

Docket No.: A.23-02-018

Exhibit No.: _____

Date: September 22, 2023

Witness: Brian Shuey

**PREPARED DIRECT TESTIMONY OF BRIAN SHUEY
ON BEHALF OF
THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION
IN PACIFIC GAS AND ELECTRIC COMPANY'S
2022 ERRR COMPLIANCE PROCEEDING**

Public Version

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1 **I. INTRODUCTION AND SUMMARY OF TESTIMONY**

2 The California Community Choice Association (**CalCCA**) presents this direct
3 testimony in the *Application of Pacific Gas and Electric Company (PG&E) for*
4 *Compliance Review of Utility Owned Generation Operations, Portfolio Allocation*
5 *Balancing Account (PABA) Entries, Energy Resource Recovery Account (ERRA)*
6 *Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility*
7 *Owned Generation Fuel Procurement, and Other Activities for the Record Period*
8 *January 1 Through December 31, 2022 (Application)*. This testimony has been prepared
9 on behalf of CalCCA by Brian Shuey, Senior Manager, NewGen Strategies and
10 Solutions, LLC. Mr. Shuey’s qualifications are set forth in Attachment A.

11 CalCCA has a particular interest in the PABA, which is charged to CalCCA
12 members’ customers through the Power Charge Indifference Adjustment (**PCIA**) rates.
13 This testimony presents CalCCA’s recommendations on issues falling within scope of the
14 following items from the Assigned Commissioner’s Scoping Memo and Ruling in this
15 case:¹

- 16 1. Whether PG&E, during the record period, prudently administered and
17 managed, in compliance with all applicable rules, regulations and
18 Commission decisions, including but not limited to Standard of Conduct No.
19 4 (SOC 4), the following:
- 20 a. Utility-Owned Generation Facilities, except for the Elkhorn Battery
21 Energy Storage System and Pit 1 Powerhouse outages which will be
22 reviewed in the 2023 ERRA Compliance proceeding;
 - 23 b. Qualifying Facilities (QF) Contracts; and
 - 24 c. Non-QF Contracts.

¹ Application (A.) 23-02-018, *Assigned Commissioner’s Scoping Memo and Ruling* at 2-3 (June 2, 2023) (Scoping Ruling).

1 If not, what adjustments, if any, should be made to account for imprudently
2 managed or administered resources?

- 3 2. Whether the entries recorded in the ERRA and the Portfolio Allocation
4 Balancing Account are reasonable, appropriate, accurate, and in compliance
5 with Commission decisions.
- 6 5. Whether PG&E administered resource adequacy procurement and sales
7 consistent with its Bundled Procurement Plan;

8 Based on my review of PG&E's Application, supporting workpapers, and
9 responses to discovery I make the following recommendations:

- 10 • PG&E should be required to provide a detailed reconciliation between the
11 resource adequacy (**RA**) position reports used as the basis for its solicitations
12 offering to sell RA for delivery in 2022 and its final RA positions resulting in
13 excess capacity in June through October 2022.
- 14 • The Commission should scrutinize PG&E's assumptions about resource
15 availability and the adjustments made to its RA position to ensure reductions
16 to capacity made available to the market are justified and to eliminate
17 potential overlap among categories.
- 18 • PG&E's Bundled Procurement Plan (**BPP**) should be updated to ensure excess
19 capacity is made available to the market, either through refined adjustments to
20 available capacity in RA position reports or through market offers outside of
21 the scheduled solicitation process.
- 22 • The Commission should consider whether disallowance, penalty, or other
23 remedy is warranted for the 2022 record year based on PG&E's non-
24 compliance with Decision (**D.**) 21-12-015.

1 **II. PG&E COUNTED A SIGNIFICANT QUANTITY OF PCIA-ELIGIBLE**
2 **RESOURCES TOWARD 2022 SYSTEM RELIABILITY INCREMENTAL**
3 **PROCUREMENT TARGETS.**

4 In its Prepared Testimony, PG&E reported it transferred a total of 923 MW of
5 excess RA capacity from its existing PCIA-eligible resource portfolio to its Cost
6 Allocation Mechanism (CAM) portfolio to be counted toward its 2022 System Reliability
7 Incremental Procurement requirement established in D.21-03-056.² According to D.21-
8 12-015 if PG&E has not met its minimum contingency procurement target for June and
9 October it may:

10 “...use excess resources in its existing portfolios to meet the
11 minimum contingency procurement target (900 MW for PG&E and
12 SCE, and 200 MW for SDG&E), *provided it has made reasonable*
13 *attempts to sell this excess capacity to other LSEs.*”³
14

15 Additionally, for the months of July, August, and September, excess resources may:

16 “... be used to meet or supplement these procurement targets up to
17 the upper end of its contingency procurement target (1,350 MW for
18 PG&E and SCE, and 300 MW for SDG&E), *provided it has made*
19 *reasonable attempts to sell this excess capacity to other LSEs.*”⁴

20 As noted in D.21-12-015, PG&E is authorized to count excess RA capacity from
21 existing resources to meet its System Reliability Incremental Procurement targets
22 provided it has first made reasonable attempts to sell this excess capacity to other load
23 servicing entities (LSEs). Because cost recovery for System Reliability Incremental
24 Procurement is through the CAM, the value of excess RA capacity provided by existing
25 resources must be transferred from the applicable balancing account to the CAM
26 balancing account (for PG&E, the New System Generation Balancing Account

² PG&E’s Prepared Testimony, Chapter 12, page 12-15, lines 3-19.

³ D.21-02-015, Phase 2 Decision Directing PG&E, SCE, and SDG&E to take actions to prepare for potential extreme weather in the summers of 2022 and 2023, page 183 (emphasis added).

⁴ *Id.*, page 184 (emphasis added).

1 (NSGBA)).

2 PG&E reports that it counted 923 MW of excess RA from existing PCIA-eligible
3 resources, during the months of June through October of 2022.⁵ As required, PG&E
4 credited PABA and charged NSGBA for the value of the RA transferred to CAM.
5 Transfers were valued at the Forecasted 2022 System RA Adder for June through
6 September, prior to the publishing of the Final 2022 System RA Adder. PG&E trued-up
7 the entries through October and made an adjustment to account for the publishing of the
8 Final RA Adders. The total amount transferred to NSGBA was [REDACTED] over the five
9 months. See Table 1 for the transfers by month.

10 **Table 1: System RA Transfer from PABA to NSGBA⁶**

	June	July	August	September	October	Total
RA Transferred to NSGBA (MW)	103.70	183.14	148.97	156.70	330.00	922.51
System RA Transferred to NSGBA \$/kW	[REDACTED]					

11
12 CalCCA does not dispute that PG&E is authorized under D.21-12-015 and D.21-
13 03-056 to count excess RA capacity toward incremental procurement obligations.
14 However, even though PG&E appropriately credited the PABA for the PCIA resources it
15 borrowed, my testimony demonstrates that PG&E did not make reasonable attempts to
16 sell the ‘excess’ capacity to other LSEs as required by D.21-12-015.

⁵ See PG&E’s response to CalCCA data requests 2.19 and 2.58.

⁶ RA Transferred to CAM from PG&E 2022 IOU Excess Resources Summary Report, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/oct-2022pge-template-for-excess-resource-reporting-d2112015-public-083122.xlsx>.

1 **III. PG&E’S SYSTEM RA POSITION REPORTS ARE INCONSISTENT WITH**
2 **PG&E’S CLAIM THAT IT HAD 923 MW OF EXCESS RA AVAILABLE DURING**
3 **SUMMER MONTHS IN 2022.**

4 PG&E’s BPP Appendix S explains that [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 PG&E creates a projected RA position at the time it holds each solicitation in
15 order to determine the quantity of RA available for sale at that point in time.⁸ As part of
16 the Joint CCA Master Data Request included with PG&E’s filing in this case, PG&E
17 provided CalCCA the RA positions it prepared for each solicitation in which it offered to
18 sell RA with delivery during 2022. Table 2 summarizes PG&E’s System RA position for
19 the months of June through October 2022 as calculated at the time of each solicitation.

⁷ See PG&E’s Bundled Procurement Plan Appendix S Section B.3.b.1.a

⁸ See PG&E’s response to Joint CCA Master Data Request 1.08.

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Table 2: Summer System RA Position (MW)

RA Position Date		Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
8/23/2021	System RA Position					
10/6/2021	System RA Position					
11/22/2021	System RA Position					
1/14/2022	System RA Position					
4/11/2022	System RA Position					
7/18/2022	System RA Position					

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PG&E reported a dramatically different picture to the Commission in its 2022 Excess Resources Report. In that report, PG&E reported that it had 923 MW of *excess* RA from existing resources during June through October 2022, including 183 MW in July and 330 MW in October.⁹

In response to CalCCA’s discovery requests, PG&E explained that it identified the final quantity of excess RA capacity counted towards meeting System Reliability Incremental Procurement targets between T-50 and T-30 days prior to each compliance month.¹⁰ That timing coincides with PG&E’s preparation of monthly RA supply plans required to be submitted to the CAISO 45 days prior to the compliance month.¹¹ This means, for example, that PG&E did not identify that it had 183 MW of excess RA for

⁹ Excess RA from PG&E 2022 IOU Excess Resources Summary Report, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/oct-2022pge-template-for-excess-resource-reporting-d2112015-public-083122.xlsx>.

¹⁰ See PG&E’s response to CalCCA data request 3.26.

¹¹ See CAISO Open Access Transmission Tariff Section 40.4.7.1.b.

