

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



March 21, 2022

AL PG&E 4458-G/6237-E

Sidney Bob Dietz II, c/o Megan Lawson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
San Francisco, CA 94177

**SUBJECT: Transfer of Residential Uncollectibles from COVID-19 Pandemic
Protections Memorandum Accounts (CPPMA) into Residential
Uncollectible Balancing Account (RUBA)**

Dear Mr. Dietz II:

Pacific Gas and Electric Company (PG&E) Advice Letter 4458-G/6237-E regarding transfer of residential uncollectibles from COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) into Residential Uncollectible Balancing Account (RUBA) is approved effective July 23, 2021.

The appendix of this letter provides a summary of the protest to AL 4458-G/6237-E, PG&E's response to the protest, and Energy Division's disposition of the issues.

Please contact Paul Phillips at Paul.Phillips@cpuc.ca.gov or (415) 703-1786 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "SB", likely representing Simon Baker.

Simon Baker
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: EDTariffUnit
David Cheng, Attorney for TURN
Service List R.18-07-005

Appendix: Energy Division Technical Review and Analysis

Background

On April 17, 2020, the CPUC approved Resolution M-4842, establishing numerous customer protections in response to the emergency situation created by the COVID-19 Pandemic. Resolution M-4842 authorized IOUs to establish COVID Pandemic Protections Memorandum Accounts (CPPMAs) to track and recover costs of implementing these emergency protections.

On June 20, 2020, the CPUC approved Decision (D.) 20-06-003, including Ordering Paragraph (OP) 89, which authorized Investor-Owned Utilities (IOUs) to establish Residential Uncollectible Balancing Accounts (RUBAs) to track and recover the costs of uncollected gas and electric residential bills. In addition, OP 92 of D.20-06-003 authorized IOUs to submit Tier 2 Advice Letters to transfer the uncollectibles recorded in the IOU CPPMAs to the newly-established RUBAs. On June 23, 2021, PG&E submitted AL 4334-G/6001-E establishing PG&E's RUBA, which was approved and effective on July 23, 2021.

On December 30, 2020, Southern California Edison (SCE) submitted AL 4385-E to transfer approximately \$96,854,000 from SCE's CPPMA to SCE's RUBA. On May 26, 2021, San Diego Gas and Electric Company (SDG&E) submitted AL 3772-E/2982-G to transfer \$1,035,651 from SDG&E's CPPMA to SDG&E's RUBA. These ALs were both approved on June 23, 2021. PG&E's AL 4458-G/6237-E seeks to transfer \$11,431,435 in residential uncollectibles recorded in PG&E's CPPMA to the RUBA.

TURN Protest and PG&E Reply

On July 13, 2021, The Utility Reform Network (TURN) filed a timely protest of AL 4458-G/6237-E, arguing that PG&E had not provided sufficient detail about the process used to determine the dollar amount of eligible residential uncollectibles to be transferred from PG&E's CPPMA to the RUBA. TURN argued that PG&E must provide more detail on its calculations before the AL operationalizing the transfer could be approved.

On July 20, 2021, PG&E replied to TURN's protest, stating that D.20-06-003 does not require IOUs to provide more detail on the proposed amount to be transferred than PG&E provided in AL 4458-G/6237-E. PG&E noted that similar ALs filed by other IOUs included similar levels of detail on the proposed amounts to be transferred and have already been approved by the CPUC. Moreover, PG&E noted that the uncollectibles transferred to PG&E's RUBA would be subject to further scrutiny during PG&E's subsequent General Rate Case (GRC), in which it will formally propose to recover these costs.

Disposition

Energy Division finds that D.20-06-003 does not specifically require the IOUs to provide any additional documentation or detail, as requested by TURN, to substantiate

the PG&E's costs beyond what was already included in AL 4458-G/6237-E. PG&E correctly observes in its reply to TURN's protest that the additional level of detail requested by TURN was not required of the other IOUs prior to the approval of their equivalent ALs. Furthermore, PG&E will not be authorized to recover these costs until they have been reviewed and approved as part of PG&E's next GRC, where a more thorough reasonableness review may be conducted. Accordingly, PG&E's AL 4458-G/6237-E is approved with an effective date of June 23, 2021.

