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

Pacific Gas & Electric Company ELC
(Corp ID 39)
Status of Advice Letter 6654E/6654E-A
As of January 25, 2023

Subject: Rate Implementation Plan Pursuant to Decision 22-05-015 to Implement Cost Recovery Associated with Reliability Contracts Procured to Meet the Modified Cost Allocation Mechanism Targets Established in Decision 19-11-016 ...

Division Assigned: Energy

Date Filed: 07-18-2022

Date to Calendar: 07-20-2022

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Authorizing Documents: D2106035

Disposition:	**Signed**
Effective Date:	**01-12-2023**

Resolution Required: Yes

Resolution Number: E-5239

Commission Meeting Date: 01-12-2023

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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The AL status certificate indicates:

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Name of Filer
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Subject of Filing
Date Filed
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Date of Issuance: January 17, 2023

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION **RESOLUTION E-5239**
January 12, 2023

R E S O L U T I O N

Resolution E-5239. Pacific Gas and Electric Company (PG&E's) Plan to Implement the Modified Cost Allocation Mechanism established in D.19-11-016 and D. 21-06-035.

PROPOSED OUTCOME:

- This resolution approves PG&E's plans for recovery of costs associated with Modified Cost Allocation Mechanism (MCAM) procurement.

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- PG&E will incur estimated costs between $3.5 million - $5 million in order to update the billing systems to implement the MCAM rate as a non-bypassable charge. No additional costs will be incurred, as this advice letter only addresses the cost recovery mechanism for costs approved in other decisions and advice letters.

By PG&E Advice Letters 6654-E, filed on July 18, 2022, and AL 6654-E-A, filed on July 29, 2022.

SUMMARY

This resolution approves, with modifications, Pacific Gas and Electric Company's ("PG&E's") cost-recovery proposal to implement the modified cost recovery mechanism ("MCAM"). The MCAM will be used by PG&E for procurement conducted on behalf of Load Serving Entities ("LSEs") that opted out of procurement required by Decision (D.) 19-11-016 or that fail to meet their procurement requirements under D.19-11-016, D.21-06-035, or future Integrated Resource Planning ("IRP") procurement orders.

BACKGROUND

To address potential reliability issues, in D.19-11-016, the CPUC determined that LSEs under its jurisdiction would be required to procure 3,300 megawatts (MW) of incremental system resource adequacy (RA) capacity, with the requirement that the capacity come online between 2021 and 2023. D.19-11-016 also required that the Investor-Owned Utilities (IOUs) procure additional generation capacity on behalf of other LSEs in their service territories that either elected to opt-out of self-procurement ("opt out procurement") or failed to acquire their share of the required capacity after electing self-procurement ("backstop procurement").

In D.21-06-035, the CPUC required LSEs under its jurisdiction to procure and bring online an additional 11,500 MW of additional Net Qualifying Capacity ("NQC") between 2023 and 2026, with a possible extension from 2026 to 2028 for "long lead-time" resources. Unlike D.19-11-016, D.21-06-035 did not allow LSEs to opt-out of self-procurement. However, D.21-06-035 requires the IOUs to backstop any LSEs that fail to procure and bring online their required share of reliability resources.

D.22-05-015 ("the MCAM Decision") addresses cost-recovery for the opt-out and backstop procurement associated with D.19-11-016 and D.21-06-035 and sets out precedent for any future backstop procurement authorized within the IRP framework. It also addresses several other cost-recovery situations such as PCIA treatment for customers who have left IOU service since November 2019, and cost-recovery of procurement on behalf of opt-out LSEs that have since ceased serving load in California through the normal Cost Allocation Mechanism (CAM).[1] The MCAM decision also affirms "that to meet the statutory requirements against cost shifting, a non-bypassable customer charge is required as a billing mechanism for recovering the above market procurement costs incurred by the IOUs on behalf of other LSEs pursuant to D.19-11-016 and D.21-06-035"[2].

In total, eleven LSEs, representing approximately 113 MW of the total 3,300 MW required, opted out of self-procuring their share of the D.19-11-016 requirements. PG&E's portion of the opt-out procurement allowed by D.19-11-016 was 48.2 MW,

[1] D.06-07-030.
[2] D.22-05-015 at FOF 12 & 13.

which the Commission added to PG&E's own procurement obligation of 716.9 MW.[3] To date, no LSE has required backstop procurement. However, the MCAM mechanism adopted in D.22-05-015 sets precedent for any future backstop procurement authorized in the IRP process in the future. D.22-05-015 authorizes the IOUs to file a Tier 2 advice letter to implement the various aspects of the MCAM in accordance with its directives.

SUMMARY OF ADVICE LETTER 6654-E AND 6654-E-A

PG&E filed AL 6654-E on July 18, 2022. On July 29, 2022, PG&E filed an amendment, AL 6654-E-A, which replaces the former in its entirety. AL 6654-E-A proposes the following:

1. **PG&E's Procurement in Compliance with D.19-11-016:** PG&E provides a detailed account of the procurement obligations for bundled and opt-out customers for each of the procurement deadlines set by D.19-11-016 and the resources that it has procured to meet those obligations. PG&E states that it will not know before August 2023 whether all of the contracts will reach commercial operation by August 2023. To accommodate this uncertainty, PG&E has executed contracts that are expected to deliver 810 MW of RA benefits against the 765.1 MW that it is required to procure on behalf its own and opt-out customers. This extra procurement, PG&E states, could provide a cushion should some of the contracted capacity fail to come online in a timely manner or should a self-procuring LSE have a last-minute deficiency in meeting its 2022 or 2023 procurement targets.[4]
2. **Vintaging of the D.19-11-016 Procurement and Treatment of Customers who Left Bundled Service after November 2019:** PG&E estimates that 93.7 percent of its procurement costs (representing the proportion of PG&E's own bundled customer procurement requirement relative to its total bundled and opt-out procurement requirement) will be categorized as PCIA-eligible resource costs on a going forward basis, effective June 1, 2022, and will be recorded to the 2019 Vintage Subaccount in the Portfolio Allocation Balancing Account (PABA) using existing line item for bilateral contract obligations. In addition, PG&E will record a proportional share of the value of RA and RPS attributes retained for bundled customer compliance as a credit entry to the 2019 vintage subaccount as it would for any other 2019 PCIA-

[3]D.19-11-016, p.41 lists the procurement amounts assigned to each LSE. The Opt-out amounts for which the IOUs were responsible were published in the Administrate Law Judge's Ruling Finalizing Load Forecasts and Greenhouse Gas Benchmarks for Individual 2020 Integrated Resource Plan Filings and Assigning Procurement Obligations Pursuant to Decision 19-11-016 (April 15, 2020), p.11.
[4] Advice Letter 6654-A, pp 6-7.

eligible resource. Also, pursuant to Ordering Paragraph ("OP") 4,[5] a proportional share of the RA and RPS will be offered for sale (RA) or voluntary allocation (RPS) to LSEs that have departing load customers for vintage 2019. The proportional share will be based on a mutually agreed upon forecast of LSE's relevant departing load, i.e., for vintages 2019 or later. PG&E proposes to present the ratemaking impacts for these contracts as part of its 2023 ERRA October Update, which will also include the net costs recorded to the 2019 vintage PABA Subaccount for the balance of 2022.

3. **Non-Operational "Opt-Out" LSEs:** Three of the original opt-out LSEs accounting for 1.2 MW of opt-out procurement have left the market and are no longer serving load in California. Pursuant to Ordering Paragraph 10, the associated costs for these LSEs will be recovered through the regular CAM.
4. **Bill Presentation of the MCAM:** PG&E proposes to display the new MCAM line on customers' bills as "Modified CAM". PG&E will provide Energy Division a mock-up of the Energy Statement sometime in 2025, before a proposed July 1, 2025, implementation date.
5. **Tariff Revisions for Summer Reliability Authorized in D.21-03-056 and D.21-12-015 for Summer 2022 and Summer 2023**: In addition to issues related to D.22-05-015, PG&E requests approval for tariff modifications to Preliminary Statement FS - NSGBA, Preliminary Statement HS – PABA, and Preliminary Statement CP – ERRA to include reference to the Commission's updated "Summer Reliability Procurement" authorized by D.21-12-015 for Summer 2022 and Summer 2023.

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[5] D.22-05-035, OP4.: "For procurement conducted on behalf of bundled customers of the investor-owned utilities (IOU) in 2019 in accordance with Decision 19-11-016, where the load has subsequently migrated to service by another load-serving entity (LSE), the LSE with new load shall have the option to enter into an agreement with the relevant IOU to purchase the system resource adequacy capacity at the Market Price Benchmark calculated in accordance with the provisions of Decision 19-10-001. This is a one-time provision that shall be based on the load of the non-IOU LSE, as mutually agreed between the IOU and the non-IOU LSE, as of the effective date of this decision and shall not include any charges for time periods prior to the effective date of this decision. Any above-market costs that remain shall be assigned a 2019 vintage in the Power Charge Indifference Amount process for recovery from all customers of the non-IOU LSEs on a non-bypassable basis. Once executed, the IOU(s) shall file Tier 1 Advice Letters with all such agreements (one advice letter may contain more than one agreement) by no later than October 1, 2022."

NOTICE

Notice of AL 6654-E and 6654-E-A was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS AND REPLIES

On August 8, 2022, the Alliance for Retail Energy Markets (AReM) filed timely protest to Advice Letters AL 6654-E as revised in 6654-E-A. AReM's protest also addressed AL 4043-E and AL 4085-E, filed by Southern California Edison ("SCE") and the San Diego Gas and Electric Company ("SDG&E") respectively, in compliance with D.22-05-015.

PG&E timely filed a reply to AReM's protest on August 15, 2022.

The Commission has reviewed Advice Letters AL 6654-E and 6654-E-A as well as the associated protest and reply to the protest. Here we describe those protest issues that pertain to AL 6654-E and PG&E's response to those protests.

Issue 1: D.22-05-015 Requires LSE-Specific Charges.

AReM's Protest

PG&E's advice letter does not state whether PG&E will recover the costs of procurement on behalf of opt-out LSEs through LSE-specific MCAM rates or through a single MCAM rate that would be charged to all LSEs in the opt-out pool. However, AReM requests that the Commission reject the MCAM AL filings of SCE and SDG&E and order all three IOUs to create LSE-specific MCAM charges for Opt-Out LSEs. AReM states that SCE and SDG&E's proposal, "clearly violates the plain language in the D.22-05-015 and will result in the very harm to customers of the opt-out entities that D.22-05-015 intends to avoid."[6]

As evidence that the Commission requires LSE-specific MCAM charges, AReM cites the MCAM Decision, which discusses a proposal made by SCE and PG&E in comments on the proposed MCAM decision ("PD") : "SCE and PG&E expressed concern that the PD 'could be interpreted as requiring [load serving entity ("LSE")]-specific rates' for LSEs that opted to have the IOUs procure power on their behalf to meet the procurement requirements specified in D.19-11-016 ("Opt-Out LSEs")."[7] AReM contends that SCE

[6] AReM Protest, p. 2.
[7] D.22-05-015, p. 58, citing PG&E and SCE's Opening Comments on Proposed Decision on Modified Cost Allocation Mechanism for Opt-Out and Backstop Procurement Obligations, April 18, 2022, pp. 11-12.

and PG&E were seeking clarification that it was the Commission's intention to "pool all opt-out LSE cost and benefits for revenue allocation purposes rather than developing LSE-specific rates."[8] AReM notes that the Commission rejected PG&E and SCE's proposal and cites D.22-05-015, which states "we will not adopt this suggestion of PG&E and SCE… [T]his means that there will be LSE-specific rates for MCAM,"[9] as proof that it is the Commission's intention that IOUs recover costs through LSE-specific rates.

In addition, AReM argues that it is appropriate that the Commission reject a single rate for all MCAM customers because only LSE-specific rates can "ensure that load migration by the customers of one LSE does not impact customers of another LSE."[10] AReM contends that because individual customers will not be tracked for MCAM purposes, with a single MCAM rate, load migration at one Opt-Out LSE will impact the rates paid by all other Opt-Out LSEs. AReM explains that if customers of an Opt-Out LSE depart for bundled service or for service by an LSE that did not opt-out, the total procurement dollars to be recovered from the opt-out pool will be divided by a smaller customer base, leading to higher rates. AReM argues that such an occurrence would, "[conflict] with cost causation principles that mandate customer rates should not vary due to load migration by other customers."[11] AReM concludes that, "the IOUs should be required to calculate LSE-specific MCAM charges which recover costs of the capacity procured for that specific Opt-Out LSE and that LSE's current customer base."[12]

PG&E's Response to Protest

In response, PG&E argues that AReM has misinterpreted the discussion in the MCAM Decision and that taken in the context of that discussion, the decision language quoted by AReM should not be read as an order requiring LSE-specific rates. The proper context for that statement, PG&E contends, was a proposal by PG&E and SCE that procurement on behalf of opt-out LSEs and backstop procurement on behalf of deficient LSEs be placed in a single pool and recovered through a single rate. PG&E cites the paragraph leading up to the language cited by AReM:

> PG&E and SCE also suggest that all Opt-Out and Backstop procurement costs should be pooled, so that there are not LSE-specific rates required to flow through the rate classes in the IOUs' billing systems. While we are sympathetic

[8] IBID, p. 12, cited on page 2 of AReM's August 8, 2022, Protest
[9] D.22-05-015, p. 58
[10] AReM's protest, p.2
[11] Ibid., p. 3.
[12] Ibid, p. 3

> to the complexity inherent here, PG&E and SCE acknowledge that this would require vintaging of backstop procurement costs, at least, depending on when the procurement occurs. We believe this creates equal complexity, but may be less fair to the underlying customers, since their costs will be averaged and dependent on other Deficient LSE compliance amounts and costs. Therefore, we will not adopt this suggestion of PG&E and SCE. In effect, this means that there will be LSE-specific rates for MCAM, depending on whether the LSE opted out or was deficient, and when.[13]

PG&E argues that AReM's position conflicts with OP 5, which directs the utilities to pool all opt-out LSE costs. PG&E concludes that, "despite some ambiguity in the Discussion Section of the Decision, PG&E is obligated to adhere to OP 5 in its implementation, and OP 5 aligns with the Decision's intent that net costs for opt-out LSEs be aggregated."[14]

Issue 2: Ratemaking Treatment

<u>AReM's Protest:</u>

AReM asks that the Commission direct PG&E (and SDG&E) to provide specific details on cost recovery for their current memorandum account balances in accordance with OP 11.[15] They point to the example of SCE's AL 4831-E, in which SCE states it will amortize procurement and administrative costs already accrued for the MCAM over a three-year period and provides illustrative rates.

