Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
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December 2, 2019

Advice 5705-E
(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: **Update to Pacific Gas and Electric Company's Bundled Procurement Plan**

Purpose

Pacific Gas and Electric Company (PG&E) requests California Public Utilities Commission (CPUC or Commission) approval to update its Bundled Procurement Plan (BPP) adopted in Commission Decision (D.) 15-10-031.[1] This BPP update includes a new Appendix P (Carbon Free Energy) and makes revisions to Appendix S (Sales Framework).

Background

The Commission adopted PG&E's proposed BPP, with modifications, in D.15-10-031. PG&E subsequently submitted a conformed BPP on December 10, 2015. PG&E has periodically submitted updates to its BPP since 2015 as necessary due to changing market and regulatory conditions and changes to PG&E's portfolio. PG&E submitted an advice letter (Advice 5473-E) on January 25, 2019 requesting to add Appendix S (Sales Framework) that addresses the sales of portfolio products. The Commission adopted PG&E's Sales Framework, with modifications, in Draft Resolution E-4998, and PG&E subsequently submitted a conformed Sales Framework on July 1, 2019.

The Commission established the Power Charge Indifference Adjustment (PCIA) Phase 2 in D.18-10-019 to "develop structures, processes, and rules governing portfolio optimization going forward."[2] The Commission ordered a working group to resolve

[1] In D.15-10-031, the Commission adopted PG&E's proposed 2014 BPP with modifications and required PG&E to conform the BPP to incorporate modifications made in the Decision no later than 90 days after the Decision. PG&E filed its conformed BPP on December 10, 2015, via Advice 4750-E, which was approved by the Commission on June 15, 2016,

[2] D.18-10-019, p. 111.

issues of portfolio optimization and cost reduction, allocation, and auction with a final report due January 30, 2020 and a Commission decision expected mid-2020.[3]

Parties in the PCIA Proceeding have raised the issue of how the value of GHG free resources that have their above market costs recovered through the PCIA should be optimized and subsequently reported for the California Energy Commission's (CEC) Power Content Label (PCL). For 2019 and 2020, prior to the Commission issuing its PCIA Phase 2 decision, PG&E developed Appendix P (Carbon Free Energy) to address these issues and PG&E solicited input from representatives from Community Choice Aggregators and Energy Service Providers. PG&E also presented this process to its Procurement Review Group on October 15, 2019.

Discussion

By this Tier 3 Advice Letter submittal, PG&E seeks approval of a new process to sell Carbon Free Energy as an interim measure for 2019 and 2020 to give the Commission time to provide longer term guidance on the treatment of Carbon Free Energy (as defined below) in PCIA Phase 2. Specifically, PG&E seeks approval of updates to its Appendix S (Sales Framework) and a new Appendix P (Carbon Free Energy), consistent with the description outlined below.

Summary of Appendix P, Carbon Free Energy

Carbon Free Energy for purposes of Appendix P is energy produced by large hydroelectric resources[4] and nuclear resources (each a "Resource Pool").[5] Following the Commission's approval of the Appendix P, PG&E proposes to offer to sell Carbon Free Energy to eligible Load Serving Entities[6] (LSEs) for energy generated from the Resource Pools in two categories: Period A (Carbon Free Energy generated from January 1, 2019 through the day before the first delivery date under a sales confirmation); and Period B (Carbon Free Energy generated from the first delivery date under a sales confirmation through December 31, 2020 (each an "Allocation Period").

Allocation Mechanism

To determine the amount of Carbon Free Energy to offer to eligible LSEs, PG&E will calculate each eligible LSEs' Allocation Ratio and corresponding Allocation Amount (defined below) of Carbon Free Energy generated from the Resource Pools.

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[3] R.17-06-026, Phase 2 Scoping Memo and Ruling of Assigned Commissioner, p. 3.

[4] Large hydroelectric resource is defined in the CEC's Power Source Disclosure Program Regulations at CCR Title 20, Section 1391 a.1, and listed in Appendix P.

[5] The initial resources in the Resource Pools are listed in Appendix P.

[6] Eligible LSEs includes Community Choice Aggregators and Energy Service Providers for the portion of their load that is forecast to pay the PCIA charge.

The quantity of Carbon Free Energy that will be offered by PG&E to eligible LSEs (Allocation Amount) will be based on an allocation of their corresponding customers' proportional share of forecasted monthly load set forth in PG&E's Energy Resource Recovery Account (ERRA) Forecast Application (Allocation Ratio). The Allocation Amount will not change if an eligible LSE gains or loses load share during the year after PG&E offers the Allocation Amount.

An example calculation for the Allocation Ratio and Allocation Amount for the Resource Pools is provided in Appendix P.

Eligible LSEs will be able to forecast their Allocation Amount using public historical generation data that can be found on the CEC's website[7] for each resource in the Resource Pools. PG&E will provide updated actual generation data on a recurring basis and will confirm the final actual Allocation Amount by May 15[8] of the year after the Carbon Free Energy is generated.

Transaction Process

To receive an offer of Carbon Free Energy from PG&E, an eligible LSE must have forecasted load identified in PG&E's ERRA Forecast Application for the applicable calendar years.

An eligible LSEs may elect to purchase an Allocation Amount from one or both of the Resource Pools and selected Allocation Periods. An eligible LSE receiving an offer of an Allocation Amount must follow the acceptance process for such offer as outlined in the Carbon Free Energy (Appendix P). If an eligible LSE rejects the Offer, PG&E shall have no obligation to offer such Allocation Amount and PG&E will retain such Allocation Amount.

Power Content Label Reporting

Eligible LSEs will make their own determinations as to the ability to report the purchases of Carbon Free Energy from the resources in the Resource Pools on their PCL with the CEC.

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[7] Historical generation data (years 2001 – 2018) is available at the following links on the CEC's website: CEC's QFER CEC-1304 Power Plant Owner Reporting Database: https://ww2.energy.ca.gov/almanac/electricity_data/web_qfer/index_cms.php
CEC QFER Generator Annual Table: https://ww2.energy.ca.gov/almanac/electricity_data/web_qfer/source_files/q_WebWorks_QFERGeneratorAnnual_Table.txt

[8] June 1 is the due date for LSEs to submit their Power Source Disclosure Report (PSDR) to the CEC; providing data by May 15th allows time to incorporate the data into the PSDR filed on June 1.

Regulatory approvals required

PG&E will offer for sale Carbon Free Energy for the Allocation Periods approved by the Commission under this Advice Letter. Sale of Carbon Free Energy generated in Period A will only occur if the CEC permits the sale of the Carbon Free Energy to be reflected in an eligible LSE's Power Source Disclosure Report. Existing CEC PCL regulations only permit reporting of a "specific purchase" that is sold "once and only once…"[9] PG&E and CalCCA requested that the CEC consider treatment of the Carbon Free Energy generated in the Allocation Periods in comments filed on October 28, 2019. If the CEC does not accept the proposed treatment of Period A by May 15, 2020, Period A quantities of Carbon Free Energy will remain with PG&E for PCL reporting purposes.

This proposal is a reasonable method to enable eligible LSEs to report generation on their Power Content Label during the 2019-2020 interim period, based on how energy from PCIA resources is actually delivered to customers. As the scheduling coordinator, PG&E delivers energy from designated resources to the California Independent System Operator (CAISO) markets and receives market revenues. Eligible LSEs pay for energy delivered from these resources through the CAISO market. Eligible LSEs' customers also pay for the above market costs associated with generation in the Resource Pools through their PCIA rate. Given that eligible LSEs and their customers purchase the energy delivered to CAISO markets by the Resource Pools, as well as the fact that they pay their associated above market costs through the PCIA, the proposal to allocate energy is appropriate. This allocation of energy via a transaction[10] will enable eligible LSEs to report their load-proportionate share of Carbon Free Energy in their Power Content Label in a simple, transparent, and easy to implement manner.

Payments and Credit

Eligible LSEs who accept a Carbon Free Energy allocation will waive their ability to make petitions, arguments or filings at the CPUC or at the California State Legislature regarding PG&E not offering any allocation, sale or transfer of Carbon Free Energy or attributes for the period that the eligible LSE accepts the offer. Neither PG&E nor the eligible LSEs will be required to post credit or collateral.

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[9] Specific purchase is defined in the CEC's Power Source Disclosure Program Regulations at CCR Title 20, Section 1391(t).

[10] The structure for transaction may take one or more possible forms based on the CEC's then current Power Source Disclosure Program Regulations and could include a structure where the eligible LSE pay PG&E the CAISO market prices for energy delivered from these resources, and eligible LSEs would then receive the right to the equivalent market revenues.

Attachments

Confidential Attachment A:	Summary of Modification to Appendix S and New Appendix P
Attachment B:	Appendix P: Carbon Free Energy
Confidential Attachment C:	Redlined Version, Appendix S
Confidential Attachment D:	Clean Version, Appendix S
Attachment E:	Clean Version, Appendix S (Public Version)

Request for Commission Approval

PG&E requests that the Commission issue a Final Resolution by no later than February 1, 2020, that:

1. Finds the Carbon Free Energy (Appendix P) as a reasonable interim measure until further direction on allocations is provided in the PCIA Phase 2 proceeding;

2. Approves Attachment B containing Appendix P: Carbon Free Energy; and

3. Approves Confidential Attachment D containing the updated Appendix S.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 23, 2019, which is 21 days[11] after the date of this submittal. Protests must be submitted to:

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

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

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

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

[11] The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 3 advice letter become effective by no later than February 1, 2020, and that the Commission issue a resolution by that date.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.16-02-007. 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/
Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.16-02-007

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 U39E)

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

Contact Person: Kimberly Loo
Phone #: (415)973-4587
E-mail: PGETariffs@pge.com
E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5705-E

Tier Designation: 3

Subject of AL: Update to Pacific Gas and Electric Company's Bundled Procurement Plan

Keywords (choose from CPUC listing): Procurement

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☑ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15-10-031

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☑ Yes ☐ No

If yes, specification of confidential information: See confidentiality declaration and matrix
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: Scott Ranzal, SDRi@pge.com, (415)264-3638

Resolution required? ☑ Yes ☐ No

Requested effective date: 2/1/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes 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 all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

PACIFIC GAS AND ELECTRIC COMPANY

DECLARATION OF SCOTT RANZAL SEEKING CONFIDENTIAL TREATMENT FOR CERTAIN DATA AND INFORMATION CONTAINED IN ADVICE LETTER 5705-E

I, Scott Ranzal, declare:

1. I am a Director in the Portfolio Management Policy department in the Energy Policy and Procurement organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include overseeing portfolio management activities for PG&E's procurement activities. 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 5705-E.

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. 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 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 December 2, 2019 at San Francisco, California.

/s/
SCOTT RANZAL

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ADVICE LETTER 5705-E
December 2, 2019

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
Confidential Attachment A – Summary of Modification to Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E's confidential sales framework. Any discussion of PG&E's sales strategies is market sensitive, because it will impact market participants' bidding behavior for market products. Disclosure of this information could cause harm to PG&E's customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite
Confidential Attachments C and D – Appendix S	Pub. Util. Code§454.5(g)	This information includes PG&E's confidential sales framework. Any discussion of PG&E's sales strategies is market sensitive, because it will impact market participants' bidding behavior for market products. Disclosure of this information could cause harm to PG&E's customers and put PG&E at an unfair business advantage through non-competitive sales results.	Indefinite

Confidential Market Sensitive Information Protected Under
Public Utilities Code Section 454.5(g) and D.06-06-066

PACIFIC GAS AND ELECTRIC COMPANY

Attachment A

Summary of Modification to Appendix S and New Appendix P

(CONFIDENTIAL)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment B

Appendix P: Carbon Free Energy

APPENDIX P

CARBON FREE ENERGY

A. Introduction/Background

Appendix P describes the standards and criteria for Pacific Gas and Electric Company's (PG&E's) management and sales of energy from large hydroelectric[1] or nuclear resources from PG&E's portfolio (Carbon Free Energy). Appendix P will guide PG&E's actions with respect to sales of Carbon Free Energy generated in calendar years 2019 and 2020. PG&E will submit Appendix P Carbon Free Energy transactions in the Quarterly Compliance Report (BPP Section IV Line No. 4) to demonstrate compliance with this Appendix P.