1 July 2022 until sometime around May 12, 2022, while preparing its monthly RA supply
2 plan. But just 31 days earlier (for its April 11, 2022 solicitation), PG&E prepared a
3 System RA position report [REDACTED]
4 [REDACTED].¹² For
5 October 2022, the change from PG&E’s System RA position report [REDACTED] to
6 the amount of excess RA counted towards PG&E’s System Reliability Incremental
7 Procurement targets (330 MW excess) [REDACTED]
8 [REDACTED]

9 **IV. PG&E DID NOT OFFER TO SELL EXCESS SYSTEM RA TO OTHER LSES**
10 **PRIOR TO COUNTING THE CAPACITY TOWARD ITS SYSTEM**
11 **RELIABILITY INCREMENTAL PROCUREMENT TARGETS.**

12 When asked to explain all attempts made to sell any portion of the 923 MW of
13 excess capacity, PG&E responded that it “attempts to sell all excess capacity, or its long
14 RA position, as determined by Appendix S [of the BPP], pursuant to the commercial
15 processes in Appendix S.”¹³ Specifically, PG&E issued six solicitations offering to sell
16 System RA for delivery during the 2022 Compliance Year. PG&E held two year-ahead
17 solicitations in August 2021 and October 2021, in which PG&E projected out the
18 available RA for the full twelve months of 2022. PG&E also held four quarterly
19 solicitations in November 2021, January 2022, April 2022, and July 2022, projecting the
20 available RA for the remaining months of 2022 updated on a quarterly basis.

21 As described earlier, PG&E’s BPP prescribes [REDACTED]
22 [REDACTED]
23 [REDACTED]

¹² PG&E held no solicitations after April 11, 2022, offering to sell RA capacity in July 2022.

¹³ See PG&E’s response to CalCCA data request 2.54.

1 [REDACTED] PG&E's BPP

2 also states, [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]¹⁴

7 Table 3 summarizes the System RA offered for sale in each solicitation with
8 delivery periods from June through October 2022 based on PG&E's projected System
9 RA positions prepared at the time of each solicitation.¹⁵ Consistent with PG&E's BPP
10 Appendix S, [REDACTED]

11 [REDACTED]

12 **Table 3: Summer System RA Volumes Offered for Sale by Solicitation (MW)**

RA Position Date	System RA Volume Offered for Sale	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
8/23/2021	Phase 1 2022 YA Solicitation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/6/2021	Phase 2 2022 YA Solicitation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/22/2021	Q1 Balance-of-Year Solicitation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
1/14/2022	Q2 Balance-of-Year Solicitation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4/11/2022	Q3 Balance-of-Year Solicitation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7/18/2022	Q4 Balance-of-Year Solicitation	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

13
14 As Table 3 demonstrates, [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]¹⁶

¹⁴ See PG&E's Bundled Procurement Plan Appendix S Section B.3.d.1.

¹⁵ See PG&E's response to Joint CCA Master Data Request 1.08 Attachment 2 and CalCCA data request 2.57.

¹⁶ See PG&E's response to CalCCA data request 3.31.

1 When asked to provide documentation demonstrating whether it received any
2 offers from other LSEs to purchase any portion of the 923 MW of excess RA, PG&E
3 responded that it “did not receive any bids from other LSEs to purchase any portion of
4 the excess capacity *after it was known to be available.*”¹⁷ However, PG&E issued each of
5 the solicitations summarized in Table 3 above *before* PG&E had determined the quantity
6 of excess RA from existing resources that it would count toward System Reliability
7 Incremental Procurement targets. In other words, PG&E offered solicitations based on a
8 System RA Position that was calculated *before* PG&E calculated the excess RA it had
9 available to meet System Reliability Incremental Procurement targets.

10 PG&E issued its final two solicitations for RA with delivery in 2022 on April 11,
11 2022, and July 18, 2022, which projected System RA positions for July through
12 December 2022 and October through December 2022, respectively. According to
13 PG&E’s BPP, [REDACTED]

14 [REDACTED]
15 [REDACTED]
16 When asked whether it had rejected offers from other LSEs to purchase any
17 portion of the 923 MW of excess capacity, PG&E simply referred back to its statement
18 that it did not receive any bids “after the excess capacity was known to be available.”¹⁸
19 Reviewing data from PG&E’s RA solicitations tells a more complete story, however.
20 Table 4 below details for each RA solicitation the bids submitted by third parties seeking
21 to purchase System RA, but which were rejected by PG&E [REDACTED]
22 [REDACTED]

¹⁷ See PG&E’s response to CalCCA data request 2.55 (emphasis added).
¹⁸ See PG&E’s response to CalCCA data request 2.56.

1 [REDACTED] Table 4 summarizes the number of bids rejected [REDACTED]

2 [REDACTED]

3 [REDACTED]. As Table 4 demonstrates, [REDACTED]

4 [REDACTED].¹⁹

5 **Table 4: Bids Rejected** [REDACTED]

Solicitation	Solicitation Terms / Number of Bids / MWs Rejected									
	June 2022		July 2022		August 2022		September 2022		October 2022	
	# of Bids	MWs	# of Bids	MWs	# of Bids	MWs	# of Bids	MWs	# of Bids	MWs
Phase 1 2022 YA	[REDACTED]									
Phase 2 2022 YA	[REDACTED]									
Q1 2022 BOY Solicitation	[REDACTED]									
Q2 2022 BOY Solicitation	[REDACTED]									
Q3 2022 BOY Solicitation	[REDACTED]									
Q4 2022 BOY Solicitation	[REDACTED]									

7 PG&E’s responses that it had not received any bids to purchase the RA “after it
8 was known to be available” obfuscates the reality of the solicitation and compliance
9 reporting processes. A follow-up discovery question from CalCCA asked PG&E to
10 explain specifically how it communicated to other LSEs that excess capacity had become
11 available following its solicitation, to which PG&E simply replied that it complied with
12 the requirements in Appendix S of its BPP at all times.²⁰ PG&E’s responses to discovery
13 fail to acknowledge that there was no RA solicitation that would have been timely
14 enough to offer PG&E’s excess RA for sale, and that therefore, LSEs *could not have*
15 made bids to purchase excess RA “once it was known to be available.” Therefore, those
16 LSEs did not have the opportunity to use PG&E’s excess RA capacity to meet their own
17 System RA obligations. PG&E’s failure to make reasonable attempts to sell the excess

¹⁹ See PG&E’s response to CalCCA data requests 2.21, 2.23, and 2.54 Supplemental.
²⁰ See PG&E’s response to CalCCA data request 3.28.

1 capacity to other LSEs, as required by D.21-12-015, should have disqualified it from
2 counting the capacity towards its 2022 System Reliability Incremental Procurement
3 targets.

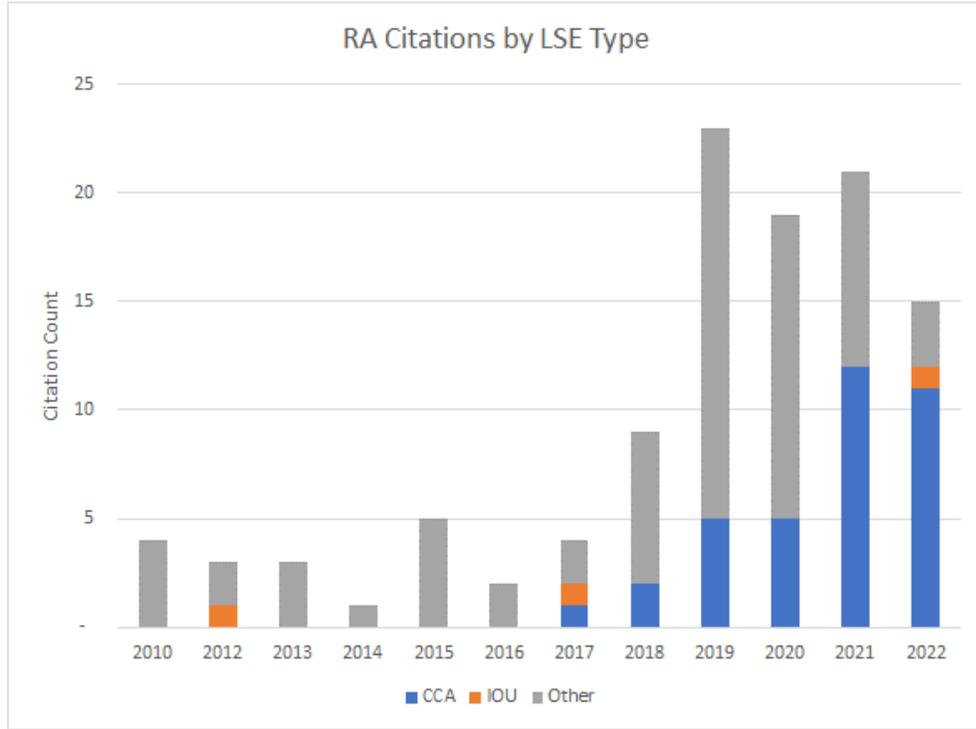
4 **V. LSES HAVE PAID SUBSTANTIAL FINES BECAUSE THEY WERE UNABLE TO**
5 **PROCURE SUFFICIENT RA CAPACITY.**

6 Allowing PG&E to count RA from existing resources toward its System
7 Reliability Incremental Procurement target without first making that capacity available to
8 other LSEs cannibalizes an already constrained RA market and increases costs to all
9 customers. One symptom of the constrained RA market is that many LSEs have been
10 unable to meet their System RA requirements despite being willing to pay. The
11 Enforcement Actions Spreadsheet updated by the Consumer Protection and Enforcement
12 Division in July 2023 tracks RA citations issues to various entities from October 2009
13 through July 2023. As shown in Figure 1, there was a sharp increase in the number of
14 citations in 2019, and elevated levels continued through 2022.²¹

²¹ CPUC's Utility Enforcement Branch – July 2023 Energy Citations, <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/consumer-protection-and-enforcement-division/documents/ueb/energy-citations/2023/july-2023-ueb-energy-citations.pdf>.

