

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



August 19, 2021

**4401-G/6116-E**

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: Tier 3 Advice Letter Regarding an Independent Safety Monitor.**

Dear Mr. Jacobson:

Advice Letter 4401-G/6116-E is partially approved & partially rejected effective August 5, 2021, per resolution M-4855 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

March 15, 2021

**Advice 4401-G/6116-E**

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Tier 3 Advice Letter Regarding an Independent Safety Monitor****I. Purpose**

In its decision approving Pacific Gas and Electric Company's (PG&E) Plan of Reorganization in Investigation (I.) 19-09-016 ("POR OII"), the California Public Utilities Commission (CPUC or Commission) instituted new requirements intended to improve PG&E's safety performance, and "direct[ed] that there will be an Independent Safety Monitor that will report to the Commission and be functionally equivalent to the federal court monitor" after the expiration of PG&E's federal monitorship, noting that certain "details for implementing the Independent Safety Monitor are reserved for future consideration, such as the Monitor's selection and appointment, its exact scope of duties, reporting requirements and budget and cost recovery."<sup>1</sup> Accordingly, PG&E was directed to submit a Tier 3 Advice Letter to the Commission "no later than one year before the expiration of the term of the federal court monitor, with a proposed scope of work, budget, solicitation process, and a process for selection/approval by the Commission."<sup>2</sup>

PG&E's federal monitorship will expire no later than five years after the federal monitor was engaged, which occurred following the federal court's entry of the Monitor Order in January 2017. Thus, pursuant to Ordering Paragraph 8 of D.20-05-053, PG&E respectfully submits this Tier 3 advice letter requesting approval of a solicitation process, process for selection and Commission approval, scope of work, and budget for an Independent Safety Monitor (ISM). PG&E also requests Commission approval to establish a new memorandum account to track and record costs related to the solicitation, selection, and engagement of an ISM as required by D.20-05-053.

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<sup>1</sup> Decision (D.) 20-05-053 at 24.

<sup>2</sup> *Id.*

## II. Background

### ***Institution of Federal Monitor***

Following the guilty verdict and judgment in the *United States of America v. Pacific Gas and Electric Company*, Case No. 3:14-CR-00175, arising out of the 2010 San Bruno gas pipeline explosion, the federal court overseeing PG&E's criminal probation issued an order to establish a monitor to evaluate, assess and monitor certain company activities for a period of five years (the Monitor Order).<sup>3</sup> The Monitor Order required PG&E and the United States Attorney's Office to work together to identify a mutually acceptable monitor to fulfill this role. As a result of that process, Pacific Gas and Electric Company retained the Hon. Mark R. Filip (ret.) of Kirkland & Ellis LLP to serve as the Federal Monitor.<sup>4</sup>

The Federal Monitor has been charged with evaluating, assessing and monitoring (i) PG&E's safety culture; (ii) PG&E's compliance and ethics program and its effectiveness; and (iii) fifteen requirements described in the Monitor Order, relating primarily to gas transmission safety and integrity management.<sup>5</sup> Following the 2017 Wildfires, the Federal Monitor, the United States Attorney's Office, and PG&E agreed that the Federal Monitor would expand its work to evaluate certain aspects of PG&E's electric distribution operations and emergency response and restoration. In April 2019, the federal court adopted new conditions of PG&E's criminal probation that included specific requirements for the Federal Monitor to assess PG&E's wildfire mitigation work, including vegetation management and equipment inspections.<sup>6</sup> Additional conditions were imposed in August 2020, including staffing an in-house vegetation management inspection manager to oversee workforce resources and documenting asset age condition and expected useful life of critical asset components.<sup>7</sup>

### ***POR OII – ISM requirement***

In D.20-05-053, the Commission directed:

[T]here will be an Independent Safety Monitor that will report to the Commission and be functionally equivalent to the federal court monitor. Other details for implementing the Independent Safety Monitor are reserved for future consideration, such as the Monitor's selection and appointment,

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<sup>3</sup> See *United States v. Pacific Gas & Electric Co.*, No. 3:14-CR-00175, Dkt. No. 916, Order (N.D. Cal. Jan. 26, 2017) (Monitor Order).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at Section I.B.(1)-(15).

<sup>6</sup> See *United States v. Pacific Gas & Electric Co.*, No. 3:14-CR-00175, Dkt. No. 1040, Order Adopting New Conditions of Probation (N.D. Cal. Apr. 3, 2019).

