

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



FILED

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Application of Pacific Gas and Electric
Company for Adoption of Electric Revenue
Requirements and Rates Associated with its
2019 Energy Resource Recovery Account
(ERRA) and Generation Non-Bypassable
Charges Forecast and Greenhouse Gas
Forecast Revenue and Reconciliation

(U 39 E)

Application 18-06-_____

**APPLICATION OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
FOR 2019 ENERGY RESOURCE RECOVERY ACCOUNT AND
GENERATION NON-BYPASSABLE CHARGES FORECAST AND
GREENHOUSE GAS FORECAST REVENUE AND RECONCILIATION**

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Dated: June 1, 2018

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TABLE OF ACRONYMS

Acronym	Full Name
A.	Application
AB	Assembly Bill
AET	Annual Electric True-up
ARB	California Air Resources Board
BPP	Bundled Procurement Plan
CAM	Cost Allocation Mechanism
CCAs	Community Choice Aggregators
CHP	Combined Heat and Power
CPUC	California Public Utilities Commission
CTC	Competition Transition Charge
D.	Decision
ERRA	Energy Resource Recovery Account
GHG	Greenhouse gas
IOU	Investor Owned Utility
MTCBA	Modified Transition Cost Balancing Account
NSGBA	New System Generation Rate Balancing Account
ORA	Office of Ratepayer Advocates
PAM	Portfolio Allocation Methodology
PCIA	Power Charge Indifference Adjustment
PG&E	Pacific Gas and Electric Company
QF	Qualifying Facility

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I. INTRODUCTION

Pursuant to Rules 2.1 and 3.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), as well as Public Utilities Code Section 454.5(d)(3)¹ and related Commission decisions, Pacific Gas and Electric Company (“PG&E”) submits this 2019 Energy Resource Recovery Account (“ERRA”) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue and Reconciliation Application (“Application”) requesting that the Commission adopt: (1) PG&E’s forecasted 2019 energy procurement revenue requirements to become effective in rates on January 1, 2019; (2) PG&E’s proposed forecasted electric sales for 2019; and (3) PG&E’s forecast of greenhouse gas (“GHG”) revenues, revenue return, and administrative and customer outreach costs for 2019

¹ All statutory references in this Application are to the Public Utilities Code unless otherwise noted.

and approve PG&E's 2017 GHG administrative and customer outreach costs as reasonable. A summary of these requests is included below.

First, PG&E requests that the Commission adopt its 2019 ERRA forecast revenue requirement as indicated in the table below:

	2019 Revenue Requirement	Amount (in millions)
1	ERRA Revenue Requirement	\$1,597.1
2	Ongoing CTC	\$82.2
3	PCIA	\$1,068.0
4	CAM	\$146.1
5	Total Revenue Requirement	\$2,893.4

PG&E will update the requested revenue requirements in its November Update. Concurrent with the filing of this testimony, testimony and hearings have concluded in the Power Charge Indifference Adjustment ("PCIA") Order Instituting Rulemaking ("OIR" or "R.") 17-07-006. The current PCIA OIR schedule calls for a final decision to be issued at the end of July. If a decision adopting the Joint Utilities² recommendation for a PCIA replacement, effective January 1, 2019, is adopted, PG&E expects to file supplemental testimony in this proceeding clarifying its implementation plans for the PCIA replacement.

Second, PG&E requests that the Commission adopt PG&E's 2019 electric sales forecast.

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² Joint Utilities include PG&E, Southern California Edison Company ("SCE") and San Diego Gas & Electric Company ("SDG&E").

Third, PG&E requests that the Commission adopt the following GHG-related forecasts for 2019:

	2019 GHG-Related Forecasts and Administrative and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	\$0.79 million
2	Net GHG revenue return	\$314.2 million
3	Semi-annual Residential California Climate Credit	\$29.15

Finally, PG&E requests that the Commission find the 2017 recorded administrative and outreach expenses of \$1.05 million related to the 2017 GHG revenue return were reasonable.