AReM requests that the Commission direct PG&E and SDG&E to provide specific details on cost recovery for their current memorandum account balances in accordance with OP 11, such that the Commission and stakeholders can evaluate whether they will be consistent with SCE's proposed treatment.

<u>PG&E's Response to Protest</u>

In response to AReM's request, PG&E (and SDG&E) points out that recovery of costs that have already accrued will not be implemented until mid-2025. Therefore, any details of cost recovery would be largely a guess and not likely to be accurate. They

[13] D.222-05-015, p. 58 cited in PG&E Response to Protest by AReM, p.3.
[14] PG&E Reply to Protest, pp. 3-4.
[15] AReM protest, p. 4.

also state that when they do calculate illustrative rates, they will do so using a 12-month coincident peak revenue allocation.

Issue 3: MCAM Confidentiality

AReM's Protest

AReM points out that both PG&E and SDG&E postponed providing a specific ratemaking proposal until their ERRA proceedings and that PG&E also chose to redact some cost information in its AL. AReM requests that Energy Division order the IOUs to provide a publicly available forecast of the MCAM charges as part of their ERRA Applications when implementing MCAM to enhance market transparency.

PG&E's Response to Protest

In response, PG&E states that the updated balance in the new MCAM balancing account and associated opt-out rates will be unredacted in PG&E's ERRA Forecast Application and that it is PG&E's practice to make their total revenue requirements and rates based on such totals public.

PG&E explains that the cost information provided in the confidential table attached to advice letters 6654-A and 6654-E-A was redacted to maintain the confidential treatment for the total cost of 13 contracts presented in PG&E's 2023 ERRA Forecast Application (A.22-05-029), currently pending before the Commission. PG&E's ERRA Forecast Update, which will be served on October 17, 2022, will be updated with the presentation of the MCAM costs consistent with the directives of D.22-05-015.[16]

DISCUSSION

We discuss and resolve each protest issue in turn below, as it pertains to AL 6654-E and 6654-E-A.

Issue 1: D.22-05-015 Requires LSE-Specific Charges.

OP 5 establishes the ratemaking treatment for LSEs that opted out of procurement:

> "For customers of load serving entities (LSEs) that opted out of self-providing capacity required by Decision 19-11-016, the opt-out costs and offsetting benefits shall be aggregated by each investor-owned utility into a single bucket for procurement and a single bucket for administrative costs. All of the procurement-related costs, including incremental administrative costs,

[16] PG&E provided the updated cost information in its updated Fall 2023 ERRA filing.

> shall be recorded as debit entries in a balancing account or sub-account specific to the Modified Cost Allocation Mechanism. These costs shall be offset by a credit entry equal to any net energy or other revenues received from the contracts. The remaining net capacity costs shall be recovered from the customers of the LSEs that opted out via a non-bypassable charge."

OP 5 is clear that a single bucket for procurement costs shall be established for opt-out costs and makes no provision for these costs to be disaggregated by LSE. In contrast, the decision specifically establishes a separate pool of costs for backstop procurement in OP 6.

The discussion that AReM refers to in the MCAM Decision was responding to a proposal by PG&E and SCE to pool the opt-out with backstop procurement costs together so that LSE-specific rates are never required to flow through the rate classes in the IOUs' billing systems. The Commission rejects the proposal because it "creates equal complexity, but may be less fair to the underlying customers, since their costs will be averaged and dependent on other Deficient LSE compliance amounts and costs."[17] In this context, the statement that AReM refers to that "there will be LSE-specific rates for MCAM, *depending on whether the LSE opted out or was deficient, and when* [emphasis added]," is not establishing an LSE-specific requirement, but is acknowledging that requiring separate buckets for backstop procurement will lead to LSE-specific rates for those subsequent procurements.

Issue 2: Ratemaking Treatment

Although transparency is preferred, we agree with PG&E that OP 11 of D.22-05-015 did not require cost recovery details. We also agree with PG&E that cost recovery details this far in advance may be so inaccurate that they are not useful. We will not require PG&E to provide further details regarding ratemaking treatment at this time and will leave these implementation details to the ERRA Forecast proceedings. Given that PG&E expects to implement MCAM rates in mid-2025, the 2024 ERRA forecast would be an appropriate venue to provide additional cost-recovery details including a publicly available forecast of MCAM charges.

Issue 3: MCAM Confidentiality

Following on our discussion of ratemaking treatment (Issue 2, above), PG&E should provide publicly available MCAM rates in their ERRA Forecast Applications, whenever PG&E begins to amortize opt-out procurement costs.

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[17] D.22-05-015, p. 58.

Additional Issue:

In its filing, PG&E discusses proposed tariff revisions for summer reliability procurement authorized in D.21-03-056 and D.21-12-015 for summer 2022 and summer 2023. In this section, PG&E requests approval for tariff modifications to Preliminary Statements FS-NSGBA, HS-PABA and CP-ERRA, to include reference to the Commission's updated "Summer Reliability Procurement" authorized in D.21-12-015 for Summer 2002 and Summer 2023.

Because these requests are not directly related to the main purpose of this advice letter – compliance with the directives of D.22-05-015 – we are concerned that parties that might wish to review or comment on the requests made regarding summer reliability contracts could be unaware of their existence. We will therefore reject this part of the advice letter without prejudice. We direct PG&E to re-submit the requests in this section as a separate advice letter and properly notify interested parties.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Please note that comments are due 20 days from the mailing date of this resolution. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments on December 8, 2022.

PG&E timely filed comments on the Draft Resolution on December 28, 2022. PG&E points out that while the Draft Resolution specifies that the RA associated with 1.2 MW procured by PG&E on behalf of opt-out LSEs that are no longer serving customers and associated costs should be recovered through the regular Cost Allocation Mechanism (CAM), the Draft Resolution does not specify how PG&E's procurement obligation under D.19-11-016 will be impacted by this transfer. PG&E requests that the Commission either (a) clarify that PG&E's procurement obligation under D.19-11-016 will be reduced to 47 MW (e.g. 48.2 MW less the inactive LSE's portion of 1.2MW) or (b) affirm that the 1.2 MW transferred to regular CAM will still count towards PG&E's procurement obligation of 48.2 MW.[18]

We agree that the 1.2 MW of procurement PG&E conducted on behalf of opt-out LSEs that subsequently left the market will count towards PG&E's D.19-11-016 procurement requirements as modified by ALJ Fitch's April 15, 2020, ruling modifying the IOU's requirements to incorporate opt-opt LSEs.[19]

FINDINGS

1. D.22-05-012, Ordering Paragraph 5, provides that a single bucket for procurement costs shall be established for opt-out costs and makes no provision for these costs to be disaggregated by load serving entity.
2. D.22-05-012, Ordering Paragraph 6, specifically establishes a separate pool of costs for backstop procurement.
3. D.22-05-015, Ordering Paragraph 11, did not require the IOUs to provide cost recovery details.
4. Cost recovery projections provided three years in advance of actual cost-recovery will likely be inaccurate.
5. The IOUs' ERRA applications are an appropriate venue to provide additional details regarding cost-recovery for opt-out procurement.
6. This resolution is not the appropriate venue to consider tariff modifications associated with procurement authorized in D.21-03-056 and D.21-12-015 for summer 2022 and summer 2023, as parties to D.21-12-015 may be unaware of the changes PG&E proposed in AL 6654-E and AL 6654-E-A.

   In accordance with D.22-05-15 Conclusion of Law 16, RA associated with the 1.2 MW procured by PG&E on behalf of opt-out LSEs that have subsequently stopped serving customers should be recovered through regular CAM with the RA credited on a pro-rata basis. However, the procurement credit for this procurement will count towards PG&E's D.19-11-016 procurement requirements as modified by ALJ Fitch's April 15, 2020, ruling.

[18] PG&E Comments on Draft Resolution E-5239, pp. 1-2

[19] Administrative Law Judge's Ruling Finalizing Load Forecasts and Greenhouse Gas Benchmarks For Individual 2020 Integrated Resource Plan Filings and Assigning Procurement Obligations Pursuant to Decision 19-11-016, p.

<u>THEREFORE, IT IS ORDERED THAT:</u>

1. PG&E is permitted to recover opt-out procurement and administrative costs through a single MCAM rate for all customers of opt-out load serving entities.
2. PG&E should provide additional details related to cost-recovery and ratemaking in its 2024 ERRA Forecast Application, filed in 2023.
3. PG&E should provide publicly available MCAM rates in its ERRA Forecast Application when it begins to amortize opt-out procurement costs.
4. PG&E's request for approval of tariff modifications associated with procurement authorized in D.21-03-056 and D.21-12-015, for summer 2022 and summer 2023, are rejected without prejudice. PG&E is ordered to submit these requests in an appropriate advice letter and to ensure that potentially interested parties are properly notified.
5. All other provisions in AL 6654-E and 6654-E-A are hereby approved.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on January 12, 2023; the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON
Rachel Peterson
Executive Director

ALICE REYNOLDS
President

GENEVIEVE SHIROMA
DARCIE HOUCK
JOHN REYNOLDS
Commissioners

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July 29, 2022

Advice 6654-E-A
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

<u>Subject:</u> **Supplemental: Rate Implementation Plan Pursuant to Decision 22-05-015 to Implement Cost Recovery Associated with Reliability Contracts Procured to Meet the Modified Cost Allocation Mechanism Targets Established in Decision 19-11-016 and Mid-Term Reliability Targets Established in D.21-06-035. Establishment of Electric Preliminary Statement Part JN, Modified Cost Allocation Mechanism Balancing Account**

This supplement supersedes Advice Letter 6654-E in its entirety. The purpose of this supplement to Advice Letter 6654-E is to correct PG&E's bundled customer procurement target pursuant to Decision (D.) 19-11-016 presented in Table 1 and Table 5 from 719.6 megawatts (MW) to 716.9 MW. The correction is to Line 1 which carries through to the table total and updates Line 1 amounts in columns to the right of the corrected amount. This supplement also includes updated language for Preliminary Statement HS "Purpose," which was described at the bottom of page 8 of Advice Letter 6654-E but was inadvertently left out of updated tariffs included in Attachments 1 and 2. Lastly, Footnote 4 in this supplement was added to take notice of Advice Letter 6658-E filed on July 20, 2022, which requests approval for contract amendments associated with D.19-11-016 procurement previously approved in Resolution 5140-E.

Purpose

The purpose of this advice letter is to request the California Public Utilities Commission (Commission or CPUC) approve: (1) PG&E's Rate Implementation Plan for contracts procured to meet the Modified Cost Allocation Mechanism (MCAM) targets established in D.19-11-016 and contracts to meet Mid-Term Reliability targets established in D.21-06-035, (2) establish Electric Preliminary Statement Part JN, Modified Cost Allocation Mechanism Balancing Account (MCAMBA) which will record contract costs net of energy and Renewable Portfolio Standard (RPS) attribute sales, if any, associated with procurement done on behalf of opt-out load serving entities (LSE) and/or procurement done on behalf of LSEs that are deficient in meeting assigned procurement targets, and (3) tariff modifications to the Portfolio Allocation Balancing Account (PABA) and the New

System Generation Balancing Account (NSGBA) that will allow recovery of the bundled and departing load portion of MCAM procurement or incremental Mid-Term Reliability procurement to be recovered through existing Power Charge Indifference Adjustment (PCIA) and New System Generation Charge (NSGC) rates, as authorized in D.22-05-015.

Background

In D.19-11-016, the Commission required the Joint IOUs to procure additional resource generation capacity on behalf of other LSEs in their service territory that either (a) elected to opt out of self-procurement or (b) failed to acquire their share of required capacity after electing to do so. We refer to the procurement for the former situation as “opt-out procurement” and the latter as “backstop procurement.” In total, eleven LSEs opted out of D.19-11-016 requirements, representing approximately 113 MW out of the total 3,300 MW of required capacity. PG&E’s portion of the opt-out procurement was 48.2 MW on top of its bundled customer procurement obligation of 716.9 MW.

TABLE 1
D.19-11-016 PROCUREMENT TARGETS

Line No.	Procurement Obligation	MW	Percent of Total	50% Incremental Online 8/1/2021	25% Incremental Online 8/1/2022	25% Incremental Online 8/1/2023	100% Online 8/1/2023
1	PG&E Bundled	716.9	93.7%	358.5	179.2	179.2	716.9
2	Opt-out	48.2	6.3%	24.1	12.05	12.05	48.2
3	**Total**	**765.1**	**100.0%**	**382.6**	**191.3**	**191.3**	**765.1**

Unlike D.19-11-016, D.21-06-035 did not allow for LSEs to opt out of self-providing capacity but did provide for backstop procurement in the event of failure by one or more LSEs to deliver their share of the capacity and/or energy procurement requirements.

TABLE 2
D.21-06-035 PROCUREMENT TARGETS

Line No.	Procurement Obligation	2023	2024	2025	2026 LLT Resources*	Minimum zero-emitting capacity by 2025**	Total***
1	PG&E Bundled	400	1,201	300	400	500	2,302

* The LLT resource requirements are divided into half from long-duration storage and half from firm, zero emitting generation resources. LSEs with an odd-numbered procurement obligation may choose how to round their obligation in whatever way results in the total capacity in this column of the table being delivered.

** The amount in this column is a subset of the 2023, 2024, and 2025 columns, and is therefore not also added to the total for each LSE.