<sup>7</sup> See *United States v. Pacific Gas & Electric Co.*, No. 3:14-CR-00175, Dkt. No. 1243, Order (N.D. Cal. Aug. 7, 2020). Additional probation conditions are currently pending before the court related broadly to PG&E's Public Safety Power Shutoff program, record and data maintenance, and vegetation management practices.

its exact scope of duties, reporting requirements and budget and cost recovery.<sup>8</sup>

The Commission determined that it would be appropriate to consider PG&E's additional experience with the Federal Monitor and PG&E's Independent Safety Oversight Committee (ISOC) before finalizing the details related to the function, scope of work, and reporting requirements for the Independent Safety Monitor (ISM).<sup>9</sup>

Accordingly, the Commission directed PG&E to submit a Tier 3 advice letter "with a proposed scope of work, budget, solicitation process, and process for selection/approval by the Commission."<sup>10</sup> The Commission stated that the Energy Division (ED) will process the advice letter in consultation with the Safety and Enforcement Division (SED) and Safety Policy Division.<sup>11</sup>

### **III. Independent Safety Monitor**

In this advice letter, PG&E implements the Commission's directive to submit a proposed solicitation process, process for selection and Commission approval, proposed scope of work, and budget for the Independent Safety Monitor (ISM). Each of these elements is described below.

#### **A. Solicitation Process**

PG&E proposes to institute, in close coordination with Commission staff, a solicitation process to identify ISM candidates for consideration. The proposed solicitation process is designed to ensure that ISM candidates are highly competent and possess the necessary qualifications to be effective in this role. At a minimum, the ISM must have adequate subject matter expertise in utility operations—gas, electric, and generation—and have adequate bandwidth to fulfill the requirements of the contract. Utility operations, risk management, and safety expertise is critical. If these qualifications are satisfied through designated subcontractor subject matter experts, such subcontractors should be identified in a bidder's proposal.

Consistent with PG&E's typical practice, a Contract Opportunity Announcement (COA) will be posted in advance of the Request for Proposal (RFP) on PGE.com with a description of the Contract deliverables, soliciting potential bidders and noting the opening date of the RFP. This COA also will be distributed by PG&E Supply Chain Responsibility Department to many community partners and Business Chambers/Associations throughout the State of California.

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<sup>8</sup> D.20-05-053 at 24.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

PG&E, in close coordination with Commission staff, will develop bid instructions, a detailed scope of work, pricing sheet, Supply Chain Responsibility/Sustainability questions, contract General Conditions, and weighted scoring criteria in advance of the RFP being launched. Bidders should develop meaningful, actionable responses to the RFP.

### **B. Selection and Approval Process**

PG&E proposes that the Commission adopt the process used in prior Commission proceedings for selecting auditors. See, e.g., Settlement Agreement Resolving Order Instituting Investigation I.18-12-007 (“Locate & Mark Settlement”) at 15 (“PG&E shall present SED with a proposal containing at least three reasonably qualified consultants to perform the work [of performing a compliance audit], whom SED may interview. SED shall select the final consultant after this presentation.”). PG&E would identify three high-scoring ISM candidates from the RFP who would then be presented to CPUC staff for selection and approval. Scoresheets for each of the bidders would be shared among PG&E and designated Commission staff, and top scoring bidders may be asked to meet with the CPUC to clarify their proposal, but during this phase they would not be allowed to revise their proposal. In addition, each candidate would need to provide a written certification that he/she is not a current or recent (*i.e.*, within the prior two years) employee, agent, or representative of PG&E and holds no interest in, and has no relationship with, PG&E, its subsidiaries, affiliates or related entities, or its employees, officers, or directors.

### **C. Proposed Scope of Work**

As recognized by DOJ guidance, “the scope of any monitorship should be appropriately tailored to address the specific issues and concerns that created the need for the monitor.”<sup>12</sup> D.20-05-053 observed that the Commission was required “to examine complex and important questions relating to PG&E’s plan of reorganization, including PG&E’s governance structure”—“not a simple analysis”—but “getting it right” was in tension with the very short deadline the Commission had under AB 1054 to render its decision.<sup>13</sup> In order to meet the deadline, the Commission acknowledged that some issues would “need further analysis and consideration to ensure a good resolution.”<sup>14</sup> The requirement that an ISM be appointed was part of the Commission’s effort to “take the initial steps here [in D.20-05-053] to begin the necessary work and provide direction and guidance”; the ISM should likewise take an active role in the “work [which] will remain to be done after th[e] decision.”<sup>15</sup>

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<sup>12</sup> Benczkowski (DOJ) Memo at 2.

<sup>13</sup> *Id.* at 10-11.

<sup>14</sup> *Id.* at 12.