II. LEGAL AND REGULATORY BACKGROUND

A. ERRRA

Section 454.5(d)(3) requires the Commission to:

Ensure timely recovery of prospective procurement costs incurred pursuant to an approved procurement plan. The commission shall establish rates based on forecasts of procurement costs adopted by the commission, actual procurement costs incurred, or combination thereof, as determined by the commission. The commission shall establish power procurement balancing accounts to track the differences between recorded revenues and costs incurred pursuant to an approved procurement plan. The commission shall review the power procurement balancing accounts, not less than semiannually, and shall adjust rates or order refunds, as necessary, to promptly amortize a balancing account, according to a schedule determined by the commission. Until January 1, 2006, the commission shall ensure that any overcollection or undercollection in the power procurement balancing account does not exceed 5 percent of the electrical corporation's actual recorded generation revenues for the prior calendar year excluding revenues collected for the Department of Water Resources. The commission shall determine the schedule for amortizing the overcollection or undercollection in the balancing account to ensure that the 5 percent threshold is not exceeded. After January 1, 2006, this adjustment shall occur when deemed appropriate by the commission consistent with the objectives of this section.

In D.02-10-062, as modified by subsequent decisions, the Commission implemented this provision by ordering PG&E and California's other investor-owned utilities ("IOUs") to establish procurement-related balancing accounts, to be referred to as the Energy Resource Recovery Account.³ These Commission decisions also established the regulatory framework for the utilities' annual ERRA forecast filings and expedited "trigger" applications.

The ERRA regulatory process includes two annual proceedings. The first, which PG&E files in February of each year, is an annual compliance proceeding to review the utility's compliance in the preceding year regarding energy resource contract administration, least-cost dispatch, fuel procurement, and the ERRA balancing account. PG&E filed its 2017 ERRA Compliance Application on February 28, 2018 (Application ("A.") 18-02-015).

The second ERRA application, which PG&E is to file by June 1 each year, is an annual forecast proceeding to adopt a forecast of PG&E's electric procurement cost revenue requirement and electricity sales for the coming year for rate-setting purposes. PG&E's last ERRA Forecast proceeding, for forecast year 2018, was A. 17-06-005, which was resolved by D.18-01-009.

In addition to the ERRA forecast and ERRA compliance proceedings, the Commission has also established an ERRA "trigger" mechanism to comply with the Section 454.5(d)(3) requirement that "any overcollection or undercollection in the power procurement balancing account does not exceed 5 percent of the electrical corporation's actual recorded generation revenues for the prior calendar year excluding revenues collected for the Department of Water Resources."⁴ In D.04-01-050 the Commission ordered that an advice letter should be filed

³ D.02-10-062 at pp. 59-64.

⁴ *Id.* at pp. 64-66; *see also* D.15-05-008 (extending ERRA trigger mechanism).

annually to calculate the threshold amount, with such filings to be made by April 1 of each year.⁵ PG&E's 2018 threshold amount (5 percent of PG&E's total generation revenues) is \$320 million, as established via Advice 5262-E, effective March 30, 2018.

Finally, in D.15-10-031, the Commission approved with modifications PG&E's 2014 Bundled Procurement Plan ("BPP") consistent with Section 454.5. PG&E filed its conformed 2014 BPP with the Commission in Advice 4750-E. On June 15, 2016, the Energy Division issued a disposition letter approving Advice 4750-E.

B. GHG Revenue Return Forecast and Administrative Costs

The return of GHG allowance revenues to customers and the administrative and outreach costs associated with the allowance revenue return have been the subject of several proceedings at the Commission, including Rulemaking 11-03-012 and A. 14-05-025. In October 2014, the Commission issued a decision directing that recorded (actual) administrative and outreach expenses be reviewed for reasonableness in ERRRA proceedings.⁶ Consistent with this direction, PG&E is including in this Application its 2017 recorded administrative and outreach expenses for the GHG program to be reconciled with the previously approved 2017 forecast. PG&E is requesting that the Commission review these expenses for reasonableness.

The Commission also directed that PG&E's ERRRA Forecast Application include forecasts for administrative and outreach expenses, GHG allowance revenue return amount, and Climate Credit amounts.⁷ PG&E has included in this Application its forecasts for each of these items and requests that the Commission adopt these forecasts in this proceeding.

