

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4468G
As of October 7, 2021

Subject: Tariff Modifications to the Transmission Integrity Management Program Memorandum Account Gas Preliminary Statement Part DP, and Gas Statutes Regulations and Rules Memorandum Account Gas Preliminary Statement Part EL

Division Assigned: Energy

Date Filed: 07-16-2021

Date to Calendar: 07-21-2021

Authorizing Documents: D1909025

Disposition:	Accepted
Effective Date:	08-15-2021

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

July 16, 2021

Advice 4468-G

(Pacific Gas and Electric Company U 39 G)

Public Utilities Commission of the State of California

Subject: Tariff Modifications to the Transmission Integrity Management Program Memorandum Account – Gas Preliminary Statement Part DP, and Gas Statutes Regulations and Rules Memorandum Account – Gas Preliminary Statement Part EL

Purpose

Pacific Gas and Electric Company (PG&E) submits this Tier 2 advice letter to update the Transmission Integrity Management Program Memorandum Account (TIMPMA) – Gas Preliminary Statement Part DP, and the Gas Statutes Rules and Regulations Memorandum Account (GSRRMA) – Gas Preliminary Statement Part EL. The TIMPMA and GSRRMA were authorized by the CPUC in PG&E's 2019 Gas Transmission and Storage Case (GT&S) Decision (D.) 19-09-025. The TIMPMA tracks and records costs associated with any new transmission integrity management statutes or rules effective after January 1, 2015. The GSRRMA tracks and records incremental costs to comply with any new federal or state statutes, regulations and rules that are issued between GT&S funding cycles for which PG&E has not been able to incorporate a forecast of costs into a rate case and which are not already addressed and recorded in another account. PG&E requests authority to update the TIMPMA and GSRRMA to clarify the inclusion of new or changed interpretation by a regulatory agency of statutes, regulations or rules.

Background

In D.16-06-056 related to PG&E's 2015 GT&S Rate Case Application (A.)13-12-012, the Commission directed PG&E to establish a memorandum account to track costs associated with any new transmission integrity management statute or rules effective after January 1, 2015 to address PG&E's concern that new legislation or rules could require it to spend more than the amount authorized for the transmission integrity management program during the rate case period.¹ The 2019 GT&S Rate Case D.19-

¹ D.16-06-056, p. 254 and Ordering Paragraph 23.

09-025 continued the TIMPMA established by D.16-06-056 to track costs for new transmission integrity management statutes or rules effective after January 1, 2015.²

Separately, in the 2019 GT&S Rate Case Application A.17-11-009, PG&E requested the Commission adopt a proposal for a new memo account to allow PG&E to track capital expenditures and expenses that are not forecast in the rate case but are necessary to comply with new Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations and any other new federal or state statutes, regulations and rules that are issued between GT&S funding cycles.³ In D.19-09-025, the Commission approved PG&E's request and ordered PG&E to file a Tier 2 Advice Letter to establish the new memorandum account.⁴

Thus, in D.19-09-025 the Commission adopted two cost recovery mechanisms related specifically to tracking incremental costs associated with new federal or state statutes, regulations, and rules that are issued between rate case cycles for which PG&E was unable to incorporate a forecast in the 2019 GT&S Rate Case and that are not already addressed or recorded in another account. If incremental expenses are incurred pursuant to any new transmission integrity management statute or rule driven by 49 Code of Federal Regulations (CFR) Part 192, Subpart O, they qualify for the TIMPMA, and if incremental capital expenditures or expenses are incurred to comply with new federal or state statutes, regulations or rules that do not qualify as 49 CFR Part 192, Subpart O, they qualify for the GSRRMA.

