

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4829G
As of September 10, 2024

Subject: Eliminate Core Transport Agents Imbalance Statement Audit Requirement in Accordance with Resolution G-3440, Ordering Paragraph 4

Division Assigned: Energy

Date Filed: 11-21-2023

Date to Calendar: 11-29-2023

Authorizing Documents: G-3440

| | |
|------------------------|-------------------|
| Disposition: | Accepted |
| Effective Date: | 09-04-2024 |

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Michael Finnerty

(279) 789-6216

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 21, 2023

Advice 4829-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Eliminate Core Transport Agents Imbalance Statement Audit Requirement in Accordance with Resolution G-3440, Ordering Paragraph 4

Purpose

The purpose of this advice letter is to seek relief from the Core Transport Agents (CTA) Imbalance Statement audit requirement pursuant to California Public Utilities Commission (CPUC or Commission) Resolution G-3440.

Background

On July 10, 2009, PG&E requested Gas Rule 17 be revised to: (1) correct a reference to Gas Rule 21 and (2) amend Gas Schedule G-Bal (Gas Balancing Service for Intrastate Transportation Customers) by adding a provision limiting accounting adjustments involving gas imbalance statements to three years.¹

On September 2, 2010, the Commission issued Resolution G-3440 which approved PG&E's proposal to amend Schedule G-BAL by limiting the duration of imbalance statement accounting adjustments to three years.

The Resolution also directed PG&E to audit each record, document, and all data related to preparing and issuing imbalance statements and accounting adjustments to CTAs with the first audit to be completed by PG&E no later than six months from the effective date of the Resolution and thereafter, each successive audit shall be completed by PG&E every three years on the anniversary date of the completion of the first audit.² Additionally, PG&E was directed to issue a written report to the Executive Director of the Energy Division no later than 30 days following the completion of each audit.³ The

¹ PG&E Advice 3033-G.

² Resolution G-3440, Ordering Paragraph (OP) 2 at 16.

³ OP 3 at 17.

Resolution provided that PG&E may request relief from the requirements of OP 2 and OP 3 by either an advice letter or application.⁴

Request for Relief

PG&E requests relief from the triennial CTA Imbalance Statement audit requirement as established in 2010. PG&E has met the specific conditions described in Resolution G-3440 intended to prevent CTA related imbalance statement errors as described below.⁵

1. Developed, implemented and will continuously observe documented procedures designed to prevent CTA related imbalance statements and accounting adjustment errors, including a formal QA review process of balancing statements to detect errors before they are disbursed to the CTAs.
2. Conferred with CTA's in the development of procedures such as protocols (electronic or other method) to facilitate the error free transfer of necessary information.
3. PG&E agrees that it will not revise these procedures unless the change will improve their effectiveness or yield efficiencies without compromising PG&E's ability to produce accurate CTA related imbalance statements and accounting adjustments.
4. PG&E has completed at least two audits (the initial audit and the first audit thereafter) and has submitted the associated reports to the Executive Director of the Energy Division.⁶

During the last three CTA Program audits (2017-2023), PG&E's Internal Audit reviewed the Program's 1) policies and procedures, (2) documentation and (3) adjustment process and identified no material process and control gaps. Each year, PG&E will continue to assess the need to include an audit of its CTA Program in its annual risk-based audit plan.

Pursuant to Res. G-3440, PG&E is not seeking authorization in this advice letter to discontinue any other audits PG&E is required to conduct.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **December 11, 2023**, which is 20 days after the date of this submittal. Protests must be submitted to:

⁴ Res. G-3440 at 12.

⁵ Res. G-3440 at 12.

⁶ As approved by the Executive Director, PG&E submitted CTA Imbalance Statement Audit Reports on July 1, 2011, July 1, 2014, June 30, 2017, October 29, 2020, and June 28, 2023.

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

PG&E requests that this Tier 2 advice submittal become effective on regular notice, **December 21, 2023**, 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 for R.14-03-002. 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/>.

 /S/
Sidney Bob Dietz II
Director, Regulatory Relations
CPUC Communications

cc: Jean Spencer, Energy Division
 Ken Thomson, Tiger Energy
 Service List R.14-03-002



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: Michael Finnerty
 Phone #: (279) 789-6216
 E-mail: PGETariffs@pge.com
 E-mail Disposition Notice to: michael.finnerty@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) #: 4829-G

Tier Designation: 2

Subject of AL: Eliminate Core Transport Agents Imbalance Statement Audit Requirement in Accordance with Resolution G-3440, Ordering Paragraph 4

Keywords (choose from CPUC listing): Compliance, Core

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Res. G-3440

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:

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: 12/21/23

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:
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

**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