B. Overview of Carbon Free Energy

This section provides a description of the processes and activities for PG&E's intended sales of its Carbon Free Energy generated in calendar years 2019 and 2020. These processes and activities include: (1) Product Definitions; (2) Allocation Methodology; (3) Commercial Processes; (4) Transaction Description; and (5) Resource Listing.

1. Product Definitions

a. **Allocation Amount** is defined as the amount of Carbon Free Energy generated from facilities identified in "Section 5 Resource Listing" corresponding to each Eligible LSE's Allocation Ratio.

b. **Allocation Ratio** is defined as the Eligible LSE's monthly load forecast for Power Charge Indifference Adjustment (PCIA)-paying customers responsible for the costs of these Resources according to PG&E's ERRA Forecast Application

[1] Large hydroelectric is defined in the CEC's Power Source Disclosure Program Regulations at CCR Title 20, Section 1391(k).

(refer to BPP Section IV Line No. 5) compared to the total forecasted load for PCIA-paying customers responsible for the costs of the Resources.

c. **Confirmed LSE** is defined as an Eligible LSE that accepts PG&E's offer of an Allocated Amount of Carbon Free Energy and executes a confirmation with PG&E for all or a portion of the Allocated Amount of Carbon Free Energy.

d. **Eligible LSE** is defined as a Load Serving Entity (LSE) (as defined in the CAISO Tariff) that (1) has forecasted load identified in PG&E's ERRA Forecast Application for the calendar year in which the Allocation Amount is accepted; and (2) that serves customers who pay the PCIA departing load charges for the above market costs of Resources.

e. **Resource(s)** is defined as one or more of the facilities in the Resource Pools.

f. **Resource Pool(s)** are defined as the two groups of eligible facilities aggregated and indicated as either large hydroelectric (one Resource Pool) or nuclear facilities (the second Resource Pool), as outlined in Section 5 Resource Listing.

2. Allocation Methodology

The Allocation Amount offered to Eligible LSEs will be reflected in Megawatt Hours based on the LSE's Allocation Ratio multiplied by the Carbon Free Energy delivered on a per Resource basis. An example calculation for the Allocation Ratio and Allocation Amount is provided below in Table 1.

Table 1: Allocation Ratio Example

Monthly Allocation Ratio = Monthly Forecasted Eligible LSE Load / Monthly Forecasted PCIA Eligible Load.

	(a)	(b)	(c)

	Monthly Forecasted Eligible LSE Load (GWh)	Monthly Forecasted PCIA Eligible Load (GWh)	Monthly Allocation Ratio (%) Eligible LSE (a) / (b)
January	500	12,000	4.17%
February	500	12,000	4.17%
March	500	12,000	4.17%
April	700	12,000	5.83%
May	700	12,500	5.60%
June	700	13,000	5.38%
July	700	13,000	5.38%
August	700	14,000	5.00%
September	800	14,000	5.71%
October	800	14,000	5.71%
November	800	12,000	6.67%
December	800	11,000	7.27%

Table 2: Allocation Amount Example

Allocation Amount = Monthly Allocation Ratio x Monthly Generation from a Resource within a Resource Pool selected by the Eligible LSE.

Example Large Hydroelectric Unit: Kerckhoff Power House 2 [2]			
	(a)	(b)	(c)
	Monthly Delivered Energy (2018 / MWh)	Monthly Allocation Ratio (%) Eligible LSE	Monthly Allocation Amount (2018 / MWh) (a) * (b)
January	13,585	4.17%	566
February	6,472	4.17%	270
March	12,643	4.17%	527

2 Kerckhoff PH 2 data is sourced from the CEC's QFER CEC-1304 Power Plant Owner Reporting Database.

April	64,294	5.83%	3,750
May	73,627	5.60%	4,123
June	48,974	5.38%	2,637
July	44,352	5.38%	2,388
August	28,613	5.00%	1,431
September	25,122	5.71%	1,436
October	102	5.71%	6
November	532	6.67%	35
December	8,949	7.27%	651

An Eligible LSE Allocation Ratio will not change during the course of the year it is determined.[3]

The quantities of Carbon Free Energy for sale will be offered in two categories (each an Allocation Period):

a. **Period A:** represents quantities of Carbon Free Energy generated from January 1, 2019 through the day before the first delivery date under a sales confirmation.

b. **Period B:** represents quantities of Carbon Free Energy generated from the first delivery date under a sales confirmation through December 31, 2020.

