E-Allocated Storage. The full amount of the CTA Storage Requirement is Self-Managed Storage and may be procured from PG&E (to extent available) or ISPs.	(L)     (L)
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PG&E STORAGE PAYMENTS:	For those months during which the CTA holds PG&E Storage, the CTA will pay a monthly charge equal to the inventory volume associated with its PG&E Storage, multiplied by the monthly rate specified in Schedule G-CFS for the applicable month.
	The CTA will pay the same rates that PG&E's Core Gas Supply Department pays for the capacity as well as any other applicable rates, fees, and charges.

ALTERNATE RESOURCES AND CTA CERTIFICATION FOR PG&E-ALLOCATED STORAGE AND SELF-MANAGED STORAGE REJECTED BY CTA:	For PG&E-Allocated Storage withdrawal capacity and Self-Managed Storage rejected by a CTA in the Initial Storage or Mid-Year Storage process, Alternate Resources, in like amounts, will be required as provided below. On a monthly basis, during the Winter Season, CTAs shall submit an executed <u>Certification of Alternate Resources for Rejected PG&amp;E-Allocated Storage Withdrawal Capacity and Self-Managed Storage Capacity</u> (Form No. 79-845, Attachment I). The CTA must provide such certification to PG&E as specified by PG&E. PG&E will not require these certifications earlier than ten (10) business days prior to the beginning of each Winter month.	(T)  (T) (T)
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Certified Alternate Resources may not duplicate any resources offered as replacements for Firm Winter Backbone capacity that the CTA may be required to hold. The CTA must satisfy the Alternative Resources obligation with any combination of the following:

1. Contracted firm storage services from PG&E or from an on-system CPUC-certified independent storage provider; and/or
2. Contracted firm PG&E Backbone capacity matched with an equivalent volume of contracted upstream gas supply, plus any necessary firm upstream pipeline capacity (upstream gas supply may include a gas producer contract, or a contract with an off-system CPUC-certified, gas utility or independent storage provider); and/or
3. Third-party peaking supply arrangements, where that supply is backed up by contracts, as specified in 1. or 2., above.

(L)  
(L)

(Continued)





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

Sheet 11

COST RESPONSIBILITY FOR CTA-REJECTED FIRM PIPELINE CAPACITY AND FIRM STORAGE INVENTORY CAPACITY (Cont'd.):	April 2015 onward is designated the "Post-Transition Period," during which CTAs will assume full cost responsibility for all rejected firm pipeline capacity and rejected firm storage inventory capacity.  In order to mitigate the costs borne by CTAs for capacity rejected by them and not retained by PG&E's Core Gas Supply Department, PG&E will, as a service to CTAs, offer such capacity to the market and will credit the capacity release proceeds against the costs otherwise owed to PG&E by the CTAs. The capacity release process is described in the next section.	(L)                     (L)
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Any CTA-Rejected Capacity costs remaining after PG&E's Core Gas Supply Department has retained a portion of such capacity, as described above, and PG&E has attempted to release such capacity, as described in the next section, will be allocated to and invoiced to the CTAs in proportion to the amount of capacity rejected by each CTA. This allocation will be performed on a pipeline-by-pipeline, month-by-month basis. CTA-Rejected Capacity costs arising from capacity offered to, but rejected by, a particular CTA during the Mid-Year Core Firm Storage Allocation Adjustment will be invoiced directly to that CTA except for the reservation rate of one penny per decatherm per month (\$0.01/Dth/month) paid by PG&E's Core Gas Supply Department, as described in the next section.

PG&E's Core Gas Supply Department will retain and take cost responsibility for a portion of the aggregate CTA-Rejected Capacity during the transition period, as described above. PG&E will manage the remaining CTA-Rejected Capacity (Net CTA-Rejected Capacity) in the following manner: PG&E will attempt to release the Net CTA-Rejected Capacity to the marketplace through an auction, bulletin board listing or similar process. As PG&E will have very little discretion in how this capacity will be resold, a CTA cannot protest the results of that process. To the extent left-over capacity remains after the capacity release process, PG&E's Core Gas Supply Department will retain this left-over capacity at the rate described below.

