Docket No.: A.23-05-012

Exhibit No.: CalCCA-02

Date: October 6, 2023

Sponsor/Witness: Clavier, Keller, Kolnowski, Pappas, Vega (PG&E)

EXHIBIT CALCCA-02

Compilation of PG&E's responses to CalCCA data requests 6.04 and 6.06-6.12

October 6, 2023

PACIFIC GAS AND ELECTRIC COMPANY
Energy Resource Recovery Account 2024 Forecast
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Data Response

PG&E Data Request No.:	CalCCA_006-Q004		
PG&E File Name:	ERRA-2024-Forecast_DR_CalCCA_006-Q004		
Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	John Pappas	Requester:	Nikhil Vijaykar

QUESTION 004

Referring to PG&E's Rebuttal Testimony page 19 lines 22-26 and page 21 lines 30-33: Please provide a citation to all RPS compliance rules that require RECs from the current RPS compliance period to be exhausted prior to using RECs from a prior RPS compliance period to meet the minimum retained RPS requirement.

ANSWER 004

PG&E clarifies that the concept of the "Minimum Retained RPS Requirement" is an aspect of power charge indifference adjustment (PCIA) ratemaking initially created for 2019 in PG&E's 2020 ERRA Forecast decision, D.20-02-047, and has not been directly addressed in RPS compliance rules or statutes. Subject to the foregoing clarification, please refer to Ordering Paragraph 28 on page 101 of Decision 12-06-038, which states:

> 28. In calculating excess procurement in one compliance period that may be applied to a later compliance period, including 2021 and later years, retail sellers must subtract from the total quantity of renewable energy credits they retire in that compliance period, all renewable energy credits necessary to meet their procurement quantity requirement for that compliance period.

The calculation and application of excess procurement is set forth in the CPUC's approved RPS Compliance Report excel spreadsheet template, which is available at https://files.cpuc.ca.gov/RPS_PPAs/Compliance%20Report%20Archives/Final%202022%20RPS%20Compliance%20Report%20Templates%20and%20Documents.zip. Please refer to the "Accounting" tab of the RPS Compliance Report excel spreadsheet. Lines 23 of the "Accounting" tab reports the Procurement Quantity Requirement (PQR) for a particular compliance period. Lines 24 through 30 report the quantity of RECs by portfolio content category retired for each year within a particular compliance period. Lines 38 through 56 perform calculations to determine the quantity of RECs satisfying the long-term contracting requirement and if necessary, exclude any ineligible RECs. Lines 61 through 69 filter out any RECs not meeting the portfolio balance requirements. Lines 73 through 80 compare the PQR to the quantity of eligible RECS to determine the quantity of excess RECs eligible for banking. If there are no excess RECs and a PQR shortfall exists for the current compliance period, then Lines 90 through 94 serve to apply prior period banked excess RECs to meet the current shortfall. Conversely if the current RPS compliance period has a surplus of RECs after meeting the current compliance period PQR, then the current compliance period excess RECs would be added to the cumulative bank which is reported on Lines 95 through 99. The point being is that the underlying mechanics of the CPUC's approved RPS compliance report template, consistent with D. 12-06-038, requires all retired RECs from the current compliance period to first be exhausted in the calculation of RPS compliance determination (i.e., to determine whether the PQR has been met) prior to using excess RECs from a prior compliance period.

Consistent with the methodology adopted for 2023 in D.22-12-044 and RPS compliance rules, PG&E continues to propose utilizing excess RECs generated and Retained during the current RPS compliance period to meet any minimum retained RPS requirements first. Once current compliance period RECs that were previously Retained are utilized, PG&E proposes a 'Last-In-First-Out' approach to draw on previously generated RECs. As described in Question ERRA-2024-Forecast_DR_CalCCA_006-Q002, Unsold 2023 RECs are those eligible for the Market Offer process, were not procured by any LSE including PG&E and remained unsold. D. 22-11-021 clarified those Unsold RECs are to be valued at zero if not procured.[1]

As Unsold RECs are valued at zero, PG&E asserts that the equitable approach is to first utilize RECs that were recognized as having value and were paid for by customers under the previous PCIA methodology, but in excess of RPS requirements, before utilizing Unsold 2023 RECs.

[1] / D. 22-11-021 also approved the IOU ratemaking methodologies for ratemaking submitted as Track 1 to 2022 RP SPlans. See also ELEC_6779-E.pdf (pge.com) at Attachment A, Section IV.

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PG&E Data Request No.:	CalCCA_006-Q006		
PG&E File Name:	ERRA-2024-Forecast_DR_CalCCA_006-Q006		
Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	John Pappas	Requester:	Nikhil Vijaykar

QUESTION 006

Referring to PG&E's Rebuttal Testimony page 19 lines 22-26: In a scenario where excess RECs from a prior RPS compliance period are used to meet the minimum retained RPS requirement during the current RPS compliance period, please cite to all rules that require the excess RECs be utilized according to a last-in/first-out sequence.