*** Numbers may not add due to rounding

D.22-05-015 adopts a MCAM charge to ensure that the net costs of electric resource procurement obligations mandated in D.19-11-016 and D.21-06-035 are allocated and recovered in a fair, economical, and legally compliant manner. Ordering Paragraph (OP) 11 requires that PG&E, Southern California Edison Company, and San Diego Gas and Electric (SDG&E) collectively, the investor-owned utilities (IOU), to submit a Tier 2 advice letter to implement the rate making provisions of the decision, including a discussion of any implementation delays.[1]

D.22-05-015 sets forth governing principles and methodologies for the MCAM whereby the costs associated with incremental procurement conducted by the IOUs on behalf of other non-IOU LSE will be allocated and recovered. Additionally, the Commission noted that the MCAM adopted in D.22-05-015 sets precedent for any future backstop procurement authorized in the integrated resources planning (IRP) process where the IOUs are procuring on behalf of some but not all LSEs, unless and until the Commission adopts a more comprehensive programmatic approach to IRP procurement authorizations.

The primary governing principles and methodologies for the MCAM ratemaking, which includes mid-term reliability procurement, are memorialized in OPs 3 – 10, which are summarized below. Generally, the cost recovery concepts in these OPs fall into three buckets: (1) Governing Principle, (2) Cost Allocation and Cost Recovery, and (3) Allocation of Resource Attributes.

[1] OP 11: Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall each file a Tier 2 advice letter by no later than 60 days after the effective date of this decision to implement the Modified Cost Allocation Mechanism (MCAM) set forth in [D.22-05-15]. These advice letters may also address cost recovery in the case of implementation delays for MCAM and existing balances in each investor-owned utility's memorandum account

1. Governing Principle

   OP 3: All load-serving entities with procurement obligations as identified in Decision (D.) 19-11-016, D.21-06-035, and any future procurement order in the context of the integrated resources planning (IRP) process, unless or until procurement orders are replaced with a programmatic IRP framework, are subject to the requirements for cost allocation of procurement costs incurred by an incumbent investor-owned utility on their behalf, as adopted in this decision.

2. Cost Recovery

   PCIA-eligible resources applicable Bundled and Incremental Departing Load Customers vintaged 2019 onwards

   a. OP 4: For procurement conducted on behalf of bundled customers of the investor-owned utilities (IOU) in 2019 in accordance with Decision 19-11-016, where the load has subsequently migrated to service by another load-serving entity (LSE), the LSE with new load shall have the option to enter into an agreement with the relevant IOU to purchase the system resource adequacy capacity at the Market Price Benchmark calculated in accordance with the provisions of Decision 19-10-001. This is a one-time provision that shall be based on the load of the non-IOU LSE, as mutually agreed between the IOU and the non-IOU LSE, as of the effective date of this decision and shall not include any charges for time periods prior to the effective date of this decision. Any above-market costs that remain shall be assigned a 2019 vintage in the Power Charge Indifference Adjustment amount process for recovery from all customers of the non-IOU LSEs on a non-bypassable basis. Once executed, the IOU(s) shall submit Tier 1 advice letters with all such agreements (one advice letter may contain more than one agreement) by no later than October 1, 2022.

   MCAM for Opt-out LSEs

   a. OP 5: For customers of load serving entities (LSEs) that opted out of self-providing capacity required by Decision 19-11-016, the opt-out costs and offsetting benefits shall be aggregated by each investor-owned utility into a single bucket for procurement and a single bucket for administrative costs. All of the procurement-related costs, including incremental administrative costs, shall be recorded as debit entries in a balancing account or sub-account specific to the Modified Cost Allocation Mechanism. These costs shall be offset by a credit entry equal to any net energy or other revenues received from the contracts. The remaining net capacity costs shall be recovered from the customers of the LSEs that opted out via a non-bypassable charge.

   MCAM for Deficient LSEs

   b. OP 6: For customers of load serving entities (LSEs) that fail to provide the capacity required by Decision (D.) 19-11-016 and/or D.21-06-035 and the commission has required backstop procurement as described in D.20-12-044, the backstop procurement costs and offsetting benefits shall be aggregated by each investor-owned utility into a single bucket for procurement and a single bucket for administrative costs. All of the procurement-related costs, including incremental administrative costs, shall be recorded as debit entries in a balancing account or sub-account specific to the Modified Cost Allocation Mechanism. These costs shall be offset by a credit entry equal to any net energy or other revenues received from the contracts. The remaining net capacity costs shall be recovered from the customers of the deficient LSEs via a non-bypassable charge.

New System Generation Charge (NSGC)

c. OP 10: In the event that a non- investor-owned-utility (IOU) load serving entity (LSE) declares bankruptcy or ceases providing retail service in California and has a capacity obligation under Decision (D.) 19-11-016 or D.21-06-035 and their retail customers are paying for capacity under the modified cost allocation mechanism adopted in this decision, the capacity shall revert to the relevant IOU, with the costs of the associated procurement allocated thereafter using the Cost Allocation Mechanism detailed in Decision 06-07-030.

3. <u>Allocation of Resource Adequacy Counting and Voluntary RPS Attribute Allocation</u>

RA Counting Allocation for Opt-out and Backstop LSEs

a. OP 7: System resource adequacy associated with contracts executed pursuant to Decision (D.) 19-11-016 or D.21-06-035 shall be allocated annually to load serving entities that opted out of self-providing capacity and/or failed to procure the requisite capacity, as determined by the Commission in the process outlined in D.20-12-044, in the same manner as under the Cost Allocation Mechanism. For the period when system resource adequacy was not allocated to those load serving entities, the costs under the Modified Cost Allocation Mechanism defined in this decision shall be offset by a credit at the system resource adequacy market price benchmark calculated in accordance with D.19-10-001.

RPS Voluntary Attribute Allocation for Opt-out and Backstop LSEs

b. OP 8: Opt-out procurement associated with Decision (D.) 19-11-016 shall be eligible for voluntary allocation to the relevant load-serving entity (LSE) of renewable attributes in the current round of the voluntary allocation process associated with the current renewables portfolio standard (RPS) compliance period being conducted as ordered in D.21-05-030 and being implemented in Rulemaking 18-07-003, at the price established for RPS attributes of resources subject to voluntary allocation in D.21-05-030. Any future backstop procurement associated with D.19-11-016 and/or D.21-06-035 shall be eligible for a future round of voluntary allocation of renewable attributes to the relevant LSE through the voluntary allocation process ordered in D.21-05-030, should there be another round of allocations in the future. If there is not another round of voluntary allocations in the RPS proceeding, then Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall make available voluntary allocations of RPS attributes only to LSEs on whose behalf they executed backstop procurement, using the same terms and processes associated with D.21-05-030 requirements.

Voluntary RSP Allocation Process

c. OP 9: Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall, if necessary, and within ten days of the effective date of this decision, adjust the process for offers available under the current voluntary allocation process ordered in Decision (D.) 21-05-030 to accommodate the opportunity for voluntary allocation to the relevant load serving entity of renewable attributes associated with opt-out procurement conducted to comply with D.19-11-016.

<u>MCAM Rate Implementation Plan and Tariff Modifications</u>

1. MCAM Procurement and Interim Cost Recovery

PG&E submitted Advice 5826-E on May 18, 2020, which requested approval of seven Energy Storage Contracts, shown in the Table 3 below. The Commission approved these contracts in Resolution E-5100, effective August 27, 2020.

TABLE 3
MCAM PROCUREMENT

Line No.	Counterparty	Project	Technology	Expected COD	Expected IDD	Term (Years)	Size (MW)
1	Dynegy Marketing & Trade, LLC	MOSS 100	Lithium Ion	7/18/2021	10/1/2021	10	100
2	Diablo Energy Storage, LLC	Tranche 1	Lithium Ion	7/18/2021	10/1/2021	15	50
3	Diablo Energy Storage, LLC	Tranche 2	Lithium Ion	7/18/2021	10/1/2021	15	50
4	Diablo Energy Storage, LLC	Tranche 3	Lithium Ion	7/18/2021	10/1/2021	15	50
5	Gateway Energy Storage, LLC	Gateway Energy Storage	Lithium Ion	7/18/2021	10/1/2021	15	50
6	NextEra Energy Resources Development, LLC	Blythe Energy Storage 110	Lithium Ion	7/18/2021	10/1/2021	15	63
7	Coso Batter Storage, LLC	COSO Battery Storage	Lithium Ion	7/18/2021	10/1/2021	16	60
8	**Total**						**423**

In addition to approving the contracts, the Commission also approved PG&E's interim cost recovery request.[2] Specifically, PG&E requested it be allowed to recover the costs associated with bundled customer's procurement through the generation rate beginning in 2021 and continue to recover costs through the generation rate until the Commission determined permanent cost recovery in R.20-05-003. The interim cost recovery allowed PG&E to ensure the majority of the costs (93.7%) were recovered timely with deferred recovery relegated to an allocated portion (6.3%) of contract costs associated with the

[2] Resolution E-5100, OP 2 and 3.

opt-out LSEs, which was recorded to PG&E's Incremental Resource Adequacy Procurement Memorandum Account (IRAPMA).[3]

PG&E also submitted six additional energy storage contracts in Advice 6033-E on December 22, 2020, which the Commission approved in Resolution E-5140, effective April 15, 2021. Table 4 below summarizes the contracts approved in Resolution E-5140.[4]

TABLE 4
MCAM PROCUREMENT

Line No.	**Counterparty**	**Project**	**Technology**	**IDD**	**Term (Years)**	**Size (MW)**
1	Nexus Renewables U.S. Inc	Amcor	Lithium Ion	8/1/2022	15	27
2	Lancaster Battery Storage, LLC	Lancaster Battery Storag	Lithium Ion	8/2/2022	15	127
3	LeConte Energy Storage, LLC	LeConte Energy Storage	Lithium Ion	8/3/2022	15	40
4	Subtotal					194
5	North Central Valley Energy Storage, LLC	NCV Energy Storage	Lithium Ion	8/4/2023	15	132
6	Daggell Solar Power 2, LLC	Daggett 2 BESS	Lithium Ion	8/5/2023	15	46
7	Daggell Solar Power 3, LLC	Daggett 3 BESS	Lithium Ion	8/6/2023	15	15
8	Subtotal					193
9	**Total**					**387**

The MCAM procurement target is 767.8 MW and to date, PG&E has executed 13 contracts that are expected to deliver 810 MW of RA benefits, which is slightly over the 767.8 MW target. PG&E will not know until August of 2023 whether all the contracts will reach commercial operation by August of 2023. Thus, the forecast volumes above the target at this point provide a cushion for meeting the commercial operation target dates if certain resources' online dates are delayed and could provide a safety net to support any self-procuring LSEs that have a last-minute deficiency in meeting its 2022 or 2023 procurement targets.

Currently, the first six contracts submitted Advice 5826-E are now all online and delivering although some contracts did have delays in their commercial operational date. We have incurred costs since 2021, which have been split between the ERRA and the IRAPMA pursuant to PG&E's interim cost recovery proposal approved in Resolution E-5100, using the allocation percentages 93.7% allocation to ERRA and 6.3% allocation to IRAPMA.

The 2021 entries to ERRA and IRAPMA are currently being reviewed through the ERRA Compliance Proceeding, which reviews balancing account entries for compliance with

[3] See Preliminary Statement IF at https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_IF.pdf

[4] Amendments to the Nexus Renewables and NextEra North Central Valley System Reliability Contracts were submitted in Advice Letter 6658-E on July 20, 2022 and are pending Commission approval.

PG&E's tariffs and Commission directives. PG&E has provided a forecast for the MCAM contracts in the 2021 and 2022 ERRA Proceedings and the bundled portion was approved for recovery through the generation rate. PG&E's 2023 ERRA Forecast for the MCAM contracts was discussed in Chapter 12 of PG&E testimony, which assumed continued interim cost recovery through generation rates. The details the transition of the MCAM contract costs to rate recovery structure approved in D.22-05-015 are discussed in more detail in more detail in Sections 2 and 3 below.

2. **Bundled Cost Recovery and Transition to PCIA Recovery through the Portfolio Allocation Balancing Account**

OP 4 approves recovery of the bundled customer portion of the resource costs through the PCIA, effective based on the effective date of the Decision, which is May 19, 2022. The decision also affirms that the contracts costs will be vintaged as 2019 resources. PG&E records its balancing account entries on an accrual basis and most recently recorded accrual entries for the June business close. For ease of implementation, PG&E proposes to transition MCAM contract costs associated with the 2019 bundled customer load obligation to PCIA-eligible resource costs, on June 1, 2022, which is the first full month after the effective date of the decision.

Once the Commission approves the Ratemaking Implementation Plan included this advice letter, an allocated portion of MCAM contract costs associated with PG&E's bundled procurement obligation (93.7 percent), will be categorized as PCIA-eligible resource costs on a going forward basis, effective June 1, and will be recorded to the 2019 Vintage Subaccount in the Portfolio Allocation Balancing Account (PABA) using existing line item for bilateral contract obligations. In addition, PG&E will record a proportional share of the value of RA and RPS attributes retained for bundled customer compliance as a credit entry to the 2019 vintage subaccount as it would for any other 2019 PCIA-eligible resource. Also, pursuant to OP 4, a proportional share of the RA and RPS will be offered for sale (RA) or voluntary allocation (RPS) to LSEs that have vintage departing load customers for vintages 2019. The proportional share will be based on a mutually agreed to forecast of LSE's relevant departing load, i.e., for vintages 2019 or later. The net above market costs for the allocated portion of the MCAM contracts would then be included in vintage PCIA rates for customers departing 2019 or after.

As noted above, PG&E presented the bundled customer's portion of MCAM contract costs in its 2023 ERRA Forecast. Chapter 6 presented total MCAM contract cost and Chapter 12 presented the portion of costs that would have been recovered through the generation rate on an interim basis.