PG&E will, as a service to CTAs, offer the Net CTA-Rejected Capacity to the marketplace prior to each capacity allocation period, that is, three (3) times per year for Pipeline capacity and once per year for storage capacity. For Pipeline capacity, PG&E will also offer Net CTA-Rejected Capacity once per month during each capacity allocation period to the extent capacity remains available. In offering capacity for release, PG&E will abide by the established capacity release procedures and applicable tariff provisions of the various Pipelines on which the rejected capacity is released. To the extent these procedures and requirements change, PG&E will adjust its procedures for the release of rejected capacity as may be appropriate.

PG&E will offer Pipeline capacity on the following basis:

1. Only single-month, single-Pipeline contracts through the end of the current capacity allocation period will be offered. Contracts for multiple Pipelines, multiple products (transmission and storage service), or multiple months will not be bundled together.
2. Any reservation rate bid greater than zero will be acceptable.
3. The minimum acceptable bid quantity will be the lesser of (i) one thousand (1,000) Dth/d, or (ii) the total capacity offered for that month on that Pipeline.
4. All applicable Pipeline tariff rates and fees other than the reservation rate will continue to apply, and will be the responsibility of the successful bidder.

(L)

(Continued)



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

Sheet 12

TREATMENT OF  
CTA-REJECTED  
FIRM PIPELINE  
CAPACITY AND  
FIRM STORAGE  
INVENTORY  
CAPACITY  
(Cont'd.):

PG&E will offer Pipeline capacity on the following basis (cont'd):

- 5. Pipeline contracts will be awarded for each month based upon the reservation rate--- highest rate first, lowest rate last. In the event there are two or more bids of equal value for a combined contract quantity greater than the remaining available capacity on a given pipeline, the bidders will each be awarded a pro rata amount of the remaining available capacity for that month.
- 6. Bidders must satisfy all applicable creditworthiness requirements of the Pipeline(s) on which they are bidding for capacity.

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(L)

To the extent Net CTA-Rejected Capacity remains unallocated after the initial auction of Pipeline capacity prior to each capacity allocation period, PG&E's Core Gas Supply Department will be deemed to have bid a reservation rate of one penny per decatherm per month (\$0.01/Dth/month) for such capacity. This deemed bid shall apply only to the first month of the Pipeline capacity allocation period, that is, to the capacity for use during the next immediate month. To the extent Net CTA-Rejected Capacity remains unallocated after each subsequent monthly Pipeline capacity auction during the capacity allocation period, PG&E's Core Gas Supply Department will similarly be deemed to have bid a reservation rate of \$0.01/Dth/month for such capacity, but only for the first month that capacity is offered in each auction.

PG&E's Core Gas Supply Department will retain these unallocated Pipeline capacity amounts in its contracts with the various Pipelines, and will have rights to use and/or release this capacity in the same manner as its other capacity holdings. The \$0.01/Dth/month effective reservation rate will be credited against the costs otherwise owed by the CTAs to PG&E in the same manner as the auction proceeds. The CTAs will be responsible for all other reservation costs associated with these Pipeline capacities, other than the \$0.01/Dth/month rate.

PG&E will offer storage capacity to the marketplace once a year, prior to the start of the annual Storage Year (April - March). PG&E will not offer rejected storage capacity to the market following the Mid-Year Storage Allocation Adjustment or at any other time. PG&E will offer storage capacity on the following basis:

- 1. Only 12-month bids will be acceptable. Contracts for multiple products (transmission and storage service) on one or more pipelines may not be bundled together.
- 2. Any reservation rate greater than zero will be acceptable.
- 3. The minimum acceptable bid quantity will be the lesser of (i) ten thousand (10,000) Dth of inventory plus associated injection and withdrawal rights, or (ii) the total storage capacity offered.
- 4. Injection and withdrawal rights will be allocated in the proportions indicated earlier under Allocation Of Core Firm Storage.
- 5. Storage contracts will be awarded for the entire Storage Year based upon the reservation rate: highest rate first, lowest rate last. In the event there are two or more bids of equal value for a combined contract quantity greater than the available storage capacity at a given price, the bidders will each be awarded a pro rata amount of the available storage capacity.
- 6. Bidders must satisfy all applicable creditworthiness requirements for the awarded storage capacity specified in PG&E's Tariffs.