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Figure 1: RA Citations by LSE Type



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Since 2009 there have been 130 fines totaling \$39.6 million to LSEs for failing to meet RA compliance requirements.²² In 2022 alone, there were 18 citations issued totaling \$10.9 million, including 11 citations to CCAs that failed to meet the Commission’s RA requirements.²³ According to the Energy Division’s Annual RA Report from 2021 “Citations and penalties have increased in recent years, likely driven by issues related to supply and demand balances due to resource retirements, load forecast increases, and changes in counting conventions.”²⁴

²²

Id.

²³

Id.

²⁴

2021 Resource Adequacy Report, https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2021_ra_report_040523.pdf.

1 Another symptom of the constrained market is the steadily increasing price of
2 System RA. Figure 2 below reproduces Figure 4 from the 2021 Resource Adequacy
3 Report,²⁵ showing the rise in RA prices from 2017 to 2021.

4 **Figure 2: Weighted Average Price of System RA, January and August 2017-2021**

2021 Resource Adequacy Report

Figure 4: Weighted Average Price of System RA (\$/kW-month), January and August 2017- 2021



Source: 2017-2021 price data submitted by LSEs.

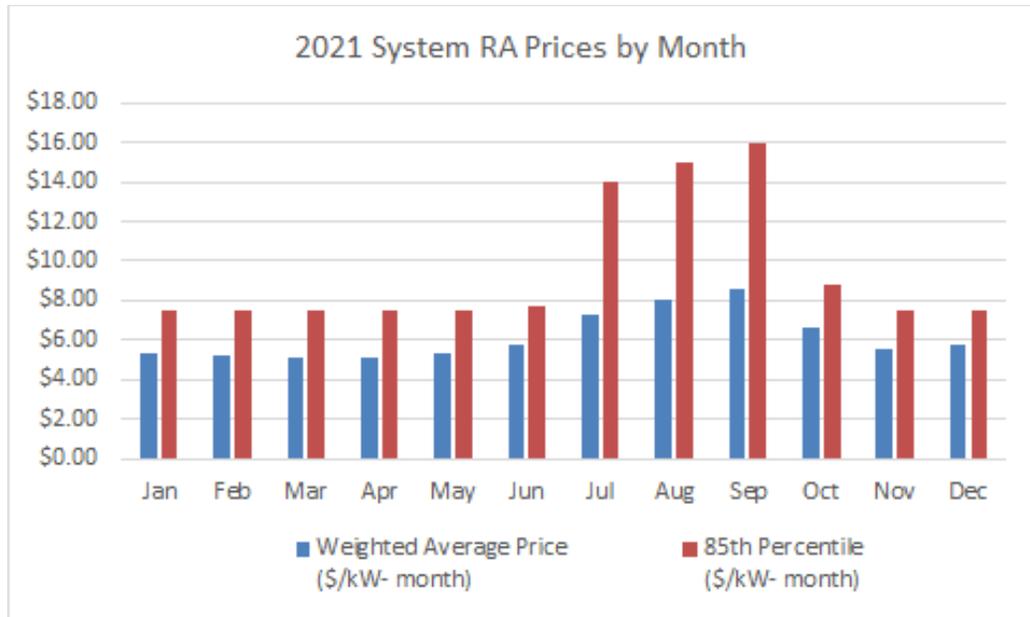
5
6 As Figure 2 shows, Energy Division’s 2021 Resource Adequacy Report illustrates
7 that the average price of System RA transactions executed for August 2021 was 158%
8 higher than for August 2017.²⁶ The RA market price benchmarks calculated by Energy
9 Division in September 2022 report that System RA prices in 2022 averaged \$8.11/kW-
10 month over the entire year, and the forecast for average System RA prices in 2023 is
11 \$7.39/kW-month.

²⁵ 2021 Resource Adequacy Report, https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2021_ra_report_040523.pdf.

²⁶ *Id.* at 28-29.

1 Energy Division’s data also shows that variation in RA prices during 2021 was
2 significantly greater during high-demand summer months relative to other periods; prices
3 for 15 percent of transactions exceeded \$14/kW-month during July – September 2021.²⁷
4 Figure 3 below presents Energy Division’s monthly price data for 2021 in graph form.

5 **Figure 3: 2021 System RA Prices by Month**



6
7 Price spikes such as these in the short-term RA market simply create a windfall
8 for existing generation owners at the expense of retail consumers; there is no incremental
9 reliability benefit to the system. If LSEs are not provided with a reasonable opportunity
10 to purchase PG&E’s excess RA in a timely manner, they will continue to struggle to meet
11 RA compliance requirements and incur penalties that increase costs to customers.

12 **VI. THE COMMISSION SHOULD SCRUTINIZE THE ASSUMPTIONS USED IN**
13 **PG&E’S POSITION REPORTING AND SOLICITATION PROCESS.**

14 The fact that [REDACTED]

15 [REDACTED] but then

²⁷ *Id.* at 27-28.

1 count excess capacity of 923 MW for System Reliability Incremental Procurement,
2 indicates the current RA solicitation process is flawed. CalCCA asked PG&E several
3 times in discovery to explain how it could forecast a shortfall in RA for a given period
4 but later have excess RA in that same period. PG&E merely responded that its “bundled
5 RA position changed due to a variety of conditions”²⁸ and reiterated that it identified the
6 excess capacity between T-50 and T-30 days prior to the compliance month.²⁹

7 As described earlier, PG&E determines its System RA position by [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]³⁰ Table 5 below details each of those line items as

12 calculated by PG&E in its RA position reports for the summer 2022 delivery period.

13 Table 5 also shows the change from the previous RA position for each component of the
14 reports.

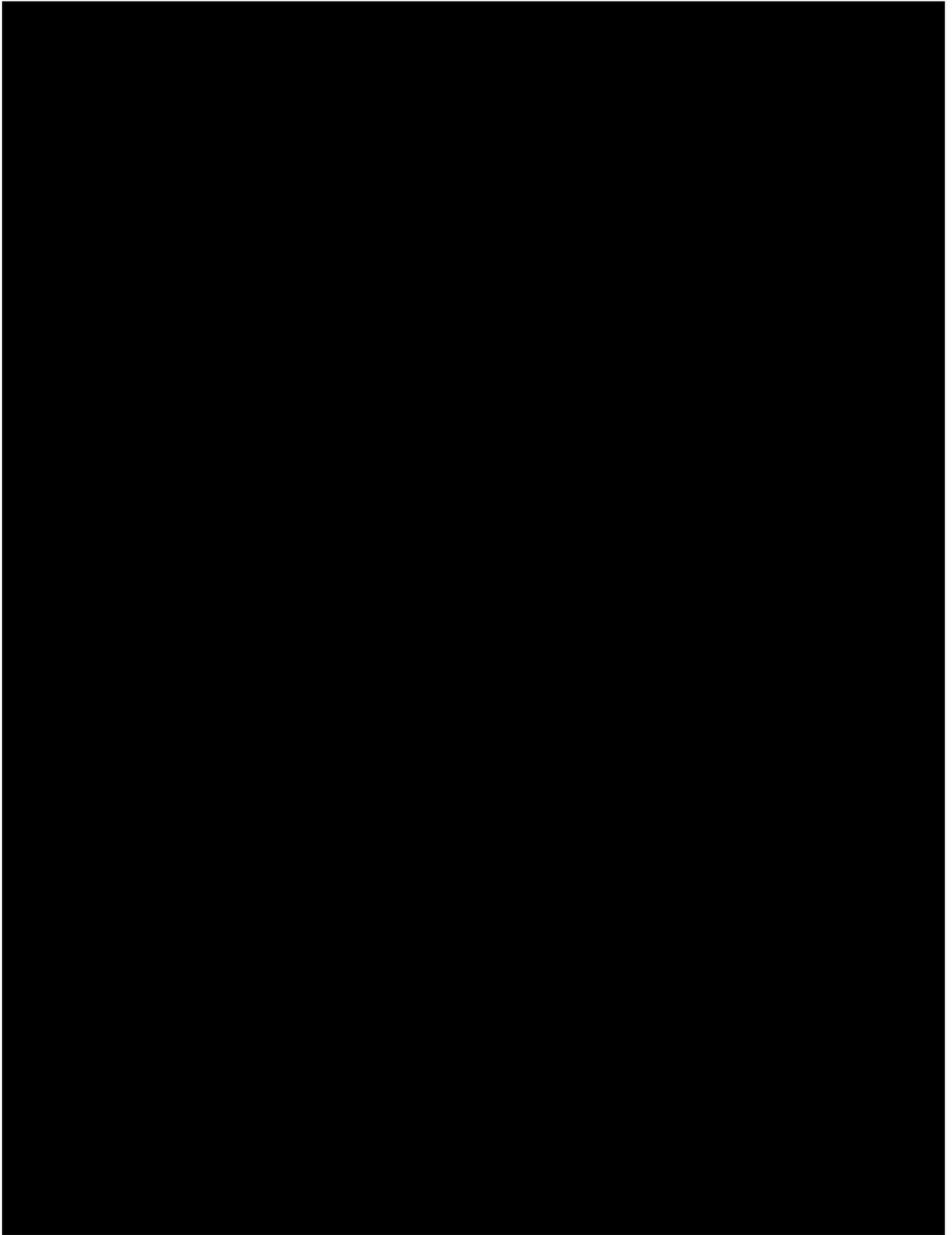
²⁸ See PG&E’s response to CalCCA data requests 3.27, 4.14 and 4.15.

