

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4586G
As of April 6, 2022

Subject: Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2023 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter Pre-Approval to Enter into Ruby Pipeline, LLC Contract

Division Assigned: Energy

Date Filed: 03-11-2022

Date to Calendar: 03-16-2022

Authorizing Documents: D2112035

Disposition:	Accepted
Effective Date:	03-11-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

March 11, 2022

Advice 4586-G

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2023 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter Pre-Approval to Enter into Ruby Pipeline, LLC Contract

Purpose

Exercise Step-Down Rights:

In accordance with Decision (D.) 21-12-035, Ordering Paragraph (OP) 3, Pacific Gas and Electric Company (PG&E) respectfully requests California Public Utilities Commission (Commission or CPUC) pre-approval to exercise PG&E's right, for 2023, to reduce its Ruby Pipeline capacity holdings (the "Step Down Right") of its Core Gas Supply Department (CGS) for all core customers pursuant to the terms of PG&E's contracts and amended contracts with Ruby Pipeline, LLC (Ruby). This request for pre-approval is made in accordance with the terms of PG&E's contracts and amended contracts with Ruby, as approved by D.08-11-032 and D.21-12-035 (the Ruby Contracts and Amended Ruby Contracts, respectively), and the procedures required by D.21-12-035 to exercise the Step Down Right.¹

Replacement Capacity Contract:

Further, this advice letter also requests pre-approval of a replacement capacity contract under the interstate capacity acquisition procedure approved in D.04-09-022.² Under this procedure, pipeline contracts endorsed by the California Public Advocates Office (Cal Advocates) and The Utility Reform Network (TURN) may be submitted for pre-approval

¹ PG&E has also requested pre-approval to exercise the Step Down Right for 2022. See AL 4582-G.

² Order Instituting Rulemaking to Establish Policies and Rules to Ensure Reliable, Long-Term Supplies of Natural Gas to California (Gas Capacity OIR), R.04-01-025.

to the Commission by an Expedited Advice Letter.³ TURN's participation in the approval process is voluntary, and TURN elected to participate in the review of this contract. PG&E consulted with Cal Advocates and TURN, and they both indicated their concurrence to proceed with the proposed contract.

Background

Exercise Step-Down Rights:

The Ruby Contracts and the Amended Ruby Contracts give PG&E the right to “step down” its capacity on the Ruby Pipeline by 20 percent each year (i.e. 50,000 Dth/day) for five years beginning in 2022. D.21-12-035 establishes the procedure for PG&E to follow when exercising its rights to reduce CGS' capacity on the Ruby Pipeline. The procedure is as follows:

1. PG&E consults with the CGS Stakeholder Group (i.e., California Public Advocates Office, Energy Division, Legal Division, and TURN), which represents the interests of Core customers, to obtain input concerning exercise of the Step Down Right.
2. PG&E files a Tier 1 advice letter requesting pre-approval from the Commission to exercise the Step Down Right.⁴

PG&E has requested Commission approval to exercise the Step Down Right for 2022.

On March 8, 2022, PG&E consulted the CGS Stakeholder Group regarding exercise of the Step Down Right for 2023. PG&E, in consultation with the CGS Stakeholder Group, determined that it was in the best interest of customers to exercise the Step Down Right for 2023, thereby reducing the total CGS' contracted Ruby Pipeline capacity holding by a total of 40 percent (accounting for exercise of the 2022 Step Down Right) from the original contract capacity.

Replacement Capacity Contract:

D.04-09-022 provides a pathway for the approval of interstate pipeline capacity contracts. As confirmed in the Approval of PG&E Advice Letter (AL) 4504-G, Energy Division agreed with PG&E that the utility could file the proposed contracts via an expedited AL.⁵

³ While PG&E may file an expedited Advice Letter per D.04-09-022, this submittal is a standard Tier 1 Advice Letter because PG&E is also requesting approval to exercise its Step Down Rights. Per D.21-12-035, PG&E shall submit a *standard* Tier 1 Advice Letter requesting Commission approval to exercise its Step Down Rights.

⁴ D. 21-12-035 at OP 3.

⁵ Please see Footnote 3.

Request

Exercise Step-Down Rights: PG&E Core Gas Supply, as required by the procedures in the Amended Ruby Contracts and D.21-12-035, having determined that exercising its Step Down Rights for 2023 is in the best interest of all core customers, requests pre-approval to reduce its Ruby Pipeline capacity holding by an additional 50,000 Dth/day, bringing the total capacity holding down to 150,000 Dth/day.

Replacement Capacity Contract: Under D.04-09-022, contracts for pipeline capacity may be submitted by advice letter. PG&E requests that the Commission approve this filing.

Description of Contract

The terms of the proposed contract are confidential as described in the accompanying Declaration dated March 11, 2022, and are described in Confidential Appendix A. Confidential Appendix A is submitted to the Energy Division, Legal Division, PAO and TURN.

In addition, upon request, the confidential contract terms will be provided to PG&E's Core Transport Agents (CTAs) who agree to the terms of a nondisclosure agreement.

All costs associated with the contracts will continue to be recovered from PG&E's core gas customers, in accordance with the interstate pipeline capacity contract procedures established in D.04-09-022 and D.15-10-050, through PG&E's Core Pipeline Demand Charge Account, and PG&E's gas tariffs, and from CTAs through the provisions of Tariff G-CT.

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **March 31, 2022**, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations

c/o Megan Lawson
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 and 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 1 advice submittal become effective upon date of submittal, which is **March 11, 2022**.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for **R.04-01-025**, **A.13-06-011**, and **A.20-08-023**. 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

cc: **Confidential Version (with Confidential Appendix A)**

Jean Spencer - Energy Division
Beth LaCour – Energy Division
Renee Guild - Energy Division
Kevin Flaherty – Energy Division
Jonathon Bromson - Legal Division
R. Mark Pocta - Public Advocates Office
Scott Logan - Public Advocates Office
Michael Tan - Public Advocates Office
Mike Florio – The Utility Reform Network

Public Version (without Confidential Appendix A)

Service list for R.04-01-025

Service list for A.13-06-011

Service list for A.20-08-023



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) #: 4586-G

Tier Designation: 1

Subject of AL: Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2023 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter Pre-Approval to Enter into Ruby Pipeline, LLC Contract

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.21-12-035

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: See Confidential Declaration
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: Wini Chen, WCCE@pge.com.

Resolution required? Yes No

Requested effective date: 3/11/22 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 correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Wini Chen, am an Expert Regulatory Analyst in Core Gas Supply of Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President of Energy Policy and Procurement of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street, Mail Code B5A
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): D.04-09-022

3. Title and description of document(s): Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2023 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter Pre-Approval to Enter into Ruby Pipeline (Advice Letter 4586-G)
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input checked="" type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)</p>	Confidential Appendix A
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

Third-Party information subject to non-disclosure or confidentiality agreements or obligations
 (Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 10th day of March, 2022 at San Francisco, California.



 Wini Chen
 Expert Regulatory Analyst
 Pacific Gas and Electric Company

Confidential Appendix A

Advice 4586-G

March 11, 2022

**Capacity Contract between
Pacific Gas and Electric Company's Core Gas Supply (PG&E) and
Ruby Pipeline, LLC (Ruby)**

CONFIDENTIAL MATERIAL

**Confidential in its Entirety as Described in the
Accompanying Declaration Dated March 10, 2022**

**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.
Braun Blasing Smith Wynne, P.C.
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
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
McClintock IP
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
Uplight
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy