

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4243G
As of June 2, 2020

Subject: Modify the Gas Preliminary Statement Part AG - Core Firm Storage Account, in Compliance with PG&E's 2019 Gas Transmission and Storage Decision 19-09-025

Division Assigned: Energy

Date Filed: 05-04-2020

Date to Calendar: 05-08-2020

Authorizing Documents: D1909025

Disposition:	Accepted
Effective Date:	06-03-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

PGETariffs@pge.com

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



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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

May 4, 2020

Advice 4243-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Modify the Gas Preliminary Statement Part AG - Core Firm Storage Account, in Compliance with PG&E's 2019 Gas Transmission and Storage Decision 19-09-025

Purpose

Pursuant to California Public Utilities Commission (CPUC or Commission) Decision (D.)19-09-025 (the Decision), Ordering Paragraphs (OP) 19, Pacific Gas and Electric (PG&E) seeks approval to modify gas Preliminary Statement Part AG – Core Firm Storage Account (CFSA) effective April 1, 2020. The affected tariff sheets are listed on the enclosed Attachment 1.

Background

On November 17, 2017, PG&E filed an application at the CPUC requesting that the Commission adopt its Gas Transmission and Storage (GT&S) revenue requirement, cost allocation, and rate design for the period of 2019-2022, including the impacts of the proposed Natural Gas Storage Strategy (NGSS) on PG&E's Core Gas Supply. On September 23, 2019, the CPUC issued D.19-09-025 in this proceeding.

In Chapter 19 of PG&E's 2019 GT&S Application (A.) 17-11-009, PG&E's Core Gas Supply (CGS) group proposed, among other things to:

- Reduce its firm PG&E CGS allocation;
- Add firm gas storage from Independent Storage Providers (ISP);

The Decision adopted PG&E's CGS group's proposal in OP 19¹,

The core customer demand component of the Reliability Standard is 2,580 thousand decatherms per day (MDth/d). Pacific Gas and Electric

¹ These changes to PG&E's Core Gas Supply group's storage holdings became effective April 1, 2020.

Company's proposal to supply gas to meet the core customer demand component by using 318 MDth/d of withdrawal capacity from its storage fields, 1,255 MDth/d from interstate pipeline capacity, with the remaining MDTH/d sourced by Citygate and Independent Storage Providers (ISP) is adopted, subject to the ISP contract requirements set forth in Appendix I. In addition, to serving core customers, ISPs must provide standby service.'

PG&E submits this Advice Letter to implement the preliminary statement changes in conformance with the Decision.

Tariff Revisions

While *incremental* third party storage costs are authorized to be recorded in the Purchased Gas Account (PGA), in review of new ISP's storage costs to comply with OP 19, PG&E has determined that the newly contracted storage costs should instead be recorded in the CFSA where PG&E base storage costs, allocated to bundle core procurement customers, are reflected.² PG&E has modified its CFSA preliminary statement to reflect this determination and will transfer the newly contracted ISP charges from the PGA account to the CFSA upon approval of this advice letter, effective April 1, 2020. The new ISP costs have been allocated correctly across customer classes and correctly reflected in the CFSA component of their rates.

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 26, 2020, which is 22 days³ after the date of this submittal. Protests must be submitted to:

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

² This is similar to how interstate and Canadian pipeline demand charges are recorded along with PG&E backbone transmission capacity charges in the Core Pipeline Demand Charge Account

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

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 19 of D.19-09-025, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, June 3, 2020 which is 30 calendar days after the date of submittal, with the tariff effective April 1, 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.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 Tariff

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) #: 4243-G

Tier Designation: 2

Subject of AL: Modify the Gas Preliminary Statement Part AG - Core Firm Storage Account, in Compliance with PG&E's 2019 Gas Transmission and Storage Decision 19-09-025

Keywords (choose from CPUC listing): Compliance, Preliminary Statement

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: 6/3/20

No. of tariff sheets: 3

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
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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
35864-G	GAS PRELIMINARY STATEMENT PART AG CORE FIRM STORAGE ACCOUNT Sheet 1	33647-G
35865-G	GAS TABLE OF CONTENTS Sheet 1	35825-G
35866-G	GAS TABLE OF CONTENTS Sheet 5	35330-G*



**GAS PRELIMINARY STATEMENT PART AG
CORE FIRM STORAGE ACCOUNT**

Sheet 1

AG. CORE FIRM STORAGE ACCOUNT (CFSA)

- 1. **PURPOSE:** The purpose of the CFSA is to record the costs and revenues associated with firm storage capacity allocated to core customers as adopted in Decision (D.) 03-12-061. The balance in this account will be incorporated into core procurement rates.

Descriptions of the terms and definitions used in this section are found in Preliminary Statement, Part C or in Rule 1.