²⁹ See PG&E’s response to CalCCA data requests 3.33.

³⁰ See PG&E’s Bundled Procurement Plan Appendix S Section B.3.b.1.a.

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Table 5: RA Position Reports Detail



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1 Table 5 demonstrates that there is little change to PG&E’s RA Position
2 components after the two year-ahead solicitations (based on the 8/23/2021 and
3 10/26/2021 position reports) are complete and resulting RA sales are incorporated. Once
4 the year ahead solicitations are complete the line-item assumptions that go into the
5 ultimate RA position do not change significantly. In fact, the changes are generally
6 smaller than the RA swings in capacity described earlier [REDACTED] between
7 PG&E's position reports and ultimate excess RA used towards its System Reliability
8 Incremental Procurement.³¹ CalCCA is continuing to issue discovery to PG&E on this
9 point and may seek to supplement this testimony if it will provide additional clarity. In
10 any event, PG&E should be required to explain specifically what changed relative to its
11 RA position reports such that it ended up with 923 MW of excess summer RA capacity,
12 most of which was never made available to the market.

13 One potential explanation for the swing in PG&E’s available RA capacity is that
14 PG&E determines factors in its RA position reporting that are impacted by resource
15 availability and other adjustments to available capacity. To the extent PG&E has
16 discretion with regard to assumptions of resource availability, outage schedules, or
17 operational constraints, it is likely to make conservative assumptions that ensure
18 resources are used to meet its own compliance rather than make those resources available
19 to the market.

20 Concerns over service reliability and resource adequacy in California, and the
21 increasingly constrained RA market, make it critical that PG&E does not improperly

³¹ The reason we’re looking at the later position reports only is to get past the major updates from the Commission on RA requirements and CAISO on resource Net Qualifying Capacity. The remaining large changes are in the existing sales line due to previous solicitations.

1 withhold available RA capacity from the market. As such, CalCCA recommends the
2 following:

- 3 • PG&E should be required to provide a detailed reconciliation between the RA
4 position reports used as the basis for its solicitations offering to sell RA for
5 delivery in 2022 and its final RA positions resulting in excess capacity in June
6 through October 2022.
- 7 • The Commission should scrutinize PG&E's assumptions about resource
8 availability and the adjustments made to its RA position to ensure reductions
9 to capacity made available to the market are justified and to eliminate
10 potential overlap among categories.
- 11 • PG&E's BPP should be updated to ensure excess capacity is made available to
12 the market, either through refined adjustments to available capacity in RA
13 position reports or through market offers outside of the scheduled solicitation
14 process.
- 15 • The Commission should consider whether disallowance, penalty, or other
16 remedy is warranted for the 2022 record year based on PG&E's non-
17 compliance with D.21-12-015.

18 This concludes my testimony.

Attachment A

Curriculum Vitae of Brian Shuey

Mr. Brian Shuey joined NewGen as a Senior Manager in May 2022, with over 15 years of experience in consulting and the utility industry. Mr. Shuey has audited specialized financial statements and reviewed adjustment clause rate filings for electric, gas, water, and steam utility companies. Additionally, Mr. Shuey participated in various special projects regarding utility rate-making issues. He also has significant Big 4 internal audit, enterprise risk management, regulatory compliance, IT consulting, and process improvement experience.

EDUCATION

Bachelor of Science in Accounting, The Pennsylvania State University

PROFESSIONAL CERTIFICATIONS

Certified Internal Auditor; Institute of Internal Auditors

KEY EXPERTISE

Adjustment Clause Rate Filing Review

Cost Recovery

Enterprise Risk Management

Financial Statement Audits

IT Consulting

Management Consulting

Process Improvement

Project Management

Regulatory Compliance

Utility Rate Design

RELEVANT EXPERIENCE

Litigation Support

Mr. Shuey provides litigation support related to utility revenue requirements, rate design, and other ratemaking issues before state and local regulatory bodies. He has evaluated utility stranded costs and exit fees for retail customer choice, including on behalf of approximately a dozen Community Choice Aggregators in California.

A sample of Mr. Shuey's clients includes the following:

- California Community Choice Association, CA
- Clean Power Alliance, CA

Brian Shuey

SENIOR MANAGER

PRIOR RELEVANT EXPERIENCE

Below is a small sample of Mr. Shuey's work within the energy utility industry.

PA Public Utility Commission Auditor & Supervisor

- Experience reviewing and auditing Electric Default Service, Transmission Service, Competitive Transition Charges, and Infrastructure Improvement Charges.
- Developed and maintained a training program for new and current employees to complete the review of adjustment clause rate filings.
- Assigned and supervised the review of over 300 adjustment clause filings per year for conformity to Commission directives and State statutes.
- Led discussions with utility personnel to revise or update filings as needed.
- Supervised the preparation of all audit work papers and reports for a team of seven auditors.
- Reviewed the work of Audit Team Leaders to ensure the audits were in accordance with generally accepted auditing standards.

Enterprise Risk Management/Internal Audit

- Directed and supervised up to 15 staff while completing multi-year internal control assessments over multiple large and small state agencies.
- Participated in risk assessments and control testing in multiple organizations over five years, utilizing COSO 13 and Green Book internal control frameworks.
- Facilitated the documentation of over 35 key processes and over 500 controls for a single client and assisted in developing and executing a risk-based monitoring plan for these controls.
- Participated in executing a risk-based audit plan, including process/control documentation and control testing.

Attachment B

PG&E Responses to CalCCA Data Requests

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Advance
Demand Flexibility Through Electric Rates.

R.22-07-005

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON ADMINISTRATIVE LAW JUDGE'S RULING ON TRACK B STAFF
PROPOSAL TO EXPAND EXISTING PILOTS**

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September 25, 2023

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SUMMARY OF RECOMMENDATIONS

- Community choice aggregator (CCA) participation in the expanded pilots will depend on decisions made by each CCA's governing board regarding whether the pilot fits within that CCA's needs and unique circumstances;
- The Staff Proposal on Existing Dynamic Rate Pilot Expansion (Staff Proposal) should be clarified regarding how the proposed funding will be allocated among the investor-owned utilities (IOUs) and participating CCAs, and across cost categories;
- The Staff Proposal should be clarified regarding expanded pilot implementation in terms of customer enrollment, marketing, education, and outreach, evaluation, and IOU/CCA coordination; and
- CCAs should be allowed to join the pilots in phases, either in June 2024, June 2025, or June 2026, to maximize CCA participation.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Advance
Demand Flexibility Through Electric Rates.

R.22-07-005

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON ADMINISTRATIVE LAW JUDGE'S RULING ON TRACK B STAFF
PROPOSAL TO EXPAND EXISTING PILOTS**

California Community Choice Association¹ (CalCCA) submits these comments in response to (1) *Administrative Law Judge's Ruling on Track B Staff Proposal to Expand Existing Pilots*² (Ruling), dated August 15, 2023, requesting party comments on the Track B staff proposal to expand existing pilots to support near-term summer reliability, (2) *Procedural Email Granting Extension for Track B Ruling Comments*, dated August 24, 2023, granting the extension of deadlines for comments (to September 18, 2023) and reply comments (to October 6, 2023) on the Ruling, and (3) *Procedural Email Granting Extension for Track B Ruling Comments*, dated September 13, 2023, granting a second extension of the deadlines for filing comments (to September 25, 2023) and reply comments (to October 9, 2023).

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² Rulemaking (R.) 22-07-005, *Administrative Law Judge's Ruling on Track B Staff Proposal to Expand Existing Pilots* (Aug. 15, 2023):
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M517/K407/517407755.PDF>.

I. INTRODUCTION

Energy Division's Staff Proposal on Existing Dynamic Rate Pilot Expansion (Staff Proposal) provides significant opportunities to further evaluate the impact of dynamic pricing on grid reliability. Existing pilots, including the Valley Clean Energy (VCE)/Pacific Gas & Electric Company (PG&E) Agricultural Pumping Dynamic Rate Pilot (AgFIT), have preliminarily demonstrated load shifts beneficial to grid reliability while providing customer savings in connection with dynamic rates.³ For this reason, CalCCA supported the expansion of the AgFIT pilot in its December 2022 comments on the Scoping Memo.⁴ Expansion of existing dynamic rate pilots as proposed by the Staff Proposal will allow testing of additional use cases implementing dynamic rates.

Each unique community choice aggregator's (CCA's) participation in any of the proposed pilots will depend on a determination by that CCA's governing board whether such participation fits within the needs and goals of the local community it serves. This CCA rate and program autonomy is reflected in the Staff Proposal's invitation, but not direction, for CCAs to participate along with PG&E and Southern California Edison Company (SCE). To facilitate each CCA's assessment of whether and how it will participate, CalCCA provides recommendations and seeks clarifications as set forth below:

- CCA participation will depend on decisions made by each CCA's governing board regarding whether the pilot fits within that CCA's needs and unique circumstances;

³ See Ruling, Attachment 2, *Preliminary Assessment of Valley Clean Energy's Agricultural Pumping Dynamic Rate Pilot* (May 26, 2023): <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M517/K407/517407316.PDF>.

