

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4805G
As of November 17, 2023

Subject: Pacific Gas and Electric Company's 2024 Annual Low Carbon Fuel Standard Gas Credit and Revenue Estimate

Division Assigned: Energy

Date Filed: 09-29-2023

Date to Calendar: 10-04-2023

Authorizing Documents: D1412083

Disposition:	Accepted
Effective Date:	10-29-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

279-789-6210

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 29, 2023

Advice 4805-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company's 2024 Annual Low Carbon Fuel Standard Gas Credit and Revenue Estimate

I. Purpose

Pursuant to Ordering Paragraph (OP) 5 and Appendix C of Decision (D.) 14-12-083, Pacific Gas and Electric Company (PG&E) hereby submits its 2024 Annual Low Carbon Fuel Standard (LCFS) Gas Credit and Revenue Estimate (2024 Annual Gas Estimate).

The requirement in D.14-12-083 states that the utilities shall submit the following:

Tier 2 Advice Letter (AL) filed no later than September 30 of each year beginning in 2015 containing information about LCFS credits and revenues for the following calendar year:

- a. An estimate of the number of credits the utility expects to generate for the following year;
- b. An estimate of the amount of revenue the utility expects to generate from the sale of those credits;
- c. An estimate of the balance that will be in the utility's balancing account on January 1 of the following year;
- d. An estimate of the cost of administering the LCFS credit program in the following year, including customer outreach expenses;
- e. An estimate of the amount of revenue that will be distributed to customers in the following year; and
- f. An estimate of the number of drivers to whom credits will be distributed and the value that will be distributed to each driver.

II. Background

Under the California Air Resources Board's (CARB) current LCFS regulation,¹ providers of alternative fuels with carbon intensities that meet the LCFS program targets² are

¹ 17 CCR § 95480 et seq.

² 17 CCR § 95482.

eligible to voluntarily opt-in to the LCFS program to generate LCFS credits.³ Electric distribution utilities⁴ that choose to opt-in to the LCFS program act as proxy regulated entities on behalf of their customers and receive LCFS credits for electricity supplied through residential electric vehicle (EV) charging equipment.⁵ Natural gas utilities that choose to opt-in to the LCFS program and own fueling stations at which fossil compressed natural gas (CNG) is dispensed to vehicles for transportation use will receive LCFS credits for fueling by public customers and their own vehicle fleets.⁶

On March 24, 2011, the California Public Utilities Commission (Commission or CPUC) opened Rulemaking (R.) 11-03-012 to address various issues related to greenhouse gas (GHG) emissions. Track 2 of R.11-03-012 addresses the use of revenues that electric and natural gas utilities (collectively, "IOUs") may receive from the sale of LCFS credits pursuant to CARB's LCFS regulation.

On May 19, 2014, the Commission issued D.14-05-021, which authorized the IOUs to sell their LCFS credits and established the criteria and reporting requirements for the sale of these credits, pursuant to Public Utilities Code Section 853(b).⁷ Additionally, the Commission directed the utilities that have opted-in to the LCFS program and wish to sell LCFS credits to file a Tier 2 AL to propose their upfront standards and plans to sell their LCFS credits, as well as the policies to return the LCFS revenue to customers. Upon approval of the AL, the IOUs may begin selling LCFS credits and recover associated costs from the sales revenue.⁸

On December 18, 2014, the Commission issued D.14-12-083, which approved the IOUs' use of several different methods to return revenue from the sale of LCFS credits. For electric utilities, the Commission authorized use of either a one-time or annual rebate, or a combination of both. For natural gas utilities, the Commission authorized use of a reduction in the fuel price at utility-owned natural gas fueling stations or a credit applied to the customer's utility bill. In D.14-12-083, the Commission modified the requirements set forth in D.14-05-021⁹ and required the IOUs to submit a Tier 2 AL containing an Implementation Plan describing the IOUs' plans for the sale of LCFS credits and return of revenue in accordance with the AL filing requirement in Appendix A of D.14-12-083.¹⁰ The Tier 2 AL must be approved prior to commencement of the sale of LCFS Credits and the recovery of associated costs from the sales revenue.¹¹

³ 17 CCR § 95484(a)(6)(A), p. 35 ("For transportation fuel supplied through EV charging equipment in a single or multi-family residence, the Electrical Distribution utility is eligible to opt-in as the regulated party in their service territory.")

