Pacific Gas and Electric Company

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February 7, 2022

Advice 4572-G/6498-E
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: **Advice Letter of Pacific Gas and Electric: Summer Reliability Market Access Program 2022-2023**

Purpose

This advice letter requests $25 million to fund PG&E's Market Access program (MAP) contracts in 2022 and PG&E's administration and system development for MAP in 2022 and 2023, and to address the topics identified by the Commission in Decision (D.)21-12-011 Ordering Paragraph (OP) 1.

Table 1: Current MAP Budget Request

Requested Budget	Amount
2022 MAP: program implementation and incentives	$20,000,000
2022-2023 MAP: PG&E administrator costs	$5,000,000
Total Budget Requested in this advice letter:	**$25,000,000**

While this advice letter includes PG&E's anticipated 2023 MAP contract budget estimate of $30 million, PG&E expects to file a separate advice letter after the MAP 2023 has been solicited and the specific budget and program details (e.g., expected savings and TSB, etc.) are available.

Background

On July 30, 2021, Governor Gavin Newsom issued a Proclamation of a State of Emergency[1] (Proclamation) in response to the significant and accelerating impacts of climate change in California. The Proclamation stated, among other things, that the entities responsible for California's electric system -- the California Public Utilities Commission (CPUC or Commission), California Independent System Operator, and

[1] Proclamation of a State of Emergency, July 30, 2021, *available at:* https://www.gov.ca.gov/wp-content/uploads/2021/07/Energy-Emergency-Proc-7-30-21.pdf

California Energy Commission-- should take actions to meet the purposes and directives of the Proclamation to mitigate the risk of capacity shortages.

In response to the Proclamation, the Administrative Law Judge (ALJ) in Rulemaking 13-11-005 issued an e-mail ruling on August 6, 2021, seeking input from parties on actions that the Commission could take, specific to energy efficiency (EE) and reliability, to respond to the Governor's Proclamation and further the Commission's overall goals.

D.21-12-011, issued by the Commission on December 8, 2021, authorized up to $185 million in incremental energy efficiency funding for program years 2022 and 2023. The largest allocation was $150 million, statewide, for a new Market Access program (MAP) funded for 2022 and 2023.[2] The Decision ordered that MAP be designed to deliver peak and/or net peak demand savings using the normalized metered energy consumption (NMEC) approach to measure energy and peak demand savings in residential and commercial buildings. The Decision permitted electric investor-owned utilities (IOUs) and Marin Clean Energy (MCE) to file advice letters (ALs) requesting MAP funding within 60 days from the issuance of the Decision.

Overview

Since the Commission issued D.21-12-011, PG&E has been working to both develop a MAP to deliver energy efficiency-based peak and net peak savings in 2022 and to plan a competitive solicitation for a MAP to deliver savings in 2023.

In scoping PG&E's MAP offerings, we have focused on the following objectives:

- How to balance urgency of the need to deliver immediate savings in summer 2022 with the need to ensure planning and negotiations reflect the significant investment of ratepayer funds.
- How to set up PG&E's MAP to be a robust program that is vendor agnostic and flexible enough to meet California's mid- and long-term reliability needs.
- How to set up MAP for success while balancing data privacy needs.
- How to meet the immediate 2022 MAP needs while enabling a fair and competitive solicitation of MAP implementers and program partners in 2023 and beyond.

PG&E anticipates that its MAP offerings will largely follow the guidance in the Commission's decision.[3] PG&E anticipates that MAP will involve ***implementers*** to lead aggregator recruitment and management, and conduct project measurement and verification (M&V), as well as ***aggregators*** to identify and manage customer energy-saving projects.

Per D.21-12-011, PG&E's MAP will target summer peak (4-7pm) and net peak (7-9pm) savings that will be measured based on NMEC methods to be articulated in a forthcoming

[2] D. 21-12-011, pp. 59-60, OP 1.
[3] D. 21-12-011, pp. 24-30.

NMEC M&V Plan. In order to ensure focus on summer peak and net-peak savings, all program costs, including aggregator incentives, portfolio administrator costs, and marketing will be capped at TSB.

PG&E intends to use third parties to implement the various aspects of MAP and will select a primary MAP implementer through a competitive solicitation. However, because it is not possible to conduct a competitive solicitation in time to deliver a comprehensive MAP for the 2022 summer season, PG&E will direct award a contract to one or more interim MAP implementers to deliver the program until a MAP implementer can be competitively sourced. The 2022 MAP is expected to focus on non-residential customers and projects, though could include residential customers and projects if the interim implementers identify viable opportunities.

While PG&E will outsource much of the implementation of MAP to vendors, PG&E intends to run MAP as a “core” offering that will be developed and owned by PG&E. PG&E, in consultation with program vendors, will develop the key elements of the program design including but not limited to: incentive and compensation structures, quality assurance protocols, M&V plan, and project eligibility criteria. While PG&E anticipates that the interim MAP implementer(s) will oversee the 2022 MAP, PG&E may select additional vendors to support certain tasks – for example, customer/project recruitment or M&V. PG&E believes that involving multiple implementers and additional service-specific vendors will enable greater program flexibility and will mitigate the inherent risk in funding a program that is new to the California EE market.

PG&E intends to launch a competitive solicitation in 2022 for the implementer(s) of PG&E’s 2023 MAP, which may include residential and/or non-residential projects. In addition to ensuring the best use of ratepayer funds through competition, PG&E expects that a competitive solicitation will provide the market an opportunity to build on the lessons learned from 2022 MAP and to propose third-party-designed MAP programs which could allow PG&E to turn over the MAP program design and implementation to one or more third parties in 2023 and close out the “core” program. PG&E expects this course of action to help expand the market of providers who can partner with PG&E to achieve the success of these MAPs.

In planning for PG&E’s 2022 and 2023 MAP offerings, PG&E has met regularly with MCE, and will continue to coordinate, to ensure that PG&E and MCE’s programs do not overlap with each other and that they will not cause market or customer confusion.

2022-23 MAP Budget Overview

PG&E proposes a budget level and strategy that balances the need to ensure that MAP has funding adequate to support its success, with the need to minimize the funds requested from ratepayers.

In D.21-12-011, the Commission set a statewide, two-year maximum allocation of $150 million for MAP. Per D.19-12-021, Table 1, the portion for PG&E’s territory (including

MCE's MAP) is 44.5 percent, equating to $66,750,000. PG&E has conferred with MCE to ensure that PG&E and MCE's combined MAP budgets are within the maximum amount established by the Commission. When the Commission approves MAP budget for PG&E and/or MCE, PG&E will incorporate those amounts for cost recovery via electricity rates.

This advice letter includes PG&E's request for $20 million for 2022 MAP implementation and incentives. If the 2022 MAP enrollments exhaust this budget, PG&E may request additional funds for the 2022 MAP through a subsequent AL. If there is remaining budget after the program has transitioned from 2022 to 2023 MAP, PG&E requests the ability to apply those funds to 2023-oriented MAP projects.

In this advice letter, PG&E is also requesting $5 million for PG&E's MAP-related portfolio administrator costs (e.g., staffing, marketing, solicitation, and data systems upgrades) for MAP across the two years, 2022-2023.

PG&E intends to cap total program expenditures, including all implementer and PG&E costs, at TSB.

Table 2. 2022-23 MAP Budget Detail for PG&E and MCE

Budget or Cost Category	Amount
2-year statewide MAP budget Cap	$150,000,000
2-year PG&E service territory MAP budget Cap	$66,750,000
MCE: 2-year MAP budget[4]	$6,000,000
PG&E: 2022 MAP program implementation and incentives	$20,000,000
PG&E: *estimated* 2023 MAP program implementation and incentives	$30,000,000
PG&E: 2022-2023 MAP administrator costs (e.g. marketing, solicitation, data systems, etc.)	$5,000,000
Total Budget Anticipated to Be Requested Over 2022-2023 for PG&E Territory (including MCE)	**$61,000,000**
Remaining budget to be requested by PG&E or MCE if needed	$5,750,000

PG&E expects to submit another advice letter to request funding for 2023 MAP implementation and incentives. While the final budget request will depend on the outcome of the competitive solicitation, PG&E anticipates requesting between $25-30 million for program implementation and incentives. The amount PG&E requests in that advice letter may be offset by any program implementation and incentive budget remaining unspent and uncommitted from the $20 million requested for 2022 MAP. These budget levels of $20 million and $25-30 million, and the ability to request additional funds if needed, will ensure that the competitively selected MAP implementer has adequate funding to implement MAP in 2023 while maintaining the ability to respond to program demand in the first year of MAP.

[4] Per 2/2/2022 email from Jenn Kreutzer of MCE.

The current budget request plus expected future budget needs for PG&E's territory for two years totals $61 million, leaving $5,750,000 for PG&E and MCE to make additional budget requests if programs perform well and additional funds are needed.

Estimated Peak Savings

Below are PG&E's high-level estimates of the savings that MAP could achieve in 2022[5]. However, because PG&E is currently in contracting discussions with vendor(s) to deliver MAP in 2022, these figures are approximate. Peak impacts represent projects installed by the summer of each year. They are estimated using the combined total of DEER (HVAC, Lighting, Water Heating, etc.) and custom (load shifting, net peak load shedding) savings load shapes for the program and assume a peak kicker rate of $200/MWh 4-7 p.m., and $400/MWh net peak kicker 7-9 p.m.

Table 3: ***2022/2023 Forecast Metrics Under Base Assumptions***

Metric	2022	2023
Total Budget Spend[6]	$23,000,000	$30,000,000
Gross kWh Savings	23,914,758	27,732,332
Net kWh Savings	22,719,020	25,839,600
Avg. Peak kW Demand Impact (Net)[7]	3,723	8,326
Avg. Net Peak kW Demand Impact (Net)[8]	4,329	9,551
Lifecycle GHG Savings (tons)	80,434	99,922
Program-Calculated TSB[9]	$23,000,000	$30,000,000
TSB (unadjusted avoided cost values)[10]	$23,633,760	$30,689,730

[5] This assumes PG&E is able to successfully negotiate contract(s) with interim implementer(s) to deliver MAP in 2022.
[6] Note that budget spend for 2022 is lower than the $25m requested in this AL, as some funds requested are earmarked for 2023 Program Administrator costs
[7] Avg. Peak kW Impact - This is the combined programmatic kW impact of projects installed before the end of Summer for hours between 4-9 PM.
[8] Avg. Net Peak kW Impact - This is the combined programmatic kW impact of projects installed before the end of Summer for hours between 7-9 PM.
[9] Aggregators will be paid based on program-calculated TSB, which is based on adjustments to avoided cost values to include kickers for peak and net peak savings, as described in the Program Compensation and Peak Savings Kicker sections below.
[10] Program expenditures will be capped at CEDARS TSB, based on unadjusted avoided cost values.

PG&E will include MAP 2022 contracted savings estimates and/or program goals in the MAP implementation plans that will be uploaded to CEDARS within 60 days of PG&E and vendor contract execution.

PG&E will provide forecasted savings for MAP 2023 in the advice letter it will file for the 2023 program after the solicitation for 2023 MAP implementer(s) is complete. However, because PG&E anticipates a higher budget for MAP in 2023, we estimate that those savings will be higher than MAP 2022, and with a program calculated TSB that exceeds the program budget.

Compensation Structure

MAP compensation comprises payments to both aggregators and implementers and PG&E intends to tie these payments to performance and actual delivery of peak savings whenever possible.

<u>Aggregator Compensation</u>

PG&E intends to publish the peak kicker and aggregator compensation structure as soon as possible to provide market actors with the information necessary to begin project planning.

Aggregators will be compensated for program-calculated TSB delivered, net of the Lead Implementer and Portfolio Administrator costs. Program-calculated TSB is based on adjustments to avoided cost values to include kickers for peak and net peak savings, as described in the Program Compensation and Peak Savings Kicker sections below. The structure of the program requires aggregators or customers to leverage their own capital up front to fund the upgrades. Aggregators will be paid quarterly, based on the program-calculated TSB achieved in that quarter for each aggregator’s portfolio.

The aggregator is responsible for compensating the customer. This structure allows the aggregators to use or design their own business models for executing customer projects. In some cases, the aggregators may fund the installation of the equipment and use the quarterly TSB payments to reimburse themselves. In other cases, the aggregator may require the customer to fund the installation and transfer the quarterly TSB payments to the customer. Some aggregators may guarantee a rate of return or payback to the customer, taking any gains or losses.

The aggregator compensation structure may be updated for 2023 if the competitively selected MAP implementer proposes improvements or changes based on lessons learned from 2022.

<u>Implementer Compensation</u>

Because PG&E is currently in the process of selecting one or more vendors to implement MAP in 2022, the information provided in this section is general in nature and subject to change. PG&E is committed to a compensation structure that best encourages MAP implementers to deliver net peak demand reductions.