⁴ See R.22-07-005, *CalCCA Comments on Assigned Commissioner's Phase 1 Scoping Memo and Ruling* (Dec. 2, 2022), at 5-7: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M499/K659/499659049.PDF>.

- The Staff Proposal should be clarified regarding how the proposed funding will be allocated: (1) among the investor-owned utilities (IOUs) and participating CCAs, and (2) across cost categories;
- The Staff Proposal should be clarified regarding expanded pilot implementation in terms of customer enrollment, marketing, education, and outreach (ME&O), evaluation, and IOU/CCA coordination; and
- CCAs should be allowed to join the pilots in phases, either in June 2024, June 2025, or June 2026, to maximize CCA participation.

II. CCA PARTICIPATION IN THE EXPANDED PILOTS WILL DEPEND ON CCA BOARD APPROVAL AND EACH CCA'S UNIQUE CIRCUMSTANCES

If the Staff Proposal is adopted, the California Public Utilities Commission (Commission) will require PG&E and SCE to expand the pilots, and CCAs will have the option to participate in the expanded pilots.⁵ CalCCA supports the Staff Proposal's recognition that each CCA retains its exclusive statutory and regulatory autonomy to determine whether and how to participate.⁶ Given the promising results demonstrated by the VCE/PG&E AgFIT pilot, CCAs are eager to consider participation, but each unique CCA will need to determine if the pilot(s) align with its local community's needs, goals, and policies. For example, a CCA's participation in Pilot #1 expanding dynamic pricing to all agricultural customers in PG&E's service territory may only be prudent for CCAs with sufficient sectors of agricultural customers. Therefore, CCA governing boards will consider all factors impacting their communities prior to deciding whether to participate in the expanded pilots, or to implement a different rate or program more aligned with their needs.

⁵ See Staff Proposal, at 1 (proposing that the Commission "direct the IOUs to expand certain existing dynamic rate pilots," while allowing the CCAs to participate).

⁶ As noted in footnote one, above, CalCCA represents the interests of 24 out of 25 of the CCAs in California. Each CCA was established after the passage of Assembly Bill (AB) 117 in 2022 enabling local governments to establish CCAs to purchase electricity on behalf of residents and business in place of the IOUs. See AB 117, Stats. 2002; ch. 838 (codified at Public Utilities Code § 366.2). AB 117 incorporates an overall statutory and regulatory framework providing CCA governing boards with operational, procurement, and ratesetting autonomy in favor of local communities establishing the policies for their CCA.

III. THE STAFF PROPOSAL SHOULD BE CLARIFIED TO ENABLE CCAS TO EFFECTIVELY ASSESS THEIR SCOPE OF PARTICIPATION IN THE EXPANDED PILOTS

The Staff Proposal should be clarified to enable CCAs to assess if and how the expanded pilots can be implemented in their service territories. As set forth above, many CCAs are eager to work with the Commission and the IOUs to establish programs under the expanded pilots, especially given the promising results from the AgFIT pilot and the ability to positively impact grid reliability. However, many details of the Staff Proposal must be clarified prior to the CCAs' committing resources to participate, especially given the short timeline for kickoff of the pilots in June 2024. As discussed below, the following aspects of the Staff Proposal should be clarified: (1) proposed budgets, including allocation of funding both to specific load serving entities (LSEs) and within the categories of costs; (2) customer enrollment and eligibility; (3) ME&O among IOUs and participating CCAs; and (4) inclusion of participating CCA data in pilot evaluations.

A. The Staff Proposal's Funding Considerations Should Be Clarified

CCAs need clarity on the proposed budgets in the Staff Proposal to assess their participation in the expanded pilots. As noted above, CCA governing boards will determine the scope and program design of each CCA's participation in the pilots, including whether sources of ratepayer funding will be needed to enable unbundled customers in their service areas to participate in the pilot(s). To make these determinations, clarity is necessary regarding funding sources, budgets, and the funding categories (including administration, vendor fees, systems and technology, billing, evaluation, and ME&O).

First, the Staff Proposal should be clarified regarding whether CCAs are eligible to receive funding for any category of budgeted costs under the pilots. If CCAs are eligible to seek cost recovery, does such eligibility extend to administrative costs, third party enrollment costs, and/or vendor fees? In addition, the VCE/PG&E AgFIT pilot includes funding for technology incentives

for participants to enable automated load shifting. Will such funding be available to pilot participants, including unbundled customers? If so, what is the amount of funding allocated?

In addition, to the extent funding is insufficient to scale the pilot to all customers wishing to participate, how will the funding be allocated across the load-serving entities offering the pilots, the pilots themselves, pilot rate classes, and individual customers? Will a cap be placed on the number of customers able to participate, or can a LSE place caps based upon funding provided by the Commission? Answers to these questions will provide clarity for CCAs to accurately determine their level and scope of participation in the pilots.

B. The Staff Proposal Should Provide Further Clarity on Expanded Pilot Customer Enrollment, ME&O, Evaluation, and Coordination between IOUs and Participating CCAs

The Staff Proposal should be clarified regarding how the IOUs and participating CCAs will coordinate customer enrollment, ME&O, and evaluation of the pilots. For example, with respect to customer enrollment, in many cases CCAs do not have access to data providing information on customer enrollment in certain demand response programs (for example, the Emergency Load Reduction Program). Given the proposed prohibition on dual enrollment for certain programs and the expanded pilots and the inability of CCAs to conduct the dual enrollment check, the IOUs will likely need to perform such dual enrollment checks for CCAs to enroll unbundled customers in its pilot programs. In addition, the Staff Proposal should be clarified regarding how ME&O will be conducted amongst the IOUs and participating CCAs. Finally, the Staff Proposal should address including participating CCA data in the expanded pilot evaluations along with the IOU data.

IV. THE STAFF PROPOSAL SHOULD INCLUDE PHASED PILOT PARTICIPATION TO MAXIMIZE CCA PARTICIPATION

Energy Division staff should consider providing launch date flexibility to maximize the number of CCAs that can prepare for and launch pilot expansions in their service territories. The

Staff Proposal includes June 2024 start dates for all three pilot expansions,⁷ providing CCAs less than nine months from awareness of the opportunity to participate in the expanded pilots to launch. The urgency in California for grid reliability and the need for load shifting away from peak grid stress times is evident and this is central to the Staff Proposal. CalCCA understands and appreciates Energy Division’s desire to set one launch date for all LSEs participating in the expanded pilots. This approach has benefits to the data collection for evaluation, and for providing consistent funding. However, given the contracting, ME&O, and other preparation work required to successfully launch the expanded pilots, nine months may be too short a runway for some CCAs. To allow more time for CCAs to adequately prepare, Energy Division staff should consider allowing a phased approach to expanded pilot launch. Allowing CCAs to launch in June 2024, June 2025, or June 2026, will maximize CCA participation because any interested CCA that may not be able to launch in June 2024 can plan to launch for a subsequent summer. This phased launch approach will ensure that more customers get opportunities to incentivize load shifting via dynamic rates, regardless of whether their CCA is ready to launch by June 2024. In addition, keeping the launch month for each year (i.e., June) consistent will ensure consistency of data for each summer.

V. QUESTIONS FOR PARTY COMMENTS

1. **Should the Commission authorize Expanded Pilot Proposal #1 to extend the VCE AgFIT Pilot, remove the participation cap, and expand eligibility to all agricultural customers in PG&E territory?**

Yes. Given the promising results of the VCE AgFIT pilot, the Commission should authorize the Expanded Pilot Proposal #1, after providing additional clarity on pilot participation as set forth in CalCCA’s comments above.

- a. **Please comment on whether the initial results of the VCE AgFIT Pilot indicate that the pilot has been successful at supporting system reliability to date. (See the attached interim**

⁷ See Staff Proposal, at 4 (Expanded Pilot #1), 7 (Expanded Pilot #2), and 8 (Expanded Pilot #3).

evaluation report.)

Yes, the pilot appears to be successful with the limited data gathered to date.

- b. Do you support the staff proposal modifications to eligibility for the pilot?**

Yes.

- c. Do you support the staff proposal modifications to the duration and/or size of the pilot?**

Yes, with the addition of the proposed phased approach as set forth in Section IV., above.

- d. Do you recommend additional marketing, education, and/or outreach for this pilot? If so, please provide details and a proposed budget.**

Yes, with clarifications as set forth in Section III.B., above.

- e. Do you agree with the staff estimates of the costs of expanding and extending the pilot?**

CalCCA requests that the Staff Proposal estimates of costs be clarified as set forth in Section III.A., above.

- f. Do you support the proposed timing of implementation of the Expanded Pilot (starting June 2024)?**

Yes, with the addition of the proposed phased approach as set forth in Section IV., above.

- 2. Should the Commission authorize Expanded Pilot Proposal #2 to expand eligibility of the VCE AgFIT Pilot to certain commercial and residential customers in PG&E territory with no participation cap?**

CalCCA supports expanding eligibility of the VCE AgFIT Pilot but seeks clarification of the expanded pilot as set forth herein.

- a. Do you support the proposed modifications to eligibility for the pilot?**

Yes.

- b. Do you support the proposed modifications to the duration and size of the pilot?**

Yes, with the addition of the proposed phased approach as set forth in Section IV., above.