Given the directives in D.22-05-015, PG&E's MCAM Rate Implementation Plan proposes that for the portion of the MCAM contracts (93.7 percent) that are transitioning to PCIA-eligible resource costs be presented in the ERRA Forecast October Update for Chapter 12. That forecast would include the 2023 Forecast of the allocated portion of MCAM contracts that would be PCIA eligible and present the 2019 Vintage subaccount balance in PABA that is attributable to the MCAM contract costs for June 2022 – December 2022 entries. The MCAM Forecast for 2023 that PG&E presented in Chapter 12 is included in Confidential Attachment 3, which assumes all 7 contracts approved in Resolution E-5100 are online and delivering and all six contracts approved in Resolution E-5140 are online and delivering by the end of 2023.

PG&E proposes to present the ratemaking impacts for these contracts as part of its 2023 ERRA October Update, which will also include the net costs recorded to the 2019 vintage PABA Subaccount for the balance of 2022. The forecast costs for 2023 and amortization of the balance in the balancing account attributable to the MCAM procurement would be rolled into the 2023 PCIA revenue requirement presented in Chapter 11 and final rates presented in Chapter 22.

In terms of tariff modifications for the PABA, PG&E is planning on using the existing line items to record the resource costs and energy, RA, and RPS attribute values realized for the allocated portion of the MCAM resource. Thus, the only tariff modification for PABA is to the Purpose, which includes language from D.22-05-015 reflecting the addition of procurement targets authorized in D.19-11-016 and D.21-06-035 for bundled customers are now designated as PCIA-eligible resources, and are vintaged as 2019 resources and 2021 resources, respectively. Those tariff modifications are included in Attachments 1 and 2 to this advice letter.

3. <u>IRAPMA balance and MCAM Rate Implementation Timeline</u>

As discussed in the background section above, pursuant to OP 5, the new MCAM charge will apply to LSEs that opted-out self-procuring its procurement target established in D.19-11-016. The MCAM charge that will apply to the opt-out LSE customers reflects the cost PG&E incurred to procure the resources on behalf the opt-out LSEs, which is effectively paying for the cost of the MCAM capacity through the new non-bypassable MCAM rate. Additionally, in the future, if a self-procuring LSE is found to be deficient in meeting its procurement targets under either D.19-11-019 directives or D.21-06-035 directives, an MCAM charge applicable to deficient LSEs will apply to the LSE’s customers and may be based on a different set of contracts if a separate request for offer (RFO) solicitation is required to secure supply contracts to meet the deficiency. To date, PG&E has gotten no notice of deficiency for any of the self-procuring LSEs in its service territory.

For the opt-out LSEs, PG&E has been incurring costs and those cost have been recorded to the IRAPMA. PG&E originally had seven Energy Service Providers (ESP) and one Community Choice Aggregation (CCA) entity that opted out of self-procuring the D.19-11-016 targets and the total opt-out MW for these LSEs was set at 48.2 MW, which constituted 6.3 percent of the total procurement target, as was shown in Table 1 above.

After Decision 22-05-015 was issued, PG&E consulted with its ESP-Relations team to review the status and activity associated with the opt-out LSEs. PG&E ESP-relations team noted that by January 1, 2021, three of the original opt-out ESPs had ceased serving customers in California and transferred all their respective service accounts to either another LSE or to Transitional Bundled Service (TBS), served under the Transitional

Bundled Commodify Cost (TBCC) tariff.[5] By March 1, 2021, all former opt-out LSE customers served under the TBCC tariff had transitioned to be served by another LSE.

PG&E consulted with Energy Division regarding the three ESP that were no longer serving customers and it was determined that the total opt-out MW for these EPS was 1.2 MW. Pursuant to OP 10, the associated costs for LSEs that go bankrupt or are no longer serving load in California can be recovered through the regular CAM, which is recorded to the NSGBA and recovered through the NSGC. Revisions to the original procurement targets are reflected in Table 5 below, which reflects that 1.2 MW of the original 48.2 MW of opt-out procurement is associated with inactive LSEs.

TABLE 5
REVISED D.19-11-016 PROCUREMENT TARGETS FOR OPT-OUT LSES

Line No.	Procurement Obligation	MW	Percent of Total	50% Incremental Online 8/1/2021	25% Incremental Online 8/1/2022	25% Incremental Online 8/1/2023	100% Online 8/1/2023
1	PG&E Bundled	716.9	93.7%	358.5	179.2	179.2	716.9
2	Active Opt-Out LSEs	47.0	6.1%	23.5	11.75	11.75	47
3	Inactive Opt-Out LSEs	1.2	0.2%	0.6	0.3	0.3	1.2
4	**Total**	**765.1**	**100.0%**	**382.6**	**191.3**	**191.3**	**765.1**

In 2021, total costs recorded to the IRAPMA were $172,755 and in 2022 an additional $578,948 was recorded through the June 2022 month-end business close. The balance in the IRAPMA as of the June 30, 2022, is $751,703, including interest. The portion of MCAM contract costs that were allocated to IRAPMA were allocated using the original allocation factor of 6.3 percent for opt-out LSE procurement. The IRAPMA Subledger summary is included in Confidential Attachment 3.

PG&E's MCAM Implementation Plan is proposing that a new balancing account be established for the MCAM that is attributable to active opt-out LSEs and that a new MCAM subaccount be added to NSGBA for the portion of costs associated with the inactive ESPs' opt-out procurement. Once the Commission approves the MCAM implementation Plan in this advice letter, PG&E would transfer the costs from the IRAPMA to the MCAMBA and the new MCAM subaccount in the NSGBA using revised allocation factors that would split the costs proportionally based on the procurement targets 47 MW and 1.2 MW.

Once the costs in the IRAPMA have been transferred to the new MCAMBA and the new MCAM Subaccount in the NSGBA, PG&E proposes to retire the IRAPMA. Transferred

[5] PG&E's TBCC tariff provides a 60-day safe harbor to departing load customers when their LSE ceases service.

costs would remain MCAMBA and continue to be recorded to the MCAMBA through 2025, as described below.

Costs transferred to the MCAM Subaccount in the NSGBA can be implemented in 2023 CAM rates and the cost transfer will be approximately 2.5 percent of the IRAPMA balance, i.e., 1.2 MW / 48.2 MW = 2.5 percent. PG&E proposes to include a more detailed showing of the transferred costs and forecast costs for 2023 as part of its 2023 ERRA October Update.

The Preliminary Statement for the new MCAMBA and tariff revisions for the NSGBA the are included in Attachments 1 and 2 of this Advice Letter.

MCAM Administrative Costs and Schedule

To date, PG&E has not recorded any incremental administrative costs in the IRAPMA but with the issuance of D.22-05-015, PG&E's Billing and Information Technology (IT) implementation teams have more certainty to move forward with planning and programming needed to implement a new MCAM line item on the opt-out customers' bill.

The discussion in D.22-05-015 indicates a preference for a presentation of the MCAM revenues like SCE's "fast lane" presentation, which is similar to SCE's presentation of its CAM revenues. PG&E does not have a similar section on its bill that allows flexibility to provide a customized breakout for subcomponents of the revenues. PG&E's proposal will instead be to simply present a separate line item for MCAM revenues on page 3 of the customer's energy statement.

A mock-up of PG&E's Energy Statement has not yet been finalized however, PG&E plans to display the new MCAM line item on customers' bills as "Modified CAM." The definition for the new "Modified CAM" will be added to page 2 of the bill, also referred to as "back-of-the-bill" and a proposed definition is:

> Modified CAM: Recovers incremental system reliability costs procured by PG&E for customers of load-serving entities that opted out or are short of their of procurement obligations required by the Commission.

PG&E proposes to provide Energy Division an example or mock-up of the Energy Statement as PG&E gets closer to implementation of the MCAM, sometime in 2025.

The current schedule for completing this work is by mid-year 2025 with the first month for implementation expected to be July 1, 2025. The forecast budget for the Billing and IT implementatin work is $3.5 million - $5 million. The costs for implementing the billing and programing work associated with the new MCAM will be amortized over a reasonable period (24 to 36 months) and will be split between opt-out LSEs and other deficient LSEs required that pay the MCAM, if any.

PG&E's 2025 ERRA Forecast would propose specific ratemaking for the MCAM rate along with a proposed amortization period for the implementation costs.

<u>Tariff Revisions for Summer Reliability Procurement authorized in D.21-03-056 and 21-12-015 for Summer 2022 and Summer 2023</u>

In addition to tariff modifications implementing the directives of the MCAM Decision, D.22-05-015, this advice letter requests approval tariff modifications to Preliminary Statement FS - NSGBA, Preliminary Statements HS – PABA, and Preliminary Statement CP – ERRA to include reference to the Commission's updated "Summer Reliability Procurement" authorized D.21-12-015 for Summer 2022 and Summer 2023.
Most revisions are in NSGBA, Preliminary Statement FS, which has four subsections in the System Reliability Incremental Procurement Subaccount, which describe the procurement transactions authorized to meet the original and updated procurement targets for emergency and summer reliability. The revisions to these existing line items either add a citation to D.21-12-015 where the Commission updated the incremental procurement targets for Summer 2022 and Summer 2023 or replace a citation to D.21-03-056. PG&E also expanded the "Purpose" Section of the preliminary statement to include a list of directives that govern the incremental summer/emergency reliability procurement.

The original summer reliability entries in these preliminary statements cited to the initial authorizations approved in D.21-02-028 and D.21-03-056. D.21-12-015 instructed the IOUs to solicit additional resources for summers 2022 and 2023, including a new target range of 900 MW to 1,350 MW for PG&E for each of the June – October summer months of 2022 and 2023. Resource types to be considered for procurement include Resource Adequacy (RA)-only contracts and incremental capacity from revised power purchase agreements. Import Energy contracts also continue to be procured to meet the updated summer reliability targets.

The ERRA, Preliminary Statement CP and the PABA, Preliminary Statement HS have no more than three line items that deal with transfers of RA costs and benefits between PABA or ERRA to the NSGBA when either existing bundled or PCIA-eligible resources are available (in excess) and can support the summer reliability targets recovered in the NSGBA or when summer reliability incremental procurement is used to support bundled customer compliance needs (transfer to ERRA only).

PG&E has also updated ERRA "Purpose" section to provide a complete list of procurement-related balancing accounts which generally correspond to a specific technology type or transaction type that are recovered in procurement-related non-bypassable charge balancing accounts and therefore, naturally excluded from ERRA.

PG&E requests that the Commission approve these clarifying tariff revisions.

Tariff Revisions

As discussed above, Clean and redline versions of PG&E's new MCAMBA, and revisions to the Preliminary Statements FS, HS, and CP are included in Attachments 1 and 2, respectively.

Protests

Pursuant to CPUC General Order 96-B, Section 7.5.1, PG&E hereby requests the protest period be waived.

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective concurrent with original Advice Letter 6654-E, which is August 17, 2022.

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 lists for R.20-05-003 and A.22-05-029. 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

Attachments
- Attachment 1 – Tariffs
- Attachment 2 – Redline Tariffs
- Attachment 3 – Redacted Attachment
- Attachment 4 – Confidentiality Declaration

cc: Service Lists R.20-05-003 and A.22-05-029

California Public Utilities Commission

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 E)

Utility type:
☑ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho
Phone #: (415) 973-8794
E-mail: PGETariffs@pge.com
E-mail Disposition Notice to: AMHP@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) #: 6654-E-A

Tier Designation: 2

Subject of AL: Supplemental: Rate Implementation Plan Pursuant to Decision 22-05-015 to Implement Cost Recovery Associated with Reliability Contracts Procured to Meet the Modified Cost Allocation Mechanism Targets Established in Decision 19-11-016 and Mid-Term Reliability Targets Established in D.21-06-035.

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.19-11-016, D.21-06-035

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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 & Matrix Attachment
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: Donna Barry, DLBf@pge.com

Resolution required? ☐ Yes ☑ No

Requested effective date: 8/17/22

No. of tariff sheets: 22

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: See Attachment 1

Service affected and changes proposed[1]: N/A

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

[1]Discuss in AL if more space is needed.

Clear Form

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: Sidney 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: (415)973-3582
Email: PGETariffs@pge.com

Contact Name:
Title:
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Clear Form

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CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA)

1. PURPOSE: The purpose of the Energy Resource Recovery Account (ERRA) is to record and recover power costs, associated with PG&E's authorized procurement plan, and California Public Utilities Code § 454.5(d)(3). Power costs recorded in ERRA are applicable solely to PG&E's bundled customers while power costs incurred on behalf of both bundled and departing load customers are recorded in the Portfolio Allocation Balancing Account, the Modified Transition Cost Balancing Account (MTCBA), the New System Generation Balancing Account (NSGBA), the BioMAT Non-bypassable Charge Balancing Account (BNBCBA), the Tree Mortality Non-bypassable Charge Balancing Account (TMNBCBA), and the Public Policy Charge Procurement Subaccount (included in the Public Policy Charge Balancing Account (PPCBA)). (T)

(Continued)

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) (Cont'd.)

2. APPLICABILITY: The ERRA shall apply to all customer classes, except for those specifically excluded by the Commission.

3. REVISION DATES: Disposition of the balance in the account shall be through the Annual Electric True-Up advice letter process, as authorized by the CPUC in the annual ERRA Forecast proceeding or an ERRA Trigger Application, including the provision that disposition of the year-end balance shall be to the PABA upon submission (where a Tier 1 advice letter is currently required) or approval (where a Tier 2 advice letter is currently required) by the Commission of the applicable compliance advice letter addressing such balance.

