

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



**Pacific Gas & Electric Company**  
**GAS (Corp ID 39)**  
**Status of Advice Letter 4731G**  
**As of April 28, 2023**

Subject: Advice Letter for Approval to Enter into Gas Storage Contract

Division Assigned: Energy

Date Filed: 03-31-2023

Date to Calendar: 04-07-2023

Authorizing Documents: D1909025

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>03-31-2023</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**

March 31, 2023

**Advice 4731-G**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Advice Letter for Approval to Enter into Gas Storage Contract**

**Purpose**

Pacific Gas and Electric Company's (PG&E) Core Gas Supply Department (CGS) requests California Public Utilities Commission (Commission) approval to enter into a gas storage contract (proposed contract). The proposed contract is necessary for PG&E to comply with the requirements of its 1-cold-day-in-10-year Reliability Standard adopted in Decision (D.) 06-07-010 and the 2019 GT&S Final Decision (D.19-09-025). In order to meet the core demand component of the system Reliability Standard, D.19-09-025 authorizes CGS to acquire reasonably priced firm storage services from Independent Storage Providers (ISPs) in addition to that furnished by PG&E's own storage facilities.

**Background**

PG&E followed the procedures described in Appendix I of D.19-09-025<sup>1</sup> for obtaining gas storage services from ISPs in order to meet the 1-cold-day-in-10-year Reliability Standard for core customers. The Appendix I procedures are based on the procedures that were adopted in D.06-07-010 and D.04-09-022, as modified by D.06-10-035.

PG&E conferred with Public Advocates Office (Cal Advocates) and The Utility Reform Network (TURN) regarding all storage offers from the competitive Request for Offer process and received Cal Advocates and TURN's concurrence for the proposed contract in compliance with the procedures outlined in Appendix I of D.19-09-025. Along with the Cal Advocates and TURN's concurrence, and per D.19-09-025, PG&E is authorized to submit a Tier 1 Advice Letter seeking Commission approval of the proposed contract with an effective date of the advice letter submittal date.

---

<sup>1</sup> D.19-02-025, Appendix I, p. 2.

**Description of Contract**

The terms of the proposed contract are confidential<sup>2</sup> and are described in Confidential Appendix A and Attachment 1. Confidential Appendix A and Attachment 1 are submitted to the Energy Division, Legal Division, Cal Advocates, and TURN pursuant to the attached confidentiality declaration dated March 31, 2023. The public version of this Advice Letter is provided to the service lists for Application (A.) 05-03-001 and A.13-12-012.

The proposed contract will be utilized by PG&E's CGS for its bundled core gas supply customers. The proposed contract will not be allocated or assigned to Core Transport Agents. All costs associated with the proposed contract will be recovered from PG&E's bundled core gas customers through PG&E's Purchased Gas Account and through PG&E's gas tariffs.

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

**Confidentiality**

Pursuant to Appendix I of D.19-09-025, PG&E designates that this Advice Letter and the attached proposed contract as market-sensitive information and therefore confidential. PG&E shall provide an unredacted advice letter and proposed contract to Cal Advocates and Commission staff. PG&E will also provide an unredacted version to TURN, if they execute an appropriate non-disclosure agreement with PG&E.

**Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, any of which must be received no later than April 20, 2023, which is twenty (20) days from the date of this submittal, in accordance with the protest period authorized in D.19-09-025.

Protests must be submitted to:

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

---

<sup>2</sup> Cal. Pub. Util. Code §§ 454.5(g), 583; see also D.06-06-066 and D.15-10-050. PG&E also submitted prior gas storage contracts with ISPs confidentially (e.g., PG&E Advice Letter 3971-G).



cc: **Confidential Version (with Confidential Appendix A and Attachment 1)**

Jean Spencer - Energy Division  
Beth LaCour - Energy Division  
Renee Guild - Energy Division  
Kevin Flaherty - Energy Division  
Latasha James - Energy Division  
Eileen Hlavka - 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 and Attachment 1)**

Service list for A.05-03-001  
Service list for A.13-12-012



# 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: 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) #: 4731-G

Tier Designation: 1

Subject of AL: Advice Letter for Approval to Enter into Gas Storage Contract

Keywords (choose from CPUC listing): Compliance, Storage

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-09-025

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: See Confidentiality 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, Chris.Fan@pge.com

Resolution required?  Yes  No

Requested effective date: 3/31/23

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 proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss 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](mailto: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

**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, Chris Fan, am a Manager of Core Gas Supply of Pacific Gas and Electric Company (“PG&E”), a California corporation. Gillian Clegg, the 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): Appendix I, D.19-09-025

3. Title and description of document(s): Advice Letter 4731-G Confidential Appendix A, and AL 4731-G Confidential Attachment 1
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&amp;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>	<p>Confidential Appendix A in its entirety, and Confidential Attachment 1 in its entirety</p>
<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 31<sup>st</sup> day of March 2023 at San Francisco, California.



---

Chris Fan  
Manager  
Pacific Gas and Electric Company

**Confidential Appendix A**

**Advice 4731-G**

**March 31, 2023**

**Gas Storage Contract between**

**Pacific Gas and Electric Company's (PG&E) Core Gas Supply (CGS) and**

**Lodi Gas Storage, LLC (Lodi)**

**CONFIDENTIAL MATERIAL**

**Confidential in its Entirety as Described in the  
Accompanying Declaration Dated March 31, 2023**

**Confidential Attachment 1**

**Advice 4731-G**

**March 31, 2023**

**Supporting Documents for Lodi Gas Storage, LLC Contract**

**CONFIDENTIAL MATERIAL**

**Submitted Pursuant to Confidentiality**

**Declaration Dated March 31, 2023**

**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  
Downey Brand LLP  
Dish Wireless L.L.C.

East Bay Community Energy Ellison  
Schneider & Harris LLP  
Engineers and Scientists of California

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
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