- c. **Do you recommend additional marketing, education, and/or outreach for this pilot? If so, please provide details and a proposed budget.**

Yes, with clarifications as set forth in Section III.B., above.

- d. **Do you agree with the proposed estimates of the costs of expanding and extending the pilot?**

CalCCA requests that the proposed estimates of costs be clarified as set forth in Section III.A., above.

- e. **Do you support the proposed timing of implementation of the Expanded Pilot (starting June 2024)?**

Yes, with the addition of the proposed phased approach as set forth in Section IV., above.

- 3. **Should the Commission authorize Expanded Pilot Proposal #3 to extend the duration of the SCE Dynamic Rate Pilot and expand pilot eligibility?**

- a. **Do you support the proposed modifications to eligibility for the pilot?**

Yes.

- b. **Do you support the proposed modifications to the duration of the pilot?**

Yes, with the addition of the proposed phased approach as set forth in Section IV., above.

- c. **What changes, if any, are necessary to enable CCA customers to participate in this pilot?**

Please see comments in Sections II.-IV., above.

- d. **Do you recommend additional marketing, education, or outreach for this pilot? If so, please provide details and a proposed budget.**

Yes, with clarifications as set forth in Section III.B., above.

- e. **Do you agree with the proposed estimates of the costs of expanding and extending the pilot?**

CalCCA requests that the Staff Proposal estimates of costs be clarified as set forth in Section III.A., above.

f. Do you support the proposed timing of implementation of the Expanded Pilot (starting June 2024)?

Yes, with the addition of the proposed phased approach as set forth in Section IV., above.

4. Please comment on the proposed evaluation requirements that would apply to the three Expanded Pilots in the Staff Proposal.

Please see comments in Section III.B., above.

5. Please comment if any existing Commission requirements or utility program rules may impede customer participation in any of the Expanded Pilots, and if so, explain how such requirements should be modified for the purpose of pilot participation.

No comment at this time.

6. Are the proposed modifications to the VCE AgFIT Pilot and SCE Dynamic Rates Pilot consistent with the Commission’s Rate Design Principles and Demand Flexibility Design Principles? If not, please provide specific ways to make the proposed modifications consistent with these principles.

Yes.

VI. CONCLUSION

For all the foregoing reasons, CalCCA respectfully requests consideration of the recommendations herein and looks forward to an ongoing dialogue with the Commission and stakeholders.

Respectfully submitted,



Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

September 25, 2023

**PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account Compliance
Application 23-02-XXX
Data Response**

PG&E Data Request No.:	JointCCAs 001-Q08		
PG&E File Name:	ERRA-2022-PGE-Compliance DR JointCCAs 001-Q08		
Request Date:	January 6, 2021	Requester DR No.:	001
Date Sent:	February 28, 2023	Requesting Party:	Joint CCAs
PG&E Witness:	Robert Gomez	Requester:	

QUESTION 08

Provide Resource Adequacy (RA) information as follows:

- (1) sold, unsold and retained resource adequacy by resource and balancing account (RA Tracker)
- (2) system, local and flex positions for solicitations governed by Appendix S including the data as presented in the attached RA Position Table for (a) each solicitation in which RA for delivery in the record year was offered for sale (b) at the time each solicitation took place
- (3) all Tier 1 advice letter filings addressing Operational Constraints, including confidential attachments.

ANSWER 08

THE ATTACHMENTS TO THIS DATA RESPONSE CONTAIN CONFIDENTIAL INFORMATION PROTECTABLE UNDER DECISION 14-10-033, DECISION 06-06-066, PUBLIC UTILITIES CODE SECTION 454.5(G) AND/OR PURSUANT TO NON-PROCUREMENT DECLARATION DATED FEBRUARY 28, 2023

- (1) Sold, unsold, and retained resource adequacy by resource and balancing account are included in the attachment "ERRA-2022-PGE-Compliance_DR_JointCCAs_001-Q08_Atch01-2022_20221231_Retained_RA_Tracker_December_2022_CONF.xlsx" in the "2022 RA Tracker" tab.
- (2) Positions for solicitations governed by Appendix S for (a) each solicitation in which RA for delivery in the record year was offered for sale (b) at the time each solicitation took place are included in ERRA-2022-PGE-Compliance_DR_JointCCAs_001-Q08_Atch02-2022_Positions_CONF.xlsx. Each RA Position Table reflects the system, flex, or local area position at the time of solicitation and the quantity available for sale at that point in time.
- (3) All Tier 1 Advice Letter filings addressing Operational Constraints, including confidential attachments are included in ERRA-2022-PGE-Compliance_DR_JointCCAs_001-Q08_Atch03-Advice_Letter_Filings_CONF.zip.

Attachment is confidential.

PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response

PG&E Data Request No.:	CalCCA 002-Q019		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q019		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 019

Referring to PG&E's prepared testimony, Page 8-4, lines 24-30: Did PG&E meet its minimum target of 900 MW as required in D.21-12-015? If yes, provide workpapers demonstrating compliance. If no, explain why not.

ANSWER 019

Yes. Attached is the public version of PG&E's progress towards the minimum procurement target of 900 MW (ERRA-2022-PGE-Compliance_DR_CalCCA_002_Q019_Atch01.xlsx). This document can also be found on the CPUC's RA Compliance website at the following link: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/oct-2022pge-template-for-excess-resource-reporting-d2112015-public-083122.xlsx>.

IOU EXCESS RESOURCE REPORTING SUMMARY

Utility Name:	Pacific Gas and Electric
Monthly Minimum MW Target:	900
Date of Report:	10/1/22

Instructions:
 General: Report actual MW values for previous months and estimates for future months. At the top enter the subset of the resources from Sections 1 and 2 shown on the IOU's supply plan for each summer month.
1. Supply-Side Emergency Reliability OIR Procurement: Report all approved contracts for supply-side resources authorized under D.21-12-015 showing the amount being claimed toward the IOU's monthly incremental procurement target even if the amount for any given month is zero MW.
2. Excess Resources from IOU Portfolio Above 15% PRM: Report any additional "excess resources" above the IOU's 15% PRM requirement being applied to CAM for each month.
3. Demand-Side Emergency Reliability OIR Procurement: Report a demand-side resources authorized under D.21-12-015 and being claimed toward the IOU's monthly incremental procurement target.

Subset of the resources below shown on the IOU's supply plan

	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22
IOU Supply Plan Summer Reliability MW Amount	670.84	706.00	652.66	756.94	703.90

Total resources available as incremental above 15% RA requirement (i.e., progress toward the IOU's incremental effective PRM target)

Project/Resources Name	Resource Type	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Advice Letter and/or Resolution	Notes
1. Supply-Side Emergency Reliability OIR Procurement -		<i>MW to be claimed for CAM Cost Recovery</i>					<i>List # if applicable</i>	<i>E.g. exp ain monthly variability discrepancies between contract values etc.</i>
<i>Itemize each new project/resource by name</i>		<i>Indicate whether the resource is new build firm import short-term energy only call option etc.</i>						
Sierra Pacific Industries	Short-term Energy-Only Call-Option	7.00	7.00	7.00	7.00	10.00		AL-6604
Chevron Taft/Cadet	Short-term Energy-Only Call-Option	2.20	2.20	2.20	2.20	2.20		AL-6604
Chevron Cymric	Short-term Energy-Only Call-Option	1.50	1.50	1.50	1.50	1.50		AL-6604
Chevron Coalanga	Short-term Energy-Only Call-Option	3.20	3.20	3.20	3.20	3.20		AL-6604
Chevron SE Kern River	Short-term Energy-Only Call-Option	15.00	15.00	15.00	15.00	15.00		AL-6604
Chevron East Ridge	Short-term Energy-Only Call-Option	3.00	3.00	3.00	3.00	3.00		AL-6604
Chevron McKittrick	Short-term Energy-Only Call-Option	4.50	4.50	4.50	4.50	4.50		AL-6604
Wheelabrator Shasta	Short-term Energy-Only Call-Option	15.90	15.90	15.90	15.90	15.90		AL-6604
Import RA: PowerEx	Firm Import	125.00	125.00	125.00	125.00			
Import RA: PowerEx	Firm Import	75.00	75.00	75.00	75.00			AL-6504
Import RA: PowerEx	Firm Import	200.00	200.00	200.00	200.00			
Import RA: Morgan Stanley	Firm Import	50.00				100.00		
Import RA: TransAlta	Firm Import		50.00	50.00	50.00	50.00		
Import RA: Guzman Energy LLC	Firm Import					25.00		
Import RA: Dynasty Power Inc.	Firm Import					25.00		
Import RA: BPA	Firm Import					100.00		
Tesoro Martinez	PPA extension	45.00	100.00	100.00	100.00	100.00		AL-6323
Import RA: ConocoPhillips	Firm Import			25.00	25.00	75.00		
Calpine	Short-term RA only	190.00						AL-6604
E k Hills	Short-term RA only	70.00						AL-6604
Vistra	Short-term RA only	30.00						AL-6604
New build	New bu Id					150.00		
New build	New bu Id			63.00	63.00	63.00		
New build	New bu Id		47.00	47.00	47.00			
UOG Enhancements - Gateway	UOG Enhancement	10.00	10.00	10.00	10.00	10.00		AL-6088 page 6 Not included in Cost Recovery for System Reliability OIR
UOG Enhancements - Colusa	UOG Enhancement	10.00	10.00	10.00	10.00	10.00		AL-6088 page 6 Not included in Cost Recovery for System Reliability OIR
2. Excess Resources from IOU Portfolio Above 15% PRM		<i>MW to be claimed for CAM Cost Recovery</i>						
Excess Resources from IOU Portfolio	Excess Resources	103.70	183.14	148.97	156.70	330.00		Amount to be Shown on RA/Supply Plan
SUBTOTAL SUPPLY-side Excess Procurement		961	855	906	1,105	990		
3. Demand-Side Emergency Reliability OIR Procurement		<i>MW reported</i>						
<i>Indicate subcategories of resource if applicable</i>		<i>Indicate whether the resource is new build firm import short-term energy only call option etc.</i>						
ELRP Enrollment		378.00	423.00	466.00	466.00	466.00		N/A
DR program expansion		19.00	15.00	14.00	14.00	12.00		N/A
Other (Smart Thermostat)		12.00	13.00	14.00	13.00	5.00		N/A
DRAM					5.00			AL-6619 Amount to be Shown on RA/Supply Plan
SUBTOTAL DEMAND-side Excess Procurement		409	451	494	498	483		