⁵ D.04-01-050 at pp. 175-177.

⁶ D.14-10-033 at pp. 26, 35.

⁷ D.14-10-033 at pp. 30-31.

Finally, in D.15-12-022, the Commission clarified that in future ERRR Forecast proceedings, PG&E should use the public GHG allowance proxy price to calculate the residential California Climate Credit.⁸ Therefore, in this Application, PG&E is requesting approval of a residential California Climate Credit that is based on a calculation that uses the public proxy price.

C. Agricultural Sales Forecast Information

In D.14-12-053, the Commission approved a stipulation between PG&E, the Agricultural Energy Consumers Association, and the California Farm Bureau Federation.⁹ In the stipulation, PG&E agreed to include a summary description of agricultural sales forecast information in its testimony, and more detailed information regarding agricultural sales in its workpapers. Chapter 2 of PG&E's Prepared Testimony includes a summary description of PG&E's agricultural sales forecast, and PG&E's workpapers include the more detailed agricultural sales information required by the stipulation.

D. Items Recently Added To PG&E's ERRR Forecast Application

Several new items have been added to this Application recently. First, in January 2015, the Commission approved PG&E's Solar Choice Programs (*i.e.*, the Green Tariff Shared Renewables Programs) in D.15-01-051, and the program was officially launched in 2016. As described in more detail in PG&E's Prepared Testimony, the 2019 requested revenue requirements in this proceeding have been adjusted for the costs associated with PG&E customers who enroll in the Solar Choice Programs.

⁸ D.15-12-022 at pp. 12-13.

⁹ See D.14-12-053, Attachment A.

Second, in its decision approving PG&E's 2017 ERRA Forecast (D.16-12-038), the Commission approved a proposal made by PG&E for future ERRA Forecast proceedings regarding the exchange of load forecasts with Community Choice Aggregators ("CCAs").¹⁰ PG&E has continued to implement its approved proposal for this proceeding, as described in more detail in Chapter 2 of PG&E's Prepared Testimony.

Finally, in the 2017 ERRA Forecast proceeding, PG&E entered into a stipulation with the Office of Ratepayer Advocates ("ORA") regarding specific load-related information to be included in workpapers and testimony in future ERRA Forecast proceedings, as well as meeting with ORA after the filing of the Application.¹¹ The information agreed to is provided in Chapter 2 of PG&E's Prepared Testimony and/or the workpapers for Chapter 2, and PG&E will schedule a meeting with ORA at ORA's earliest convenience.

III. DESCRIPTION OF PG&E'S REQUESTS IN THIS APPLICATION

A. ERRA Request

The ERRA records energy procurement costs associated with serving bundled customers. These costs include contracted resource costs, fuel costs for PG&E-owned and contracted generation, Qualifying Facility ("QF") and purchased power costs, and other electric procurement costs such as natural gas hedging and collateral costs and GHG compliance costs associated with the Assembly Bill ("AB") 32 cap-and-trade program. The Ongoing Competition Transition Charge ("CTC") forecast revenue requirement consists of the above-market costs associated with eligible contracts entered into before December 20, 1995, and QF contract

¹⁰ D.16-12-038, OP 3.

¹¹ See *Opening Brief of Pacific Gas and Electric Company*, filed September 27, 2016 in A.16-06-003, Attachment A.

restructuring costs. Ongoing CTC costs are recorded in the Modified Transition Cost Balancing Account (“MTCBA”).

Related to the Ongoing CTC is the PCIA, which is applicable to departing load customers that are responsible for a share of PG&E’s new generation resource commitments. The PCIA is intended to ensure that the departing load customers pay their share of the above-market portion of new generation resource costs, and that bundled customers remain indifferent to customer departures.