<sup>15</sup> *Id.*

Consistent with the goals expressed in D.20-05-053, PG&E proposes that the detailed scope of work to be developed in close coordination with Commission staff for purposes of the RFP focus the ISM's efforts during a two-year period of engagement on:

- (1) Governance processes, and the effectiveness of PG&E's Board and executive management in addressing the safety and operational risks identified through PG&E's Enterprise and Operational Risk Management Program;
- (2) Risk management process, including hazard identification, risk assessment, improvement action planning, and tracking;
- (3) Recordkeeping and record management;
- (4) Policy, procedures and training (encompassing safety, culture and technical);
- (5) Data analytics, including integrated systems and the availability of quality, cohesive information for decisionmaking; and
- (6) Prioritization, evaluation and performance of safety initiatives.

If the ISM seeks to modify the monitorship workplan beyond that contemplated by this scope, PG&E would file an advice letter with the Commission.

The ISM will operate as an agent of the Commission, reporting to the Commission, with independence from PG&E. The ISM would be empowered to take all reasonable steps the ISM deems necessary to be fully informed with respect to the monitorship and would be afforded regular communications with PG&E leadership. PG&E would be obligated to cooperate with the ISM to allow the ISM to fulfill the duties of the monitorship, including providing the ISM with access to non-privileged information, documents, records, facilities and/or employees, as reasonably requested by the ISM. To the extent the ISM seeks access to privileged or attorney work product information, PG&E would use its best efforts to provide the ISM with comparable information without compromising the asserted privilege or protection.<sup>16</sup>

#### **D. Budget and Cost Recovery for ISM**

D.20-05-053 noted that certain "details implementing the Independent Safety Monitor are reserved for future consideration, such as the Monitor's . . . budget and cost recovery."<sup>17</sup>

PG&E proposes that bidders provide a detailed budget for completion of the two year engagement, not to exceed the range of \$2 million to \$5 million for each year. For comparison purposes, NorthStar Consulting's total contract amount for the period March 31, 2016 through December 31, 2021 (5 years and 9 months) under the Safety Culture OII is \$5 million. PG&E proposes that the annual budget established by the Commission for each of the two years of engagement be based on the accepted bid within the above

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<sup>16</sup> *United States v. Pacific Gas & Electric Co.*, No. 3:14-CR-00175 (N.D. Cal. Apr. 16, 2019), ECF No. 1055. See also *id.*, ECF No. 1053 (U.S. Attorney's Office support for confidentiality of Monitor reports).

<sup>17</sup> *Id.* at 24.

range. The ISM, PG&E, and designated Commission staff would meet at least once each year of the engagement to discuss revisions to cost (including as a result of modifications to the monitorship workplan, discussed above). PG&E proposes that the Commission order approving the ISM provide that the ISM would be required to obtain Commission approval to bill amounts in excess of the established annual budgets through a resolution process. If the ISM seeks to exceed the budget, PG&E would file an advice letter with the Commission.

D.20-05-053 deferred addressing the details regarding cost recovery in connection with implementation of the ISM,<sup>18</sup> and until the Commission addresses those details PG&E requests Commission approval to establish a new memorandum account (the "Independent Safety Monitor Expense Memorandum Account") to track and record: (a) costs related to the solicitation and selection of the ISM, including related administrative costs; and (b) engagement of the ISM, including all costs and expenses within the winning bidder's approved two-year budget. PG&E would not use the memorandum account to track internal PG&E costs or labor expenses involved in selecting and implementing the ISM. Establishing the memorandum account until the Commission addresses the issue of cost recovery in connection with implementation of D.20-05-053's requirements regarding the ISM will ensure that all costs ordered by the Decision are appropriately tracked. The mere opening of a memorandum account does not prejudice any party's ability to contest the recorded costs at the point that PG&E seeks cost recovery, and likewise does not prejudice PG&E's ability to recover the costs. However, the tracking of the costs through a memorandum account would preserve PG&E's ability to later request Commission review and approval of the recoverability of such costs, an issue that has been expressly "reserved for future consideration" under D.20-05-053.

#### **IV. Consistency With Decision and Findings**

Consistent with Ordering Paragraph 8 of D.20-05-053, PG&E has timely submitted this Tier 3 advice letter requesting approval of a solicitation process, process for selection and Commission approval, scope of work, and budget for an ISM. PG&E requests Commission approval to establish a new memorandum account to track and record: (a) costs related to the solicitation and selection of the ISM, including related administrative costs; and (b) engagement of the ISM, including all costs and expenses within the winning bidder's approved two-year budget.

#### **V. 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\*\*\***

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<sup>18</sup> *Id.*

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 5, 2021, which is 21 days<sup>19</sup> 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).