IOU Progress toward Monthly Target	1,370	1,306	1,400	1,603	1,473	
Minimum Excess Procurement Target per D.21-12-015	900	900	900	900	900	-- total MW procured
DIFFERENCE	-470	-406	-500	-703	-573	-- negative values mean minimum target exceeded; positive values mean minimum target not met
Supply Side Headroom (3,000 Max)	389	495	444	245	360	-- maximum additional supply resources permitted

Monthly IOU reports available at: <https://www.cpuc.ca.gov/General.aspx?id=6311>

D.21-12-015 Ordering Paragraph 74:

"In recognition of the continued tight grid conditions experienced this summer the California Independent System Operator's testimony reflecting a significant shortfall in Load Serving Entity supply plan resources at net peak and the need for additional contingency resources identified in the California Energy Commission's Summer 2022 Stack Analysis Southern California Edison Company (SCE) Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) shall use their best efforts to meet a revised targeted procurement range of 2,000 megawatts (MW) to 3,000 MW for summers 2022 and 2023 which includes and is not additive to the targeted procurement of 1,000 MW of contingency resources adopted in Decision (D.) 21-02-028 and D.21-03-056 and results in an "effective PRM" of 20%-22.5%. Based on the proportional load share in each utility's service territory the revised targeted procurement range represents 900 – 1,350 MW of additional procurement for SCE and PG&E and 200 – 00 MW for SDG&E."

D.21-12-015 Ordering Paragraph 74:

"Pacific Gas and Electric Company Southern California Edison Company and San Diego Gas & Electric Company shall provide the monthly amounts of the excess resources they applied to the Cost Allocation Mechanism as well as the calculus used to determine these amounts to Commission's Energy Division and Energy Division will post this information on the Commission's website."

Applying the TAC as a CAISO load share for each utility's service territory to the contingency procurement set forth in this decision results in a gap procurement amounts of 900 MW-1,350 MW each for PG&E and SCE as a result of the 10% and 200 MW-300 MW for SDG&E as a result of the 10% (D.21-12-015, F nd ng of fact 28) PG&E has Excess Resources from its portfolio available to supplement the above stated resources in October 2022. These supplemental megawatts are not captured in the above total and will not be subtracted to recover your through D.21-12-015. The available energy from any Excess Resources will be offered in the CAISO market based on least cost dispatch standards.

"PG&E bids resources with different rights into the CAISO market based on the incremental costs of opportunity costs. By bidding its resources into the CAISO market at the incremental opportunity costs, PG&E enables total procurement to meet customer demand in the CAISO market at least cost. Resources with the lowest physical cost are not necessarily the ability to be bid and may be fully or partially self-scheduled into the CAISO market." Page 1, 7, 2020 PG&E EERRA Compliance Testimony

PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response

PG&E Data Request No.:	CalCCA 002-Q021		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q021		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 021

Referring to PG&E’s prepared testimony, Page 8-7, lines 18-23: For each solicitation referenced in the cited testimony, please provide all workpapers detailing PG&E’s quantitative evaluation of all bids received. Workpapers should include, but not be limited to, the following:

- a. Details of all bids received, by solicitation, including buyer, term, volume, bid price, product, area, etc.
- b. Each bid received but rejected
- c. Justification for rejecting any bid
- d. Each bid received resulting in an executed contract.

ANSWER 021

THE ATTACHMENTS TO THIS DATA RESPONSE CONTAIN CONFIDENTIAL INFORMATION PROTECTABLE UNDER DECISION 14-10-033, DECISION 06-06-066, AND/OR PUBLIC UTILITIES CODE SECTION 454.5(G) – SUBJECT TO NDA

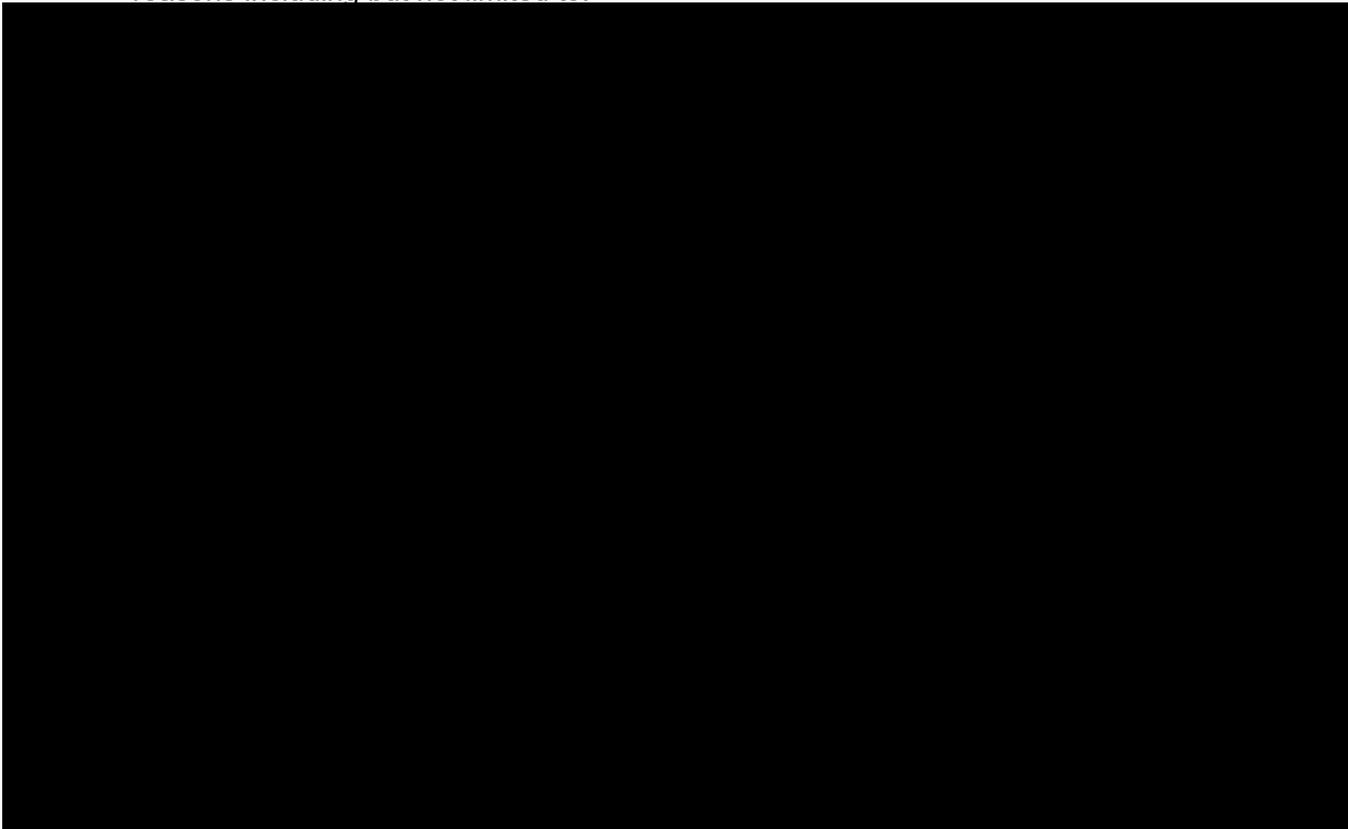
- a) Please see the following attachments for the bid summary or shortlist files for each solicitation that were submitted to the PRG.
 - **Q2 2022 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch1-CONF
 - **Q3 2022 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch2-CONF
 - **Q4 2022 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch3-CONF
 - **Q3 2023 Year Ahead Phase 1 Solicitation:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch4-CONF)
 - **Q3 2023 Year Ahead Phase 2 Solicitation:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch5-CONF)
 - **Q2 2023 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch6-CONF

These files mentioned above contain the details of all bids received for each RA solicitation with 2022 and 2023 delivery, including counterparty, term, volume, bid price,

product, area. For reference, the table below shows the file that corresponds to each solicitation.

