

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4392G/6100E
As of April 12, 2021

Subject: Vegetation Management Balancing Account and Wildfire Mitigation Balancing Account
Revenue Requirement True Up Per Decision 20-12-005 Ordering Paragraphs 8 and 9

Division Assigned: Energy

Date Filed: 02-23-2021

Date to Calendar: 02-26-2021

Authorizing Documents: D2012005

Disposition:	Accepted
Effective Date:	03-25-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

February 23, 2021

Advice 4392-G/6100-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Vegetation Management Balancing Account and Wildfire Mitigation
Balancing Account Revenue Requirement True Up Per Decision 20-12-
005 Ordering Paragraphs 8 and 9**

Purpose

In accordance with Ordering Paragraphs (OP) 8 and 9 of Decision (D.) 20-12-005, Pacific Gas and Electric Company (PG&E) **hereby submits** this Tier 2 advice letter to seek recovery of the Vegetation Management Balancing Account (VMBA) expense undercollection of \$110.823 million and Wildfire Mitigation Balancing Account (WMBA) expense undercollection of \$7.600 million as authorized by D.20-12-005 OP 1. This advice letter does not request a revenue requirement true-up for WMBA capital spend.

Background

On December 13, 2018, PG&E filed its 2020 General Rate Case (GRC) application requesting the Commission authorize its GRC revenue requirement for the 2020-2022 period. On December 20, 2019, PG&E filed the Joint Motion of the Public Advocates Office, The Utility Reform Network, Small Business Utility Advocates, Center for Accessible Technology, The National Diversity Coalition, Coalition of California Utility Employees, California City County Street Light Association, The Office of the Safety Advocate, and Pacific Gas and Electric Company for approval of a settlement agreement.

On December 3, 2020, the CPUC approved D.20-12-005 in PG&E's 2020 GRC, approving the Settlement Agreement (SA), with certain modifications, and adopting base revenue requirements for the 2020-2022 GRC term.

The SA, as revised and approved by D.20-12-005 OP 1, authorizes PG&E to recover VMBA expenses up to 120% of the adopted values through a Tier 2 advice letter.¹

¹ See 2020 GRC SA Section 2.3.3 Table 3 for the adopted values. The 2020 adopted expense value is \$548.013 million.

The SA, as revised by the D.20-12-005 OP 1.a., requires that recorded amounts greater than 120% of the adopted values be recovered through a separate application. PG&E does not seek recovery of recorded amounts greater than 120% of adopted through this advice letter. In accordance with OP 1.a., PG&E will seek recovery of such costs through a future application.

The SA, as revised and approved by D.20-12-005 OP 1, authorizes PG&E to recover WMBA expenses up to 115% of the adopted values through a Tier 2 advice letter.²

The SA, as revised by the D.20-12-005 OP 1.b., requires that recorded amounts greater than 115% of the adopted values be recovered through a separate application. PG&E does not seek recovery of recorded amounts greater than 115% of adopted through this advice letter. In accordance with OP 1.b., PG&E will seek recovery of such costs through a future application.

On December 22, 2020, in accordance with D.20-12-005, PG&E filed Advice Letter 4344-G/6032-E, which included the following updates and revisions:

- Modified the VMBA (Electric Preliminary Statement BU) to become a two-way balancing account that records actual Routine and Enhanced Vegetation Management costs compared to amounts adopted in PG&E's GRC, and records costs for Tree Mortality and Fire Risk Reduction that were previously recovered through the Catastrophic Emergency Memorandum Account (CEMA).
- Established the WMBA (Electric Preliminary Statement IO and Gas Preliminary Statement Part FL) to track and record actual expenses and the capital revenue requirements associated with work authorized for recovery through the WMBA for PG&E's wildfire mitigation activities.

On February 5, 2021, PG&E submitted AL 4377-G/6076-E to provide, among other things, clarifying accounting details to the WMBA Electric and Gas Preliminary Statements.

Undercollection of 2020 Expenses

As provided in SA sections 2.3.3 and 2.3.2.1, Tables 1 and 2 show adopted expense, the associated adopted amounts at 120% and 115% of the expense adopted values, amounts PG&E is seeking recovery of in this advice letter, and total 2020 accounts spend, for the VMBA and WMBA, respectively. Additional details are provided in Attachment A.

² See 2020 GRC SA Section 2.3.2.1 Table 1 for the adopted values. The 2020 adopted expense value is \$53.371 million.

