

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 5, 2016

Advice Letter 4844-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**Subject: Submittal of ESP Financial Security Requirements in
Compliance with D.13-01-021, D.13-02-017, and
D.13-04-001**

Dear Mr. Jacobson:

Advice Letter 4844-E is effective as of June 9, 2016.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division



May 10, 2016

Advice 4844-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Submittal of Electric Service Provider (ESP) Financial Security Requirements in Compliance With D.13-01-021, D.13-02-017, and D.13-04-001

Pacific Gas and Electric Company (PG&E) hereby submits its calculation of the financial security requirements for the Electric Service Providers (ESPs) serving customers within its service territory.

Purpose

In compliance with Ordering Paragraph (OP) 6 of Decision (D.) 13-01-021¹, this advice filing is to provide the California Public Utilities Commission (CPUC or Commission) with the updated ESP financial security requirements.

Background

On January 24, 2013, the Commission approved D.13-01-021 which adopted a methodology to derive incremental procurement costs for the financial security requirement and re-entry fees for an involuntary return of direct access (DA) residential and small commercial customers. On February 25, 2013, the Commission approved D.13-02-017, and on April 2, 2013, the Commission approved D.13-04-001. These two decisions corrected inadvertent technical errors in D.13-01-021. On January 10, 2014, Edward Randolph, Director of the Energy Division, issued an initial disposition letter on PG&E's Advice 4229-E, Southern California Edison's Advice 2903-E and San Diego Gas & Electric's Advice 2484-E, further clarifying the methodology for calculating the ESPs' financial security amounts.

¹ As corrected by D.13-02-017, approved on February 25, 2013, and D.13-04-001, approved on April 2, 2013.

OP 6 of D.13-01-021 requires the investor owned utilities (IOUs) to update the applicable ESP financial security amounts by the 10th of May and November of each year and to submit them in a Tier 2 Advice Letter.

Attachment B contains a table showing, by ESP, the calculated financial security amount based upon the methodology adopted in Appendix 1 of D.13-01-021. The table has been redacted of any confidential ESP information. An unredacted version with the relevant supporting data and calculation of each respective ESP's financial security amount will be submitted under confidential seal to the Energy Division. A declaration supporting confidential treatment is found in Attachment A.

The version of this advice letter posted at www.pge.com is redacted.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 31, 2016, which is 21 days² after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

² The 20-day protest period concludes on a holiday. PG&E is hereby moving this date to the following business day.

Facsimile: (415) 973-7226
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, telephone number, postal address, and (where appropriate) 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 filing become effective on regular notice, June 9, 2016, which is 30 calendar days after the date of filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.07-05-025. 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.07-05-025

Attachment A – Declaration of Ronald Jang supporting confidential treatment
Confidential Attachment B – ESP Financial Security Requirement
(Redacted copy provided in public version)

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING 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 E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **4844-E**

Tier: **2**

Subject of AL: **Submittal of Electric Service Provider (ESP) Financial Security Requirements in Compliance With D.13-01-021, D.13-02-017, and D.13-04-001**

Keywords (choose from CPUC listing): Compliance, Direct Access

AL filing type: Monthly Quarterly Annual One-Time Other Bi-Annual

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.13-01-021, D.13-02-017, and D.13-04-001

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: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: Yes. Attachment B - ESP Financial Security Requirement.

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Ronald Jang, (415) 973-2973

Resolution Required? Yes No

Requested effective date: June 9, 2016

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: N/A

Service affected and changes proposed: N/A

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

Protests, dispositions, and all other correspondence regarding this AL are due no later than 21 days¹ after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission

Energy Division

EDTariffUnit

505 Van Ness Ave., 4th Flr.

San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Erik Jacobson

Director, Regulatory Relations

c/o Megan Lawson

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

¹ The 20-day protest period concludes on a holiday. PG&E is hereby moving this date to the following business day.