- 2. **APPLICABILITY:** The CFSA applies to all core procurement rate schedules and contracts subject to the jurisdiction of the CPUC, except for those schedules and contracts specifically excluded by the CPUC.
- 3. **REVISION DATE:** The revision date applicable to the CFSA rate shall coincide with the revision date of the monthly core procurement rate or at other times, as ordered by the CPUC.
- 4. **FORECAST PERIOD:** The forecast test period will be as specified in the current Cost Allocation Proceeding.
- 5. **CFSA RATES:** CFSA rates are included in the effective rates set forth in each gas procurement rate schedule (see Preliminary Statement, Part B), as applicable.
- 6. **ACCOUNTING PROCEDURE:** PG&E shall make the following entries to the CFSA at the end of each month or when applicable:
 - a. a debit entry equal to one-twelfth of the total core firm storage base revenue requirement, excluding the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense;
 - b. a debit entry equal to the core portion of the recorded carrying cost on PG&E working gas in storage;
 - c. a debit entry equal to the Independent Storage Providers costs allocated to core procurement customers, excluding an allowance for RF&U; (N)
(N)
 - d. a credit entry equal to the core firm storage revenue from core procurement customers for the month, excluding the allowance for RF&U; (T)
 - e. a credit entry equal to the core firm storage revenue from CTAs pursuant to Schedule G-CFS, excluding the allowance for RF&U; (T)
 - f. a credit entry equal to the revenue received from the sale of released core storage capacity (T)
 - g. a credit entry equal to the revenues received from the storage component of the Net CTA-Rejected Capacity Costs billed to CTAs pursuant to Schedule G-CT, excluding the allowance for RF&U; and (T)
 - h. an entry equal to the interest on the average of the balance in the account at the beginning of the month and the balance after entries 6.a. through 6.g., above, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)
(T)



GAS TABLE OF CONTENTS

Sheet 1

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Preliminary Statements.....	35828, 35866-G	(T)
Preliminary Statements, Rules	35742-G	
Rules, Maps, Contracts and Deviations.....	35656-G	
Sample Forms	34229,32986,32987,32886,35791,32888-G	

(Continued)

Advice 4243-G
Decision D.19-09-025

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted	<u>May 4, 2020</u>
Effective	<u>April 1, 2020</u>
Resolution	



GAS TABLE OF CONTENTS

Sheet 5

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Part AG	Core Firm Storage Account.....	35864-G
Part AN	Hazardous Substance Mechanism.....	23281,33423,23283,16693,32964-G
Part AW	Self-Generation Program Memorandum Account	33442-G
Part BA	Public Purpose Program-Energy Efficiency	23360,23361-G
Part BB	Public Purpose Program Memorandum Account	23362,29327-G
Part BH	Public Purpose Program Surcharge-Low Income Energy Efficiency Balancing Account	33443-G
Part BI	Public Purpose Program Surcharge-Research, Development and Demonstration Balancing Account	33444,23366-G
Part BQ	Pension Contribution Balancing Account	24853,24224-G
Part BS	Climate Balancing Account	33445-G
Part BT	Non-Tariffed Products and Services Balancing Account.....	26710-G
Part CA	California Solar Initiative Thermal Program Memorandum Account.....	33455,28060-G
Part CI	AB32 Cost of Implementation Fee Memorandum Account – Gas.....	28673-G
Part CK	TID Almond Power Plant Balancing Account	28889,28890-G
Part CL	Transmission Integrity Management Program Balancing Account.....	35323*-G
Part CN	Topock Adder Projects Balancing Account	33457-G
Part CO	Adjustment Mechanism For Costs Determined In Other Proceedings	33652,33653,33654,33655-G
Part CP	Gas Transmission & Storage Revenue Sharing Mechanism	32758,33461,33462,33463-G
Part CS	Tax Act Memorandum Account – Gas	33252,33253-G
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Part CX	Core Gas Pipeline Safety Balancing Account	31681,31682-G
Part CY	NonCore Gas Pipeline Safety Balancing Account.....	31683,31684-G
Part CZ	California Energy Systems for the 21st Century Balancing Account.....	30264*-G
Part DA	Statewide Marketing, Education and Outreach Expenditure Balancing Account	33043-G
Part DC	Energy Data Center Memorandum Account – Gas.....	31288-G
Part DB	Mobile Home Park Balancing Account.....	34937-G
Part DD	Gas Transmission & Storage Memorandum Account (GTSMA)	34783,34784, 34785,34786,34787-G
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Part DF	SmartMeter™ Opt-Out Program Balancing Account – Gas (SOPBA-G).....	32304,32305,32306-G
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Part DI	Greenhouse Gas Expense Memorandum Account - Gas (GHGEMA-G)	33473-G
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Part DM	Assembly Bill 802 Memorandum Account - Gas	33474-G
Part DN	Line 407 Memorandum Account (L407MA)	33475-G

(T)

(Continued)

Advice 4243-G
May 4, 2020

Attachment 2

Redline Tariffs



**GAS PRELIMINARY STATEMENT PART AG
CORE FIRM STORAGE ACCOUNT**

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(N)
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(T)

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