Solicitation	Q2 through Balance of Year 2022	Q3 through Balance of Year 2022	Q4 through Balance of Year 2022	Q3 2023 Year Ahead (Phase 1)	Q3 2023 Year Ahead (Phase 2)	February through Balance of Year 2023
Date Issued to the Market	1/26/2022	3/31/2022	7/21/2022	8/11/2022	9/29/2022	11/9/2022
Attachment	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch1-CONF	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch2-CONF	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch3-CONF	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch4-CONF	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch5-CONF	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q021_Atch6-CONF

- b) Attachments referenced in 2.21a shows accepted or rejected status of received bids for solicitations held in 2022. Accepted bids are shortlisted with the intention of execution while rejected bids are labelled as "Not Shortlisted". Some bids are partially shortlisted and partially rejected.
- c) PG&E rejected bids received in response to RA solicitations in 2022 for a variety of reasons including but not limited to:



- d) All attachments referenced in 2.21a show the accepted status of received bids. Accepted bids are shortlisted with the intention of execution but not all shortlisted bids result in executed contracts for reasons #6,8 and 9 stated in 2.21c. Bids that resulted in executed contracts are in Attachment E and H of the QCR.

Attachment is confidential.

PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response

PG&E Data Request No.:	CalCCA 002-Q023		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q023		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 023

Referring to the previous question (CalCCA to PG&E 2.22): For PG&E’s 2022 year ahead RA solicitation(s), please provide all workpapers detailing PG&E’s quantitative evaluation of all bids received. Workpapers should include, but not be limited to, the following:

- a. Details of all bids received, by solicitation, including buyer, term, volume, bid price, product, area, etc.
- b. Each bid received but rejected
- c. Justification for rejecting any bid
- d. Each bid received resulting in an executed contract.

ANSWER 023

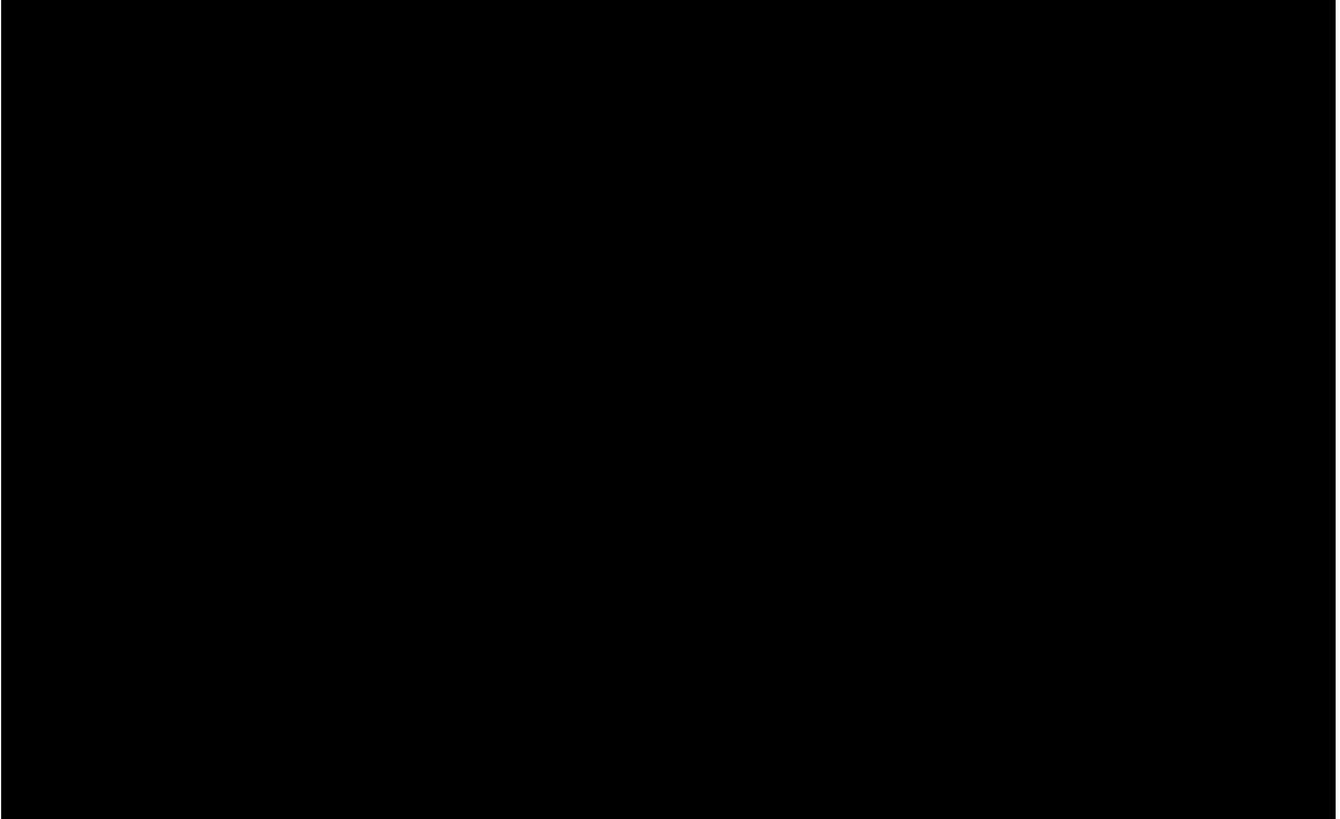
THE ATTACHMENTS TO THIS DATA RESPONSE CONTAINS CONFIDENTIAL INFORMATION PROTECTABLE UNDER DECISION 14-10-033, DECISION 06-06-066, AND/OR PUBLIC UTILITIES CODE SECTION 454.5(G) – SUBJECT TO NDA

- a) Refer to the following Attachments for PG&E’s 2022 year ahead RA solicitation(s) that were submitted to the PRG.
 - **Phase 1 2022 Year-Ahead:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q023_Atch1-CONF
 - **Phase 2 2022 Year-Ahead:** ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q023_Atch2-CONF

These files mentioned above contain the details of all bids received for each RA solicitation with 2022 delivery, including counterparty, term, volume, bid price, product, area. For reference, the table below shows the file that corresponds to each solicitation.

Solicitation	Phase 1 2022 Year-Ahead	Phase 2 2022 Year-Ahead
Date Issued to the Market	8/31/2021	10/1/2021
Attachment	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q023_Atch1-CONF)	ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q023_Atch2-CONF)

- b) Attachments referenced in 2.23a above shows the accepted or rejected status of received bids for PG&E's 2022 year ahead RA solicitation(s). Accepted bids are shortlisted with the intention of execution while rejected bids are labelled as "Not Shortlisted". Some bids are partially shortlisted and partially rejected.
- c) PG&E rejected bids received in response to PG&E's 2022 year ahead RA solicitation(s) for a variety of reasons including but not limited to:



- d) All attachments referenced in 2.23a show the accepted status of received bids. Accepted bids are shortlisted with the intention of execution but not all shortlisted bids result in executed contracts for reasons stated in 2.23c 6, 8 and 9. Bids that resulted in executed contracts are in Attachment E and H of the QCR.

Attachment is confidential.

PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response

PG&E Data Request No.:	CalCCA 002-Q054		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q054		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 054

Referring to PG&E's prepared testimony, page 12-15, lines 13-19: Please explain in detail all attempts to sell to other LSEs any portion of the 923 MW of excess capacity prior to it being transferred from PABA to ERRA.

ANSWER 054

PG&E made attempts to sell all excess capacity, or its long RA position, as determined by Appendix S, pursuant to the commercial processes in Appendix S. Please see Table 8-1 of PG&E's prepared testimony of a list of solicitations, and Question 21 - attachments 1-6 and Question 23 - attachments 1-2 for the results of each solicitation.

**PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response**

PG&E Data Request No.:	CalCCA 002-Q054		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q054Supp01		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023(original)	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 054

Referring to PG&E’s prepared testimony, page 12-15, lines 13-19: Please explain in detail all attempts to sell to other LSEs any portion of the 923 MW of excess capacity prior to it being transferred from PABA to ERRA.

ANSWER 054

PG&E made attempts to sell all excess capacity, or its long RA position, as determined by Appendix S, pursuant to the commercial processes in Appendix S. Please see Table 8-1 of PG&E’s prepared testimony of a list of solicitations, and Question 21 - attachments 1-6 and Question 23 - attachments 1-2 for the results of each solicitation.

ANSWER 001_SUPP

THE ATTACHMENT TO THIS DATA RESPONSE CONTAINS CONFIDENTIAL INFORMATION PROTECTABLE UNDER DECISION 14-10-033, DECISION 06-06-066, AND/OR PUBLIC UTILITIES CODE SECTION 454.5(G) – SUBJECT TO NDA

PG&E’s February-December 2022 Balance of Year solicitation held in Q4 of 2021 was not included in PG&E’s original response to 2.54. Please see attachment 1 (ERRA-2022-PGE-Compliance_DR_CalCCA_002-Q54_Atch1-CONF) for the results of this solicitation.

Attachment is confidential.

**PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response**

PG&E Data Request No.:	CalCCA 002-Q055		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q055		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 055

Referring to PG&E's prepared testimony, page 12-15, lines 13-19: Please provide documentation demonstrating whether PG&E received any offers from other LSEs to purchase any portion of the 923 MW of excess PCIA resource capacity.

ANSWER 055

PG&E did not receive bids from other LSEs to purchase any portion of the excess capacity after it was known to be available.

**PACIFIC GAS AND ELECTRIC COMPANY
2022 Energy Resource Recovery Account – Compliance
Application 23-02-018
Data Response**

PG&E Data Request No.:	CalCCA 002-Q056		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q056		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

QUESTION 056

Referring to PG&E's prepared testimony, page 12-15, lines 13-19: Please explain whether any offers to purchase any portion of the 923 MW of excess PCIA resource capacity were rejected by PG&E. If yes, provide all details supporting why PG&E rejected the offer.

ANSWER 056

Please see answer to CalCCA DR 002 Q55.