Table 1:
2020 VMBA Undercollection Calculation (Amounts in Thousands)

Line	Description	VMBA Expense Recorded A	VMBA Expense Adopted B	VMBA Expense Adopted at 120% C = B * 120%	Amount Subject to Future Reasonableness Review D = A - C	VMBA Expense Undercollection E = A - B - D
1	Adopted Expense Amount	\$1,250,093	\$548,013	\$657,615	\$592,477	\$109,603
2	Revenue Fees and Uncollectibles (Electric factor: 0.011136)	\$13,921	\$6,103	\$7,323	\$6,598	\$1,221
3	Total Revenue Requirement	\$1,264,014	\$554,116	\$664,938	\$599,076	\$110,823

Note: table sums may not add up due to rounding

Table 2:
2020 WMBA Undercollection Calculation (Amounts in Thousands)

Line	Description	WMBA Expense Recorded A	WMBA Expense Adopted B	WMBA Expense Adopted at 115% C = B * 115%	Amount Subject to Future Reasonableness Review D = A - C	WMBA Expense Undercollection E = A - B - D	WMBA Expense Undercollection Subject to Recovery F ³
1	Adopted Expense Amount	\$215,736	\$53,371	\$61,377	\$154,359	\$8,006	\$7,510 ³
2	Revenue Fees and Uncollectibles (Electric factor: 0.011136, Gas factor: 0.013657)	2,434	636	732	1,702	\$95	\$90
3	Total Revenue Requirement	\$218,170	\$54,007	\$62,109	\$156,061	\$8,101	\$7,600

Note: table sums may not add up due to rounding

³ Undercollection is calculated by comparing total actual expenses to total adopted expenses. As discussed in Advice Letter 4344-G/6032-E, amounts allocated to the FERC jurisdiction will not be recorded in the WMBA. As a result, 6.38% of the total A&G incurred expenses will be recovered through PG&E's FERC-jurisdictional formula rates. PG&E's adopted expenses of \$53,371 thousand is allocated 97.10% A&G and 2.90% O&M, as adopted in the 2020 GRC. PG&E requests that the CPUC-jurisdictional portion of \$7,510 million, which is recorded in the WMBA, plus the revenue fees and uncollectibles amount of \$90 thousand, be approved for recovery, for a grand total of \$7,600 thousand.

PG&E proposes to incorporate these revenue requirements in rates in future electric and gas rate changes.

Tariff Changes

PG&E proposes to add the following standard entry to the Accounting Procedures section of the Main Account.

An entry to record the transfer of amounts to or from other accounts as approved by the Commission.

When PG&E filed Advice Letter 4344-G/6032-E to modify the VMBA, PG&E inadvertently missed adding this standard transfer language to the Main Account.

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 **March 15, 2021**, 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, 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, and OP 8 and 9 of D.20-12-005, this advice letter is submitted with a Tier 2 designation. PG&E requests that this **Tier 2** advice submittal become effective on regular notice **March 25, 2021**, 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 service lists below. 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

cc: Service List



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 U 39 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 4392-G/6100-E

Tier Designation: 2

Subject of AL: Vegetation Management Balancing Account and Wildfire Mitigation Balancing Account Revenue Requirement True Up Per Decision 20-12-005 Ordering Paragraphs 8 and 9

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. 20-12-005

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: N/A

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: 3/25/21

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:

Clear Form

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
48876-E	ELECTRIC PRELIMINARY STATEMENT PART BU VEGETATION MANAGEMENT BALANCING ACCOUNT Sheet 2	48050-E
48877-E	ELECTRIC TABLE OF CONTENTS Sheet 1	48749-E
48878-E	ELECTRIC TABLE OF CONTENTS Sheet 12	47880-E



**ELECTRIC PRELIMINARY STATEMENT PART BU
VEGETATION MANAGEMENT BALANCING ACCOUNT**

Sheet 2

BU. VEGETATION MANAGEMENT BALANCING ACCOUNT (VMBA) (Cont'd.)

5. VMBA ACCOUNTING PROCEDURE (Cont'd)

MAIN ACCOUNT:

- a. A debit entry equal to PG&E's actual Routine and Enhanced Vegetation Management expense for the month.
- b. A credit entry equal to one-twelfth of the amount adopted in PG&E's GRC or other base revenue proceeding for vegetation management expense.
- c. An entry to record the transfer of amounts to or from other accounts as approved by the Commission. (N)
(N)
- d. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, G.13 or its successor. (T)

REASONABLENESS REVIEW SUBACCOUNT:

- a) A debit entry equal to actual tree mortality expenses;
- b) A debit entry equal to actual Routine and Enhanced Vegetation Management expenses that are greater than 120 percent of adopted expenses;
- c) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
- e) An entry equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries at a rate equal to one-twelfth 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.