The interim MAP implementer compensation may have some combination of the following payment flows to align implementer compensation with the level of effort required to implement MAP:

- A fixed fee component for the duration of the contract.
- A variable monthly fee paid based on time and materials, or otherwise reflective of implementation effort at various stages of the contract.
- A pay for performance project completion fee based on forecasted program value (i.e., program-calculated TSB) for each completed project submitted by the aggregators in the prior month, or actual savings accrued month to month.

Peak Savings Kicker

D.21-12-011 clearly conveys the Commission's priority for the 2022-2023 MAP and reliability programs to deliver savings in the peak hours between 4 p.m. and 9 p.m., with the highest priority being the "net peak" hours between 7 p.m. and 9 p.m.[11] Unlike Demand Response (DR) programs that pursue peak hour savings on specific days when the electric grid is experiencing high demand, the MAP offerings will focus on these peak hours every day of the summer season. The key to the success of MAP in delivering savings during these hours will be to design the program offerings to sufficiently incentivize aggregators to pursue projects that focus on these hours each day.

PG&E envisions that 2022 MAP will make payments to aggregators based on the program-calculated TSB derived from adjustments to avoided cost values to shift value into peak periods while reducing value in off-peak periods. To establish consistent rates within each of the peak, net peak, and off-peak periods, PG&E intends to derive program-calculated TSB by following two steps:

1. Calculate TSB using smoothed avoided cost values for generation capacity, transmission, and distribution across three categories: (a) peak hours of 4-7 p.m., June-September; (b) net peak hours of 7-9 p.m., June-September; (c) all other hours
2. Apply a kicker as follows for peak and net peak hours from June-September: (a) peak hours: kicker anticipated to be in the range of $100-$200, (b) off-peak hours: kicker anticipated to be in the range of $200-$500 per MWh. After applying the kicker, reduce the value of all off-peak hours proportionally.

By adding kickers for peak and net peak periods, and proportionally discounting non-peak hours, the total value for the full year remains constant throughout the process. This aligns with the discussion in D.21-12-011 of the benefits of this approach to limit risk to ratepayers by incentivizing peak and net peak demand reductions in June through

[11] See, e.g., D.21-12-011, p. 52, FOF 3.

September of 2022 and 2023 while limiting spending to Total System Benefit.[12] PG&E will further describe these adjustments the MAP M&V Plan.

Because negotiations are ongoing at the time of this AL, the details of the program incentive structure are not finalized. However, PG&E is exploring program kicker incentive payments in the range of $100-$200 for 4-7 p.m., and $200-$500 for 7-9 p.m.

Program Reporting

PG&E plans to report incremental savings achieved through the MAP as part of its regular reporting, including summer monthly and annual reports. While exact data processes will not be final until MAP implementation contracts are executed, PG&E envisions including the following kinds of data in its MAP reporting:

- Total program savings (kWh)
- Average peak savings (4-9pm), gross peak savings (4-7pm), net peak (7-9pm) program impact
- Total program TSB value generated ($) (without adjustments to avoided cost values)
- Total program TSB value generated ($) (with adjustments to avoided cost values)
- Program payment recommendations for aggregators
- Forecasted peak (4-9pm), gross peak (4-7pm), net peak (7-9pm) savings from both enrolled and installed projects
- Forecasted kWh savings from enrolled projects
- Total budget reserved (from enrolled projects)
- Number of projects enrollments per month
- Number of project installations per month

PG&E will work with the 2022 and 2023 MAP implementers to identify tools or systems that might aid in the speed and detail of reporting for MAP performance and achievements.

In addition, PG&E will provide additional MAP and/or reliability reporting according to the reporting process developed by Energy Division (ED) staff. PG&E will work with ED staff to develop a reporting framework for MAP and/or the summer reliability efforts that provides timely information to the Commission without creating an unnecessary burden on PG&E or the MAP and reliability program implementers.

Integration with Other Programs

<u>Existing Energy Efficiency Programs</u>

MAP provides a new and unique EE offering that, if designed for success, should attract a vast array of Energy Services companies including PG&E 3P EE implementers. PG&E

[12] D.21-12-011, p. 26.

is looking for approaches that are most likely to maximize benefit to customers and California's energy grid. A significant imbalance in market signals stemming from aggressive peak kickers in MAP threaten the health of existing EE Portfolio and compromise goal attainment.