June 23, 2021

Advice 4458-G/6237-E

(Pacific Gas and Electric Company U 39 M)

Public Utilities Commission of the State of California

**Subject: Transfer of Residential Uncollectibles from COVID-19 Pandemic
Protections Memorandum Accounts (CPPMA) into Residential
Uncollectible Balancing Accounts (RUBA)**

Purpose

The purpose of this filing is to seek approval from the California Public Utilities Commission (the Commission or CPUC) to transfer the portions of its incremental residential uncollectible expense in the electric and gas COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) into the electric and gas Residential Uncollectible Balancing Accounts (RUBA). The balance transfers are in accordance with Ordering Paragraph (OP) 92 of Commission Decision (D.) 20-06-003, dated June 11, 2020.

Background

On April 16, 2020, the Commission adopted Resolution M-4842, directing utilities to offer the protections adopted in D.19-07-015 to all residential and small business customers through April 16, 2021.

On May 1, 2020, PG&E submitted Advice 4244-G/5816-E in accordance with OP 4 of Resolution M-4842, to establish new gas and electric COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) to record costs associated with offering the required protections in the Resolution.

On June 11, 2020, the CPUC adopted D.20-06-003, which authorized PG&E to establish new two-way balancing accounts to record uncollectibles recovered from residential electric and gas customers compared to actual uncollectibles. On November 16, 2020, PG&E submitted Advice 4334-G/6001-E to establish its RUBA. PG&E then submitted supplemental Advice 4334-G-A/6001-E-A on January 13, 2021. These were approved on April 13, 2021.

On February 11, 2021, the Commission adopted Resolution M-4849 extending COVID-19 emergency customer protections for all residential and small business customers from April 16, 2021 through June 30, 2021. In Resolution M-4849, the Commission further directed the electric and gas corporations subject to this Resolution to continue to use the CPPMA established in Resolution M-4842 to record costs associated with extending the required customer protections in Resolution M-4849.

Request to Transfer CPPMA Residential Uncollectibles to RUBA

PG&E submits this Tier 2 Advice Letter in compliance with Ordering Paragraph 92 which states:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company may submit Tier 2 Advice Letters to address the issue of transferring the portion of their COVID-19 Pandemic Protections Memorandum Account related to uncollectibles from residential disconnections into the two-way balancing account.

PG&E requests approval to transfer the incremental electric and gas residential customer uncollectible expense of \$8.5M and \$2.9M, respectively, from the CPPMA to the RUBA. These amounts represent the incremental uncollectible expense recorded in the CPPMA for the period of March 4, 2020¹ through June 10, 2020² as of May 31, 2021. The Uncollectible Expense (line two in the table below) is recorded initially as an estimate and then trued-up to actual write-offs. As such, PG&E also requests that the amounts transferred take into account any adjustments to Uncollectible Expense that occurs between May 31, 2021 and the approval of this filing.

These amounts also represent the interest expense/(revenue) accrued on the recorded incremental uncollectible expense as of May 31, 2021. Interest is recorded on a monthly basis. As such, PG&E also requests to transfer any related interest for the period of June 2021 to the approval of this advice filing.

¹ Advice Letter 4244-G-B/5816-E-B was approved with an effective date of March 4, 2020.

² Advice Letter 4334-G/6001-E and its supplemental, 4334-G-A/6001-E-A, were approved with an effective date for the RUBA of June 11, 2020. The incremental residential uncollectible expense recorded in the CPPMA for the period of June 11, 2020 (effective date of the RUBA) through April 30, 2021 was transferred to the RUBA. In addition, all subsequent incremental residential uncollectible expense will be recorded directly in the RUBA.

	<u>Electric</u>	<u>Gas</u>	<u>Total</u>
Revenues	\$(3,286,325)	\$(2,392,294)	\$(5,678,619)
Uncollectible Expense	11,819,300	5,287,435	17,106,735
Incremental Uncollectible Expense	8,532,975	2,895,141	11,428,116
Interest	3,952	(633)	3,319
Total Transfer to RUBA	\$8,536,927	\$2,894,508	\$11,431,435

Upon approval, PG&E will transfer the amounts described above from the CPPMA to the RUBA. The balances in the RUBA, including the transferred amounts, will be recovered in rates through the next Annual Electric and Gas True-up advice letter process.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **July 13, 2021**, which is 20 days after the date of this filing. 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:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-1448
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

PG&E requests that this Tier 2 advice filing become effective on regular notice, **July 23, 2021**, which is 30 calendar days after the date of filing.

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.18-07-005. 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments

cc: Service List R.18-07-005



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 (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) #: 4458-G/6237-E

Tier Designation: 2

Subject of AL: Transfer of Residential Uncollectibles from COVID-19 Pandemic Protections Memorandum Accounts (CPPMA) into Residential Uncollectible Balancing Accounts (RUBA)

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.20-06-003

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: 7/23/21

No. of tariff sheets: 0

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