

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4733G
As of April 27, 2023

Subject: Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2024 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter for Pre-Approval to Enter into Ruby Pipeline, LLC Contract

Division Assigned: Energy

Date Filed: 03-31-2023

Date to Calendar: 04-05-2023

Authorizing Documents: D2112035

Disposition:	Accepted
Effective Date:	03-31-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio
(951)965-8905
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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

March 31, 2023

Advice 4733-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2024 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter for 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) approval to exercise PG&E's right for 2024 to reduce its Ruby Pipeline capacity holdings ("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 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 Decision (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 to the Commission by an Expedited Advice Letter.³ TURN's participation in the

¹ Per PG&E Core Gas Supply's existing 15-year contract with Ruby Pipeline, CGS may Step Down 50,000 Dth/day of its 250,000 Dth/day contracted capacity beginning Nov. 1, 2022 for five years through the end of the contract (Oct. 31, 2026). CGS received approval to exercise the right to Step Down in 2022 (Advice 4582-G) and 2023 (Advice 4586-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.

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.

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.

Pre-approval of the proposed contract is necessary for PG&E to comply with the Commission's minimum interstate pipeline capacity quantity requirements established in D.15-10-050 to ensure reliable supply of natural gas to PG&E's core customers.

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 approval from the Commission to exercise the Step Down Right.⁴

On March 30, 2023, PG&E consulted the CGS Stakeholder Group regarding exercise of the Step Down Right for 2024. 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 2024, thereby reducing the total CGS' contracted Ruby Pipeline capacity holding by a total of 60 percent (including the exercise of the 2022 and 2023 Step Down Rights) 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

Request

Exercise Step Down Rights: PG&E CGS, as required by the procedures in the Amended Ruby Contracts and D.21-12-035, having determined that exercising its Step Down Rights

⁴ D.21-12-035 at OP 3.

⁵ See Footnote 3.

for 2024 is in the best interest of all core customers, requests approval to reduce its Ruby Pipeline capacity holdings by an additional 50,000 Dth/day beginning November 1, 2024.

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 for pre-approval of the proposed replacement contract.

Description of Contract

The terms of the proposed contract are confidential as described in the accompanying Declaration dated March 31, 2023 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 would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Confidentiality

PG&E designates that this Advice Letter and the attached Appendix A as market-sensitive information and therefore confidential.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 20, 2023 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



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 #: (951)965-8905
E-mail: PGETariffs@pge.com
E-mail Disposition Notice to: stuart.rubio@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) #: 4733-G

Tier Designation: 1

Subject of AL: Request for Approval to Exercise the Ruby Pipeline Contract Step Down Rights for 2024 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter for 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 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 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, 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): D.04-09-022

3. Title and description of document(s): Request for Approval to Exercise the Ruby Pipeline Step Down Rights for 2024 Pursuant to Decision 21-12-035, Ordering Paragraph 3 and Advice Letter for Pre-Approval to Enter into Ruby Pipeline, LLC Contract – Confidential 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 31st day of March 2023 at San Francisco, California.



Chris Fan
Manager
Pacific Gas and Electric Company

Confidential Appendix A

Advice 4733-G

March 31, 2023

**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 31, 2023**

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California	Pioneer Community Energy Public Advocates Office
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Green Power Institute Hanna & Morton ICF	Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc.
Atlas ReFuel BART	iCommLaw International Power Technology Intertie	Resource Innovations SCD Energy Solutions San Diego Gas & Electric Company
Barkovich & Yap, Inc. Braun Blaising Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission	Intestate Gas Services, Inc.	SPURR San Francisco Water Power and Sewer Sempra Utilities
California Hub for Energy Efficiency Financing	Johnston, Kevin Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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.		