

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4826G
As of December 22, 2023

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

Division Assigned: Energy

Date Filed: 11-22-2023

Date to Calendar: 11-29-2023

Authorizing Documents: D1909025

Disposition:	Accepted
Effective Date:	12-22-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(279)789-6209

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

November 22, 2023

Advice 4826-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 CGS 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.19-09-025¹ 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 file a Tier 1 Advice Letter seeking Commission approval of the proposed contract with an effective date 30 days after the advice letter submittal date.

¹ D.19-02-025, Appendix I, p. 2.

Description of Contract

The terms of the proposed contract are confidential² 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 November 22, 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 contracts will be recovered from PG&E's bundled core gas customers through PG&E's Core Firm Storage 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 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 shall 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 December 12, 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

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:

² California Public Utilities Code Section 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 La Cour - 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 #: (279)789-6209

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) #: 4826-G

Tier Designation: 1

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

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: Safi Rizvi, Safi.Rizvi@pge.com

Resolution required? Yes No

Requested effective date: 12/22/23

No. of tariff sheets: N/A

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:

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

**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, Safi Rizvi, am a Principal Regulatory Analyst 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
300 Lakeside Drive, Oakland, CA
94612

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 of Decision 19-09-025

3. Title and description of document(s): Advice Letter (AL) 4826-G Confidential Appendix A, and AL 4826-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&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 22nd day of November 2023 at Oakland, California.

Digitally signed by
Safi Rizvi
 Safi Rizvi
 Date: 2023.11.22
 09:37:23 -08'00'

Safi Rizvi
 Principal Regulatory Analyst
 Pacific Gas and Electric Company

Confidential Appendix A

Advice 4826-G

November 22, 2023

Gas Storage Contract between

**Pacific Gas and Electric Company's (PG&E) Core Gas Supply (CGS) and
Central Valley Gas Storage, LLC (CVGS)**

CONFIDENTIAL MATERIAL

**Confidential in its Entirety as Described in the
Accompanying Declaration Dated November 22, 2023**

Confidential Attachment 1

Advice 4826-G

November 22, 2023

Supporting Documents for Central Valley Gas Storage, LLC (CVGS) Contract

CONFIDENTIAL MATERIAL

**Confidential in its Entirety as Described in the
Accompanying Declaration Dated November 22,
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
Buchalter
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