ANSWER 006

PG&E clarifies that the concept of the "Minimum Retained RPS Requirement" is an aspect of Power Charge Indifference Adjustment (PCIA) ratemaking initially created in 2019 for PG&E's 2020 ERRA Forecast decision, D.20-02-047, and has not been directly addressed in RPS compliance rules or statutes. Subject to the foregoing clarification, once RECs are banked as excess procurement, their vintage cannot be differentiated in RPS compliance templates. PG&E is not aware of an RPS compliance rule which specifically requires excess from prior period RECs be utilized according to a last-in/first out sequence. However, similar to the RPS compliance rules prioritizing current compliance period RECs first, utilizing excess RECs previously retained from the most recent prior RPS compliance period next ensures that customers who most recently paid for those excess volumes are prioritized in the order of crediting of the account.

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PG&E Data Request No.:	CalCCA_006-Q007		
PG&E File Name:	ERRA-2024-Forecast_DR_CalCCA_006-Q007		
Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	John Pappas	Requester:	Nikhil Vijaykar

QUESTION 007

Referring to PG&E's Rebuttal Testimony page 20 lines 21-24: Please provide a citation to any RPS compliance rule that prohibits using RECs from a prior compliance period if a utility has excess procurement during the current compliance period.

ANSWER 007

Please refer to PG&E's response to ERRA-2024-Forecast_DR_CalCCA_006-Q004.

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PG&E Data Request No.:	CalCCA_006-Q008		
PG&E File Name:	ERRA-2024-Forecast_DR_CalCCA_006-Q008		
Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	John Pappas	Requester:	Nikhil Vijaykar

QUESTION 008

Referring to PG&E's Rebuttal Testimony page 21 lines 28-30: Please provide citation to the specific CPUC approved RPS compliance rules referenced by PG&E.

ANSWER 008

Please refer to PG&E's response to ERRA-2024-Forecast_DR_CalCCA_006-Q004.

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalCCA_006-Q009		
PG&E File Name:	ERRA-2024-Forecast_DR_CalCCA_006-Q009		
Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	George Clavier	Requester:	Nikhil Vijaykar

QUESTION 009

Referring to PG&E's Rebuttal Testimony page 26 lines 15 through page 27 line 2: Confirm that in the instant application PG&E removed DCPP unit 1 from the legacy utility owned generation PCIA vintage for the Indifference Amount forecast effective November 2, 2024.

ANSWER 009

Yes, PG&E confirms.

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PG&E Data Request No.:	CalCCA_006-Q010		
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Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Marcus Keller	Requester:	Nikhil Vijaykar

QUESTION 010

Referring to PG&E's Rebuttal Testimony page 25, Table 2: Confirm that PG&E's proposed common cost allocation factors are based on the 2023 gross costs which include DCPP in the legacy utility owned generation PCIA vintage for a full 12 months.

ANSWER 010

Yes. Consistent with the allocation methodology from Advice Letter 5440-E to use authorized revenue requirements, PG&E's proposed common cost allocation factors are based on the authorized portfolio cost component of the authorized revenue requirements from PG&E's 2023 ERRA Forecast, which is the current authorized revenue requirement as PG&E's 2024 ERRA Forecast is still pending.

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PG&E Data Request No.:	CalCCA_006-Q011		
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Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Benjamin Kolnowski	Requester:	Nikhil Vijaykar

QUESTION 011

Referring to PG&E's Rebuttal Testimony page 27 lines 21-32: Confirm whether PG&E agrees with CalCCA's proposal that if the balance does not reduce to $1 million by the end-of-2024 then it will roll the balance into PABA in 2025.

ANSWER 011

PG&E agrees that if the PUBA balance does not reduce to $1 million or lower by the end-of-2024, PG&E will propose to set the PUBA rate adders to zero in 2025 by transferring the remaining PUBA balance to PABA.

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Request Date:	September 29, 2023	Requester DR No.:	006
Date Sent:	October 3, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Angelia Vega	Requester:	Nikhil Vijaykar

QUESTION 012

Referring to PG&E's Rebuttal Testimony page 28 lines 14-19: Confirm PG&E will include in its October update the adjustment to reduce GRC-related costs for SFGO by $17 million.

ANSWER 012

Yes, PG&E confirms. However, as stated in PG&E's Rebuttal Testimony Question & Answer 65, PG&E is requesting the Commission's authorization in this proceeding to add back the amount that was credited in the 2024 PCIA rates up to the time when the 2023 GRC final decision is implemented, since the SFGO revenue requirement is already deducted from the 2023 GRC request. This is to ensure that the credit is not unduly distributed twice in customers' bills.