4. RATES: The ERRA rate is set forth in electric Preliminary Statement Part I. (L)

5. ACCOUNTING PROCEDURES: The CPUC-jurisdictional portion of all entries shall be made at the end of each month, or as applicable, excluding the allowance for Revenue Fees and Uncollectible (RF&U) Accounts expense, as follows:

Customer Billed Revenue Entries:

a) A credit entry equal to the revenue from the generation rates less the recorded revenues from the: (1) PCIA rates (as defined in Part I of PG&E's electric Preliminary Statement (PS)), (2) Power Charge Collection Balancing Account (as defined in Part I of PG&E's electric PS), (3) DWR Franchise Fees (as defined in Part I of PG&E's electric PS);

b) A credit entry equal to revenues received from Electric Schedule TBCC, (Transitional Bundled Commodity Cost); (L)

(Continued)

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd)

Retained RPS and RA Value Entries:

c) A debit entry equal to the Retained Renewable Portfolio Standard (RPS) Value, determined using the most current Commission-adopted RPS Adder, multiplied by Actual Retained RPS quantities. A corresponding credit entry equal the Retained RPS Value is recorded in PABA, MTCBA, and the BNBCBA.

d) A debit or credit entry to true-up the Retained RPS Value, determined using the Forecast RPS Adder to the Retained RPS Value using the Final RPS Adder. A corresponding credit or debit entry equal to the true-up of the Retained RPS Value is recorded in PABA, MTCBA, and the BNBCBA.

e) A debit entry equal to the Retained Resource Adequacy (RA) Value, determined using the most current Commission-adopted RA Adder, multiplied by the Actual Retained RA quantities. A corresponding credit entry equal to the Retained RA Value is recorded in PABA, MTCBA, and the BNBCBA.

f) A debit or credit entry to true-up the Retained RA Value, (L)
determined using the Forecast RA Adder to the Retained RA Value I
using the Final RA Adder. A corresponding credit or debit entry I
equal to the true-up of the Retained RA Value is recorded in PABA I
and MTCBA. (L)

(Continued)

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd)

(L)
(L)

g) A credit entry to transfer an allocated portion of the cost for import capacity rights to the NSGBA if PG&E uses existing PGE-owned import allocation rights to meet the updated procurement targets (T) pursuant to D.21-02-028 or D.21-03-056, and D.21-12-015. The (T) credit entries will be based on either the average price PG&E received for sales of its excess maximum import capability or, if not available or representative of market value, another reasonable market benchmark.

h) A debit entry to reflect the resource adequacy (RA) value of procurement originally directed in the Emergency Reliability proceeding, Rulemaking 20-11-003 and Rulemaking 21-10-002 , (T) including resources procured pursuant to D.21-02-028, D.21-03-056, I and D.21-12-015, that are transferred to ERRA to meet bundled (T) service RA compliance requirements. The contract costs and energy benefits of the Emergency and Summer Reliability procurement, if (T) any, will continue to be allocated to all benefitting customers through the NSGBA.

System RA Value Transferred to the New System Generation Balancing Account (NSGBA):

i) A credit entry equal to the value of RA that is excess or unsold RA capacity and that is transferred to the System Reliability Incremental Procurement Subaccount of NSGBA in order to meet the updated (T) procurement targets pursuant to D.21-12-015, after having made (T) reasonable attempts to sell excess capacity to other load-serving entities to meet their 15% planning reserve margin. The credit entry will use the most current market price benchmark for system RA, which is approved in the annual ERRA Forecast, and used to value RA capacity in the PCIA calculation.

Utility-Owned Generation Related Entries:

j) A debit or credit entry, as appropriate, to record ESA costs associated with bundled customer portfolio/procurement activity (which is embedded in the annual authorized revenue requirements associated with PG&E's owned generation).

CAISO Related Entries:

k) A debit or credit entry equal to the net charges or revenues for energy associated with load and generating resources recovered in ERRA and the New System Generation Balancing Account (NSGBA);

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT

1. PURPOSE: The purpose of the New System Generation Balancing Account (NSGBA) is to record the benefits and the costs of Power Purchase Agreements (PPAs) associated with generation resources for which the Commission has determined that the costs and benefits will be allocated to all benefitting customers, including bundled service, Direct Access, and Community Choice Aggregation customers. Subaccounts shall be established in the NSGBA for each PPA associated with an eligible generation resource or a category of generation resources for which net capacity costs have been identified as recoverable on a non-bypassable basis.

   Pursuant to Decision (D.) 20-06-002, Ordering Paragraph (OP) 17, a Centralized Local Procurement Subaccount (CLPSA) is established to facilitate cost recovery of procurement and administrative costs PG&E incurs in its role as the Central Procurement Entity (CPE) through the New System Generation Charge (NSGC). The net capacity cost associated with the procurement of CLPSA-eligible resources will be equal to the costs of the contracted resource or utility-owned generation (UOG) resource, including fuel and expense associated with greenhouse gas (GHG) compliance, net of actual revenue and cost the generation resources receive in the California Independent System Operator Corporation's (CAISO) energy and ancillary market is recoverable through the NSGC. The administrative cost associated with PG&E's CPE role is also recoverable through the NSGC pursuant to D. 20-06-002.

   Pursuant to D.20-12-006, OPs 3 – 6, the Commission approved a local capacity requirement reduction compensation mechanism (LCR RCM) for new preferred and energy storage resources, and certain combinations of hybrid preferred resources and energy storage resources, including new utility-owned resources that have executed contracts on or after June 17, 2020.

   Summer Reliability: D.21-02-028 and D.21-03-056 authorized the IOUs to continue their procurement efforts and endeavor to meet and exceed their respective incremental procurement targets to achieve an effective 17.5 percent planning reserve margin (PRM) for the months of May through October 2021 and 2022. Increasing the PRM from 15 percent to an effective 17.5 percent results in a minimum incremental procurement target of 450 megawatts (MW) for PG&E. The Decision states that resource adequacy (RA) resources in excess of an IOU's 15 percent PRM should be charged to all benefiting customers in the IOU's service territory via the CAM and authorizes the IOUs to acquire and pair imports with maximum import capability to be included in CAM procurement costs. (N)

   Summer Reliability: D.21-12-015 instructed the IOUs to solicit additional resources for summers 2022 and 2023, including a new target range of 900 MW to 1,350 MW for PG&E for each of the June – October summer months of 2022 and 2023. Resource types to be considered for procurement include Resource Adequacy (RA)-only contracts and incremental capacity from revised power purchase agreements. Also, D.21-12-015, OP 13 ordered the IOUs to seek DR RA Resources from third-party Demand Response Providers (DRPs) through a "bilateral" contracting process.

   Modified Cost Allocation Mechanism: Pursuant to D.22-05-015, OP 10, the Commission authorizes recovery of opt-out or backstop procurement. In the event that a non-investor-owned-utility (IOU) load serving entity (LSE) declares bankruptcy or ceases providing retail service in California and has a capacity obligation under D.19-11-016 or D.21-06-035 and their retail customers are paying for capacity under the modified cost allocation mechanism (MCAM) adopted in 22-05-015. OP 10 provides that the capacity shall revert to the relevant IOU, with the costs of the associated procurement allocated thereafter using the Cost Allocation Mechanism detailed in Decision 06-07-030. (N)

(L)

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

2. APPLICABILITY: The NSGBA shall apply to all benefiting customers and customer classes, except for those specifically excluded by the Commission. (L)

3. REVISION DATES: The balancing account shall be trued-up annually.

4. RATES: The Cost Allocation Methodology (CAM) rate recovers the net capacity costs associated with NSGBA resources and is set forth in the applicable customer rate schedules.

5. ACCOUNTING PROCEDURES: The CPUC-jurisdictional portion of all entries shall be made at the end of each month as follows:

   a) Revenues – the following entry reflects the revenue entry equal to the CAM rate recovering net capacity costs from all CAM-eligible resources.

      A credit entry equal to the revenue from the CAM rate from non-exempt retail customers during the month, excluding the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense;

   b) Net Capacity Costs - the following entries reflect the net capacity costs associated with eligible resources, by subaccount:

      1. QF/CHP Program Subaccount

         i. A debit entry equal to the capacity and energy costs for eligible QF/CHP Program contracts;

         ii. A credit entry equal to the energy revenues as established in Appendix A of D.07-09-044, Section IX.B.2 for eligible QF/CHP Program contracts.

         iii. Total QF/CHP Program net capacity costs are equal to the sum of lines 5.b.1.i and 5.b.1.ii. (L)

      2. Marsh Landing Power Purchase Agreement (PPA) Subaccount

         i. A debit entry equal to the capacity and energy costs for the Marsh Landing PPA;

         ii. A credit entry equal to the energy revenues, if any, as established in Appendix A of D.07-09-044, Section IX.B.2 for the CAM-eligible Marsh Landing PPA.

         iii. Total Marsh Landing PPA net capacity costs are equal to the sum of lines 5.b.2.i and 5.b.2.ii.

      3. Vistra Moss Landing Energy Storage Resource Adequacy Agreement (ESRAA) Subaccount

         i. A debit entry equal to the contract costs (e.g. capacity and any other charges under the terms of the contract) for the Vistra Moss Landing ESRAA;
         ii. A debit entry equal to the costs to charge the battery;
         iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the CAM-eligible Vistra Moss Landing ESRAA:

(L)
(L)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

b) Net Capacity Costs (Cont'd)

4. Hummingbird Energy Storage Resource Adequacy Agreement (ESRAA) Subaccount (L)

   i. A debit entry equal to the contract costs (e.g. capacity and any other charges under the terms of the contract) for the Hummingbird ESRAA;
   ii. A debit entry equal to the costs to charge the battery;
   iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the CAM-eligible Humminbird ESRAA:

5. mNOC AERS Behind-the-Retail Meter Capacity Storage Agreement (BTM CSA) Subaccount

   i. A debit entry equal to the contract costs (e.g. capacity and any other charges under the terms of the contract) for the mNOC AERS BTM CSA;
   ii. A debit entry equal to the costs to charge the battery;
   iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the CAM-eligible mNOC AERS BTM CSA:

6. Elkhorn Energy Storage Facility Subaccount

   i. A debit entry equal to the revenue requirement associated with operations and actual capital costs incurred related to the Elkhorn project up to the adopted amount. Capital related revenue requirements include depreciation expense, the return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
   ii. A debit entry equal to the costs to charge the battery;
   iii. A credit entry equal to the CAISO market revenues received, net of any charges, for the CAM-eligible Elkhorn Energy Storage Facility: (L)

7. Centralized Local Procurement Subaccount

   i. A debit/credit entry equal to the capacity, fuel, and GHG compliance costs for non-utility contract resources procured by the CPE, including any LCR RCM payments made to preferred resources and energy storage resources pursuant to D.20-12-006;

   ii. A debit/credit entry equal to the capacity, fuel, and GHG compliance costs for PG&E contract resources procured by the CPE, including any LCR RCM payments made to preferred resources and energy storage resources pursuant to D.20-12-006;

   iii. A debit/credit entry equal to the authorized revenue requirement, fuel costs, and GHG compliance costs, if any, for PG&E UOG resources procured by the CPE , including any LCR RCM payments made to preferred resources and energy storage resources pursuant to D.20-12-006;

   iv. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges received by the buyer from the seller as defined in the contract terms and conditions associated with non-utility and PG&E contract resources and PG&E UOG resources procured by the CPE;

(L)
(L)

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

b) Net Capacity Costs (Cont'd)

7. Centralized Local Procurement Subaccount (Cont'd) (L)

v. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to non-utility and PG&E contract resources and PG&E UOG resources procured by the CPE;

vi. A debit entry equal to costs incurred by PG&E (acting as the CPE) as a result of deferring the procurement of local resource(s) and utilizing the California Independent System Operator's (CAISO's) backstop mechanisms.

vii. Administrative costs associated with the CPE role, including but not limited to employee and consultant costs, legal fees, technology systems costs, and credit-related costs associated with CPE procurement of non-utility contracted resources and PG&E contracted resources, including pre-payments and credit and collateral payments, including all associated fees , associated with PG&E's role as the designated CPE in its distribution service area.

viii. Total net capacity costs are equal to the sum of lines 5.b.3.i, 5.b.3.ii, 5.b.3.iii., 5.b.3.iv, 5.b.3.v, 5.b.3.vi, and 5.b.3.vii. (L)

8. Modified Cost Allocation Mechanism Subaccount (N)

i. A debit entry equal to the opt-out and backstop resource costs associated with MCAM procurement where the LSE is no longer serving customers in PG&E's service territory (e.g., capacity and energy, if applicable, under the terms of the contract).

ii. A debit entry equal to any associated fuel costs for the MCAM resource.

iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the MCAM resource, including costs to charge the resource if it is a battery storage resource.

iv. A credit entry for the RPS attribute at the price established for RPS attributes subject to voluntary allocation in D.21-05-030. The MCAM RPS attributes, if any, will be included in the next available round of the voluntary allocation process associated with the current renewables portfolio standard (RPS) compliance implemented in Rulemaking 18-07-003. (N)

(L)
(L)

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.) (L)

b) Net Capacity Costs (Cont'd)

9. System Reliability Incremental Procurement

A. Amendments to Existing Purchase Power Agreements for Incremental Energy

i. A debit/credit entry equal to the incremental energy costs for 10 amended contracts authorized in D.21-02-028 and approved in Advice Letter 6088-E, and incremental energy costs for contract amendments that support updated Summer Reliability Targets for Summer 2022 and Summer 2023, as authorized in D.21-12-015 which will deliver incremental energy during a CAISO system emergency or Flex Alert including administrative costs associated with the procurement (e.g., Independent Evaluator expenses); (L) (L)/(T) (L)/(T) (L)

ii. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges during the time the contract is delivering incremental energy;

iii. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to contract resources during the time the contract is delivering incremental energy.