⁴ 17 CCR § 95481(a)(23), p. 12 ("Electrical Distribution Utility' means an entity that owns or operates an electrical distribution system.")

⁵ D.14-12-083, p. 6.

⁶ *Id.*

⁷ D.14-05-021, Ordering Paragraph 1.

⁸ D.14-05-021, Ordering Paragraphs 1, 6.

⁹ D.14-12-083, p. 32.

¹⁰ D.14-12-083, Ordering Paragraphs 2, 3.

¹¹ D.14-05-021, Ordering Paragraphs 1, 6.

On March 18, 2015, PG&E filed AL 3575-G/4604-E containing its Implementation Plan. Pursuant to the requirements in D.14-12-083, the Implementation Plan outlined PG&E's proposed requirements for LCFS credit sales, provided a forecast of 2015 revenue return activity, and described the proposed process for identifying revenue recipients, calculating rebate amounts, and processing rebates. The Implementation Plan also created LCFS subaccounts for electricity and natural gas in its existing Greenhouse Gas Revenue Balancing Account (GHGRBA) and Gas Programs Balancing Account (GPBA), respectively, to track and record the proceeds from the sale of consigned LCFS credits, any approved program costs, and the LCFS revenues returned to customers. On August 7, 2015, the Commission approved PG&E's AL 3575-G/4604-E, effective immediately.

In February 2020, the Commission issued a ruling with the draft Transportation Electrification Framework, which covered a variety of topics related to the utilities and transportation electrification including policies to support and ensure efficient implementation of the LCFS program. The Commission issued D.20-12-027 on the LCFS electric credit holdback revenue utilization by the Investor Owned Utilities (IOU) on December 17, 2020, which created requirements for the use of the LCFS holdback revenue and directed each IOU to file an Implementation Plan via a Tier 2 Advice Letter with at least one program proposal within 180 days of the decision. In accordance with D.20-12-027, PG&E filed AL 6226-E¹² with the 2021 LCFS Implementation Plan which included five program proposals in June 2021 and received CPUC approval in December 2021. As described in the Implementation Plan, PG&E will continue to report the forecast of LCFS program and financial data through annual forecasts and reports.

In 2022, the CPUC requested that PG&E file separate advice letters for the electric and gas portions of its LCFS Annual Estimate. The Electric portion of the 2024 Forecast can be found in Advice 7035-E, and the Gas portion in Advice 4806-G.

III. Annual Gas Forecast

PG&E's annual gas forecast of LCFS program and financial data for 2024 is provided in CONFIDENTIAL Attachment A of this filing.

IV. Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **October 19, 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

¹² https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6226-E.pdf

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 (GO) 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 (GO 96-B, Section 3.11).

V. Confidentiality

PG&E requests confidential treatment of the redacted information in this AL. Pursuant to D.16-08-024, a confidentiality declaration describing the information in this advice filing for which PG&E requests confidential treatment and the justification for protecting the confidentiality of the information is provided in Public Attachment B.

The confidential material in this advice filing will be made available to non-market participants in accordance with and upon execution of PG&E's Proposed Non-Disclosure Certificate Agreement. Parties wishing to obtain access to the confidential material of this advice filing may contact Ben Ellis in PG&E's Law Department at b1ez@pge.com to obtain a non-disclosure agreement.

VI. Tier Designation

Pursuant to D.14-12-083, this advice filing is submitted with a Tier 2 designation.

VII. Effective Date

PG&E requests that this Tier 2 advice submittal become effective upon **October 29, 2023**, which is 30 calendar days from the submittal date.

VIII. Notice

In accordance with GO 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 for R.11-03-012. 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



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 #: 279-789-6210

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) #: 4805-G

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company's 2024 Annual Low Carbon Fuel Standard Gas Credit and Revenue Estimate

Keywords (choose from CPUC listing): Compliance, Credit

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.14-12-083

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: Lydia Krefta, Lydia.Krefta@pge.com

Resolution required? Yes No

Requested effective date: 10/29/23

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

CONFIDENTIAL

Market Sensitive Information Protected Under General Order 66-C,
Public Utilities Code Section 454.5(g), Government Code Section 6254(k), and
Decisions 06-06-066 and 08-04-023

CONFIDENTIAL

ATTACHMENT A

**PACIFIC GAS AND ELECTRIC COMPANY'S 2024 ANNUAL LOW
CARBON FUEL STANDARD GAS CREDIT AND REVENUE ESTIMATE**

**PACIFIC GAS AND ELECTRIC COMPANY’S 2024 ANNUAL LOW CARBON FUEL
STANDARD GAS CREDIT AND REVENUE ESTIMATE**

I. INTRODUCTION

Pursuant to Ordering Paragraph (OP) 5 and Appendix C of Decision (D.) 14-12-083, Pacific Gas and Electric Company (PG&E) presents the following annual estimate for the calendar year 2024 for the sale of Low Carbon Fuel Standard (LCFS) credits and return of associated revenue to eligible natural gas customers.

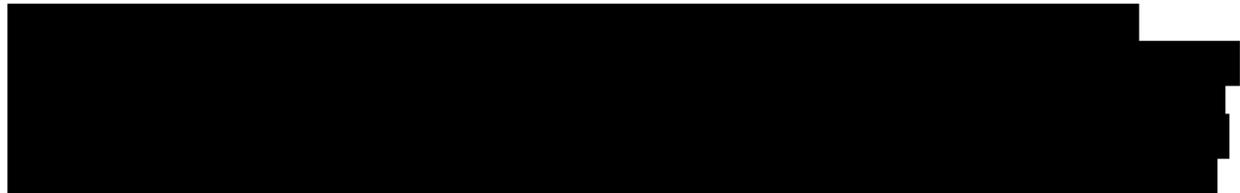
The estimated values below represent reasonable assumptions based on current LCFS prices, program participation, program administrative costs, and other factors. The actual variables and the resulting revenues and program costs could differ significantly from the figures provided in this 2024 Annual Gas Estimate.

A. Program Summary

The June 2021 LCFS implementation plan kept in place PG&E’s one existing program for natural gas vehicle customers.¹³ The **Renewable Natural Gas Fuel Credit** provides annual on-bill credits that divide the annual gas LCFS revenue between customers based on their pro-rata share of CNG usage. The credit is applied to customer accounts automatically – they do not need to apply.

B. RNG Pilot Summary

PG&E filed Advice Letter 3961-G and received approval in June 2018 to develop a voluntary renewable natural gas procurement pilot. The intent of this original three-year pilot was to procure renewable natural gas (RNG) and replace 100% of the CNG dispensed at PG&E’s natural gas stations for internal and external fleet use in support of the State policies¹⁴ by promoting renewable natural gas production and to reduce greenhouse gas emissions associated with the life cycle of transportation fuels used in California. In addition, the pilot lowered overall costs for PG&E’s compressed natural gas (CNG) customers by distributing increased revenues generated from the sale of LCFS credits and Renewable Identification Number (RIN) credits from the U.S. Environmental Protection Agency (EPA) under the Renewable Fuel Standard Program.



¹³ AL 6226-E, “2021 Low Carbon Fuel Standard Implementation Plan”, available at: https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6226-E.pdf

¹⁴ CPUC Rulemaking (R.)17-06-015.

[REDACTED]

On October 22, 2021, PG&E submitted Advice Letter 4513-G to the California Public Utilities Commission requesting the continuance of PG&E's Biomethane Environmental Proceeds Subaccount to track the proceeds received by PG&E and to return the revenue from the sale of the LCFS and RIN credits to PG&E's CNG customers. The CPUC approved the advice letter on September 6, 2022. As a result, PG&E will continue to earn LCFS credits from RNG usage at PG&E-owned stations and return the proceeds to customers via the annual RNG Fuel Credit.

