

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

PG&E Data Request No.:	CalCCA 002-Q057		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q057		
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 057**

Referring to PG&E’s prepared testimony, page 12-15, lines 13-19: Please provide all RA Position Breakdown documents demonstrating that the excess capacity was made available in an RA solicitation pursuant to Appendix S of PG&E’s approved Bundled Procurement Plan prior to being counted toward PG&E’s system reliability procurement target.

**ANSWER 057**

Please see please see PG&E’s response to the Joint CCA’s Master Data Request question 8, Attachment 2: “ERRA-2022-PGE-Compliance\_DR\_JointCCAs\_001-Q08\_Atch02-2022\_Positions\_CONF.xlsx”.

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**Application 23-02-018**  
**Data Response**

PG&E Data Request No.:	CalCCA 002-Q058		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q058		
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 058**

Referring to PG&E's prepared testimony, page 12-15, footnote 25:

- a. What factors caused Diablo Canyon to have excess capacity?
- b. How was it determined that Diablo Canyon was the resource with the excess capacity?
- c. Why wasn't it another resource with the excess capacity at this time?
- d. Does PG&E have discretion to select the resource with the excess capacity? If so, please describe how PG&E makes that determination.

**ANSWER 058**

**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. During the summer months of June through October 2022, [REDACTED] [REDACTED] not fully utilized to meet PG&E's bundled compliance commitments, RA sales, or planned outage substitution obligations.
- b. PG&E selected resources to meet its bundled compliance obligations, RA sales obligations, and planned outage substitution obligations. After meeting those obligations, [REDACTED] [REDACTED].
- c. [REDACTED] excess capacity available during the summer months.
- d. D.21-12-015 authorized IOUs to meet incremental procurement targets with excess RA capacity, and was silent regarding how excess resources should be selected. See response to Joint CCA DR 002 Q58 part a.

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PG&E Data Request No.:	CalCCA 003-Q026		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 003-Q026		
Request Date:	April 25, 2023	Requester DR No.:	003
Date Sent:	May 23, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 026**

Referring to CalCCA DR Response 2.55: When did it become known to PG&E that the excess PCIA resource capacity was available?

**ANSWER 026**

PG&E objects to this question on the grounds that it is beyond the scope of the ERRA Compliance proceeding, is irrelevant, and is not reasonably calculated to lead to admissible evidence. This data request is irrelevant to the subject matter of this proceeding because the ERRA Compliance proceeding concerns PG&E's demonstration of compliance with its Bundled Procurement Plan (BPP), [REDACTED]

[REDACTED] Subject to and without waiving this objection, PG&E responds as follows:

The final quantity of excess RA capacity shown towards meeting Summer Reliability procurement targets was identified between T-50 and T-30 days prior to the compliance month.

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PG&E Data Request No.:	CalCCA 003-Q027		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 003-Q027		
Request Date:	April 25, 2023	Requester DR No.:	003
Date Sent:	May 23, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 027**

Referring to CalCCA DR Response 2.55: If the referenced excess PCIA resource capacity was not previously known to be available, what circumstances changed that caused the capacity to become excess and available for use to meet summer reliability needs?

**ANSWER 027**

PG&E objects to this question on the grounds that it is beyond the scope of the ERRA Compliance proceeding, is irrelevant, and is not reasonably calculated to lead to admissible evidence. This data request is irrelevant to the subject matter of this proceeding because the ERRA Compliance proceeding concerns PG&E's demonstration of compliance with its Bundled Procurement Plan (BPP). [REDACTED]

[REDACTED] Subject to and without waiving this objection, PG&E responds as follows:

PG&E's bundled RA position changed due to a variety of conditions.

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PG&E Data Request No.:	CalCCA 003-Q028		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 003-Q028		
Request Date:	April 25, 2023	Requester DR No.:	003
Date Sent:	May 23, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 028**

Referring to CalCCA DR Response 2.55: Please explain specifically how PG&E communicated to other LSEs that the excess capacity had become available.

**ANSWER 028**

PG&E objects to this question on the grounds that it is beyond the scope of the ERRA Compliance proceeding, is irrelevant, and is not reasonably calculated to lead to admissible evidence. This data request is irrelevant to the subject matter of this proceeding because the ERRA Compliance proceeding concerns PG&E's demonstration of compliance with its Bundled Procurement Plan (BPP), [REDACTED]

[REDACTED]

[REDACTED] Subject to and without waiving this objecting, PG&E responds as follows:

For information regarding the required commercial processes under Appendix S of PG&E's BPP, please refer to Section B.1.d of Appendix S. PG&E complied with the requirements in Appendix S of its BPP at all times.

