

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 30, 2020

Advice Letter 4224-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: Advice Letter for Approval to Enter into Gas Storage Contract

Dear Mr. Jacobson:

Advice Letter 4224-G is effective as of April 1, 2020.

Sincerely,

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

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

March 2, 2020

Advice 4224-G
(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Advice Letter for Approval to Enter into Gas Storage Contract

Purpose

Pacific Gas and Electric Company's (PG&E) Core Gas Supply Department (CGS) requests California Public Utilities Commission (Commission) approval to enter into a gas storage contract (proposed contract). The contract is necessary for PG&E to comply with the requirements of its 1-cold-day-in-10-year reliability standard adopted in Decision (D.) 06-07-010 and the 2019 GT&S Final Decision (D.19-09-025). In order to meet the core demand component of the system Reliability Standard, D.19-09-025 authorizes CGS to acquire reasonably priced firm storage services from Independent Storage Providers (ISPs) in addition to that furnished by PG&E's own storage facilities.

Advice Letter Process

PG&E followed the procedures described in Appendix I of D.19-09-025 for obtaining gas storage services from ISPs in order to meet the 1-cold-day-in-10-year planning Reliability Standard for core customers. The Appendix I procedures are based on the procedures that were adopted in D.06-07-010 and D.04-09-022, as modified by D.06-10-035.

PG&E consulted with Public Advocates Office (Cal PA) regarding all storage offers from the competitive Request for Offer process and received Cal PA's concurrence for the proposed contract. As described in D.19-09-025, the involvement of The Utility Reform Network (TURN) in the process is voluntary and TURN indicated they were not participating in the evaluation of this proposed contract.¹ With the Cal PA's concurrence and TURN's election to not participate, PG&E may file a Tier 1 Advice Letter seeking Commission approval of the proposed contract with an effective date no earlier than 30 days after the advice letter submittal date. Consequently, PG&E requests that the Commission approve this submittal by April 1, 2020.

¹ D.19-09-025, page 1 of Appendix I states, "TURN's participation is voluntary."

Description of Contract

The terms of the proposed contract are confidential² and are described in Confidential Appendix A and Attachment. Confidential Appendix A and Attachment are submitted to the Energy Division, Legal Division, and Cal PA pursuant to the attached confidentiality declaration dated February 28, 2020. The public version of this Advice Letter is provided to the service lists for A.05-03-001 and A.13-12-012.

The proposed contract will be utilized by PG&E's CGS for its bundled core gas supply customers. The proposed contract will not be allocated or assigned to Core Transport Agents. All costs associated with the proposed contract will be recovered from PG&E's bundled core gas customers through PG&E's Purchased Gas Account and through PG&E's gas tariffs.

This submittal will not affect any other rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than March 23, 2020, which is twenty-one (21) days³ from the date of this submittal, in accordance with the protest period authorized in D.19-09-025. Protests should be mailed 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 also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

² Public Utilities Code section 454.5(g) and 583, D.06-06-066 and D.15-10-050. PG&E also submitted prior gas storage contracts with ISPs confidentially (e.g., PG&E Advice Letter 3971-G).

³ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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

Facsimile: (415) 973-3852
E-mail: PGETariffs@pge.com

Effective Date

In accordance with the comment and evaluation period provided in D.19-09-025, PG&E submits this advice letter as a Tier 1 and requests Commission approval of this submittal effective April 1, 2020, which is 30 days after the date of this submittal.

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 service lists for A.05-03-001 and A.13-06-011. Address changes to the General Order 96-B service list should be directed to email 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

Appendix A and Attachment (Confidential)

cc: **Confidential Version (with Confidential Appendix A and Attachment)**

Jean Spencer - Energy Division
Eugene Cadenasso – Energy Division
Beth LaCour – Energy Division
Renee Guild - Energy Division
Kevin Flaherty – Energy Division
Jonathon Bromson - Legal Division
R. Mark Pocta - Public Advocates Office
Pearlie Sabino - Public Advocates Office
Crystal Yeh - Public Advocates Office
Michael Tan - Public Advocates Office

Public Version (without Confidential Appendix A and Attachment)

Service list for A.05-03-001

Service list for A.13-12-012

Marcel Hawiger - The Utility Reform Network



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: 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) #: 4224-G

Tier Designation: 1

Subject of AL: Advice Letter for Approval to Enter into Gas Storage Contract

Keywords (choose from CPUC listing): Compliance, Contracts, Storage

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: See Confidentiality Declaration

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: Wini Chen; (415) 973-8801

Resolution required? Yes No

Requested effective date: 4/1/20

No. of tariff sheets: N/A

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 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:

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Wini Chen, am an Expert Regulatory Analyst in Core Gas Supply of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President of Energy Policy and Procurement of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street, Mail Code B5A
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): D.19-09-025, A.05-03-001

3. Title and description of document(s): AL 4224-G Confidential Appendix A, and AL 4224-G Confidential Attachment 1
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check

Basis for Confidential Treatment

Where Confidential
Information is located on
the documents

Customer-specific data, which may include demand, loads, names, addresses, and billing data
(Protected under PUC § 8380; Civ. Code §§ 1798 *et seq.*; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)

Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual
(Protected under Civ. Code §§ 1798 *et seq.*; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)

Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113
(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)

Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data
(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

Confidential Appendix
A in entirety, and
Confidential
Attachment 1 in
entirety

Corporate financial records
(Protected under Govt. Code §§ 6254(k), 6254.15)

Third-Party information subject to non-disclosure or confidentiality agreements or obligations

(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 28th day of February, 2020 at San Francisco, California.



Wini Chen
Expert Regulatory Analyst
Pacific Gas and Electric Company

Confidential Appendix A and Attachments

Two Gas Storage Contracts

**(Confidential in its Entirety as Described in the
Accompanying Declaration Dated February 28, 2020)**

**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		