PG&E intends to consult with Energy Division staff to explore options that minimize program and portfolio imbalance, which may include:

- Allowing third parties who enroll as aggregators to claim and pay non-peak savings in the existing portfolio from projects PG&E third party implementers, while claiming summer peak savings in MAP. This would require developing a realistic plan to ensure accurate attribution of all financial and savings claims and verify all program requirements (e.g., incrementality) are met.
- Aligning MAP incentives with kickers in existing programs. This option is less efficient and difficult to scale as it would require modifying many individual contracts with third parties with complex compensations structures and diverse program design. This option also limits MAP's ability to set appropriate incentives if price signals must be dampened to ensure parity with existing programs.

Demand Response Programs

As PG&E plans and implements the 2022-2023 MAP, key considerations are what opportunities and barriers exist to integration of the MAP with other demand-side customer offerings. DR programs and pilots are especially relevant given the shared objectives between the MAP and DR programs of minimizing peak energy consumption, particularly during summer days when grid reliability may be compromised due to short electricity supply. The incorporation of DR into the MAP is an opportunity PG&E has identified as a potential pathway to increase customer participation in demand-side offerings which serves a dual purpose of 1) acquiring more flexible demand to mitigate capacity shortfalls while 2) providing customers DR marketing, education, and outreach, including the financial incentives that come with participation.

For the 2022-2023 MAP, PG&E proposes encouraging non-residential MAP participants to dually enroll with PG&E’s Emergency Load Reduction Program (ELRP) pilot[13]. The ELRP is a CPUC ordered DR pilot within the Emergency Reliability OIR Proceeding which provides directly enrolled customers and third-party DR aggregators the opportunity to voluntarily reduce load during times of grid stress and emergency. PG&E believes there are efficiencies and benefits to this integration as opposed to attempting to design any new DR offerings specific for the MAP. PG&E proposes a phased approach.

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[13] Participants that wish to enroll in the ELRP must meet existing ELRP eligibility and participation requirements as defined in D. 21-12-015.

The ELRP has two customer enrollment channels – direct enrollment with PG&E and through a DR aggregator.[14]

- 2022 MAP: Promote direct enrollment and participation through the MAP onboarding process to non-residential MAP participants[15]. PG&E will look for ways to coordinate the enrollment flows of both the MAP and the ELRP to streamline the customer enrollment experience.

  While PG&E believes in the important role DR aggregators play in increasing the reach and participation of DR, PG&E believes that the direct enrollment pathway will allow for the most streamlined integration in 2022. With the DR aggregator pathway, contractual complexities may arise with the introduction of a new DR aggregator to the customer, in addition to the existing MAP aggregator. Customers would have to seek out a DR aggregator that is participating in the ELRP and agree to the aggregator's services. To address this barrier, PG&E will be coordinating with the MAP aggregators to understand opportunities to encourage MAP aggregators to enroll as an ELRP aggregator.

- 2023 MAP: PG&E would expand the focus from the direct enrollment pathway to include the remaining aggregator pathways based on the learnings from the engagements with the MAP aggregators in 2022.

While integration of MAP and the ELRP is expected to add value in terms of grid savings, as well as customer and aggregator experience, there is a critical question surrounding how to distinguish MAP-savings from those savings that are the result of ELRP events. The ELRP has various baseline methods (e.g., 10-10, 5-10, etc.) used to calculate performance based on the sub-option participant decides to enroll in. Hence, any ELRP performance calculation will only capture incremental reduction attributed to ELRP event and will not incentivize any MAP related activities done by the customer and their third-party MAP aggregator. There is, however, the matter of ensuring that the incremental ELRP performance is not counted towards MAP to avoid overpayment and to ensure equitable accounting between EE and DR. To address this, PG&E will engage both MAP and ELRP EM&V teams to observe and evaluate the results of the 2022-2023 MAP and may engage a third-party evaluator to conduct Early M&V.[16] This effort will provide greater insights on how best to pursue future dual participation and stacking of program

[14] Enrollment channels are further segregated into sub-groups as defined in D. 21-12-015. The first channel is applicable to sub-groups A.1 and A.3, the second is applicable to sub-groups A.2, A.4 and A.5.

[15] This does not exclude DR aggregator participation. While the focus for 2022 will be direct enrollment, DR aggregator enrollment is allowed.