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PG&E Data Request No.:	CalCCA 003-Q031		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 003-Q031CONF		
Request Date:	April 25, 2023	Requester DR No.:	003
Date Sent:	May 23, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 031**

Referring to the previous question and MDR 1.8, Attachment 2:

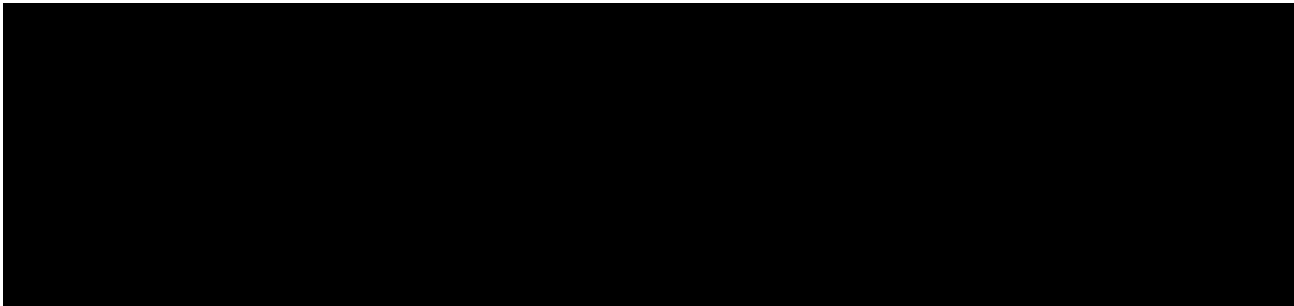
- a. Please confirm [REDACTED] If not confirmed, please explain.
- b. Please confirm [REDACTED] If not confirmed, please explain.
- c. Please confirm [REDACTED] If not confirmed, please explain.

**ANSWER 031**

***THIS DATA RESPONSE CONTAINS 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 MAY 23, 2023 – SUBJECT TO NDA.***

PG&E objects to this data request to the extent that it seeks information intended to support an argument that excess capacity was required to be offered in an RA solicitation pursuant to Appendix S of PG&E’s BPP on the grounds that it assumes facts not in evidence, is beyond the scope of the ERRA Compliance proceeding, is irrelevant, and is not reasonably calculated to lead to admissible evidence. This data request refers to the previous question, which refers to CalCCA DR Response 2.57, which is premised on the false assumption [REDACTED]

[REDACTED] As a result, this data request is irrelevant to the subject matter of this proceeding, which concerns PG&E’s demonstration of compliance with its BPP. Subject to and without waiving this objection, PG&E responds as follows:



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PG&E Data Request No.:	CalCCA 003-Q033		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 003-Q033CONF		
Request Date:	April 25, 2023	Requester DR No.:	003
Date Sent:	May 23, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 033**

Referring to CalCCA MDR 1.8, Attachment 2: Please explain how PG&E ends up with excess to transfer from PABA to CAM for Summer Reliability even though the position reports showed [REDACTED] [REDACTED]?

**ANSWER 033**

PG&E objects to this question on the grounds that it is beyond the scope of the ERRA Compliance proceeding, is irrelevant, and is not reasonably calculated to lead to admissible evidence. This data request is irrelevant to the subject matter of this proceeding because the ERRA Compliance proceeding concerns PG&E's demonstration of compliance with its Bundled Procurement Plan (BPP). [REDACTED]

[REDACTED] Subject to and without waiving this objection, PG&E responds as follows:

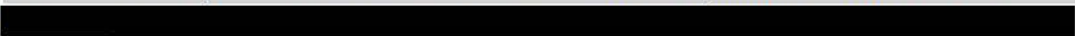

The final quantity of excess RA capacity shown towards meeting Summer Reliability procurement targets was identified between T-50 and T-30 days prior to the compliance month.



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PG&E Data Request No.:	CalCCA_004-Q014		
PG&E File Name:	ERRA-2022-PGE-Compliance_DR_CalCCA_004-Q014CONF		
Request Date:	June 29, 2023	Requester DR No.:	004
Date Sent:	July 14, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 014**

Referring to PG&E's response to CalCCA 03.33: Please explain in detail how PG&E can show   


**ANSWER 014**

***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***



**PACIFIC GAS AND ELECTRIC COMPANY**  
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PG&E Data Request No.:	CalCCA 004-Q015		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 004-Q015		
Request Date:	June 29, 2023	Requester DR No.:	004
Date Sent:	July 14, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 015**

Referring to PG&E's response to CalCCA 03.33: Please explain how PG&E may forecast a shortfall in RA for a given period but later have actual excess RA in that period.

**ANSWER 015**

PG&E objects to this question on the grounds that it is beyond the scope of the ERRA Compliance proceeding, is irrelevant, and is not reasonably calculated to lead to admissible evidence. This data request is irrelevant to the subject matter of this proceeding because the ERRA Compliance proceeding concerns PG&E's demonstration of compliance with its Bundled Procurement Plan (BPP). The possible RA position changes that can occur after the monthly sales amount is determined pursuant to the BPP are not relevant to whether PG&E complied with the BPP. Subject to and without waiving this objection, PG&E responds as follows:

PG&E's bundled RA position changed due to a variety of conditions.