II. 2024 NATURAL GAS ESTIMATE

A. Credit Estimate. *An estimate of the number of credits the utility expects to be generated for the following year.*

PG&E estimates that the RNG vendor will receive a total of [REDACTED] credits for PG&E usage from CARB in 2024.¹⁵ This assumes similar carbon intensities for RNG in 2023 and 2024.

B. Revenue Estimate. *An estimate of the amount of revenue the utility expects to receive from the sale of those credits.*

PG&E sold the last of its CNG credits in July 2020. All credits are now generated and sold by the RNG vendor, with the revenue transferred to PG&E.

PG&E estimates that at a LCFS credit price of [REDACTED], PG&E will receive approximately [REDACTED] in 2024 for the sale of LCFS credits.¹⁶ This revenue will be transferred to PG&E which will then be used in the approved revenue return mechanism, a bill credit paid out in 2025 to customers utilizing PG&E CNG stations.

C. Balancing Account Estimate as of January 1, 2024. *An estimate of the balance that will be in the utility's balancing account on January 1 of the following year.*

PG&E's March 18, 2015 AL 3575-G/4604-E created LCFS subaccounts for electricity and natural gas in its existing Greenhouse Gas Revenue Balancing Account (GHGRBA) and

¹⁵ The credit lifecycle occurs as follows: credits from usage occurring in Q1 are reported on in Q2, received by the RNG vendor in Q3, and the revenue from the sale of those credits is transferred to PG&E by the RNG vendor in Q3. [REDACTED]

Gas Programs Balancing Account (GPBA), respectively, to track and record the proceeds from the sale of LCFS credits, any approved program costs, and the LCFS revenues returned to customers.

For the purpose of this estimate, the balance in the LCFS subaccount in PG&E's GPBA on January 1, 2024 is calculated as the balance in the account at the end of August 2023, plus additional revenue from the sale of credits from the RNG vendor through 2023 and less administrative costs and revenue distributed to customers from September through December 2023.

As of August 2023, [REDACTED]. PG&E expects to receive [REDACTED] from the RNG vendor in Q3 and Q4 for LCFS and RIN credits generated earlier in 2023 and incur an additional \$3,500 in administrative costs through the end of the year.

As a result, PG&E estimates a balance of [REDACTED]

The total balance available at the start of 2024 will be returned to PG&E CNG customers in Q3 2024 via an on-bill credit.

D. Administrative Cost Estimate. *An estimate of the cost of administering the Low Carbon Fuel Standard credit program in the following year, including customer outreach expenses.*

PG&E has one customer program for returning LCFS revenue to customers, the Renewable Natural Gas Fuel Credit. In addition, PG&E has compliance activities required to participate in the CARB LCFS program that must occur regardless of whether there are customer programs (for example, annual reporting).

Table 5 below shows the administrative, marketing education and outreach (ME&O), and evaluation estimated budgets for each program or spending category for 2024.

Table 5. PG&E LCFS Natural Gas Program Administration Costs in 2024

Program/Category	Admin	ME&O	Total
Overhead			
Overhead	\$6,200	\$0	\$6,200
Programs			
Renewable Natural Gas Fuel Credit	\$6,000	\$2,500	\$8,500

¹⁷ Numbers may not add up due to rounding.

A brief description of the spending for each program/category follows:

- **Overhead (non-program expenses):** Includes activities required to participate in the LCFS program, including compliance activities (annual reports and forecasts to the CPUC and CARB) and implementation plan development. Most other compliance requirements and credit sales are currently being handled by the RNG vendor.
- **Renewable Natural Gas Fuel Credit:**
 - *Administrative expenses:* Includes calculation of the credit amount for each customer, coordination with Natural Gas Vehicles teams, and technical support to distribute the credit on customer bills.
 - *ME&O:* Includes targeted outreach to credit recipients via direct mail, email, and personalized outreach from an account representative for very large credits. Also includes updates to the credit website and FAQ page.