[16] Early M&V "seeks to validate key savings assumptions and to better understand how savings are achieved for the purpose of improving programs." See Decision 10-04-029 (April 21, 2010), p. 25.

incentives between the MAP and the ELRP whose learnings can be expanded broadly across EE and DR.

Incremental Savings

PG&E is invested in the success of MAP while ensuring that its MAP offerings do not undermine its main EE portfolio. MAP's higher incentive levels and lower cost effectiveness threshold could make it more appealing to implementers than existing EE programs. As such, PG&E has been working to set MAP program design and requirements to ensure that projects in MAP are unique and not diverted from the main EE portfolio. To that end, PG&E has identified several strategies that it may implement to ensure that savings resulting from the MAP in 2022 are incremental. In addition, PG&E is hopeful that the competitive solicitation will yield additional strategies.

The actions that PG&E has already identified to ensure that MAP will achieve savings that are incremental to the main EE portfolio include:

- Any active project that has already been submitted to a program in the main EE portfolio will not be eligible for MAP;
- MAP aggregator recruitment efforts will focus on attracting new market participants that don't participate in the main EE portfolio of programs; and
- PG&E will undertake an effort to identify projects that do not fit into the main EE portfolio:
    - Projects that have already been rejected from the main EE portfolio because of low cost effectiveness; or
    - Energy saving measures that are not eligible in the main EE portfolio.

PG&E will continue to refine the program requirements in support of incrementality as it continues to develop the 2022 MAP program prior to launch.

2022 MAP Launch Strategy

The window for launching the 2022 MAP in time to provide relief during the summer 2022 peak season is very narrow. PG&E intends to negotiate and execute a contract with the interim MAP implementer(s) as soon as possible following approval of this advice letter to allow them sufficient time to recruit and enroll aggregators into the program and provide aggregators sufficient time to identify and contract with customers and install projects.

To meet this aggressive timeline, PG&E requests that the ED dispose of PG&E's advice letter no later than March 9, 2022. Any delays to the approval of this advice letter, or any substantive changes that require program redesign or renegotiation of the interim MAP implementer(s) contract, will delay the program launch and jeopardize the ability to deliver savings in the summer of 2022.

PG&E will develop the following program launch documents and upload them to CEDARS per the direction provided in D. 21-12-011:

- Implementation Plan
- Program Schedule
- Program Manual
- Marketing, Education and Outreach Plan

Table 44 lays out the 2022 MAP launch timeline and key milestones to deliver savings during the summer of 2022.

Table 4. 2022 MAP Launch: Anticipated Timeline and Milestones

Month	Activity/Milestone for 2022 Interim MAP
February 2022	7- PG&E submits MAP advice letter
March 2022	9 - Commission approves MAP advice letter within 30 days of submission
April 2022	Executed Contract with Interim MAP Implementer(s) Interim MAP Implementer(s) begin/conduct aggregator recruitment Approved aggregators begin outreach to potential MAP customers
May 2022	PG&E uploads interim MAP Launch documents to CEDARS Aggregators secure commitments from MAP customers
June-September 2022	Ongoing project enrollment and installation
November - December 2022	Interim MAP stops accepting customer enrollments after December 31, 2022

Concurrent with the 2022 MAP activities, PG&E intends to conduct a competitive solicitation to secure a primary MAP implementer for 2023 and beyond. PG&E intends to conduct the solicitation and complete contracting before the end of 2022 so that program start-up activities and aggregator enrollments can begin on or before January 1, 2023.

<u>Protests</u>

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than February 28, 2022, which is 21 days[17] after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

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

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

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

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 1 of D.21-12-011, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, March 9, 2022 which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.13-11-005. 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

cc: Service List R.13-11-005

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 M)

Utility type:
- [x] ELC
- [x] 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) #: 4572-G/6498-E

Tier Designation: 2

Subject of AL: Advice Letter of Pacific Gas and Electric: Summer Reliability Market Access Program 2022-2023

Keywords (choose from CPUC listing): Compilance

AL Type: [ ] Monthly [ ] Quarterly [ ] Annual [x] One-Time [ ] Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:
D.21-12-011

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 [x] No

If yes, specification of confidential information:
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution required? [ ] Yes [x] No

Requested effective date: 3/9/22

No. of tariff sheets: N/A

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed[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: Utility/Entity Name: Telephone (xxx) xxx-xxxx: Facsimile (xxx) xxx-xxxx: Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
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 Energy Management Service
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
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