(Continued)



**GAS TABLE OF CONTENTS**

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page .....	<b>35535-G</b>	(T)
Rate Schedules .....	35528, <b>35536-G</b>	(T)
Preliminary Statements.....	35522, 35068-G	
Preliminary Statements, Rules .....	35245-G	
Rules, Maps, Contracts and Deviations.....	35195-G	
Sample Forms .....	34229, 32986, 32987, <b>35537</b> , 34953, 32888-G	(T)

(Continued)

Advice 4190-G  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

December 11, 2019  
G-3537



**GAS TABLE OF CONTENTS**

Sheet 3

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

**Rate Schedules  
Non-Residential**

G-AFTOFF	Annual Firm Transportation Off-System .....	30657,35295,22057-G
G-SFT	Seasonal Firm Transportation On-System Only .....	30678,35305,22178-G
G-AA	As-Available Transportation On-System.....	30651,35292-G
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Advice 4190-G  
December 10, 2019

## **Attachment 2**

### **Redline Tariffs**

# CORE GAS AGGREGATION SERVICE AGREEMENT



## ATTACHMENT I CERTIFICATION OF ALTERNATE RESOURCES FOR REJECTED PG&E-ALLOCATED STORAGE WITHDRAWAL CAPACITY and SELF-MANAGED STORAGE CAPACITY

<b>CTA Name:</b>	<b>CTA Group No.:</b>	<b>For (Month/Year):</b>
------------------	-----------------------	--------------------------

This Attachment to the Core Gas Aggregation Service Agreement (CTA Agreement) is made subject to its terms and provisions and is a legally binding document.

In accordance with Schedule G-CT and the CTA's Attachment D – Core Firm Storage Requirement – currently in effect, this Attachment to the CTA Agreement represents Certification by the CTA of Alternate Resources for PG&E-Allocated Storage and Self-Managed Storage Program. This form is required to the extent that the CTA rejects all or part of either an Initial Storage Allocation or a Mid-Year Storage Allocation Adjustment. The CTA must provide this executed form to PG&E prior to each Winter Season month, indicating the Alternate Resources held by the CTA, in amounts and delivery reliability at least equal to the storage withdrawal capacity associated with amounts of capacity for the month(s) that the CTA has rejected.

### TERM and QUANTITY

	1	2	3	4 (=1 - 2 + 3)
<b>Allocation Period</b>	<b>PG&amp;E-Allocated Storage and Self-Managed Storage - Firm Withdrawal Capacity Requirement (Dth/day)</b>	<b>CTA Contracted Withdrawal Capacity (Dth/day)</b>	<b>CTA Contracted Withdrawal Capacity &amp; Assigned by CTA (Dth/day)</b>	<b>Remaining Firm Withdrawal Capacity Requirement (Dth/day)<sup>1</sup></b>
Initial Allocation:				
Mid-Year Adjustment:				
Total:				

<sup>1</sup> If the Remaining Firm Withdrawal Capacity Requirement is zero, this form will not be required.

### ALTERNATE RESOURCES

As the representative of the indicated CTA, the undersigned declares and certifies that CTA holds the following resources satisfying the requirement for Alternate Resources for the month specified above. These resources shall be held for the use of the CTA's Core Group and shall not be assigned or otherwise encumbered for the indicated month. Each of these resources is available to meet loads on the peak load days for the volume and month specified above, and all are available for coincident supply.

