

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4228G/5790E
As of May 21, 2020

Subject: Post-retirement Benefits Other than Pensions (PBOPs) for the period from 2017 to 2019

Division Assigned: Energy

Date Filed: 03-23-2020

Date to Calendar: 03-27-2020

Authorizing Documents: D9512055

Disposition:	Accepted
Effective Date:	04-22-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

pgetariffs@pge.com

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505 Van Ness Avenue
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To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

March 23, 2020

ADVICE 4228-G/5790-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Post-retirement Benefits Other than Pensions (PBOPs) for the period from 2017 to 2019

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this advice submittal in compliance with the requirement in Decision (D.) 95-12-055 in PG&E's 1996 General Rate Case (GRC), Application (A.) 94-12-005, to provide a reconciliation of the revenue requirement associated with contributions to the PBOPs and Long Term Disability (LTD) trusts. Although the decisions in PG&E's intervening GRCs through the 2011 GRC continued to require these reconciliations, D.17-05-013 in PG&E's 2017 GRC did not restate this requirement. Contributions to the trusts matched the amounts adopted in D.17-05-013 for 2017, 2018 and 2019. Accordingly, no adjustment to PG&E's revenue requirements during 2017 to 2019 is necessary.

Background

This submittal is made in compliance with D.95-12-055 (OP 8, as modified by D.96-05-010) in PG&E's 1996 GRC (A.94-12-005), decisions in PG&E's intervening GRCs, and D.92-12-015 regarding ratemaking for PBOPs contributions. In the Settlement of the 2007 GRC, the Office of Ratepayer Advocates (ORA) and PG&E agreed to a consolidated approach for the adopted contribution amounts for PBOPs and LTD. For example, if the amount adopted for the contribution to the PBOP medical plan trust could not be contributed to the plan's trust on a tax deductible basis, the amount could be contributed to the LTD trust (up to the maximum tax deductible amount). This approach has continued through the 2017 GRC cycle.

The following table shows that the contributions to the PBOPs medical and life and LTD trusts matched the amounts adopted in the 2017 GRC for the years 2017 to 2019:

2017 GRC Cycle (2017 - 2019)

PBOPs Medical and Life and LTD Trust Contributions (including Medicare Part D)^{[a], [b], [c], [d]}
(Millions of Dollars)

Line	Plan	2017	2018	2019	Total
1	PBOP-Med	20.1	24.5	22.7	67.3
2	PBOP-Life	3.6		2.1	5.8
3	Long Term Disability (LTD)	31.9	30.8	30.6	93.3
4	Sub-Total	55.6	55.3	55.5	166.4
5	Medicare Part D Subsidy				
6	PBOP-Med	5.0	3.7	2.0	10.7
7	LTD	0.3	.2	.1	.6
8	Sub-Total	5.3	3.9	2.1	11.3
9	Total Contributions to Trusts	60.9	59.2	57.6	177.7
10	Adopted	55.5	55.5	55.5	166.4
11	Difference	5.4	3.8	2.1	11.3

[a] Totals do not add due to rounding

[b] All Trust contributions were tax deductible.

[c] Due to an administrative error, \$0.3 million of the 2019 contribution was made in 2020.

[d] The net over contribution is due to the Medicare Part D subsidy received from Centers for Medicare and Medicaid Services (CMS) which PG&E and the labor unions agreed would be credited to retirees and, therefore, are additional contributions to the PBOPs medical and LTD trusts.

Since the amounts contributed to the trusts matched the amount adopted in the 2017 GRC decision, no adjustment to PG&E's revenue requirement is necessary.

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, facsimile or E-mail, no later than April 13, 2020, which is 21 days¹ after the date of this submittal. Protests must be submitted to:

¹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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

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

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

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

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

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

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

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, April 22, 2020, which is 30 calendar days after the date of 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 parties on the service list for A.15-09-001. 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

cc: Service List for A.15-09-001



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 M)

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) #: 4228-G/5790-E

Tier Designation: 2

Subject of AL: Post-retirement Benefits Other than Pensions (PBOPs) for the period from 2017 to 2019

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.95-12-055

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: 4/22/20

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:

Clear Form

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