Quantities of Carbon Free Energy generated in Period A may not be acceptable to the CEC for PCL purposes and therefore PG&E sales of such quantities of Carbon Free Energy for such time period would be contingent on whether the CEC permits such sales for PCL reporting purposes (CEC Permission). PG&E and CalCCA requested that the

[3] For the 2019 Allocation Ratio, PG&E will use the 2018 ERRA Forecast Application .

CEC consider such CEC Permission in comments filed on October 28, 2019.[4] If the CEC does not accept the proposed treatment of Period A by May 15, 2020, Period A quantities will remain with PG&E for PCL reporting purposes.

3. Commercial Process

This section provides an overview of the commercial process in which PG&E intends to sell Carbon Free Energy. PG&E will offer (Offer) to each Eligible LSE their respective Allocation Ratio which will correspond to an Allocation Amount of Carbon Free Energy generated during calendar years 2019 and 2020 from the Resource Pools. The Offer will be a one-time event following the CPUC's approval of Appendix P with such date of Offer referred to as the "Offer Date". Within thirty (30) days following the Offer Date (Offer Response Due Date) each Eligible LSE must accept or reject in writing to PG&E its respective Offer of the Allocation Ratio and corresponding Allocation Amounts along with, if accepting, their choice of one or both of the Resource Pools for Carbon Free Energy.

In the event an Eligible LSE does not accept or reject in writing the Offer by the Offer Response Date, then such non-response will be deemed a rejection by the Eligible LSE. In the case of a non-response or a rejection on the part of an Eligible LSE, PG&E

[4] PG&E recommended language in 10/28/19 comments: *"Specified purchases shall be documented through purchase agreements executed prior to generation of the purchased electricity, except that purchases of generation from in-state or dynamically scheduled large hydroelectric and nuclear resources in 2019 and 2020 may be documented after the generation of the electricity when a retail supplier whose customers are paying for such resources through the California Public Utilities Commission-approved Power Charge Indifference Adjustment elects to show such in-state large hydroelectric or nuclear resources following a CPUC-approval of a mechanism for allocating such resources."*
https://efiling.energy.ca.gov/GetDocument.aspx?tn=230401&DocumentContentId=61959

shall have no obligation to offer such Allocation Amount and PG&E will retain such Allocation Amount.

Within fifteen (15) business days following the Offer Response Due Date, PG&E and each Eligible LSE which has accepted the Offer and selected the Resource Pool(s) shall enter into a confirmation to the EEI Master Purchase and Sale Agreement (Sales Agreement) to reflect the sale of such Carbon Free Energy as reflected in the Offer.

Following acceptance of an Offer and an executed Sales Agreement between an Eligible LSE and PG&E the Eligible LSE transaction will be considered confirmed, subject to the CEC Permission, as applicable to the Allocation Period (Confirmed LSE Transaction Date). Following the Confirmed LSE Transaction Date, PG&E shall provide each Confirmed LSE with its quarterly Allocation Amount at approximately fifty-five (55) calendar days after each calendar quarter and shall commence sales of the Carbon Free Energy to the Confirmed LSEs pursuant to their Sales Agreement.

On or about each May 15th following the most recent calendar year end, PG&E will notify the Confirmed LSE in writing of actual, finalized Allocation Amount of Carbon Free Energy delivered to each Confirmed LSE from the Resource Pool(s) selected by the Confirmed LSE. After delivery of finalized Allocation Amounts to each LSE, PG&E will notify the CEC pursuant to the then current CEC Power Source Disclosure Program regulations of the sale of the Carbon Free Energy to the respective Confirmed LSE for purposes of Power Content Label (PCL) reporting on or before the annual reporting deadline.