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<sup>19</sup> The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

**VI. Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.3, and OP 8 of D.20-05-053, this advice letter is submitted with a Tier 3 designation. PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

**VII. 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 I.19-09-016. 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 in I.19-09-016



# 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 U39M)

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) #: 4401-G/6116-E

Tier Designation: 3

Subject of AL: Tier 3 Advice Letter Regarding an Independent Safety Monitor

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.20-05-053

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:

No. of tariff sheets: 6

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 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:

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
37007-G	GAS PRELIMINARY STATEMENT PART FO INDEPENDENT SAFETY MONITOR MEMORANDUM ACCOUNT - GAS (ISMMA-G) Sheet 1	
37008-G	GAS TABLE OF CONTENTS Sheet 1	36999-G
37009-G	GAS TABLE OF CONTENTS Sheet 6	36968-G



**GAS PRELIMINARY STATEMENT PART FO**

Sheet 1

(N)

**INDEPENDENT SAFETY MONITOR MEMORANDUM ACCOUNT - GAS (ISMMA-G)**

(N)

**FO. INDEPENDENT SAFETY MONITOR MEMORANDUM ACCOUNT – GAS (ISMMA-G)**

(N)

1. **PURPOSE:** The purpose of the Independent Safety Monitor Memorandum Account - Gas (ISMMA) is to track and record incremental costs related to the solicitation and selection of the Independent Safety Monitor (ISM), including related administrative costs, and engagement of the ISM, including costs and expenses within the winning bidder's approved five-year budget in accordance with the requirements of D.20-05-053. The ISMMA will not include costs recorded and recovered in another account.
2. **APPLICABILITY:** The ISMMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATES:** Disposition of the balance in the account will be through a General Rate Case (GRC) or other application as authorized by the Commission.
4. **RATES:** The ISMMA does not have a separate rate component.
5. **ACCOUNTING PROCEDURE:** The following entries will be made each month, or as applicable:
  - a) A debit entry equal to incremental costs related to the solicitation and selection of the ISM, including related administrative costs, and engagement of the ISM;
  - b) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
  - c) 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 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.

(N)

(N)

(Continued)

Advice 4401-G  
Decision D.20-05-053

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

Submitted  
Effective  
Resolution

March 15, 2021



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Advice 4401-G  
Decision D.20-05-053

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

Submitted \_\_\_\_\_  
Effective \_\_\_\_\_  
Resolution \_\_\_\_\_  
March 15, 2021



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Sheet 6

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Part DQ	Engineering Critical Assessment Balancing Account (ECABA).....	32809-G
Part DR	Hydrostatic Station Testing Memorandum Account (HSTMA).....	33084-G
Part DS	Work Required by Others Balancing Account (WROBA) .....	33477-G
Part DT	Critical Document Program Memorandum Account (CDPMA) .....	32812-G
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Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
49244-E	ELECTRIC PRELIMINARY STATEMENT PART IV INDEPENDENT SAFETY MONITOR MEMORANDUM ACCOUNT - ELECTRIC (ISMMA-E) Sheet 1	
49245-E	ELECTRIC TABLE OF CONTENTS Sheet 1	49237-E*
49246-E	ELECTRIC TABLE OF CONTENTS Sheet 17	49186-E



**ELECTRIC PRELIMINARY STATEMENT PART IV** Sheet 1 (N)  
INDEPENDENT SAFETY MONITOR MEMORANDUM ACCOUNT - ELECTRIC (ISMMA-E) (N)

- IV. INDEPENDENT SAFETY MONITOR MEMORANDUM ACCOUNT – ELECTRIC (ISMMA-E) (N)
  - 1. PURPOSE: The purpose of the Independent Safety Monitor Memorandum Account - Electric (ISMMA) is to track and record incremental costs related to the solicitation and selection of the Independent Safety Monitor (ISM), including related administrative costs, and engagement of the ISM, including costs and expenses within the winning bidder's approved five-year budget in accordance with the requirements of D.20-05-053. The ISMMA will not include costs recorded and recovered in another account. (N)
  - 2. APPLICABILITY: The ISMMA shall apply to all customer classes, except for those specifically excluded by the Commission.
  - 3. REVISION DATES: Disposition of the balance in the account will be through a General Rate Case (GRC) or other application as authorized by the Commission.
  - 4. RATES: The ISMMA does not have a separate rate component.
  - 5. ACCOUNTING PROCEDURE: The following entries will be made each month, or as applicable:
    - a) A debit entry equal to incremental costs related to the solicitation and selection of the ISM, including related administrative costs, and engagement of the ISM;
    - b) An entry to record the transfer of amounts to or from other accounts as approved by the Commission; and
    - c) 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 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. (N)

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**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  
Sempra 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