Updated Interpretation of 49 CFR § 192.939

As a result of the 2020 TIMP Audit performed by the Safety and Enforcement Division (SED), PG&E was issued a violation of 49 CFR § 192.939 related to assessment intervals for newly identified threats in existing high consequence areas (HCAs). SED's interpretation of § 192.939 conflicted with PG&E's prior interpretation and assessment plan. Over a period of several months, PG&E and the SED discussed their respective understandings of the § 192.939 requirements, which included the review of independent research from industry experts. In March 2021, SED and PG&E agreed that seeking an official PHMSA interpretation was an appropriate next step to obtain clarity on § 192.939 and to resolve this matter.

On April 28, 2021, PG&E submitted a request to PHMSA seeking an interpretation of 49 CFR § 192.939 related to the time requirement for when an assessment of a newly activated threat must be completed in an existing HCA if the threat is newly activated

² D.19-09-025, Ordering Paragraph 74.

³ A.17-11-009, Exhibit PG&E-2, B.3.b. page 17B-13.

⁴ D.19-09-025, Ordering Paragraph 67. PG&E filed Advice Letter 4165-G on October 23, 2019 to create the GSRRMA and the Advice Letter was approved by the CPUC on March 23, 2020.

during the reassessment period provided by 49 CFR § 192.939.⁵ In its letter, PG&E explained that PHMSA had not previously published express guidance on this issue, but pointed out that PG&E's interpretation was consistent with guidance previously provided by PHMSA in frequently asked questions.

On June 23, 2021, PHMSA provided its interpretation that "agrees with the CPUC's assessment that 49 CFR § 192.939 does not have an exception for newly discovered threats within existing HCAs if they are discovered within an assessment cycle. Therefore, a pipeline operator must assess a newly activated threat on a covered segment within the same assessment cycle as other threats that were previously identified through risk assessment under 49 CFR § 192.917(a) regardless of when the threat becomes active."⁶

This new interpretation provided by PHMSA in June fundamentally impacts PG&E's transmission integrity management assessment plan as the 7-year reassessment timeframe would be based on the same 7-year cycle as other threats that were previously identified through risk assessment instead of being based on 7-years from the date of the newly identified threat. This results in the necessary acceleration of assessments and introduction of new assessments, which were not contemplated when PG&E forecast its transmission integrity management programs in the 2019 GT&S Rate Case.

A new or changed interpretation by a regulatory agency of statutes, regulations, and rules may result in the need for PG&E to comply with certain requirements that had not previously been anticipated or included in a rate case forecast. Similar to a new rule or regulation, a new or changed interpretation by a regulatory agency can result in incremental costs between rate case cycles. It is reasonable that the mechanisms afforded by the Commission in D.19-09-025 are clarified to allow for the tracking of incremental costs due to a new or changed interpretation. This is fully consistent with the intent of the TIMPMA and GRSSMA, which were approved as mechanisms to allow PG&E to recover costs for new or unanticipated work arising from statutes, regulations or rules.

Tariff Revisions

PG&E requests authority to update the TIMPMA Preliminary Statement Part DP and GSRRMA Preliminary Statement Part EL to clarify the inclusion of new or changed interpretation by a regulatory agency of statutes, regulations, or rules. Such changes in interpretation by a regulatory agency not known or anticipated by PG&E when developing its forecast for the rate case period may drive incremental costs in programs built to comply with such statutes, regulations and rules and thus PG&E should be provided a reasonable opportunity to track incremental costs associated with new interpretation by

⁵ Attachment 1.

⁶ Attachment 2.

a regulatory agency. Both the TAMPMA and GSRRMA are subject to reasonableness review through an application or as otherwise directed by the Commission prior to receiving authorization in rates for cost recovery. Thus, while PG&E can record these costs under the proposed tariff revisions, it will only be able to recover these costs after an appropriate reasonableness review.