Held by CTA in addition to total amount in Column 2 minus Column 3 above:

Alternate Resources	Contract/Exhibit No.	Contract/Exhibit MDQ (Dth/day)
Firm Backbone Pipeline Capacity:* (must include equivalent gas supply contract)	Gas Supply Contract:	
PG&E Firm Storage and Withdrawal Capacity:* (must meet minimum gas supply pursuant to G-CFS)	Current Gas Inventory (Dth):	
Alternate Firm Storage and Withdrawal Capacity:* (Storage Provider other than PG&E) (must meet minimum gas supply pursuant to G-CFS)	Mission to On-System:	
	Current Gas Inventory (Dth):	
California Production Supply: (must include firm Silverado Path Transportation Exhibit)	Silverado to On-System:	
<b>Total:</b>		

**\*Backbone Pipeline Capacity held to satisfy the Firm Winter Season Storage requirements may not simultaneously be used to fulfill this Remaining Firm Withdrawal Capacity Requirement.**

CORE GAS AGGREGATION SERVICE AGREEMENT



**ATTACHMENT I**

**CERTIFICATION OF ALTERNATE RESOURCES FOR  
REJECTED PG&E-ALLOCATED STORAGE WITHDRAWAL  
CAPACITY and SELF-MANAGED STORAGE CAPACITY**

**Core Transport Agent**

Name of Authorized Representative: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_





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

Sheet 9

PG&E STORAGE PAYMENTS: For those months during which the CTA holds PG&E Storage, the CTA will pay a monthly charge equal to the inventory volume associated with its PG&E Storage, multiplied by the monthly rate specified in Schedule G-CFS for the applicable month. (L)

The CTA will pay the same rates that PG&E's Core Gas Supply Department pays for the capacity as well as any other applicable rates, fees, and charges.

ALTERNATE RESOURCES AND CTA CERTIFICATION FOR PG&E-ALLOCATED STORAGE AND SELF-MANAGED STORAGE REJECTED BY CTA: For PG&E-Allocated Storage withdrawal capacity and Self-Managed Storage rejected by a CTA in the Initial Storage or Mid-Year Storage process, Alternate Resources, in like amounts, will be required as provided below. On a monthly basis, during the Winter Season, CTAs shall submit an executed Certification of Alternate Resources for Rejected PG&E-Allocated Storage Withdrawal Capacity and Self-Managed Storage Capacity (Form No. 79-845, Attachment I). The CTA must provide such certification to PG&E as specified by PG&E. PG&E will not require these certifications earlier than ten (10) business days prior to the beginning of each Winter month.

Certified Alternate Resources may not duplicate any resources offered as replacements for Firm Winter Backbone capacity that the CTA may be required to hold. The CTA must satisfy the Alternative Resources obligation with any combination of the following:

1. Contracted firm storage services from PG&E or from an on-system CPUC-certified independent storage provider; and/or
2. Contracted firm PG&E Backbone capacity matched with an equivalent volume of contracted upstream gas supply, plus any necessary firm upstream pipeline capacity (upstream gas supply may include a gas producer contract, or a contract with an off-system CPUC-certified, gas utility or independent storage provider); and/or
3. Third-party peaking supply arrangements, where that supply is backed up by contracts, as specified in 1. or 2., above.

ALTERNATE STORAGE RESOURCES AND CTA CERTIFICATION FOR CTA SELF-MANAGED STORAGE: Each year CTAs will be required to certify Alternate Storage Resources, in like amounts, for Self-Managed Storage not elected from PG&E, as described below. On a monthly basis (summer and winter), CTAs shall submit an executed Certification of Alternate Storage Resources for Self-Managed Storage Capacity (Form No. 79-845M, Attachment M). PG&E will not require these certifications earlier than ten (10) business days prior to the beginning of each month. This form will not be required if Self-Managed Storage is procured from PG&E. Certified Alternate Storage Resources may not simultaneously be used to fulfill both Attachment J and Attachment I. CTAs shall procure Alternate Storage Resources from an ISP as outlined on the Attachment M with the following:

1. Fixed Equivalent Withdrawal (FEW) rights or variable equivalent withdrawal rights each month equal to those amounts available under Schedule G-CFS; and
2. Month-end minimum inventory target levels equal to those levels required under Schedule G-CFS.

The CTA must satisfy the Alternate Storage Resource requirement with any combination of the following: (L)

(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	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		