

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4657G/6712E
As of November 3, 2022

Subject: Wildfire Mitigation Balancing Account Revenue Requirement True Up Per Decision 20-12-005 Ordering Paragraph 9

Division Assigned: Energy

Date Filed: 09-26-2022

Date to Calendar: 10-05-2022

Authorizing Documents: D2012005

Disposition:	Accepted
Effective Date:	10-26-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

September 26, 2022

Advice 4657-G/6712-E

(Pacific Gas and Electric Company U 39 M)

Public Utilities Commission of the State of California

**Subject: Wildfire Mitigation Balancing Account Revenue Requirement True Up
Per Decision 20-12-005 Ordering Paragraph 9**

Purpose

In accordance with Ordering Paragraph (OP) 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 Wildfire Mitigation Balancing Account (WMBA) expense undercollection of \$8.178 million as authorized by D.20-12-005 OP 1 and 9. This advice letter does not request a revenue requirement true-up for WMBA recorded capital costs.

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 period.

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:

- 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.

The SA, as revised and approved by D.20-12-005 OP 1 and OP 9 authorizes PG&E to recover WMBA expenses up to 115% of the adopted values through a Tier 2 advice letter.¹

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.

Undercollection of 2022 Expenses

As provided in SA section 2.3.2.1, Table 1 below shows adopted expense, adopted expense at 115% of the expense adopted value and the amount PG&E is seeking recovery of in this advice letter. Additional details supporting this expense revenue requirement request are provided in Attachment A.

**Table 1:
2022 WMBA Undercollection Calculation (Amounts in Thousands)**

Expense Adopted	Expense Adopted at 115%	Expense Undercollection	Revenue Fees & Uncollectibles Electric: 0.010811 Gas: 0.013332	Total Revenue Requirement for Advice Letter filing	Expense Undercollection Subject to Recovery in Advice Letter ^{2,3}
\$57,448	\$66,065	\$8,617	\$100	\$8,717	\$8,178

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

¹ See 2020 GRC SA Section 2.3.2.1 Table 1 for the adopted values. The 2022 adopted expense value is \$57,448 million.

² 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 2022 of \$57,448 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 \$8,078 million, which is recorded in the WMBA, plus the revenue fees and uncollectibles amount of \$100 thousand, be approved for recovery, for a grand total of \$8,178 thousand.

³ The revenue requirements by functional area are provided in Attachment A to this advice letter.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than October 17, 2022, which is 21 days⁴ 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

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, October 26, 2022, 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 to parties shown on the attached list and the parties on the service list A.18-12-009. 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/>.

⁴ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments: Attachment A: 2022 GRC Revenue Requirement - WMBA

cc: Service List A.18-12-009



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 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 4657-G/6712-E

Tier Designation: 2

Subject of AL: Wildfire Mitigation Balancing Account Revenue Requirement True Up Per Decision 20-12-005 Ordering Paragraph 9

Keywords (choose from CPUC listing): Compliance, Balancing Account

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:

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: 10/26/22

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:
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

Attachment A

2022 GRC Revenue Requirement - WMBA

2022 GRC Revenue Requirement - WMBA
Table 1: Revenue Requirement by program for the costs between 100%-115% 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)	57,448	15%	8,617	Electric: 0.010811 Gas: 0.013332	100	8,717	8,178
		66,065.20					

Table 2: Revenue Requirement by Line of Business for the costs between 100%-115% of authorized spend

Program	Electric Distribution	Electric Generation	Gas Distribution	Gas Transmission	Electric Transmission	Total
Wildfire Mitigation Balancing Account (WMBA)	3,400	2,050	1,835	892	540	8,717

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	1,668	55,780	57,448		
Wildfire Mitigation Balancing Account Authorized -115%	1,919	64,147	66,065		
Wildfire Mitigation Balancing Account Authorized -15%	250	8,367	8,617		

Line of Business	Operations and Maintenance	Admin and General	Total cost	RF&U	Total RRQ
Electric Distribution	250	3,113	3,363	36	3,400
Electric Generation		2,028	2,028	22	2,050
Gas Distribution		1,811	1,811	24	1,835
Gas Transmission		881	881	12	892
Electric Transmission		534	534	6	540
Total	250	8,367	8,617	100	8,717

**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 Blaising 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.

Resource Innovations

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