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, 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 **August 5, 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:

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

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, this advice letter is submitted with a Tier 2 designation. PG&E requests that this **Tier 2** advice submittal become effective on regular notice, **August 15, 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 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/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments

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 (U 39 G)

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) #: 4468-G

Tier Designation: 2

Subject of AL: Tariff Modifications to the Transmission Integrity Management Program Memorandum Account – Gas Preliminary Statement Part DP, and Gas Statutes Regulations and Rules Memorandum Account – Gas Preliminary Statement Part EL

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.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: 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: 8/15/21

No. of tariff sheets: 4

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: 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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
37287-G	GAS PRELIMINARY STATEMENT PART DP TRANSMISSION INTEGRITY MANAGEMENT PROGRAM MEMORANDUM ACCOUNT (TIMPMA) Sheet 1	36061-G
37288-G	GAS PRELIMINARY STATEMENT PART EL GAS STATUTES REGULATIONS AND RULES MEMORANDUM ACCOUNT (GSRRMA) Sheet 1	36067-G
37289-G	GAS TABLE OF CONTENTS Sheet 1	37273-G
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GAS PRELIMINARY STATEMENT PART DP
TRANSMISSION INTEGRITY MANAGEMENT PROGRAM
MEMORANDUM ACCOUNT (TIMPMA)

Sheet 1

DP. Transmission Integrity Management Program Memorandum Account (TIMPMA)

1. **PURPOSE:** The purpose of the Transmission Integrity Management Program Memorandum Account (TIMPMA) is to record and track costs associated with any new transmission integrity management statutes or rules, or new or changed interpretation by a regulatory body of transmission integrity management statutes or rules, effective after January 1, 2015. (T)
(T)

This account is comprised of a main account, which records backbone transmission and/or storage costs for future recovery from all customers and a Local Transmission Subaccount, which records local transmission costs for future recovery from all customers except Backbone Service-Level end-use customers who do not fund local transmission activities.

2. **APPLICABILITY:** The TIMPMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATES:** Disposition of the balance in this account shall be through an application or as otherwise directed by the Commission.
4. **RATES:** The TIMPMA does not have a separate rate component.
5. **ACCOUNTING PROCEDURE:**

MAIN ACCOUNT:

The following entries, net of an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense, will be made to the account each month or as applicable:

- a) A debit entry equal to the fully burdened actual expenses incurred.
- b) An entry to transfer amounts to or from another account as authorized by the Commission.
- c) An entry equal to the 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.

6. LOCAL TRANSMISSION SUBACCOUNT:

The purpose of the Local Transmission Subaccount is to separately track costs related to PG&E's local transmission system that are associated with the TIMPMA.

The following entries will be made each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

- a) A debit entry equal to the actual expenses incurred, including applicable benefits burden;
- b) An entry to transfer amounts to or from another account as authorized by the Commission; and

(Continued)

<i>Advice</i>	4468-G	<i>Issued by</i>	<i>Submitted</i>	July 16, 2021
<i>Decision</i>	D.19-09-025	Robert S. Kenney	<i>Effective</i>	_____
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	_____



GAS PRELIMINARY STATEMENT PART EL Sheet 1
GAS STATUTES REGULATIONS AND RULES MEMORANDUM ACCOUNT (GSRRMA)

EL. Gas Statutes Regulations and Rules Memorandum Account (GSRRMA)

1. **PURPOSE:** The purpose of the Gas Statutes Regulations and Rules Memorandum Account (GSRRMA) is to track and record incremental costs to comply with any new federal or state statutes, regulations and rules, or new or changed interpretation by a regulatory body of statutes, regulations and rules, that are issued between GT&S funding cycles for which PG&E has not been able to incorporate a forecast of costs into a rate case and which are not already addressed and recorded in another account.

(T)
(T)

This account is comprised of a Main Account, which records backbone transmission and/or storage costs for future recovery from all customers and a Local Transmission Subaccount, which records local transmission costs for future recovery from all customers except Backbone Service-Level end-use customers who do not fund local transmission activities.

2. **APPLICABILITY:** The GSRRMA applies to all customer classes, except for those schedules or contracts specifically excluded by the Commission.

3. **REVISION DATE:** Disposition of the balances in this account will be through an application or as otherwise authorized by the Commission.

4. **RATES:** The GSRRMA does not have a rate component.

