

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4507G/6357E
As of December 14, 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: 10-08-2021

Date to Calendar: 10-13-2021

Authorizing Documents: D2012005

Disposition:	Accepted
Effective Date:	12-13-2021

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



October 8, 2021

Advice 4507-G/6357-E

(Pacific Gas and Electric Company 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 \$121.873 million and Wildfire Mitigation Balancing Account (WMBA) expense undercollection of \$7.871 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 2021 adopted expense value is \$602.814 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.

Undercollection of 2021 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 and amounts PG&E is seeking recovery of in this advice letter 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 2021 adopted expense value is \$55,292 million.

Table 1:
2021 VMBA Undercollection Calculation (Amounts in Thousands)

Expense Adopted	Expense Adopted at 120%	Expense Undercollection	Revenue Fees & Uncollectibles Electric: 0.010869	Total Revenue Requirement for Advice Letter filing
\$602,814	\$723,377	\$120,563	\$1,310	\$121,873

Note: table sums may not add up due to rounding

Table 2:
2021 WMBA Undercollection Calculation (Amounts in Thousands)

Expense Adopted	Expense Adopted at 115%	Expense Undercollection	Revenue Fees & Uncollectibles Electric: 0.010869 Gas: 0.013390	Total Revenue Requirement for Advice Letter filing	Expense Undercollection Subject to Recovery in Advice Letter ³
\$55,292	\$63,586	\$8,294	\$97	\$8,390	\$7,871

Note: table sums may not add up due to rounding

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

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 **October 28, 2021**, which is 20 days after the date of this submittal. Protests must be submitted to:

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 for 2021 of \$55,292 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 \$7,780 million, which is recorded in the WMBA, plus the revenue fees and uncollectibles amount of \$91 thousand, be approved for recovery, for a grand total of \$7,871 thousand.

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, 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, **November 7, 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. 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: Attachment A: 2020 GRC Revenue Requirement - VMBA and WMBA

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 (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) #: 4507-G/6357-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: 11/7/21

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

Attachment A

2020 GRC Revenue Requirement - VMBA and WMBA

2021 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)	55,292	15%	8,294	Electric: 0.010869 Gas: 0.013390	97	8,390	7,871
Vegetation Management Balancing account	602,814	20%	120,563	0.010869	1,310	121,873	121,873
Total	658,106		128,857		1,407	130,264	129,744

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)	3,272	1,973	1,766	859	519	8,390
Vegetation Management Balancing account	121,873	-	-	-	-	121,873
Total	125,145	1,973	1,766	859	519	130,264

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	1,606	53,686	55,292		
Wildfire Mitigation Balancing Account Authorized -115%	1,847	61,739	63,586		
Wildfire Mitigation Balancing Account Authorized -15%	241	8,053	8,294		
Line of Business	Operations and Maintenance	Admin and General	Total cost	RF&U	Total RRQ
Electric Distribution	241	2,996	3,237	35	3,272
Electric Generation		1,952	1,952	21	1,973
Gas Distribution		1,743	1,743	23	1,766
Gas Transmission		848	848	11	859
Electric Transmission		514	514	6	519
Total	241	8,053	8,294	97	8,390

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

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Energy Management Service Engineers and Scientists of California	Pioneer Community Energy Public Advocates Office
Alta Power Group, LLC Anderson & Poole		Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions San Diego Gas & Electric Company
Atlas ReFuel BART	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF IGS Energy International Power Technology	SPURR San Francisco Water Power and Sewer Semptra Utilities
Barkovich & Yap, Inc. California Cotton Ginners & Growers Assn California Energy Commission	Intertie	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.
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McKenzie & Associates	
Cameron-Daniel, P.C. Casner, Steve Cenergy Power Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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		