4. Transaction Description

PG&E will only sell Carbon Free Energy to a Confirmed LSE pursuant to a Sales Agreement. PG&E will not post collateral or performance assurance for any sale of Carbon Free Energy to a Confirmed LSE and will not require a Confirmed LSE to post collateral or performance assurance for such transaction.

PG&E's Offer to each Eligible LSE is in exchange for the following consideration from each Eligible LSE:

a. Agreement that the sale and delivery of the Carbon Free Energy is a reasonable manner to manage disposition of the Carbon Free Energy; and

b. Agreement to waive its ability to make petitions, arguments, or filings to the CPUC or the California Legislature asserting that PG&E has not offered any allocation, sale, or transfer of Carbon Free Energy or environmental attributes associated with such Carbon Free Energy for the period in which the Eligible LSE accepts the Offer.

5. Resource Listing

In accepting an Offer, Eligible LSEs may select one or both Resource Pools (i.e. nuclear and/or large hydroelectric), which Resource Pools are comprised of the Resources identified below. The list of Resources in the Resource Pools may be modified by PG&E upon a Tier 1 Advice Letter filing with the CPUC.

#	Facility Name	Fuel Type	EIA ID
1	Diablo Canyon #1 Gen	NUCLEAR	6099
2	Diablo Canyon #2 Gen	NUCLEAR	6099
3	Balch #1 PH	LARGE HYDRO	217

4	Balch #2 PH	LARGE HYDRO	218
5	Belden	LARGE HYDRO	219
6	Bucks Creek	LARGE HYDRO	220
7	Butt Valley	LARGE HYDRO	221
8	Caribou 1	LARGE HYDRO	222
9	Caribou 2	LARGE HYDRO	223
10	Cresta	LARGE HYDRO	231
11	Drum #1	LARGE HYDRO	235
12	Drum # 2	LARGE HYDRO	236
13	Electra	LARGE HYDRO	239
14	Haas	LARGE HYDRO	240
15	James B Black	LARGE HYDRO	249
16	Kerckhoff #2 PH	LARGE HYDRO	682
17	Kings River	LARGE HYDRO	254
18	Pit 1	LARGE HYDRO	265
19	Pit 3	LARGE HYDRO	266
20	Pit 4	LARGE HYDRO	267
21	Pit 5	LARGE HYDRO	268
22	Pit 6	LARGE HYDRO	269
23	Pit 7	LARGE HYDRO	270
24	Poe	LARGE HYDRO	272
25	Rock Creek	LARGE HYDRO	275
26	Salt Springs	LARGE HYDRO	279
27	Stanislaus	LARGE HYDRO	285
28	Tiger Creek	LARGE HYDRO	287
29	SOUTH FEATHER WATER AND POWER AGENCY (Woodleaf and Forbestown)	LARGE HYDRO	417
30	NID-CHICAGO PARK	LARGE HYDRO	412

Confidential Market Sensitive Information Protected Under
Public Utilities Code Section 454.5(g) and D.06-06-066

PACIFIC GAS AND ELECTRIC COMPANY

Attachment C

Redline Version, Appendix S

(CONFIDENTIAL)

Confidential Market Sensitive Information Protected Under
Public Utilities Code Section 454.5(g) and D.06-06-066

PACIFIC GAS AND ELECTRIC COMPANY

Attachment D

Clean Version, Appendix S

(CONFIDENTIAL)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment E

Clean Version, Appendix S (Public Version)

APPENDIX S

SALES FRAMEWORK

CONFIDENTIAL

A. Introduction/Background

This Appendix describes the standards and criteria for Pacific Gas and Electric Company's (PG&E's) management and sales of physical energy-only products, Resource Adequacy (RA) Products, and Import Capacity Counting Rights. Due to customer load departure, PG&E may encounter scenarios in which portfolio products exceed the requirements of the portfolio. In these situations, the Sales Framework guides actions PG&E will take. In addition, any transactions under this Sales Framework Appendix will be filed for approval through the Quarterly Compliance Reports (QCR), as required by the Bundled Procurement Plan (BPP).

