

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4625G
As of August 1, 2022

Subject: Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization

Division Assigned: Energy

Date Filed: 07-01-2022

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Disposition:	Accepted
Effective Date:	07-31-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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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.

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- Advice Letter Number
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Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

July 1, 2022

Advice 4625-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Compliance Report on the Adequacy of Backbone Transmission
Capacity Holdings and Capacity Utilization**

Pacific Gas and Electric Company (“PG&E”) hereby submits for filing a compliance report on the adequacy of PG&E’s backbone transmission capacity holdings and slack capacity consistent with PG&E’s proposals in Phase II of the Gas Capacity OIR, Decision (“D.”) 06-09-039.

Purpose

The purpose of this advice letter and the attached report is to comply with Ordering Paragraph 3 in D.06-09-039 and to provide the California Public Utilities Commission (“Commission”) with an update on PG&E’s backbone transmission capacity utilization outlook. Ordering Paragraph 3 states:

3. The Pacific Gas and Electric Company and the Southern California Gas Company shall demonstrate in biennial advice letter filings to the Commission’s Energy Division starting in 2008 that they hold adequate backbone transmission capacity and have slack capacity consistent with their proposals presented herein. The first filing is due July 1, 2008.

Background

In 2004, the Commission issued Rulemaking (“R.”) 04-01-025 to investigate the adequacy of natural gas supplies and infrastructure to meet the long-term needs of the gas consumers in California. In D.06-09-039, the Commission determined that it was “comfortable with the total amount of firm backbone transmission capacity on both the PG&E and SoCal Gas systems.”¹ To ensure that the utilities monitor the adequacy of their backbone capacity, the Commission required that the utility make biennial advice letter submittals, starting in 2008, to demonstrate that they have adequate backbone capacity consistent with the showings made in Rulemaking 04-01-025. This advice letter is the eighth biennial submittal.

¹ D.06-09-039, Finding of Fact 12.

Summary of Report

Based on the information contained in the attached report, PG&E has adequate backbone transmission capacity to ensure that both current and forecast demand can be met based on the criteria adopted in D.06-09-039 through 2035.

The adequacy of PG&E's backbone transmission capacity holdings to serve core and electric customers have historically been addressed in PG&E's Gas Transmission and Storage Rate Case Applications and Bundled Procurement Plan proceedings. PG&E believes that these are the appropriate forums in which to address this issue and, therefore, will limit comments in both the advice letter and the report to addressing the adequacy of system capacity relative to current and forecast demand.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than July 21, 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 2 advice letter become effective on regular notice, July 31, 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 (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) #: 4625-G

Tier Designation: 2

Subject of AL: Compliance Report on the Adequacy of Backbone Transmission Capacity Holdings and Capacity Utilization

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other: Biennial

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-09-039

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: 7/31/22

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

PACIFIC GAS AND ELECTRIC COMPANY

ATTACHMENT 1

**COMPLIANCE REPORT ON THE ADEQUACY OF
BACKBONE TRANSMISSION CAPACITY HOLDINGS AND
CAPACITY UTILIZATION**

SUBMITTED JULY 1, 2022



PACIFIC GAS AND ELECTRIC COMPANY
ATTACHMENT 1
COMPLIANCE REPORT ON THE ADEQUACY OF
BACKBONE TRANSMISSION CAPACITY HOLDINGS AND
CAPACITY UTILIZATION

TABLE OF CONTENTS

A. Introduction.....	1
B. Adequacy of PG&E’s Backbone Transmission Capacity Holdings	2
C. Backbone Capacity Utilization	3
D. Demand Forecasts	6
E. Adequacy of PG&E’s Backbone Transmission Capacity	6
F. Adequacy of Local Transmission Capacity and Design Criteria	9
G. Conclusion.....	11

1 **PACIFIC GAS AND ELECTRIC COMPANY**
2 **ATTACHMENT 1**
3 **COMPLIANCE REPORT ON THE ADEQUACY OF**
4 **BACKBONE TRANSMISSION CAPACITY HOLDINGS AND**
5 **CAPACITY UTILIZATION**

6 **A. Introduction**

7 In Decision (D.) 06-09-039, the California Public Utilities Commission
8 (Commission) adopted a natural gas transportation backbone capacity utilization
9 guideline for Pacific Gas and Electric Company (PG&E) and Southern California
10 Gas Company. This guideline states that if annual utilization of intrastate
11 backbone transmission capacity exceeds 80-90 percent on a forecast basis, an
12 expansion of capacity may be needed. This guideline is set as a range
13 to provide the utilities with flexibility to manage how and when to make
14 new infrastructure investments.

15 D.06-09-039 required that:

16 The Pacific Gas and Electric Company and the Southern California Gas
17 Company shall demonstrate in biennial advice letter filings to the
18 Commission's Energy Division starting 2008 that they hold adequate
19 backbone transmission capacity and have slack capacity consistent with
20 their proposals presented herein.¹

21 In compliance with the Commission's direction, this filing updates the
22 analysis PG&E performed in Phase II of Gas Capacity Order Instituting
23 Rulemaking (R.04-01-025) and in PG&E's previous compliance filings.² This
24 updated assessment addresses PG&E's holding of backbone and storage
25 capacity to service bundled core customers and PG&E's electric generation
26 requirements (Section B), adequacy of the backbone transmission system
27 (Section E), and adequacy of the local transmission capacity (Section F).

28 The 2022 California Gas Report (CGR) referenced in this filing will be filed
29 with the Commission on August 1, 2022.

1 See D.06-09-039, Ordering Paragraph (OP) 3, at p. 184.

2 PG&E previously submitted compliance filings in 2008, 2010, 2012, 2014, 2016, 2018
and 2020.

1 **B. Adequacy of PG&E’s Backbone Transmission Capacity Holdings**

2 Since 1998, PG&E’s intrastate backbone transmission capacity holdings to
3 serve core customers have been determined through PG&E’s Gas Transmission
4 and Storage (GT&S)³ and Cost Allocation Rate Design (CARD) Rate Case⁴
5 Applications, also referred to as PG&E’s Gas Accords. This Application
6 structure has provided core customers access to PG&E GT&S services, while
7 also providing, among other things, the opportunity for all participating parties to
8 evaluate PG&E’s core backbone transmission and storage holdings. In PG&E’s
9 2019 GT&S Rate Case, the Commission approved the proposed core backbone
10 transmission holdings and a firm core storage holding for 2019-2022 in
11 conjunction with the approval of PG&E’s Natural Gas Storage Strategy. The
12 Commission authorized acquisition of storage capacity from the Independent
13 Storage Providers (ISP), firm intrastate and interstate pipeline capacity, and/or
14 firm peaking supply arrangements to meet the core planning standard.⁵ In
15 PG&E’s 2023 GT&S CARD Rate Case, PG&E Core Gas Supply has proposed
16 core backbone transmission holdings and firm storage holdings for 2023-2026,
17 as well as modification to the Interstate Capacity Planning Range to reliably
18 serve core customers. For bundled electric customers, PG&E arranges
19 intrastate backbone transmission capacity according to its Natural Gas
20 Procurement Limits, filed as part of Appendix C: Procurement Limits and
21 Ratable Rates of PG&E’s Bundled Procurement Plan (BPP). PG&E’s 2014 BPP
22 was approved in D.15-10-031 on October 22, 2015.⁶ PG&E’s BPP was filed as
23 a distinct phase of the biennial Long-Term Procurement Plan (LTPP)
24 proceedings, and each BPP superseded those in previous LTPPs.

25 PG&E believes that the combined General Rate Case (GRC) proceedings
26 and the BPP are the appropriate forums in which to address the adequacy of
27 PG&E’s intrastate contractual holdings for the core and bundled-electric
28 portfolios, respectively.

3 See A.21-06-021.

4 See A.21-09-018.

5 See D.06-07-010, OP 1, at p. 36.

6 See D.15-10-031.

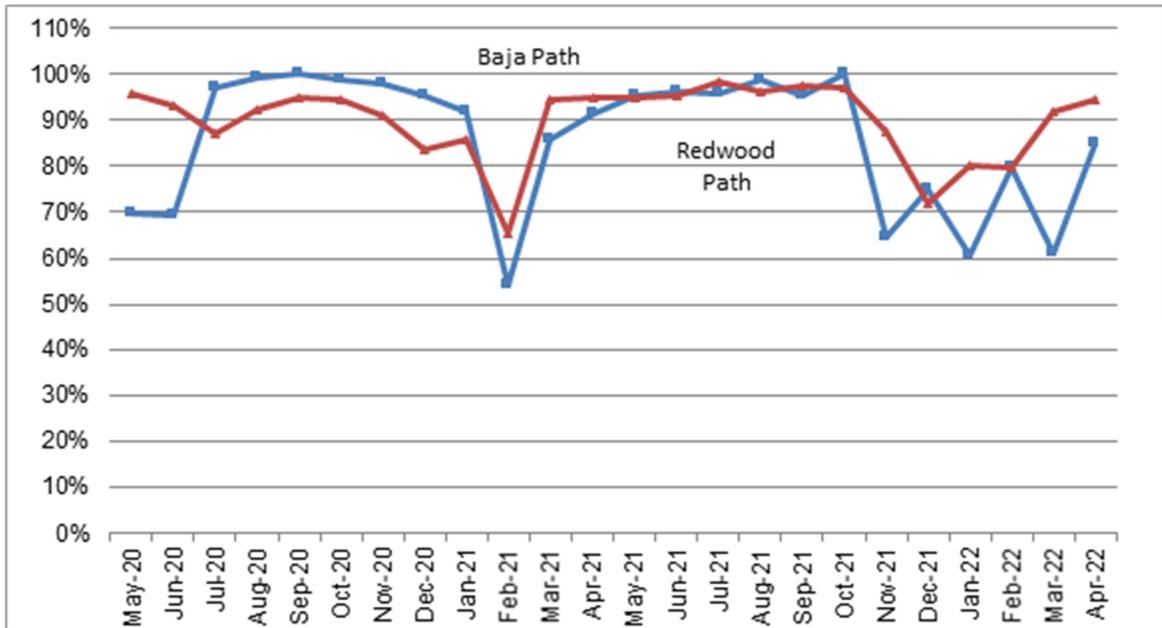
1 **C. Backbone Capacity Utilization**

2 Additional pipeline capacity over and above average demand levels
3 provides significant value to customers even in years without pipeline
4 maintenance outages, supply disruptions, or increased demand. Additional
5 pipeline capacity allows the market flexibility to move purchases between receipt
6 points, which results in more gas-on-gas competition at the PG&E Citygate.
7 Additional pipeline capacity, when combined with storage, also provides
8 significant flexibility for customers to time their gas purchases throughout the
9 year.

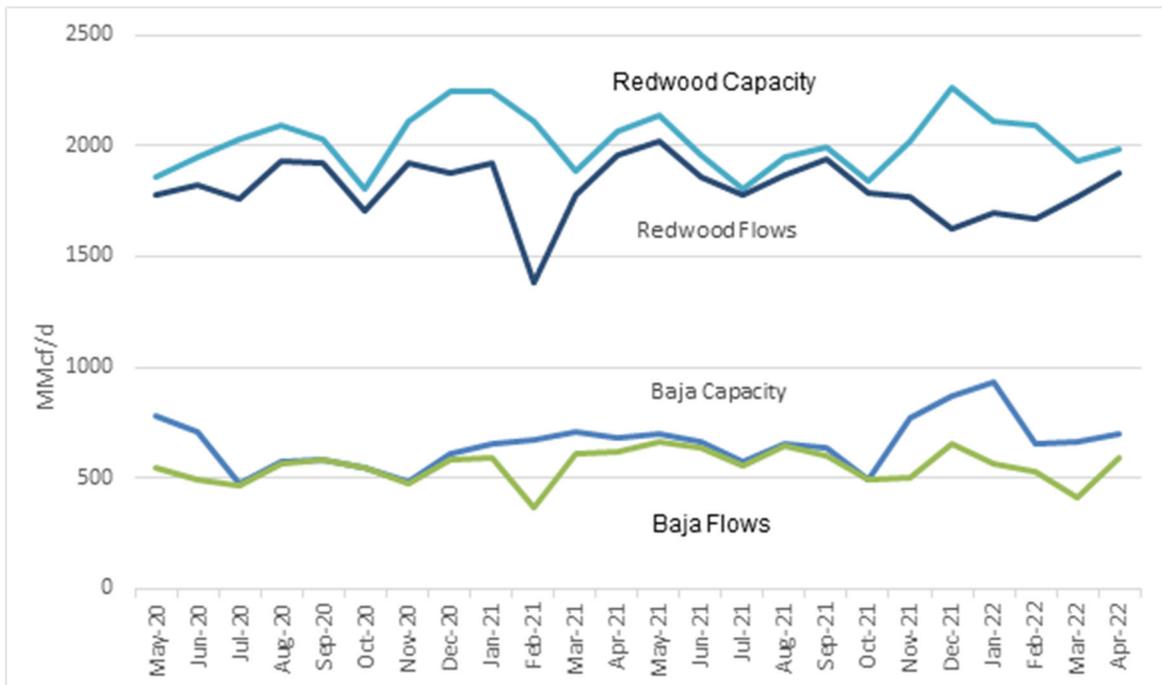
10 Figures 1, 2, and 3 below show backbone capacity utilization during the
11 24-month period ending April 30, 2022. The Redwood Path continued to be the
12 preferred supply path as shippers used it to transport gas from the
13 Rocky Mountains on the Ruby Pipeline and from Canada on Gas Transmission
14 Northwest to PG&E's system. The Redwood Path had high utilization, at times
15 between 87 and 98 percent during the traditional storage injection season
16 (April-October).

17 The Baja Path, which shippers used to transport gas from Texas and the
18 U.S. Southwest on the El Paso Natural Gas and Transwestern pipelines, had
19 slightly lower utilization rates than the Redwood Path during the past 24 months.
20 Baja utilization—86 percent on average — has been lower compared to the
21 previous 24-month period average of 95 percent. The lower utilization during
22 the 2021-2022 winter period is the result of decreased usage during the very
23 mild winter.

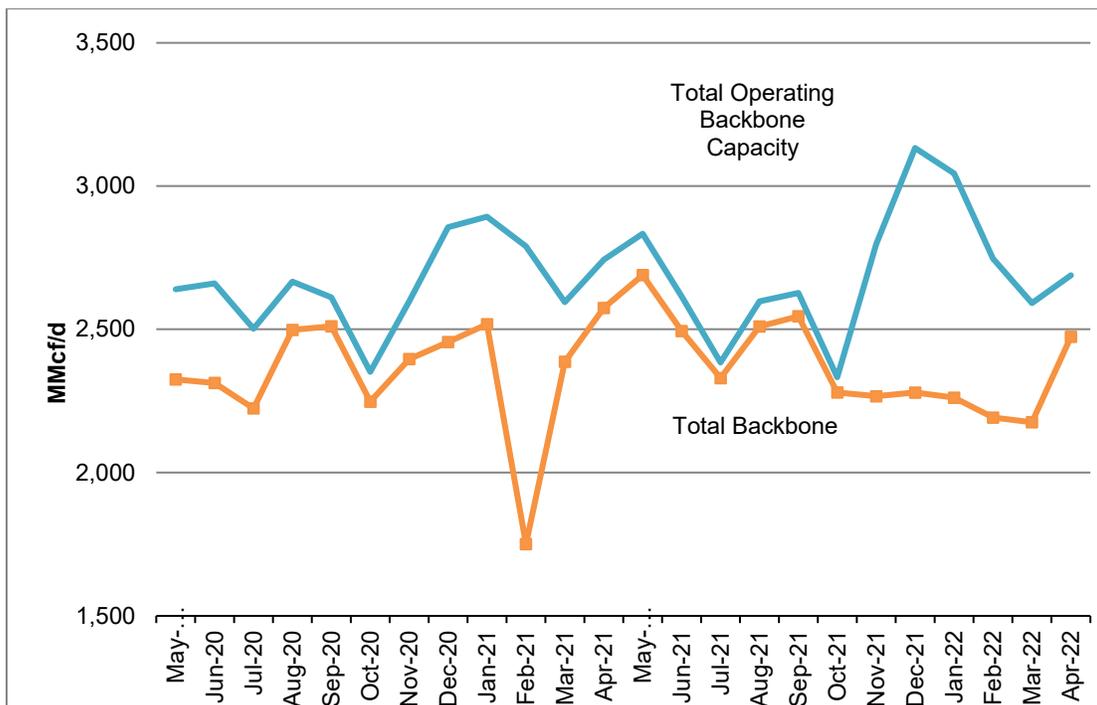
**FIGURE 1
PERCENT BACKBONE CAPACITY UTILIZATION BY PATH
MAY 2020 – APRIL 2022**



**FIGURE 2
BACKBONE CAPACITY AND FLOW BY PATH (MMCF/D)
MAY 2020 – APRIL 2022**



**FIGURE 3
TOTAL BACKBONE CAPACITY AND FLOWS (MMCF/D)
MAY 2020 – APRIL 2022**



1 A sufficient backbone capacity margin ensures that the marginal supply
2 source at the California border is available to compete against any other supply
3 source that might otherwise drive a higher price. A margin of capacity also
4 facilitates the injection of gas into storage. This storage injection occurs in
5 addition to end-use demand for gas on the backbone system, resulting in high
6 pipeline utilization at certain times of the year.

7 The market takes advantage of the extra backbone capacity to time the
8 injection and withdrawal of gas to and from the storage fields. Gas is typically
9 bought for injection at times when its current price is lower than its anticipated
10 future value, when it will be withdrawn. Without the extra backbone capacity on
11 PG&E’s system, customers would be significantly constrained in their ability to
12 time the injection of gas into storage fields. The price of natural gas can vary
13 substantially from month to month and the lowest prices are usually seen in
14 the spring and fall months. It is important to maintain sufficient backbone
15 capacity for the market to make large injections in months when natural gas
16 prices are lower.

1 **D. Demand Forecasts**

2 To assess the adequacy of PG&E’s infrastructure to meet current and future
3 demand, PG&E used the demand forecasts in the 2022 CGR. The CGR
4 provides a comprehensive, long-term outlook for natural gas requirements for
5 both core and noncore markets. Evaluating PG&E’s infrastructure using the
6 CGR forecasts provides a valid assessment of the adequacy of PG&E’s
7 infrastructure to meet current and future demand through 2031.

8 The off-system demand forecast presented in this analysis is the same as
9 that presented in the 2022 CGR for the years 2020-2035. PG&E off-system
10 demand averages 272 MMcf/d in 2022 and averages about 308 MMcf/d from
11 2023 through 2026. Afterwards, the off-system demand forecast is zero from
12 2027 through 2031. This forecast reflects PG&E’s actual currently booked
13 off-system contracts for 2023-2031. PG&E anticipates its future off-system
14 contracts will be short-term and/or discounted contracts, as is the current
15 practice. PG&E would expand backbone capacity to serve the off-system
16 market only if it had additional customers willing to pay full tariff rates under
17 long-term contracts.

18 PG&E developed the 1-in-10 year Cold and Dry Forecast by relying on cold
19 temperature conditions combined with dry hydro conditions. This forecast
20 assumes that winter temperatures over the time horizon will have a 1-in-10
21 likelihood of occurrence. The cold weather assumption increases electric load
22 for space heating needs and impacts EG gas demand. This same methodology
23 was used in the CGR for the high-demand forecasts.

24 **E. Adequacy of PG&E’s Backbone Transmission Capacity**

25 Table 1 below shows the transmission capacities of the PG&E backbone
26 system. Table 2 compares the amount of backbone capacity to forecasted
27 demand on the PG&E system from 2022 to 2031. Based on this demand
28 forecast, PG&E expects average annual backbone capacity utilization to be
29 73 percent or less from 2022 through 2026, and 63 percent or less from 2027
30 through 2031, indicating compliance with the 80-90 percent annual utilization
31 standard established in D.06-09-039. Note that the higher annual utilization
32 rates in the early years of the forecast period stem from the currently booked
33 contracts for off-system service discussed above. While there is uncertainty in
34 this forecast, the ten-year window provides sufficient lead-time for system

1 enhancements to meet longer-term growth should the forecast of system use
 2 change over time.

3 Other than the increase in demand arising from currently booked off-system
 4 contracts, PG&E estimates that utilization of its backbone system through 2031
 5 will be gradually decreasing.

**TABLE 1
 PG&E BACKBONE TRANSMISSION CAPACITY (MMCF/D)**

Line No.	Transmission Path	Firm Receipt Capacity ^(a)
1	Silverado Path ^(b)	56
2	Baja Path	935
3	Redwood Path	2,060
4	Total	3,051

- (a) Firm Receipt Capacities are those currently approved for use within PG&E.
 (b) Conventional California production and renewable natural gas.

**TABLE 2
 PG&E BACKBONE CAPACITY UTILIZATION (MMCF/D)**

Line No.	Year	Average Demand ^(a)	1-in-10 Cold and Dry Year Demand ^(a)	Backbone Receipt Capacity ^(b)	Capacity Utilization Cold and Dry Year Demand
1	2022	2,105	2,165	3,051	71%
2	2023	2,110	2,205	3,051	72%
3	2024	2,099	2,200	3,051	72%
4	2025	2,094	2,197	3,051	72%
5	2026	2,119	2,233	3,051	73%
6	2027	1,805	1,932	3,051	63%
7	2028	1,794	1,919	3,051	63%
8	2029	1,778	1,900	3,051	62%
9	2030	1,754	1,877	3,051	62%
10	2031	1,740	1,865	3,051	61%

- (a) Average Demands and 1 in 10 Cold and Dry Year Demands are based on the 2022 CGR with off system contracts excluded entirely in 2027-2035 to reflect currently booked contracts.
 (b) Backbone Receipt Capacity is taken from Table 1 above.

6 Table 3 below shows the forecast of peak day demands and available
 7 capacities and is the same as will be shown in the upcoming 2022 CGR. The

1 core demand is the forecast demand anticipated during a 1 day in 10-year peak
2 day event. The noncore non-EG demand is the average forecast daily demand
3 for December under 1-in-10 cold and dry hydro conditions. PG&E forecast the
4 peak day demand for electric generation in Table 3 by taking the 90th percentile
5 of December-February daily demand under 1-in-10 cold-and-dry conditions from
6 the upcoming 2022 CGR.

7 There is a very high level of uncertainty in forecasting peak day electric
8 generation demand. Daily electric generation demand in PG&E's service area is
9 not only dependent on conditions in Northern California, but also
10 Southern California and throughout the West including availability of generation
11 plants, local demand for gas in other sectors, hydroelectric generation
12 conditions, additions to renewable generation resources, and natural gas prices.
13 Taking the 90th percentile represents a reasonable balance between
14 overplanning capacity, i.e. planning capacity based on the highest peak day
15 demand, and not having adequate capacity to supply EG facilities that would be
16 needed to ensure the reliability of the electric system.

17 Peak demand forecasts, existing pipeline and storage capacities, and new
18 capacity investments are subject to ongoing litigation in PG&E's 2023 GRC
19 Application (A.) 21-06-021.

**TABLE 3
FORECAST OF DEMANDS FOR CAPACITY AND THE AVAILABLE CAPACITY AS ADOPTED IN
D.19 09 025 NATURAL GAS STORAGE STRATEGY**

Line No.	Forecast	2022-2023	2023-2024	2024-2025
1	Core Peak Day Demand ^(a)	2,572	2,575	2,579
2	Noncore Non- EG Demand ^(b)	458	460	475
3	EG, Including SMUD ^(c)	897	908	929
4	Off System and Shrinkage ^(d)	345	340	345
5	Inventory Management	300	300	300
6	Reserve Capacity	250	250	250
7	Total Demands	4,822	4,833	4,878
8	Northern Supply Capacity	2,700	2,700	2,700
9	Southern Supply Capacity	1,056	1,072	1,088
10	PG&E McDonald Island and Los Medanos Storage	970	915	814
11	California Production ^(e)	56	56	56
12	Total Supply	4,782	4,743	4,658
13	Short Fall () or surplus	(40)	(90)	(220)

(a) Core Demand calculated for 34.2 degrees Fahrenheit system composite temperature taken from the 2022 CGR. These demand numbers include the adjustment for building electrification added in the 2022 CGR.

(b) Noncore Non EG demand is the average daily winter (December) demand under 1 in 10 cold and dry conditions from the 2022 CGR.

(c) EG, including SMUD represents the 90th percentile of Dec Feb daily demand under 1 in 10 Cold and Dry Conditions from the 2022 CGR.

(d) Off System forecast plus Shrinkage from the 2022 CGR.

(e) Includes forecasted conventional production and renewable natural gas.

1 F. Adequacy of Local Transmission Capacity and Design Criteria

2 All of PG&E’s local gas transmission systems are designed to provide
3 adequate capacity under all weather conditions including extreme cold weather.
4 There are two cold weather design criteria: Cold Winter Day (CWD) and
5 Abnormal Peak Day (APD). The CWD design criterion ensures adequate
6 capacity to meet all estimated demands, including noncore demands. The APD
7 design criterion ensures adequate capacity to meet estimated peak core
8 customer demands alone. (APD assumes that all noncore customers are
9 curtailed in order to support service to core customers.) PG&E is not proposing
10 any changes to these standards.

11 The CWD design criterion is based on a cold event that has a recurrence
12 interval of one day in two years. Each local planning area has its own specific
13 CWD temperature. Across the PG&E gas system, the average daily system

1 weighted mean CWD temperature is approximately 37.0 degrees Fahrenheit (F).
2 When analyzing each local transmission system for adequate capacity, all core
3 customers are assumed to be at their CWD load, while noncore customers are
4 assumed to be at a reasonable, sustainable maximum load.

5 The APD design criterion is based on an extremely cold weather event
6 having a recurrence interval of one day in 90 years. This corresponds to a
7 composite temperature of about 28.3 degrees F across the PG&E gas system.
8 Each local planning area has its own specific APD temperature.

9 If core supplies are insufficient to meet core demand, PG&E can divert gas
10 from noncore customers, including EG customers, to serve core demand.
11 PG&E's tariffs contain diversion and Emergency Flow Order non-compliance
12 charges that are designed to induce the noncore market to curtail its use of gas,
13 if required. During the cold weather event in December 2013, which was close
14 to a 1-day-in-10-year event, total noncore demand reached 2.5 Bcf/day.
15 However, some noncore customers were curtailed due to local capacity
16 constraints. PG&E would attempt to serve noncore demand during an APD, but
17 only to the extent such service was compatible with maintaining uninterrupted
18 service to the core load.

19 All of PG&E's local transmission systems fully meet the APD and CWD
20 design criterion. Most local transmission systems are constrained by the APD
21 design criterion because they are sized to serve only core demand on an APD.
22 On systems where noncore customers are predominant, CWD is the
23 constraining design criterion rather than APD.

24 The APD core forecast is developed using the observed relationship
25 between historical daily weather and core usage data. This relationship is then
26 used to forecast the core load under APD conditions. A 3-year forecast of APD
27 demands is shown in Table 4. This table demonstrates the adequacy of existing
28 supplies to meet core APD demands.

**TABLE 4
FORECAST OF CORE GAS DEMAND AND SUPPLY
ON AN ABNORMAL PEAK DAY
(MMCF/D)**

Line No.	APD Forecast	2022-2023	2023-2024	2024-2025
1	APD Core Demand ^(a)	3,057	3,062	3,070
2	ISP Withdrawal ^(b)	2,162	2,162	2,162
3	Maximum Firm Flowing Supply ^(c)	3,051	3,051	3,051
4	Total Resources to Meet Demands ^(d)	4,232	4,193	4,108

- (a) Includes PG&E's Core Gas Supply Department and other Core Aggregator's core customer demands. APD core demand forecast is calculated for 28.3 degrees Fahrenheit system composite temperature, corresponding to 1 in 90 year cold temperature event. PG&E uses a system composite based on six weather sites.
- (b) The ISP Withdrawal is based on information provided by the ISP to PG&E and internal PG&E analysis.
- (c) The Maximum Firm Flowing Supply includes firm Redwood and Baja capacities and nominal amounts of California gas production. These values are those currently approved for use within PG&E.
- (d) The Total Resources to Meet Demand (Line No. 4) are less than the sum of ISP Withdrawal (Line No. 2) and Maximum Firm Flowing Supply (Line No. 3) because PG&E's system cannot simultaneously accommodate all flowing supplies and all storage withdrawals.

1 **G. Conclusion**

2 Peak demand forecasts, existing pipeline and storage capacities, and new
3 capacity investments are subject to ongoing litigation in PG&E's 2023 GRC
4 A.21-06-021.

**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
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Clean Power Research
Coast Economic Consulting
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Crown Road Energy, LLC
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Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
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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
Stoel Rives LLP

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