The Cost Allocation Mechanism (“CAM”) was originally authorized in D.06-07-029, and the methodology by which it was to be calculated was determined by D.07-09-044 which approved specific guidelines to be used to develop the CAM revenue requirement and resulting rate, and provides for a true-up of this rate to actual costs.¹² Under the CAM, certain costs and benefits are allocated among all load serving entities in a utility’s service territory. The CAM charge was first included in forecast year 2012, as a result of a settlement agreement on outstanding policy issues related to QF and Combined Heat and Power (“CHP”) generation. The CAM is recovered through the New System Generation Rate Balancing Account (“NSGBA”).

PG&E requests that the Commission adopt its 2019 ERRA forecast revenue requirements:

	2019 Revenue Requirement	Amount (in millions)
1	ERRA Revenue Requirement	\$1,597.1
2	Ongoing CTC	\$82.2
3	PCIA	\$1,068.0
4	CAM	\$146.1
5	Total Revenue Requirement	\$2,893.4

¹² The CAM was modified by the Commission in D.11-05-005.

Consistent with past ERRA forecast proceedings, PG&E proposes to update its 2019 ERRA, Ongoing CTC, PCIA, and CAM forecast revenue requirements in its the November Update to reflect market conditions close to the time when 2019 rates go into effect and to revise the forecasted year-end 2018 ERRA, MTCBA, and NSGBA balances. The approved amounts will be consolidated with other approved electric revenue requirements and rate changes through the Annual Electric True-up (“AET”) process later in 2018.

B. 2019 Electric Sales Forecast

PG&E requests that the Commission approve PG&E’s electric sales forecast for 2019.

C. GHG Request

The California Air Resources Board (“ARB”) allocates GHG allowances to the California IOUs on behalf of IOU customers:

The utilities act as an intermediary by holding and then selling the allowances for ratepayer benefit; ARB prohibits the utilities from using the allowances for their own compliance obligation or their own benefit. The revenue from the sales of those GHG allowances is then returned to ratepayers and helps offset the increases in electricity costs that result from GHG compliance.¹³

In the Prepared Testimony accompanying this Application, PG&E has included its forecast of 2019 GHG allowance revenues and the methodology that PG&E will use to allocate these revenues to its customers.

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¹³ D.14-10-033 at p. 5.

PG&E requests that the Commission adopt the following GHG-related forecasts for 2019:

	2019 GHG-Related Forecasts and Administrative and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	\$0.79 million
2	Net GHG revenue return	\$314.2 million
3	Semi-annual Residential California Climate Credit	\$29.15

PG&E will update these forecasts in its November Update, as directed by the Commission in D.14-10-033.¹⁴

PG&E also requests that the Commission find the 2017 recorded administrative and outreach expenses of \$1.05 million pertaining to implement of GHG revenue return were reasonable.

IV. OVERVIEW OF PREPARED TESTIMONY

PG&E's Prepared Testimony accompanying this Application consists of one exhibit (PG&E-1) which includes the following chapters:

Chapter	Title
1	Introduction and Policy
2	Sales and Peak Forecast
3	Generation Resources and Cost Summary
4	Fuel Costs for Utility-Owned Generation
5	Qualifying Facility and Purchased Power Costs
6	Procurement Costs: Post-2002 Contracted Resources, Residual Market Transactions, and Other Costs
7	Greenhouse Gas Costs

¹⁴ See D.14-10-033 at pp. 31-33 (describing GHG allowance revenue information to be updated in November Update).

Chapter	Title
8	Hedging, Collateral and Green Tariff Share Renewables Program Costs
9	Generation Non-Bypassable Charges
10	Revenue Requirements
11	Greenhouse Gas Forecast Revenue and Reconciliation – Cost Calculations
12	Greenhouse Gas Forecast Revenue and Reconciliation – Administrative and Outreach Expenses
13	Greenhouse Gas Forecast Revenue and Reconciliation – Revenue Calculations
14	Rate Proposal

PG&E provides in Exhibit (PG&E-1) a public (redacted) version of its testimony, and also provides to appropriate parties a confidential (unredacted) version (PG&E-1-C) which is submitted under Sections 454.5(g) and 583. PG&E is concurrently submitting declarations identifying the confidential material subject to protection under D.06-06-066, D.14-10-033 (which adopted confidentiality protections for GHG-related information), and Section 454.5(g).¹⁵

