

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4448G/6219E
As of December 27, 2021

Subject: Revised Low Carbon Fuel Standard Credits Sales Plans for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company

Division Assigned: Energy

Date Filed: 06-08-2021

Date to Calendar: 06-11-2021

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	07-08-2021

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

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

June 8, 2021

Advice 4448-G/6219-E

(Pacific Gas and Electric Company ID U 39 M)

Advice 4516-E

(Southern California Edison Company – U 338 E)

3754-E/2975-G

(San Diego Gas & Electric Company U 902-E)

Public Utilities Commission of the State of California

Subject: Revised Low Carbon Fuel Standard Credits Sales Plans for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company

Purpose

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (collectively IOUs)¹ submit and request approval of this Advice Letter to amend their Low Carbon Fuel Standard (LCFS) Credits Sales Plans (Sales Plans) contained in each IOU's respective advice letter filing.² The amendment to the Sales Plans allows the IOUs to transact in the California Air Resources Board's (CARB) Credit Clearance Market (CCM) as described in this advice letter.

Background

The CCM is a secondary LCFS market that only occurs if entities with a compliance obligation under the LCFS regulation (e.g., oil refineries) have not procured enough LCFS credits to meet their annual obligation by the compliance deadline. As described in the CARB regulation, the CCM, if one occurs, will operate from June 1 to August 30.³ Available credits for sale in the CCM may occur in two ways:

¹ Investor-Owned Utilities.

² PG&E Advice Letter 3575-G/4604-E approved August 7, 2015; SCE Advice Letter 3194-E approved August 5, 2015; SDG&E Advice Letter 2716-E approved August 3, 2015.

³ LCFS Regulation, Section 95485(c), Credit Clearance Market.

1. *Pledging Credits* – fuel reporting entities and credit generators may voluntarily pledge credits for sale in the CCM between the first Monday in April and April 30th.⁴
2. *Advanced Credits* – if pledged credits are insufficient to fully clear the outstanding deficits, the Executive Officer may issue Advanced Credits to eligible large IOUs and POUs⁵ based on a pro-rata of their base credits. Under CARB’s regulation, Advanced Credits **must be pledged for sale in the CCM and may only be sold at the maximum LCFS price**. In addition, the first “issuance of Advanced Credits will mark the start of the six-year Advanced Credit window” and “shall not exceed 10 million.” At the end of the six-year window, total base credits issued subsequently will be adjusted downwards based on the schedule in CARB’s LCFS regulation.⁶

Proposed Amendment to LCFS Sales Plans

In order to transact in the CCM, voluntarily or as required by law under CARB’s LCFS regulation, the IOUs respectfully request Commission approval to add the CCM as an approved method in their respective Sales Plans. Any sales transactions will only occur if a CCM takes place.⁷

As mentioned above, *pledging* credits for sale in the CCM is optional. If the IOUs choose to voluntarily pledge credits in the CCM, each IOU will follow its respective internal governance guidelines, as necessary, prior to pledging any credits in the CCM.

In addition to the voluntary aspects of the regulation, CARB regulation update, effective July 1, 2020, requires Large IOUs and POUs to participate in selling Advanced Credits in the CCM if voluntarily pledged credits do not clear the outstanding deficits. The Commission must also authorize the IOUs to participate in the CCM if required by the CARB to sell Advanced Credits so that CARB does not penalize the IOUs for failing to comply with CARB’s regulation. The IOUs are not requesting any other changes in their Sales Plans.

The IOUs expect to follow their internal standard credit and collateral processes when transacting in the CCM. The IOUs will also follow the existing procedures to allocate

⁴ On the first Monday in April the Executive Officer will call for credits to be pledged for sale in the CCM. LCFS Regulation, Sections 95485(c)(3).

⁵ Publicly-Owned Utilities.

⁶ LCFS Regulation, Sections 95485(c)(3)(C).

⁷ On May 15th of each year, the Executive Officer will announce whether CCM will occur. (LCFS Regulation Section 95485(c)(3)(F)) On May 14, 2020, the CARB issued a market notice that a CCM “will not be held in 2020 as all the parties covered under LCFS met their 2019 obligations.” On May 14, 2021, the CARB also announced 100 percent compliance in LCFS for compliance year 2020 and that a CCM “will not be held in 2021”.

portions of the proceeds generated from the credit sales in the CCM to the Clean Fuel Reward program.⁸

Protests

*****Due to the COVID-19 pandemic, 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 June 28, 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:

For PG&E:

Sidney Bob Dietz II
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

⁸ LCFS Regulation Sections 95485(c)(3)(C) and 95483(c)(1)(A).

For SCE:

Shinjini C. Menon
Managing Director – State Regulatory Operations Southern
California Edison Company
8631 Rush Street
Rosemead, CA 91770
Telephone No.: (626) 302-3377
Facsimile No.: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

And

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For SDGE:

Aurora Carrillo
Sr Regulatory Tariff Administrator
San Diego Gas & Electric Company
E-Mail: ACarrillo@sdge.com and SDGETariffs@sdge.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

PG&E requests that this Tier 2 advice submittal become effective on regular notice, July 8, 2021 which is 30 calendar days after the date of submittal, consistent with prior LCFS advice letters that do not implement IOU transportation electrification programs. If the Commission determines that a different tier designation is required, the IOUs defer to that determination.

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 R.18-12-006, R.13-11-007, and R.11-03-012. 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/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments

cc: Service List R.18-12-006, R.13-11-007, and R.11-03-012



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) #: 4448-G/6219-E et al.

Tier Designation: 2

Subject of AL: Revised Low Carbon Fuel Standard Credits Sales Plans for Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company

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 #:

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: 7/8/21

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: Sidney Bob Dietz II, 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
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