B. Firm Import Energy (L) (L)/(T)

i. A debit/credit entry equal to the energy costs for two firm energy import agreements authorized in D.21-02-028 and approved in Advice Letter 6089-E, and energy costs for import energy that support updated Summer Reliability Targets for Summer 2022 and Summer 2023, as authorized in D.21-12-015, including administrative costs associated with the procurement (e.g., Independent Evaluator expenses). (L) (L)/(T) (L)/(T) (L)

ii. A debit entry to record the costs resulting from the transfer of allocated portion of the import capacity rights to the NSGBA, pursuant to D.21-03-056, related to the use of existing import capacity rights to meet procurement targets in D.21-03-056 and updated procurement targets for Summer 2022 and Summer 2023 as authorized in D.21-12-015. Debit entries will be based on either the average price PG&E received for sales of its excess maximum import capability or, if not available or representative, another reasonable market benchmark. (L) (L)/(T) (L)/(T) (L)

iii. A debit entry to record the costs associated with procured import capacity rights pursuant to D.21-03-056 related to the use of import capacity rights to meet procurement targets in D.21-03-056, and updated procurement targets for Summer 2022 and Summer 2023 as authorized in D.21-12-015.

iv. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges during the time the contract is delivering energy. (L)/(T) (L)

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

b) Net Capacity Costs (Cont'd)

9. System Reliability Incremental Procurement

B. Firm Import Energy (cont'd)

v. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to contract resources during the time the contract is delivering energy. (T)/(L) (L) I (L)

C. System Reliability Procurement authorized in D.21-03-056 and D.21-12-015

i. A debit/credit entry for procurement costs authorized in D.21-03-056 and D.21-12-015 – but not already included in Sections A and B of this subaccount above – to reach the updated 900 – 1,350 MW incremental target above PG&E's existing 15% planning reserve margin and any administrative costs associated with the incremental procurement (e.g., Independent Evaluator expenses) for Summer 2022 and Summer 2023. (L)/(T) (T) (T) (L) (L) (L)/(T)

(D) I I I I I I (D)

iI. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges during the time the contract is delivering incremental energy. (T)

iii. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to contract resources during the time the contract is delivering incremental energy. (T)

D. Transfer of Resource Adequacy Value for System Reliability Incremental Procurement to ERRA from NSGBA and/or transfer of Excess RA Capacity from Other Accounts to NSGBA to meet System Reliability Incremental Procurement Targets.

i. A credit entry to transfer to ERRA costs associated with the value of RA capacity for procurement ordered as a result of the Emergency Reliability proceeding, Rulemaking 20-11-003, including contracts procured pursuant to D.21-02-028, D.21-03-056, and D.21-12-015, in the months when such contracts are used to meet bundled service customers RA compliance requirements. Energy costs and benefits associated with contracts procured pursuant to D.21-02-028, D.21-03-056, and D.21-12-015, will continue to be allocated to all benefitting customers through the NSGBA. (T) (T)

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

b) Net Capacity Costs (Cont'd)

9. System Reliability Incremental Procurement (Cont'd)

D. Transfer of Resource Adequacy Value for System Reliability Incremental Procurement to ERRA from NSGBA and/or transfer of Excess RA Capacity from Other Accounts to NSGBA to meet System Reliability Incremental Procurement Targets. (Cont'd) (L)

ii. A debit entry to record costs associated with the value of the RA capacity transferred from PABA, ERRA, or the Modified Cost Allocation Mechanism Balancing Account (MCAMBA) that are excess or unsold RA capacity or proxy RA resources. The RA capacity value recorded in NSGBA reflects the use of the capacity to meet the updated system reliability incremental procurement targets pursuant to D.21-03-056 and D.21-12-015, after having made reasonable attempts to sell excess capacity to other load-serving entities to meet their 15% RA planning reserve margin requirements. The debit entry will be calculated using the most current market price benchmark for system RA approved in the annual ERRA Forecast, which is used to calculate the value of RA in the Power Charge Indifference Amount (PCIA) calculation. (L)/(T)

c) Interest – the following entry equals the interest applied to the sum of revenues and net capacity costs for each subaccount for the month. (L)

1. A monthly entry equal to interest on the average balance in the sum of the subaccounts at the beginning of the month and the balance in the sum of the subaccounts after the above entries, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (L)

(Continued)

HS. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)

1. PURPOSE: The purpose of the PABA is to record the “above-market” costs of all generation resources that are eligible for recovery through Power Charge Indifference Adjustment (PCIA) rates.

   The PABA is comprised of subaccounts for each year’s vintage portfolio resources, that records the costs, market revenues, and imputed revenues of all generation resources executed or approved by the Commission for cost recovery that year. Amounts will include costs related to contracts executed with third parties and utility-owned generation.

   Pursuant to Decision (D.) 20-06-002 issued in the Generation Resource Adequacy Rulemaking, (R.) 17-09-020, on Central Procurement, the Commission determined that PG&E contracts and utility-owned generation (UOG) resources can be procured by the Central Procurement Entity (CPE) and be reclassified to be recovered through the New System Generation Charge (NSGC) and recorded to the Centralized Local Procurement Subaccount (CLPSA) of the New System Generation Balancing Account (NSGBA) for the term of the CPE contract. At the end of the CPE contract term, the resource would be reclassified back to its original cost recovery mechanism, which in the case of a PCIA-eligible resource would be a PABA vintage subaccount. Pursuant to D.20-06-002, PCIA-eligible resources that are reclassified from NSGC back to PCIA will be exempt from the PCIA rate cap authorized in D.18-10-019.

   Decision 22-01-023 modified the ERRA Trigger calculation to consider ERRA balances net of the PABA balances when calculating over- or under-collected amounts that are above the 4 percent trigger and are forecast to exceed the 5 percent threshold.

   In D.22-01-023, the Commission authorized disposition of the year-end ERRA balances via a transfer to the most recent vintage PABA subaccount.

   Decision 22-05-015, OP 4, provides that any above-market costs associated with the Modified Cost Allocation Mechanism procurement ordered in D.19-11-016 done on behalf of bundled customers shall be assigned a 2019 vintage and D.21-06-035, OP 12, provides that procurement done on behalf of bundled customers will be assigned a 2021 vintage. Procurement ordered in these decisions will be recovered from bundled and departing load customers of non-IOU LSEs through the PCIA. (N)

2. APPLICABILITY: The PABA shall apply to all customer classes, except for those specifically excluded by the Commission.

3. REVISION DATES: Disposition of the balance in the account shall be through the Annual Electric True-Up advice letter process, as authorized by the CPUC in the annual ERRA forecast proceeding or an ERRA Trigger Application, including the provision that disposition of the year-end balance in the ERRA shall be to the PABA upon submission (where a Tier 1 advice letter is currently required) or approval (where a Tier 2 advice letter is currently required) by the Commission of the applicable compliance advice letter addressing such balance.

4. RATES: PABA rates are included in the effective rates set forth in each rate schedule.

5. ACCOUNTING PROCEDURES: The PABA consists of two types of subaccounts:

   “Legacy Utility Owned Generation Subaccount” records and recovers the above market costs associated with adopted revenue requirements related to PG&E-owned generation installed before 2002 (“Legacy UOG”), including capital and related non-fuel operating and maintenance expenses. Legacy UOG includes PG&E’s hydroelectric and nuclear generation facilities.

   “Vintage Subaccounts” record and recover the above market power costs associated with PG&E’s authorized procurement plan by vintage. Power costs recorded in each vintage subaccount include, but are not limited to, fuel and greenhouse gas (GHG) costs, third party power purchase contracts, and utility owned generation revenue requirements. These costs are offset by CAISO generation revenues, forward sales revenues, and PCIA revenues from customers assigned to the vintage subaccount. Note that each year beginning with 2009 has its own vintage subaccount. Resources are assigned to a vintage portfolio based on the year the generation resource commitment is made (i.e., contract execution date or Commission approval of UOG construction) and customers are assigned to a vintage based on their departure date. Customers who depart before July 1 of a given year are assigned to the prior year’s vintage.

(Continued)

HS. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)

5. ACCOUNTING PROCEDURES: (Cont'd.)

Retained RPS and RA Value Entries:

h. A credit entry equal to the Retained RPS Value, determined using the most current Commission-adopted RPS Adder multiplied by Actual Retained RPS quantities. A corresponding debit entry equal to the Retained RPS Value is recorded in ERRA.

i. A debit or credit entry to true-up the Retained RPS Value, determined using the Forecast RPS Adder to the Actual Retained RPS Value using the Final RPS Adder. A corresponding credit or debit entry equal to the true-up of the Retained RPS Value is recorded in ERRA.

j. A credit entry equal to the Retained RA Value, determined using the most current Commission-adopted RA Adder, multiplied by the Actual Retained RA quantities. A corresponding debit entry equal to the Retained RA Value is recorded in ERRA.

k. A debit or credit entry to true-up the Retained RA Value, determined using the Forecast RA Adder to the Retained RA Value using the Final RA Adder. A corresponding credit or debit entry equal to the true-up of the Retained RA Value is recorded in ERRA.

System RA Value Transferred to the System Reliability Incremental Procurement Subaccount in New System Generation Balancing Account (NSGBA):

l. A credit entry equal to the value of RA capacity that is excess or unsold RA capacity that is transferred to the System Reliability Incremental Procurement Subaccount of NSGBA and (T)
used to meet the updated system reliability incremental procurement targets pursuant to (T)
D.21-12-015, after having made reasonable attempts to sell excess capacity to other load-serving entities to meet their 15% planning reserve margin. The credit entry will use the most current market price benchmark for system RA approved in the Annual ERRA Forecast, which is used to calculate the value of RA capacity in the PCIA calculation.

Utility-Owned Generation Related Entries:

m. A debit entry equal to one-twelfth of the electric generation portion of revenue requirement associated with the CPUC authorized pension contribution amount.

n. A debit entry equal to the annual authorized revenue requirements associated with PG&E's owned generation divided by twelve, excluding PCIA-eligible UOG resource costs that have been procured by the Central Procurement Entity (CPE) for recovery through the New System Generation Charge (NSGC) and recorded to the Centralized Local Procurement Subaccount (CLPSA) of the New System Generation Balancing Account (NSGBA).

o. A debit or credit entry, as appropriate, to record ESA costs associated with PCIA eligible generation resources portfolio/ procurement activity (which is embedded in the annual authorized revenue requirements associated with PG&E's owned generation).

p. A debit or credit entry, as appropriate, to record the gain or loss on the sale of an electric generation non-depreciable asset, as approved by the CPUC.

q. A debit entry equal to one-twelfth of the annual authorized revenue requirement for the Diablo Canyon Power Plant Employee Retention Program (see corresponding entry in the Employee Retention Subaccount of the Diablo Canyon Retirement Balancing Account (DCRBA) per Preliminary Statement HK, 5b.1).

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART JN Sheet 1
MODIFIED COST ALLOCATION MECHANISM BALANCING ACCOUNT

JN. Modified Cost Allocation Mechanism Balancing Account (N)

1. PURPOSE: The purpose of the Modified Cost Allocation Mechanism Balancing Account is to track and record the contract costs and market value of the energy and RPS attributes, if any, related to the procurement of incremental resource adequacy (RA) capacity required by CPUC Decision (D.) 19-11-016 and D.21-06-035, including any related administrative costs that are not otherwise recovered in rates. Such costs may include: (1) procurement expense for incremental RA capacity allocated to load-serving entities (LSE) that have opted-out of self-procurement or have deficiencies in meeting the self-procurement targets requiring PG&E to purchase backstop procurement on the LSEs' behalf, and (2) incremental administrative costs associated with the procurement such an the independent evaluator consulting costs and administrative costs associated with implementing the billing system modifications needed to bill these customers. The MCAMBA will not include cost or benefits recorded and recovered in another account. (N)

2. The MCAMBA will have subaccounts where the first subaccount will be exclusively for tracking net capacity costs associated for LSEs that opted-out of procuring its D.19-11-016 procurement targets.

3. Subsequent subaccounts may be added if the Commission orders that PG&E perform backstop procurement for self-procuring LSEs that fail to meet its procurement target and are deemed deficient. The number of Deficient LSE Subaccounts will be dependent on the number and timing of the self-procuring LSEs' deficiency. Where possible, PG&E will look to pool the incremental procurement together to cover as many deficient LSEs as possible.

4. APPLICABILITY: The MCAMBA shall apply to the LSE customer classes where the LSE opted out of the procurement required in D.19-11-016 and self-procuring LSEs customers where the LSE has been found to have deficiencies in meeting its procurement targets established by D.19-11-016 and D.21-06-035 requiring PG&E to purchase backstop procurement to satisfy the procurement targets set by the Commission.

5. REVISION DATE: Disposition of the balances in the account shall be as authorized by the Commission.

6. RATES: The MCAMBA will have separate rate components for customers of the opt-out LSEs and potentially separate MCAMBA rate components for customers of Deficient LSEs. The number of Deficient LSE MCAMBA rate components will depend on the timing of the procurement done on behalf of the deficient LSE(s). (N)

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART JN Sheet 2
MODIFIED COST ALLOCATION MECHANISM BALANCING ACCOUNT

JN. Modified Cost Allocation Mechanism Balancing Account (N)

7. ACCOUNTING PROCEDURE: The following entries will be made each month, or as applicable: (N)

a. <u>D.19-11-016 Opt-Out LSE Subaccount</u>

1. Revenues – the following entry reflects the revenue entry for Opt-out LSE customers equal to the MCAM rate recovering an allocated portion of net capacity costs.

   i. A credit entry equal to the revenue from the MCAM rate from Opt-out LSE customers during the month, excluding the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

2. Net Capacity Costs - the following entries reflect the net capacity costs associated with eligible resources in this subaccount:

   i. A debit entry equal to the Opt-out LSE resource costs associated with MCAM procurement (e.g., capacity and energy, if applicable, under the terms of the contract).

   ii. A debit entry equal to any associated fuel costs for the Opt-out MCAM resources.

   iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the Opt-out MCAM resources, including costs to charge the resources if it is a battery storage resource.

   iv. A credit entry for the RPS attribute at the price established for RPS attributes subject to voluntary allocation in D.21-05-030. The Opt-out MCAM resources' RPS attributes, if any, will be included in the next available round of the voluntary allocation process associated with the current renewables portfolio standard (RPS) compliance implemented in Rulemaking 18-07-003.

3. System RA Value Transferred to the New System Generation Balancing Account (NSGBA):

   i. A credit entry equal to the value of the proxy RA resource that is transferred to the System Reliability Incremental Procurement Subaccount of the NSGBA to meet the incremental system reliability procurement targets pursuant to D.21-03-056 and D.21-12-015. The credit entry will use the most current market price benchmark for system RA capacity, which is approved in the Annual Energy Resource Recovery Account (ERRA) Forecast and used to value RA capacity in the Power Charge Indifference Amount (PCIA) calculation. (N)

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART JN Sheet 3
MODIFIED COST ALLOCATION MECHANISM BALANCING ACCOUNT

JN. Modified Cost Allocation Mechanism Balancing Account (N)

7. ACCOUNTING PROCEDURE: (Cont'd) (N)

a. D.19-11-016 Opt-Out LSE Subaccount (Cont'd)

4. Interest

a. An entry equal to interest on the average balance in the subaccount at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

b. Deficient LSE Subaccount

1. Revenues – the following entry reflects the billed revenue entry equal from customers for the MCAM Deficiency rate recovering net capacity costs for a pool of deficient LSEs.

i. A credit entry equal to the revenue from the MCAM Deficiency rate from Deficient LSE customers during the month, excluding the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense.

2. Net Capacity Costs - the following entries reflect the net capacity costs associated with eligible resources in this subaccount:

i. A debit entry equal to backstop resource costs associated with MCAM procurement done on behalf of Deficient LSE(s) (e.g., capacity and energy, if applicable, under the terms of the contract).

ii. A debit entry equal to any associated fuel costs for the MCAM resource for Deficient LSE(s).

iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the MCAM resource of Deficient LSE(s), including costs to charge the resource if it is a battery storage resource.

iv. A credit entry for the RPS attribute at the price established for RPS attributes subject to voluntary allocation in D.21-05-030. The MCAM RPS attributes of Deficient LSE(s), if any, will be included in the next available round of the voluntary allocation process associated with the current renewables portfolio standard (RPS) compliance implemented in Rulemaking 18-07-003.

(N)

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART JN Sheet 4
MODIFIED COST ALLOCATION MECHANISM BALANCING ACCOUNT

JN. Modified Cost Allocation Mechanism Balancing Account (N)

7. ACCOUNTING PROCEDURE: (Cont'd) (N)

b. Deficient LSE Subaccount (Cont'd)

3. System RA Value Transferred to the New System Generation Balancing Account (NSGBA):

i. A credit entry equal to the value of the proxy RA resource that is transferred to the System Reliability Incremental Procurement Subaccount of the NSGBA to meet the system reliability incremental procurement targets pursuant to D.21-03-056 and D.21-12-015. The credit entry will use the most current market price benchmark for system RA capacity, which is approved in the Annual Energy Resource Recovery Account (ERRA) Forecast and used to value RA capacity in the Power Charge Indifference Amount (PCIA) calculation.

4. Interest

a. An entry equal to interest on the average balance in the subaccount at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

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Attachment 2

Redline Tariffs

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA)

1. PURPOSE: The purpose of the Energy Resource Recovery Account (ERRA) is to record and recover power costs, associated with PG&E's authorized procurement plan, and California Public Utilities Code § 454.5(d)(3). Power costs recorded in ERRA are applicable solely to PG&E's bundled customers while power costs incurred on behalf of both bundled and departing load customers are recorded in the Portfolio Allocation Balancing Account, the Modified Transition Cost Balancing Account (MTCBA), the New System Generation Balancing Account (NSGBA), ~~and~~ the BioMAT Non-bypassable Charge Balancing Account (BNBCBA), ~~and~~ the Tree Mortality Non-bypassable Charge Balancing Account (TMNBCBA), and the Public Policy Charge Procurement Subaccount (included in the Public Policy Charge Balancing Account (PPCBA)). (T) | (T)

(Continued)

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd)

f) A debit or credit entry to true-up the Retained RA Value, determined using the Forecast RA Adder to the Retained RA Value using the Final RA Adder. A corresponding credit or debit entry equal to the true-up of the Retained RA Value is recorded in PABA and MTCBA. (T) | | | (T)

g) A credit entry to transfer an allocated portion of the cost for import capacity rights to the NSGBA if PG&E uses existing PGE-owned import allocation rights to meet the updated procurement targets pursuant to D.21-02-028 or D.21-03-056, and D.21-12-015. The credit entries will be based on either the average price PG&E received for sales of its excess maximum import capability or, if not available or representative of market value, another reasonable market benchmark.

h) A debit entry to reflect the resource adequacy (RA) value of procurement originally directed in the Emergency Reliability proceeding, Rulemaking 20-11-003 and Rulemaking 21-10-002, including resources procured pursuant to D.21-02-028, ~~and~~ D.21-03-056 and D.21-12-015, that ~~is~~ are transferred to ERRA to meet bundled service RA compliance requirements. The contract costs and energy benefits of the Emergency and Summer Reliability procurement, if any, will continue to be allocated to all benefitting customers through the NSGBA.

System RA Value Transferred to the New System Generation Balancing Account (NSGBA):

i) A credit entry equal to the value of RA that is excess or unsold RA capacity and that is transferred to the System Reliability Incremental Procurement Subaccount of NSGBA in order to meet the updated procurement targets pursuant to D.21-12-015 ~~D.21-03-056~~, after having made reasonable attempts to sell excess capacity to other load-serving entities to meet their 15% planning reserve margin. The credit entry will use the most current market price benchmark for system RA, which is approved in the annual ERRA Forecast, and used to value RA capacity in the PCIA calculation.

Utility-Owned Generation Related Entries:

j) A debit or credit entry, as appropriate, to record ESA costs associated with bundled customer portfolio/procurement activity (which is embedded in the annual authorized revenue requirements associated with PG&E's owned generation).

CAISO Related Entries:

k) A debit or credit entry equal to the net charges or revenues for energy associated with load and generating resources recovered in ERRA

(Continued)

and the New System Generation Balancing Account (NSGBA);

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT

1. PURPOSE: The purpose of the New System Generation Balancing Account (NSGBA) is to record the benefits and the costs of Power Purchase Agreements (PPAs) associated with generation resources for which the Commission has determined that the costs and benefits will be allocated to all benefitting customers, including bundled service, Direct Access, and Community Choice Aggregation customers. Subaccounts shall be established in the NSGBA for each PPA associated with an eligible generation resource or a category of generation resources for which net capacity costs have been identified as recoverable on a non-bypassable basis. (T)

   Pursuant to Decision (D.) 20-06-002, Ordering Paragraph (OP) 17, a Centralized Local Procurement Subaccount (CLPSA) is established to facilitate cost recovery of procurement and administrative costs PG&E incurs in its role as the Central Procurement Entity (CPE) through the New System Generation Charge (NSGC). The net capacity cost associated with the procurement of CLPSA-eligible resources will be equal to the costs of the contracted resource or utility-owned generation (UOG) resource, including fuel and expense associated with greenhouse gas (GHG) compliance, net of actual revenue and cost the generation resources receive in the California Independent System Operator Corporation's (CAISO) energy and ancillary market is recoverable through the NSGC. The administrative cost associated with PG&E's CPE role is also recoverable through the NSGC pursuant to D. 20-06-002.

   Pursuant to D.20-12-006, OPs 3 – 6, the Commission approved a local capacity requirement reduction compensation mechanism (LCR RCM) for new preferred and energy storage resources, and certain combinations of hybrid preferred resources and energy storage resources, including new utility-owned resources that have executed contracts on or after June 17, 2020.

   Summer Reliability: D.21-02-028 and D.21-03-056 authorized the IOUs to continue their procurement efforts and endeavor to meet and exceed their respective incremental procurement targets to achieve an effective 17.5 percent planning reserve margin (PRM) for the months of May through October 2021 and 2022. Increasing the PRM from 15 percent to an effective 17.5 percent results in a minimum incremental procurement target of 450 megawatts (MW) for PG&E. The Decision states that resource adequacy (RA) resources in excess of an IOU's 15 percent PRM should be charged to all benefiting customers in the IOU's service territory via the CAM and authorizes the IOUs to acquire and pair imports with maximum import capability to be included in CAM procurement costs.

   Summer Reliability: D.21-12-015 instructed the IOUs to solicit additional resources for summers 2022 and 2023, including a new target range of 900 MW to 1,350 MW for PG&E for each of the June – October summer months of 2022 and 2023. Resource types to be considered for procurement include Resource Adequacy (RA)-only contracts and incremental capacity from revised power purchase agreements. Also, D.21-12-015, OP 13 ordered the IOUs to seek DR RA Resources from third-party Demand Response Providers (DRPs) through a "bilateral" contracting process.

   Modified Cost Allocation Mechanism: Pursuant to D.22-05-015, OP 10, the Commission authorizes recovery of opt-out or backstop procurement. In the event that a non-investor-owned-utility (IOU) load serving entity (LSE) declares bankruptcy or ceases providing retail service in California and has a capacity obligation under D.19-11-016 or D.21-06-035 and their retail customers are paying for capacity under the modified cost allocation mechanism (MCAM) adopted in 22-05-015. OP 10 provides that the capacity shall revert to the relevant IOU, with the costs of the associated procurement allocated thereafter using the Cost Allocation Mechanism detailed in Decision 06-07-030.

2. APPLICABILITY: The NSGBA shall apply to all benefiting customers and customer classes, except for those specifically excluded by the Commission.

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART FS Sheet 1
NEW SYSTEM GENERATION BALANCING ACCOUNT

3. REVISION DATES: The balancing account shall be trued-up annually.
4. RATES: The Cost Allocation Methodology (CAM) rate recovers the net capacity costs associated with NSGBA resources and is set forth in the applicable customer rate schedules.
5. ACCOUNTING PROCEDURES: The CPUC-jurisdictional portion of all entries shall be made at the end of each month as follows:
   a) Revenues – the following entry reflects the revenue entry equal to the CAM rate recovering net capacity costs from all CAM-eligible resources.

      A credit entry equal to the revenue from the CAM rate from non-exempt retail customers during the month, excluding the allowance for Revenue Fees and Uncollectible (RF&U) accounts expense;
   b) Net Capacity Costs - the following entries reflect the net capacity costs associated with eligible resources, by subaccount:
      1. QF/CHP Program Subaccount
         i. A debit entry equal to the capacity and energy costs for eligible QF/CHP Program contracts;
         ii. A credit entry equal to the energy revenues as established in Appendix A of D.07-09-044, Section IX.B.2 for eligible QF/CHP Program contracts.
         iii. Total QF/CHP Program net capacity costs are equal to the sum of lines 5.b.1.i and 5.b.1.ii.

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

b) Net Capacity Costs (Cont'd)

7. Centralized Local Procurement Subaccount

i. A debit/credit entry equal to the capacity, fuel, and GHG compliance costs for non-utility contract resources procured by the CPE, including any LCR RCM payments made to preferred resources and energy storage resources pursuant to D.20-12-006;

ii. A debit/credit entry equal to the capacity, fuel, and GHG compliance costs for PG&E contract resources procured by the CPE, including any LCR RCM payments made to preferred resources and energy storage resources pursuant to D.20-12-006;

iii. A debit/credit entry equal to the authorized revenue requirement, fuel costs, and GHG compliance costs, if any, for PG&E UOG resources procured by the CPE , including any LCR RCM payments made to preferred resources and energy storage resources pursuant to D.20-12-006;

iv. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges received by the buyer from the seller as defined in the contract terms and conditions associated with non-utility and PG&E contract resources and PG&E UOG resources procured by the CPE;

v. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to non-utility and PG&E contract resources and PG&E UOG resources procured by the CPE;

vi. A debit entry equal to costs incurred by PG&E (acting as the CPE) as a result of deferring the procurement of local resource(s) and utilizing the California Independent System Operator's (CAISO's) backstop mechanisms.

vii. Administrative costs associated with the CPE role, including but not limited to employee and consultant costs, legal fees, technology systems costs, and credit-related costs associated with CPE procurement of non-utility contracted resources and PG&E contracted resources, including pre-payments and credit and collateral payments, including all associated fees , associated with PG&E's role as the designated CPE in its distribution service area.

viii. Total net capacity costs are equal to the sum of lines 5.b.3.i, 5.b.3.ii, 5.b.3.iii., 5.b.3.iv, 5.b.3.v, 5.b.3.vi, and 5.b.3.vii. (T)

8. Modified Cost Allocation Mechanism Subaccount (L)

i. A debit entry equal to the opt-out and backstop resource costs associated with MCAM procurement where the LSE is no longer serving customers in PG&E's service territory (e.g., capacity and energy, if applicable, under the terms of the contract).

ii. A debit entry equal to any associated fuel costs for the MCAM resource.

iii. A credit entry equal to the CAISO market revenues received, net of any related charges, for the MCAM resource, including costs to charge the resource if it is a battery storage resource. (L)

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART FS Sheet 3
NEW SYSTEM GENERATION BALANCING ACCOUNT

iv. A credit entry for the RPS attribute at the price established for RPS attributes subject to voluntary allocation in D.21-05-030. The MCAM RPS attributes, if any, will be included in the next available round of the voluntary allocation process associated with the current renewables portfolio standard (RPS) compliance implemented in Rulemaking 18-07-003.

(Continued)

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.) (N)

~~8~~9. System Reliability Incremental Procurement

A. Amendments to Existing Purchase Power Agreements for Incremental Energy

i. A debit/credit entry equal to the incremental energy costs for 10 amended contracts authorized in D.21-02-028 and approved in Advice Letter 6088-E, and incremental energy costs for contract amendments that support updated Summer Reliability Targets for Summer 2022 and Summer 2023, as authorized in D.21-12-015 which will deliver incremental energy during a CAISO system emergency or Flex Alert including administrative costs associated with the procurement (e.g., Independent Evaluator expenses);

ii. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges during the time the contract is delivering incremental energy;

iii. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to contract resources during the time the contract is delivering incremental energy.