5. **ACCOUNTING PROCEDURE:**

MAIN ACCOUNT:

The following entries will be made each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

- a) A debit entry equal to incurred expenses; including applicable benefit burdens;
- b) A debit or credit entry equal to the capital-related revenue requirement related to actual capital expenditures incurred. Capital-related revenue requirements include depreciation expense, return on rate base at the authorized cost of capital, federal and state income taxes, and property taxes associated with the cost of installed equipment;
- c) An entry to transfer the balance to or from another account, as authorized by the Commission; and
- d) 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.

6. **LOCAL TRANSMISSION SUBACCOUNT:**

The purpose of the Local Transmission Subaccount is to separately track costs related to PG&E's local transmission system associated with the GSRRMA.

The following entries will be made each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

(Continued)

Advice	4468-G	Issued by	Submitted	July 16, 2021
Decision	D.19-09-025	Robert S. Kenney	Effective	
		Vice President, Regulatory Affairs	Resolution	



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Advice 4468-G
Decision D.19-09-025

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted _____ July 16, 2021
Effective _____
Resolution _____



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Advice 4468-G
July 16, 2021

Attachment 2

Redline Tariff Revisions



GAS PRELIMINARY STATEMENT PART DP
TRANSMISSION INTEGRITY MANAGEMENT PROGRAM
MEMORANDUM ACCOUNT (TIMPMA)

Sheet 1

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- 2. **APPLICABILITY:** The TIMPMA shall apply to all customer classes, except for those specifically excluded by the Commission.
- 3. **REVISION DATES:** Disposition of the balance in this account shall be through an application or as otherwise directed by the Commission.
- 4. **RATES:** The TIMPMA does not have a separate rate component.
- 5. **ACCOUNTING PROCEDURE:**

MAIN ACCOUNT:

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- c) An entry equal to the 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.

6. LOCAL TRANSMISSION SUBACCOUNT:

The purpose of the Local Transmission Subaccount is to separately track costs related to PG&E's local transmission system that are associated with the TIMPMA.

The following entries will be made each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

- a) A debit entry equal to the actual expenses incurred, including applicable benefits burden;
- b) An entry to transfer amounts to or from another account as authorized by the Commission; and

(Continued)



GAS PRELIMINARY STATEMENT PART EL Sheet 1
GAS STATUTES REGULATIONS AND RULES MEMORANDUM ACCOUNT (GSRRMA)

EL. Gas Statutes Regulations and Rules Memorandum Account (GSRRMA)

1. PURPOSE: The purpose of the Gas Statutes Regulations and Rules Memorandum Account (GSRRMA) is to track and record incremental costs to comply with any new federal or state statutes, regulations and rules, or new or changed interpretation by a regulatory body of statutes, regulations and rules, that are issued between GT&S funding cycles for which PG&E has not been able to incorporate a forecast of costs into a rate case and which are not already addressed and recorded in another account.

(T)
(T)

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- 2. APPLICABILITY: The GSRRMA applies to all customer classes, except for those schedules or contracts specifically excluded by the Commission.
- 3. REVISION DATE: Disposition of the balances in this account will be through an application or as otherwise authorized by the Commission.
- 4. RATES: The GSRRMA does not have a rate component.
- 5. ACCOUNTING PROCEDURE:

MAIN ACCOUNT:

The following entries will be made each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

- a) A debit entry equal to incurred expenses; including applicable benefit burdens;
- b) A debit or credit entry equal to the capital-related revenue requirement related to actual capital expenditures incurred. Capital-related revenue requirements include depreciation expense, return on rate base at the authorized cost of capital, federal and state income taxes, and property taxes associated with the cost of installed equipment;
- c) An entry to transfer the balance to or from another account , as authorized by the Commission; and
- d) 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.

6. LOCAL TRANSMISSION SUBACCOUNT:

The purpose of the Local Transmission Subaccount is to separately track costs related to PG&E's local transmission system associated with the GSRRMA.

The following entries will be made each month, or as applicable, excluding an allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

(Continued)

**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