

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4544G
As of January 21, 2022

Subject: Adjusted Disallowance of Vintage Pipeline Replacement Program from the 2019 Gas Transmission and Storage Rate Case Pursuant to Ordering Paragraph 4 of D.21-11-036

Division Assigned: Energy

Date Filed: 12-22-2021

Date to Calendar: 12-24-2021

Authorizing Documents: D2111036

Disposition:	Accepted
Effective Date:	01-01-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

December 22, 2021

Advice 4544-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Adjusted Disallowance of Vintage Pipeline Replacement Program from the 2019 Gas Transmission and Storage Rate Case Pursuant to Ordering Paragraph 4 of D.21-11-036

Purpose

Pursuant to Ordering Paragraph (OP) 4 of Decision (D.) 21-11-036, Pacific Gas and Electric Company's (PG&E) submits this Advice Letter to implement the adjusted disallowance associated with the Vintage Pipeline Replacement Program from the 2019 Gas Transmission and Storage (GT&S) D.19-09-025 (the 2019 GT&S Decision).

Background

In D.19-09-025, the Commission authorized PG&E's GT&S revenue requirements for the period 2019-2022. Included in the 2019 GT&S Decision was the permanent disallowance of \$304.2 million of forecast 2015-2018 capital costs associated with PG&E's Vintage Pipeline Replacement Program. The Commission allowed PG&E to true up the disallowance to actual cost overruns through a Tier 2 Advice Letter. On October 18, 2019, PG&E submitted Advice Letter 4162-G to update amounts for actual spend, thereby reducing the \$304.2 million disallowance to \$237.3 million.¹

Separately, on October 23, 2019, PG&E filed an Application for Rehearing (AFR) of the 2019 GT&S Decision seeking rehearing of the Vintage Pipeline Replacement Program disallowance, among other issues. On November 19, 2021, the Commission issued D.21-11-036 denying PG&E's AFR but recognized the 2019 GT&S Decision's intent to disallow only 2016-2018 Vintage Pipeline Replacement costs, not 2015-2018 as referred to in the 2019 GT&S Decision. D.21-11-036 orders the correction of Conclusion of Law 63 to be changed to clarify dates from "2015-2018" to "2016-2018" and authorizes PG&E to file a Tier 2 Advice Letter to implement the adjusted disallowance.

¹ Advice Letter 4162-G was approved on March 27, 2020.

Removal of 2015 Cost Disallowance for Vintage Pipeline Replacement Program

Pursuant to Ordering Paragraph 94 of D.19-09-025, PG&E provided the updated analysis, by year, for 2015-2018 actuals of the Vintage Pipeline Replacement disallowance in Advice Letter 4162-G, Attachment A.² The analysis updated The Utility Reform Network's (TURN) data request from the 2019 GT&S proceeding that was the basis for the Commission's disallowance, resulting in the actual 2015-2018 disallowance of \$237.3 million that TURN accepted.³ Removing the 2015 value of \$39.4 million from the disallowance reduces the amount from \$237.3 million, as approved in Advice Letter 4162-G, to \$197.9 million. The total Revenue Requirement (RRQ) increase is approximately \$3.5 to \$4.9 million annually and displayed in the table below.⁴ As D.21-11-036 was issued after PG&E filed its 2023 General Rate Case Application (GRC), the \$39.4 million in rate base associated with the removal of 2015 Vintage Pipeline Replacement disallowance was not included in the 2023 GRC; therefore, the 2023-2026 revenue requirement is included in this Advice Letter.⁵

Year	2019	2020	2021	2022	2023	2024	2025	2026
RRQ Impact (\$ in thousands)	4,962	4,308	4,003	3,943	3,797	3,701	3,606	3,511

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 January 11, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

² Advice Letter 4162-G in its entirety is available electronically at the following link:
https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_4162-G.pdf

³ November 7, 2019 Response of The Utility Reform Network to the Application of Pacific Gas and Electric Company for Rehearing of Decision 19-09-025, p. 3, "As a preliminary matter, TURN notes that pursuant to D.19-09-025, PG&E has recalculated the disallowance amount for VPR to be \$237.3 million in its Advice Letter 4162-G, which TURN accepts."

⁴ PG&E will record the revenue requirement to the Adjustment Mechanism for Cost Determined in Other Proceedings (AMCDOP). The revenue requirement associated with the \$237.2 million disallowance was recorded to the Rate Base Adjustment Memorandum Account (RBAMA) and the ending balance is transferred annually to the AMCDOP. PG&E requested to close the RBAMA in the 2023 GRC.

⁵ PG&E filed its 2023 GRC Phase 1 application on June 30, 2021. As required by the Rate Case Plan Decision 20-01-002, the 2023 GRC application integrated the GT&S RRQ.

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 4 of D.21-11-036, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, January 21, 2022 which is 30 calendar days after the date of submittal.



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 G)

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) #: 4544-G

Tier Designation: 2

Subject of AL: Adjusted Disallowance of Vintage Pipeline Replacement Program from the 2019 Gas Transmission and Storage Rate Case Pursuant to Ordering Paragraph 4 of D.21-11-036

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.21-11-036

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: 1/21/22

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:

**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
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
International Power Technology

Intertie

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

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy
Public Advocates Office

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