B. Firm Import Energy ~~authorized in Advice Letter 6089-E~~

i. A debit/credit entry equal to the energy costs for two firm energy import agreements authorized in D.21-02-028 and approved in Advice Letter 6089-E, and energy costs for import energy that support updated Summer Reliability Targets for Summer 2022 and Summer 2023, as authorized in D.21-12-015, including administrative costs associated with the procurement (e.g., Independent Evaluator expenses).

ii. A debit entry to record the costs resulting from the transfer of allocated portion of the import capacity rights to the NSGBA, pursuant to D.21-03-056, related to the use of existing import capacity rights to meet procurement targets in D.21-03-056 and updated procurement targets for Summer 2022 and Summer 2023 as authorized in D.21-12-015. Debit entries will be based on either the average price PG&E received for sales of its excess maximum import capability or, if not available or representative, another reasonable market benchmark.

iii. A debit entry to record the costs associated with procured import capacity rights pursuant to D.21-03-056 related to the use of import capacity rights to meet procurement targets in D.21-03-056, and updated procurement targets for Summer 2022 and Summer 2023 as authorized in D.21-12-015.

iv~~i~~. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges during the time the contract is delivering energy.

iii. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to contract resources during the time the contract is delivering energy. (N)

C. System Reliability Procurement authorized in D.21-03-056 and D.21-12-015

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART FS Sheet 4
NEW SYSTEM GENERATION BALANCING ACCOUNT

i. A debit/credit entry for procurement costs authorized in D.21-03-056 and D.21-12-015 – but not already included in Sections A and B of this subaccount above – to reach the updated 900 – 1,350 ~~450~~ MW incremental target above PG&E's existing 15% planning reserve margin and any administrative costs associated with the incremental procurement (e.g., Independent Evaluator expenses) for Summer 2022 and Summer 2023.

FS. NEW SYSTEM GENERATION BALANCING ACCOUNT (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.) (N)

C. System Reliability Procurement authorized in D.21-03-056 and D.21-12-015 (Cont'd)

~~ii. A debit entry to record the costs resulting from the transfer of allocated portion of the import capacity rights to the NSGBA, pursuant to D.21-03-056 and D.21-12-015, related to the use of existing import capacity rights to meet updated procurement targets in D.21-12-015 for Summer 2022 and Summer 2023 D.21-03-056. Debit entries will be based on either the average price PG&E received for sales of its excess maximum import capability or, if not available or representative, another reasonable market benchmark.~~

~~iii. A debit entry to record the costs associated with procured import capacity rights pursuant to D.21-03-056 related to the use of import capacity rights to meet the updated procurement targets in D.21-12-015 for Summer 2022 and Summer 2023D.21-03-056.~~

ii~~v~~. A debit/credit entry equal to the actual net revenues and costs received in the CAISO energy and ancillary services market or net revenues and costs for energy and ancillary services' payments/charges during the time the contract is delivering incremental energy.

~~v~~iii. A debit/credit entry equal to miscellaneous CAISO charges/credits assigned to contract resources during the time the contract is delivering incremental energy.

D. Transfer of Resource Adequacy Value for System Reliability Incremental Procurement to ERRA from NSGBA and/or transfer of Excess RA Capacity from Other Accounts to NSGBA to meet System Reliability Incremental Procurement Targets.

i. A credit entry to transfer to ERRA costs associated with the value of RA capacity for procurement ordered as a result of the Emergency Reliability proceeding, Rulemaking 20-11-003, including contracts procured pursuant to D.21-02-028, ~~and~~ D.21-03-056, and D.21-12-015, in the months when such contracts are used to meet bundled service customers RA compliance requirements. Energy costs and benefits associated with contracts procured pursuant to D.21-02-028 ~~and~~ D.21-03-056, and D.21-12-015 will continue to be allocated to all benefitting customers through the NSGBA.

ii. A debit entry to record costs associated with the value of the RA capacity transferred from PABA, ERRA, or the Modified Cost Allocation Mechanism Balancing Account (MCAMBA)~~Incremental Resource Adequacy Memorandum Account (IRAMA)~~ that are excess or unsold RA capacity or proxy RA resources. The RA capacity value recorded in NSGBA reflects the use of the capacity to meet the updated system reliability incremental procurement targets pursuant to D.21-03-056 and D.21-12-015, after having made reasonable attempts to sell excess capacity to other load-serving entities to meet their 15% RA planning reserve margin requirements. The debit entry will be calculated using the most current market price benchmark for system RA approved in the annual ERRA Forecast, which is used to calculate the value of RA in the Power Charge Indifference Amount (PCIA) calculation. (N)

(Continued)

ELECTRIC PRELIMINARY STATEMENT PART HS Sheet 1
PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)

HS. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)

1. PURPOSE: The purpose of the PABA is to record the "above-market" costs of all generation resources that are eligible for recovery through Power Charge Indifference Adjustment (PCIA) rates.

   The PABA is comprised of subaccounts for each year's vintage portfolio resources, that records the costs, market revenues, and imputed revenues of all generation resources executed or approved by the Commission for cost recovery that year. Amounts will include costs related to contracts executed with third parties and utility-owned generation. (D)

   Pursuant to Decision (D.) 20-06-002 issued in the Generation Resource Adequacy Rulemaking, (R.) 17-09-020, on Central Procurement, the Commission determined that PG&E contracts and utility-owned generation (UOG) resources can be procured by the Central Procurement Entity (CPE) and be reclassified to be recovered through the New System Generation Charge (NSGC) and recorded to the Centralized Local Procurement Subaccount (CLPSA) of the New System Generation Balancing Account (NSGBA) for the term of the CPE contract. At the end of the CPE contract term, the resource would be reclassified back to its original cost recovery mechanism, which in the case of a PCIA-eligible resource would be a PABA vintage subaccount. Pursuant to D.20-06-002, PCIA-eligible resources that are reclassified from NSGC back to PCIA will be exempt from the PCIA rate cap authorized in D.18-10-019.

   Decision 22-01-023 modified the ERRA Trigger calculation to consider ERRA balances net of the PABA balances when calculating over- or under-collected amounts that are above the 4 percent trigger and are forecast to exceed the 5 percent threshold.

   In D.22-01-023, the Commission authorized disposition of the year-end ERRA balances via a transfer to the most recent vintage PABA subaccount.

   Decision 22-05-015, OP 4, provides that any above-market costs associated with the Modified Cost Allocation Mechanism procurement ordered in D.19-11-016 done on behalf of bundled customers shall be assigned a 2019 vintage and D.21-06-035, OP 12, provides that procurement done on behalf of bundled customers will be assigned a 2021 vintage. Procurement ordered in these decisions will be recovered from bundled and departing load customers of non-IOU LSEs through the PCIA.

2. APPLICABILITY: The PABA shall apply to all customer classes, except for those specifically excluded by the Commission.

3. REVISION DATES: Disposition of the balance in the account shall be through the Annual Electric True-Up advice letter process, as authorized by the CPUC in the annual ERRA forecast proceeding or an ERRA Trigger Application, including the provision that disposition of the year-end balance in the ERRA shall be to the PABA upon submission (where a Tier 1 advice letter is currently required) or approval (where a Tier 2 advice letter is currently required) by the Commission of the applicable compliance advice letter addressing such balance.

4. RATES: PABA rates are included in the effective rates set forth in each rate schedule.

5. ACCOUNTING PROCEDURES: The PABA consists of two types of subaccounts:

   "Legacy Utility Owned Generation Subaccount" records and recovers the above market costs associated with adopted revenue requirements related to PG&E-owned generation installed before 2002 ("Legacy UOG"), including capital and related non-fuel operating and maintenance expenses. Legacy UOG includes PG&E's hydroelectric and nuclear generation facilities.

   "Vintage Subaccounts" record and recover the above market power costs associated with PG&E's authorized procurement plan by vintage. Power costs recorded in each vintage subaccount include, but are not limited to, fuel and greenhouse gas (GHG) costs, third party power purchase contracts, and utility owned generation revenue requirements. These costs are offset by CAISO generation revenues, forward sales revenues, and PCIA revenues from customers assigned to the vintage subaccount. Note that each year beginning with 2009 has its own vintage subaccount. Resources are assigned to a vintage portfolio based on the year the generation resource commitment is made (i.e., contract execution date or Commission approval of UOG construction) and customers are assigned to a vintage based on their departure date. Customers who depart before July 1 of a given year are assigned to the prior year's vintage.

(Continued)

HS. PORTFOLIO ALLOCATION BALANCING ACCOUNT (PABA)

5. ACCOUNTING PROCEDURES: (Cont'd.)

Retained RPS and RA Value Entries:

h. A credit entry equal to the Retained RPS Value, determined using the most current Commission-adopted RPS Adder multiplied by Actual Retained RPS quantities. A corresponding debit entry equal to the Retained RPS Value is recorded in ERRA.

i. A debit or credit entry to true-up the Retained RPS Value, determined using the Forecast RPS Adder to the Actual Retained RPS Value using the Final RPS Adder. A corresponding credit or debit entry equal to the true-up of the Retained RPS Value is recorded in ERRA.

j. A credit entry equal to the Retained RA Value, determined using the most current Commission-adopted RA Adder, multiplied by the Actual Retained RA quantities. A corresponding debit entry equal to the Retained RA Value is recorded in ERRA.

k. A debit or credit entry to true-up the Retained RA Value, determined using the Forecast RA Adder to the Retained RA Value using the Final RA Adder. A corresponding credit or debit entry equal to the true-up of the Retained RA Value is recorded in ERRA.

(D)

System RA Value Transferred to the System Reliability Incremental Procurement Subaccount in New System Generation Balancing Account (NSGBA): (N)

l. A credit entry equal to the value of RA capacity that is excess or unsold RA capacity that is transferred to the System Reliability Incremental Procurement Subaccount of NSGBA and used to meet the updated system reliability incremental procurement targets pursuant to D.21-12-015~~D.21-03-056~~, after having made reasonable attempts to sell excess capacity to other load-serving entities to meet their 15% planning reserve margin. The credit entry will use the most current market price benchmark for system RA approved in the Annual ERRA Forecast, which is used to calculate the value of RA capacity in the PCIA calculation. (N)

Utility-Owned Generation Related Entries:

m. A debit entry equal to one-twelfth of the electric generation portion of revenue requirement associated with the CPUC authorized pension contribution amount. (T)

n. A debit entry equal to the annual authorized revenue requirements associated with PG&E's owned generation divided by twelve, excluding PCIA-eligible UOG resource costs that have been procured by the Central Procurement Entity (CPE) for recovery through the New System Generation Charge (NSGC) and recorded to the Centralized Local Procurement Subaccount (CLPSA) of the New System Generation Balancing Account (NSGBA). (T)

o. A debit or credit entry, as appropriate, to record ESA costs associated with PCIA eligible generation resources portfolio/ procurement activity (which is embedded in the annual authorized revenue requirements associated with PG&E's owned generation). (T)

p. A debit or credit entry, as appropriate, to record the gain or loss on the sale of an electric generation non-depreciable asset, as approved by the CPUC. (T)

q. A debit entry equal to one-twelfth of the annual authorized revenue requirement for the Diablo Canyon Power Plant Employee Retention Program (see corresponding entry in the Employee Retention Subaccount of the Diablo Canyon Retirement Balancing Account (DCRBA) per Preliminary Statement HK, 5b.1). (T)

(Continued)

Attachment 3

Redacted Attachments

PACIFIC GAS AND ELECTRIC COMPANY
Table 5
MCAM Procurement Costs
($1000s)

Line No.	Description	2023
1	ERRA	
2	Bundled RA	
3	Memo Account	
4	Opt-Out RA	

PACIFIC GAS AND ELECTRIC COMPANY
IRAPMA Subledger

Tariff Line Item	DR/CR	Tariff Description	FY 2021 YTD	FY 2022 YTD
Incremental Expenses				
5.a.	**DR**	A debit entry equal to costs of incremental RA capacity purchased for PG&E's bundled customers and customers of LSEs that have opted-out of self-procurement that are not otherwise recovered in rate.		
5.b.	**DR**	A debit entry equal to incremental administrative costs related to entry a) above		
Miscellaneous Costs				
5.c.	**DR/CR**	A debit or credit entry equal, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission		
		Total Activity Before Interest		
5.d.	**DR/CR**	An entry equal to the interest on the balance of the account		
		Beginning Balance	**-**	
		IRAPMA Ending Balance as of June 2022	**172,755.12**	**751,703.04**

Attachment 4

Confidentiality Declaration

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFIC GAS AND ELECTRIC COMPANY
ADVICE LETTER 6654-E-A FOR RATE
IMPLEMENTATION PURSUANT TO DECISION 22-05-015
& THE ESTABLISHMENT OF ELECTRIC PRELIMINARY
STATEMENT FOR MODIFIED COST ALLOCATION
MECHANISM BALANCING ACCOUNT

DECLARATION OF DONNA BARRY
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN PG&E'S ADVICE LETTER

I, Donna L. Barry, declare:

1. I am a Principal Regulatory Analyst in the Electric Rates and Rate Architecture Department within the Regulatory Affairs organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include development of cost recovery proposals, analyses in support of testimony and various reports filed at the Commission. In carrying out these responsibilities, I have acquired knowledge of generation procurement purchased for PG&E's electric portfolio, utility-owned generation revenue requirements, and speciality program costs and rates. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's Advice Letter 6654-E-A for rate implementation pursuant to decision 22-05-015 AND the establishment of a new Electric Preliminary Statement for the Modified Cost Allocation Mechanism Balancing Account.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by

D.06-06-066, Appendix 1, and Public Utilities Code §454.5(G). The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on July 18, 2022 at Pleasant Hill, California.

/s/

DONNA L. BARRY

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

ADVICE LETTER 6654-E-A
JULY 18, 2022
ATTACHMENT 3

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	**Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To**	**Justification for Confidential Treatment**	**Length of Time Data To Be Kept Confidential**
Document: Table 5			
TABLE 5	II.B.4 – Generation Cost Forecast (Non-QF Bilaterals)	Confidential generation cost forecast for QF generation. Public by resource category (*e.g.*, hydro, conventional, etc.) after three years.	Three Years
Document: Table 7			
TABLE 7	XI - Monthly Procurement Costs	Recorded procurement cost detail of monthly cost and utility operational information.	Three Years

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 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

East Bay Community Energy Ellison Schneider & Harris LLP
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

Intestate Gas Services, Inc.
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
NLine Energy, Inc.
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.
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