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Title Page		48877-E (T)
Rate Schedules.....	48262,48263,48264,48265,48266,48267,47616,44177,48268-E	
Preliminary Statements.....	48269, 48878 ,48075,41723,47619,48076,48077-E	(T)
Rules	48750,48751,48752-E	
Maps, Contracts and Deviations	37960-E	
Sample Forms.....	47207,37631,47208,47620, 37632,47210,47211,47621,47213,47622,47214,36059-E	

(Continued)

Advice 6100-E
Decision D.20-12-005

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 23, 2021



ELECTRIC TABLE OF CONTENTS

Sheet 12

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements (Cont'd)		
Part BB	Competition Transition Charge Responsibility for All Customers and CTC Procedure for Departing Loads 24070,19906,19907,16400,14960,14961, 16229,16230, 16231,24071,14964,14965,14966,14967,14968-14969,16401,16402-E	
Part BK	Transmission Revenue Requirement Reclassification Memorandum Account.....	47878-E
Part BU	Vegetation Management Balancing Account.....	33880, 48876-E
Part BY	Self-Generation Program Memorandum Account.....	26209-E

(T)

(Continued)

Advice 6100-E
Decision D.20-12-005

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 23, 2021

Attachment 2

Redline Tariff Revisions



**ELECTRIC PRELIMINARY STATEMENT PART BU
VEGETATION MANAGEMENT BALANCING ACCOUNT**

Sheet 2

BU. VEGETATION MANAGEMENT BALANCING ACCOUNT (VMBA) (Cont'd.)

5. VMBA ACCOUNTING PROCEDURE (Cont'd)

MAIN ACCOUNT:

- a. A debit entry equal to PG&E's actual Routine and Enhanced Vegetation Management expense for the month.
- b. A credit entry equal to one-twelfth of the amount adopted in PG&E's GRC or other base revenue proceeding for vegetation management expense.
- c. An entry to record the transfer of amounts to or from other accounts as approved by the Commission.
- ed. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, G.13 or its successor.

REASONABLENESS REVIEW SUBACCOUNT:

- a) A debit entry equal to actual tree mortality expenses;
- b) A debit entry equal to actual Routine and Enhanced Vegetation Management expenses that are greater than 120 percent of adopted expenses;
- c) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
- e) An entry equal to the interest on the average of the balance in this account at the beginning of the month and the balance in this account after the above entries at a rate equal to one-twelfth 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.

Attachment A

2020 GRC Revenue Requirement - VMBA and WMBA

2020 GRC Revenue Requirement - VMBA and WMBA
Table 1: Revenue Requirement by program for the costs between 100%-115%/120% of authorized spend

Program	100% of authorized spend	Spend % covered in the Advice letter filing	Spend \$ covered in the Advice letter filing	Revenue Fees and Uncollectibles factor	Revenue Fees and Uncollectibles \$	Total Revenue Requirement for advice letter filing	WMBA Expense Undercollection Subject to Recovery in advice letter
Wildfire Mitigation Balancing Account (WMBA)	53,371	15%	8,006	Electric: 0.011136 Gas: 0.013657	95	8,101	7,600
Vegetation Management Balancing account	548,013	20%	109,603	0.011136	1,221	110,823	110,823
Total	601,384		117,608		1,316	118,924	118,423

Table 2: Revenue Requirement by Line of Business for the costs between 100%-115%/120% of authorized spend

Program	Electric Distribution	Electric Generation	Gas Distribution	Gas Transmission	Electric Transmission	Total
Wildfire Mitigation Balancing Account (WMBA)	3,159	1,905	1,705	829	501	8,101
Vegetation Management Balancing account	110,823	-	-	-	-	110,823
Total	113,983	1,905	1,705	829	501	118,924

Table 3: Revenue Requirement calculation by Line of Business for Wildfire Mitigation Balancing Account

	Operations and Maintenance	Admin and General	Total cost		
Wildfire Mitigation Balancing Account Authorized	1,550	51,821	53,371		
Wildfire Mitigation Balancing Account Authorized -115%	1,782	59,594	61,377		
Wildfire Mitigation Balancing Account Authorized -15%	232	7,773	8,006		
Line of Business	Operations and Maintenance	Admin and General	Total cost	RF&U	Total RRQ
Electric Distribution	232	2,892	3,125	35	3,159
Electric Generation		1,884	1,884	21	1,905
Gas Distribution		1,682	1,682	23	1,705
Gas Transmission		818	818	11	829
Electric Transmission		496	496	6	501
Total	232	7,773	8,006	95	8,101

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Semptra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy