

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



August 31, 2022

Advice Letter 4642-G

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St.
San Francisco, CA 94177

SUBJECT: Expedited Advice Letter Pre-Approval to Enter into El Paso Natural Gas Company Pipeline Contract

Dear Mr. Dietz,

This disposition letter serves as a notice of approval of PG&E Advice Letter 4642-G, Expedited Advice Letter Pre-Approval to Enter into El Paso Natural Gas Company Pipeline Contract

Advice Letter 4642-G is approved, effective August 10, 2022.

Background

The purpose of this expedited advice letter is to request pre-approval of a contract under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022. Under this procedure, pipeline contracts endorsed by the Public Advocates Office (Cal Advocates) and The Utility Reform Network (TURN) may be submitted for pre-approval to the Commission by an expedited advice letter. TURN's participation in the approval process is voluntary and TURN elected to participate in the review of this contract. On August 4, 2022, PG&E consulted with Cal Advocates and TURN, and both indicated their concurrence to proceed with the proposed contract.

Under D.04-09-022, contracts for pipeline capacity may be submitted by expedited advice letter seeking Commission approval within 21 days of the advice letter submittal date. PG&E requests that the Commission approve this filing by August 31, 2022. 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 4504-G in 2021, Energy Division agreed with PG&E that the interstate pipeline capacity contract acquisition procedures adopted in D.04-09-022, as modified by the Commission in response to Advice Letter 3001-G-A, should be extended for an additional five-year period.

The terms of the proposed contract are confidential as described in the accompanying Declaration dated August 10, 2022, and are described in Confidential Appendix A. Confidential Appendix A is submitted to the Energy Division, Legal Division, Cal Advocates, and TURN.

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**Protest**

Commercial Energy submitted a protest on August 22nd on the following grounds:

1. Decision 04-09-022 supports disclosure of the need for expedited approval of new interstate pipeline contracts; and
2. PG&E's advice letter contains no justification for an urgent purchase of additional interstate pipeline capacity.

Commercial Energy asserts that Energy Division require PG&E to supplement its Advice Letter 4642-G immediately with additional public information in order to explain the justification for expedited treatment, to specify the quantity of interstate capacity to be acquired and why this capacity is required within the context of PG&E's current capacity planning range.

Utility Response

PG&E responded by stating that:

1. Commercial Energy conflates two processes described in D.04-09-022: 1) requirements for a Pre-Approved Capacity Range and 2.) requirements for Expedited Capacity Advice Letters. Under the Pre-Approved Capacity Range process, the utility is required to provide an explanation for the urgency of the contract, among other things. The Expedited Capacity Advice Letter process, which PG&E is using for AL 4642-G, does not require PG&E to publicly explain the need for expedited approval of new interstate pipeline capacity; and
2. Providing a public explanation of the need for the proposed transaction would reveal supply portfolio purchasing plans and strategies and expose PG&E's core customers to potentially higher costs.

Energy Division staff conclude that PG&E has followed the procedures for interstate pipeline capacity contract acquisition adopted in D.04-09-022 and modified in Advice Letters 3001-G-A and 4504-G. Therefore, Commercial Energy's protest is rejected, and Advice Letter 4642-G is approved.

Sincerely,

Handwritten signature of Leuwam Tesfai in black ink.

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: Jean Spencer, Energy Division
Jordan Christenson, Energy Division

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



Beth LaCour, Energy Division
Renee Guild, Energy Division
Kevin Flaherty, Energy Division
Elizabeth Dorman, Legal Division
Jonathan 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
Ron Perry, Commercial Energy of California
(ron.perry@commercialenergy.net)
Service list for R.04-01-025
Service list for A.13-06-011
Service list for A.20-08-023

August 10, 2022

Advice 4642-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Expedited Advice Letter Pre-Approval to Enter into El Paso Natural Gas Company Pipeline Contract

Pacific Gas and Electric Company (PG&E) respectfully requests California Public Utilities Commission (Commission or CPUC) pre-approval to enter into a firm transportation service agreement (FTSA) with El Paso Natural Gas Company (EPNG) which is needed to transport natural gas supplies from the San Juan Basin to California on behalf of core gas customers.

Purpose

The purpose of this expedited advice letter is to request pre-approval of a contract under the interstate capacity acquisition procedure approved in Decision (D.) 04-09-022.¹ Under this procedure, pipeline contracts endorsed by the Public Advocates Office (Cal Advocates) and The Utility Reform Network (TURN) may be submitted for pre-approval to the Commission by an Expedited Advice Letter. TURN's participation in the approval process is voluntary, and TURN elected to participate in the review of this contract. On August 4, 2022, PG&E consulted with Cal Advocates and TURN, and both indicated their concurrence to proceed with the proposed contract.²

Expedited Advice Letter Process

Under D.04-09-022, contracts for pipeline capacity may be submitted by expedited advice letter, seeking Commission approval within 21 days of the advice letter submittal date. PG&E requests that the Commission approve this filing by August 31, 2022.

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.

¹ Rulemaking (R.) 04-01-025, Decision (D.) 04-09-022, Order Instituting Rulemaking to Establish Policies and Rules to Ensure Reliable, Long-Term Supplies of Natural Gas to California (Gas Capacity OIR).

² Energy Division and Legal Division also participated in the meeting on August 4, 2022.

Description of Contract

The terms of the proposed contract are confidential as described in the accompanying Declaration dated August 10, 2022 and are described in Confidential Appendix A. Confidential Appendix A is submitted to the Energy Division, Legal Division, Cal Advocates, 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 will not increase any current rate or charge, cause 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 August 22, 2022, which is ten (10) days plus the weekend from the date of this submittal, in accordance with the expedited protest period authorized in D.04-09-022. 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, 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

In accordance with the comment and evaluation period provided in D.04-09-022, PG&E submits this advice letter as a Tier 1 advice submittal become effective upon date of submittal, which is August 10, 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 service lists 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) #: 4642-G

Tier Designation: 1

Subject of AL: Expedited Advice Letter Pre-Approval to Enter into El Paso Natural Gas Company Pipeline 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.04-09-022

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 and matrix
 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: Chris Fan, ckf4@pge.com

Resolution required? Yes No

Requested effective date: 8/10/22

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 G)**

1. I, Chris Fan, am a Principal Regulatory Analyst of 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):

3. Title and description of document(s): Expedited Advice Letter Pre-Approval to Enter into El Paso Natural Gas Contract (Advice Letter 4642-G) - Appendix A
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 August 2022 at San Francisco, California.



Chris Fan
Principal Regulatory Analyst
Pacific Gas and Electric Company

Advice 4641-G
August 10, 2022

Confidential Appendix A

**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
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