V. INFORMATION REQUIRED BY THE COMMISSION’S RULES OF PRACTICE AND PROCEDURE

A. Statutory and Other Authority (Rule 2.1)

PG&E files this Application pursuant to Sections 451, 454, 454.5, and 701, the Commission’s Rules of Practice and Procedure, and prior decisions, orders and resolutions of the Commission, including but not limited to Decisions 02-10-062, 02-12-074, 03-06-067, 03-06-076, 03-07-030, 04-01-050, 04-12-048, 05-01-031, 05-02-040, 06-07-030, 07-05-005, 07-12-052, 08-11-004, 12-01-033, 13-12-011, 14-10-033, 14-12-054, 15-12-022, and 16-12-038.

¹⁵ This is consistent with the Commission’s direction in D.08-04-023.

B. Legal Name and Principal Place of Business (Rule 2.1(a))

The legal name of the Applicant is Pacific Gas and Electric Company. PG&E is a corporation organized under the State of California. PG&E's principal place of business is 77 Beale Street, San Francisco, California 94105.

C. Correspondence and Communications (Rule 2.1(b))

All correspondence, communications, and service of papers regarding this Application should be directed to:

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D. Categorization, Hearings, And Issues To Be Considered (Rule 2.1(c))

1. Proposed Categorization

PG&E proposes that this Application be categorized as a ratesetting proceeding.

2. Need for Hearings

The need for hearings depends on the degree to which other parties contest the proposals and forecasts contained in this Application. While PG&E hopes to resolve the Application without hearings, PG&E's proposed schedule conservatively assumes that hearings may be necessary.

3. Issues to Be Considered

The issues presented in this 2019 ERRA Forecast Application are as follows:

1. Should the Commission adopt the following forecast revenue requirement for PG&E for 2019:

	2019 Revenue Requirement	Amount (in millions)
1	ERRA Revenue Requirement	\$1,597.1
2	Ongoing CTC	\$82.2
3	PCIA	\$1,068.0
4	CAM	\$146.1
5	Total Revenue Requirement	\$2,893.4

2. Should the Commission adopt PG&E's electric sales?
3. Should the Commission adopt the following GHG-related forecasts for 2019:

	2019 GHG-Related Forecasts and Administrative and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	\$0.79 million
2	Net GHG revenue return	\$314.2 million
3	Semi-annual Residential California Climate Credit	\$29.15

4. Were PG&E's recorded 2017 administrative and outreach expenses of \$1.05 million reasonable?

5. Should the Commission approve PG&E's rate proposals associated with its proposed total electric procurement related revenue requirements to be effective in rates on January 1, 2019?

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E. Procedural Schedule

PG&E proposes the following procedural schedule for this Application.

Date	Event
June 1, 2018	PG&E files ERRRA Forecast Application
	Notice of Application appears in Daily Calendar
+ 30 days after Notice	Protests filed
+ 10 days after Protests/ Responses	Reply filed
July 27, 2018	Prehearing Conference
August 14, 2018	Intervenor testimony served (if any)
August 31, 2018	Rebuttal testimony served (if any)
Early September	Hearings (if any)
September 21, 2018	Opening Briefs
October 5, 2018	Reply Briefs
November 2018	Proposed Decision
December 2018	Final Decision

F. Articles of Incorporation (Rule 2.2)

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E's Restated Articles of Incorporation, effective April 12, 2004, was filed with the Commission on May 3, 2004 with PG&E's A. 04-05-005. These articles are incorporated herein by reference.

G. Authority to Increase Rates (Rule 3.2)

This Application does not request an increase in electric rates for bundled customers. However, the request in this Application will be updated in November and, depending on changes that occur as a result of market conditions, PG&E may request an increase at that time. Therefore, out of an abundance of caution, PG&E is providing material in this Application that

complies with Rule 3.2. This Application is not a general rate increase application, so Rule 3.2(a) may apply (depending on the November Update) except for subsections (4), (7), and (9).

H. Balance Sheet and Income Statement (Rule 3.2(a)(1))

PG&E's most current balance sheet and income statement for the period ending March 31, 2018 were filed on May 15, 2018, in A.18-05-014 and are incorporated by reference herein.