E. Revenue to be Distributed to Customers. *An estimate of the amount of revenue that will be distributed to customers in the following year.*

In its Implementation Plan, PG&E described its proposed method for calculating the amount of revenue that will be distributed to customers:

To calculate the amount of revenue to be distributed to each Gas Recipient, PG&E plans to take the total amount of Gas Revenue determined to be distributed for a given Rebate Period and divide it pro rata among each Gas Recipient based on each customer’s total CNG fuel consumption during the Rebate Period.¹⁸

For the purpose of this estimate, PG&E assumes that the revenue returned to customers in 2024 will be the total available in the LCFS Gas balancing account on January 1, 2024. This includes the total revenue generated for credits transferred to PG&E from Q1 – Q4 2023, minus administrative costs incurred in 2023. [REDACTED]

F. Estimate of Number of Revenue Recipients. *An estimate of the number of drivers to whom credits will be distributed and the value that will be distributed to each driver.*

In Q3 2024, PG&E will distribute on-bill credit to each of its currently active CNG fueling accounts based on their percentage of consumption for the period of January 2023 through December 2023. PG&E expects to return [REDACTED] to a total of approximately [REDACTED] customers in 2024 for 2023 usage. Of this, approximately 98% ([REDACTED]) will be returned to [REDACTED] public fueling accounts based on their usage, and approximately 2%

¹⁸ 2021 Implementation Plan, p.62. https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6226-E.pdf

CONFIDENTIAL

Market Sensitive Information Protected Under General Order 66-C,
Public Utilities Code Section 454.5(g), Government Code Section 6254(k), and
Decisions 06-06-066 and 08-04-023

([REDACTED]) to 25 PG&E fleet accounts. Credits are determined by usage and vary widely;
for the 2023 credit, values ranged from [REDACTED]

Attachment B

Declaration Supporting Confidential Designation on
Behalf of Pacific Gas and Electric Company
Pursuant to D.16-08-024

(Public)

**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, Lydia Krefta, am the Director of Clean Energy Transportation Regulatory Compliance and Pilots at Pacific Gas and Electric Company (“PG&E”), a California corporation. Michael Delaney, the Vice President of Utility Partnerships & Innovation of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612-3534

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): (R.) 11-03-012, Order Instituting Rulemaking to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emissions 2.

3. Title and description of document: Advice Letter 4805-G, Pacific Gas and Electric Company’s 2024 Annual Low Carbon Fuel Standard Gas Credit and Revenue Estimate.
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[INCLUDE IF ADDITIONAL DETAILS

NECESSARY TO IDENTIFY LOCATION OF CONFIDENTIAL INFORMATION: , with further detail provided in Appendix A, which is incorporated into this declaration]:

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>	<p>Gray shaded areas of pages 1-5 of Attachment A</p>
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

X

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)

Grey shaded areas on pages 1-2 of Attachment A related to the RNG pilot

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a) [NEED TO EXPLAIN HOW THE PUBLIC INTEREST SERVED BY NOT DISCLOSING THE RECORD CLEARLY OUTWEIGHS THE PUBLIC INTEREST SERVED BY DISCLOSURE]):

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 29th day of September, 2023 at Oakland, California.

Lydia Krefta

Lydia Krefta
Director, Clean Energy Transportation
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 G)

**Order Instituting Rulemaking to Address Utility Cost and Revenue Issues Associated with Greenhouse Gas Emissions R.11-03-012
ATTACHMENT TO DECLARATION
September 29, 2023**

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
A	2024 Low Carbon Fuel Standard Annual Forecast – Gas	<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>Third-Party information subject to non-disclosure or confidentiality agreements or obligations</p> <p>(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)</p>	<p>Gray shaded areas of pages 1-5 of Attachment A</p> <p>Grey shaded areas on pages 1-2 of Attachment A related to the RNG pilot</p>

**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 Community Choice Association
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

Electrical Power Systems, Inc.
Fresno
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
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