B. Overview of Sales Framework

This section provides a description of the commercial processes and activities that PG&E will pursue to manage any sales of its portfolio of physical energy, RA Product, and Import Capacity Counting Rights. These processes and activities include: (1) product terms and volumes; (2) commercial processes; and (3) evaluation methodologies. PG&E will offer resource adequacy capacity from resources located in Local Reliability Areas[1] for delivery periods covering all three years in the multiyear framework adopted in Decision (D.) 19-02-022.

1. Physical Energy-only Sales

[redacted]

[1] Local ReliabilityAreas refers to Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.

[redacted]

2. RA Product and Import Capacity Counting Right

[redacted]

[redacted]

[redacted]

[redacted]

[4] Local Area refers to the separate Bay Area, Humboldt, North Coast / North Bay, Sierra, Stockton, Greater Fresno, and Kern local areas (or any subsequently defined Local Reliability Areas in the PG&E Transmission Access Charge area) for program year 2020 forward.

[redacted]

[redacted]

[redacted]

[redacted]

c. Contract Terms

PG&E will only sell RA products using an Edison Energy Institute (EEI) enabling agreement and a PG&E RA confirmation agreement. Sale transactions of RA products will not be facilitated through a Western Systems Power Pool (WSPP) enabling agreement. Additionally, PG&E will not post collateral or performance assurance for any RA product sales.

d. Commercial Process

[redacted]

The table below outlines the schedule in which PG&E solicitations will be issued. Updates to the table will be posted to PG&E's website and submitted to the CPUC via Tier 1 Advice Letter, at least annually, which will cover delivery periods for the current and upcoming calendar years.

PG&E's RA SOLICITATION SCHEDULE

Solicitation[5]	Delivery Term[6]	Products	Anticipated Date
Q4 through Balance of Year 2019	Monthly, through December 2019	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	July/August 2019
Annual Multiyear (2020 – 2022)	Monthly, January through December (2020 – 2022)	System RA with/without Flex Import Capacity Counting Rights Local RA with/without Flex RA Swaps	Q3 2019[7]
February through Balance of Year 2020	Monthly, February through December 2020	System RA with/without Flex Import Capacity Counting Right Local RA with/without Flex RA Swaps	November 2019
Q2 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	January 2020
Q3 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	April 2020
Q4 through Balance of Year 2020	Monthly, through December 2020	System RA with/without Flex Local RA with/without Flex Import Capacity Counting Rights RA Swaps	July/August 2020

[5] If PG&E does not have available products to sell, PG&E will not issue a solicitation.

[6] This table does not guarantee availability of product for the delivery period offered. Quantity is subject to meeting the requirements as described in this Appendix.

[7] PG&E will issue at least one solicitation to cover the delivery term of three years under the multiyear framework.

Annual Multiyear (2021 – 2023)	Monthly, January through December (2021 – 2023)	System RA with/without Flex Import Capacity Counting Rights Local RA with/without Flex RA Swaps	Q3 2020[8]
February through Balance of Year 2021	Monthly, February through December 2021	System RA with/without Flex Import Capacity Counting Right Local RA with/without Flex RA Swaps	November 2020

[redacted]

[8] PG&E will issue at least one solicitation to cover the delivery term of three years under the multiyear framework.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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

AT&T
Albion Power Company
Alcantar & Kahl LLP

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
P.C. CalCom Solar
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
County of Tehama - Department of Public Works
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

Downey & Brand
East Bay Community Energy
Ellison Schneider & Harris LLP
Energy Management Service

Engineers and Scientists of California

Evaluation + Strategy for Social Innovation
GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Charge Networks
Green Power Institute
Hanna & Morton
ICF

International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc. Linde
Los Angeles County Integrated Waste Management Task Force
Los Angeles Dept of Water & Power
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
Morgan Stanley
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy
Praxair

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions

SCE
SDG&E and SoCalGas

SPURR
San Francisco Water Power and Sewer
Seattle City Light
Sempra Utilities
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Troutman Sanders LLP
Utility Cost Management
Utility Power Solutions
Utility Specialists

Verizon
Water and Energy Consulting Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)
Yep Energy