**DECLARATION OF RONALD JANG
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN ADVICE LETTER 4844-E
(PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)**

I, Ronald Jang, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee at PG&E since 1977. My current title is Principal Third-Party Relations Specialist within PG&E's Customer Care organization. In this position, my responsibilities include maintaining the on-going business relationship with third-party electric service providers (ESPs) participating in PG&E's direct access service program. In carrying out these responsibilities, I have acquired knowledge of the operations of electric service providers in general. Through this experience, I have become familiar with the type of information ESPs' consider confidential and proprietary.

2. Based on my knowledge and experience, I make this declaration seeking confidential treatment of "Attachment B to Advice Letter 4844-E," submitted on May 10, 2016. By this Advice Letter, PG&E is seeking this Commission's approval of its calculations of the financial security requirements for individual ESPs in compliance with Ordering Paragraph 6 of Decision 13-01-021.

3. PG&E is seeking confidential treatment of the number of customers served by each ESP, historic usage information, forecasted electric pricing information, and the calculated financial security requirement. The material PG&E is seeking to protect constitutes information that should be protected under Public Utilities Code § 583 and General Order 66-C. Finally, PG&E states that: (1) the information is not already public; and (2) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on May 10, 2016 at San Francisco, California.

/s/ Ronald O. Jang
Ronald O. Jang

**ATTACHMENT B
Redacted Public Version**

ESP FINANCIAL SECURITY REQUIREMENT	
Pacific Gas and Electric Company	
Advice 4844-E	
May 10, 2016	
Electric Service Provider	Total Financial Security
3phases Renewables LLC	
Agera Energy LIC	
Calpine Power America LLC	
Commerce Energy	
Commercial Energy of Montana, Inc	
Constellation Newenergy, Inc	
Direct Energy Business LLC	
EDF Industrial Power Services (CA), LLC	
Gexa Energy of California Inc	
Liberty Power Holdings LLC	
Noble Americas Energy Solutions LLC	
Pilot Power Group Inc	
Shell Energy North America (US) LP	
The Regents Of The University of California	
Tiger, Inc.	

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

AT&T	Division of Ratepayer Advocates	Office of Ratepayer Advocates
Albion Power Company	Don Pickett & Associates, Inc.	OnGrid Solar
Alcantar & Kahl LLP	Douglass & Liddell	Pacific Gas and Electric Company
Anderson & Poole	Downey & Brand	Praxair
Atlas ReFuel	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
BART	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
Barkovich & Yap, Inc.	G. A. Krause & Assoc.	SCE
Bartle Wells Associates	GenOn Energy Inc.	SDG&E and SoCalGas
Braun Blaising McLaughlin & Smith, P.C.	GenOn Energy, Inc.	SPURR
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Water Power and Sewer
CENERGY POWER	Green Charge Networks	Seattle City Light
CPUC	Green Power Institute	Sempra Energy (Socal Gas)
California Cotton Ginners & Growers Assn	Hanna & Morton	Sempra Utilities
California Energy Commission	International Power Technology	SoCalGas
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Edison Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Leviton Manufacturing Co., Inc.	Sunshine Design
Center for Biological Diversity	Linde	Tecogen, Inc.
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	Los Angeles Dept of Water & Power	TransCanada
Clean Power	MRW & Associates	Troutman Sanders LLP
Clean Power Research	Manatt Phelps Phillips	Utility Cost Management
Coast Economic Consulting	Marin Energy Authority	Utility Power Solutions
Commercial Energy	McKenna Long & Aldridge LLP	Utility Specialists
Cool Earth Solar, Inc.	McKenzie & Associates	Verizon
County of Tehama - Department of Public Works	Modesto Irrigation District	Water and Energy Consulting
Crossborder Energy	Morgan Stanley	Wellhead Electric Company
Davis Wright Tremaine LLP	NLine Energy, Inc.	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	NRG Solar	YEP Energy
Defense Energy Support Center	Nexant, Inc.	
Dept of General Services	ORA	