I. Statement of Presently Effective Rates (Rule 3.2(a)(2))

PG&E's presently effective electric rates were filed on March 30, 2018, A.18-03-015 and are incorporated by reference herein.

J. Statement of Proposed Increases or Changes In Rates (Rule 3.2(a)(3))

Exhibit A of this Application presents PG&E's proposed changes in electric rates.

K. Summary of Earnings (Rule 3.2(a)(5) and (a)(6))

A summary of recorded year 2016 revenues, expenses, rate cases and rate of return for PG&E's Electric Department was filed with the Commission on September 14, 2017, in A.17-09-006 and is incorporated by reference.

L. Most Recent Proxy Statement – Rule 3.2(a)(8)

PG&E's most recent proxy statement dated April 10, 2018, was filed with the Commission on May 15, 2018, in A.18-05-014 and is incorporated herein by reference.

M. Type of Rate Change Requested (Rule 3.2(a)(10))

The ERRR, Ongoing CTC, PCIA, and CAM rate changes sought in this Application only pass through to customers electric procurement costs and ongoing electric industry restructuring-related transition costs, including non-bypassable charges. With regard to GHG, this Application seeks to return to customers GHG allowance revenues. Thus, the GHG portion of this Application is not a rate increase.

N. Notice to Governmental Entities (Rule 3.2(b))

Exhibit B presents the list of governmental entities, including the State of California and cities and counties served by PG&E, to whom PG&E will mail a notice stating in general terms the proposed revenues, rate changes, and ratemaking mechanisms requested in this Application, within twenty days after filing this Application.

O. Publication (Rule 3.2(d))

Within twenty days after filing this Application, PG&E will publish in newspapers of general circulation in each county in its service territory a notice of filing.

P. Notice to Customers (Rule 3.2(d))

Within 45 days of filing this Application, PG&E will include notices with the regular bills mailed and emailed to all customers affected by the proposed changes.

Q. Safety (Rule 2.1(c))

In D.16-01-017, the Commission adopted an amendment to Rule 2.1(c) requiring Applications to clearly state “relevant safety considerations.” The Commission has previously explained that the “safe and reliable provision of utilities at predictable rates promotes public safety” and that review of the ERRA Forecast Application “ensures that utilities use reasonable assumptions in arriving at the forecast and provide rate certainty to bundled customers.”¹⁶ As demonstrated in this Application and the Prepared Testimony, PG&E’s forecasts in this proceeding are based on testimony regarding 2019 procurement-related costs and the return of GHG allowance revenues, and Commission-approved methodologies for certain non-bypassable charges. PG&E is providing detailed testimony and workpapers supporting all of its 2019 cost and retail sales forecasts, its revenue requirements and rate proposals, and its request to recover

¹⁶ D.14-12-053 at p. 13 (PG&E’s 2015 ERRA Forecast application).

2017 GHG-related administration and outreach costs. PG&E's proposals in this proceeding will promote the safe and reliable provision of electric service and establish predictable rates for 2019, all of which will facilitate public safety.

VI. CONCLUSION

Wherefore, PG&E respectfully requests that the Commission issue an order in this ERRA Forecast Application to:

1. Adopt the following revenue requirements for 2019:

	2019 Revenue Requirement	Amount (in millions)
1	ERRA Revenue Requirement	\$1,597.1
2	Ongoing CTC	\$82.2
3	PCIA	\$1,068.0
4	CAM	\$146.1
5	Total Revenue Requirement	\$2,893.4

2. Adopt PG&E's 2019 electric sales;
3. Adopt the following GHG-related revenue forecasts for 2019:

	GHG-Related Forecasts and Administrative and Outreach Expenses	Amount
1	GHG Administrative and Outreach Expenses	\$0.79 million
2	Net GHG revenue return	\$314.2 million
3	Semi-annual Residential California Climate Credit	\$29.15

4. Approve PG&E's recorded 2017 administrative and outreach expenses of \$1.05 million as reasonable;

5. Approve PG&E's rate proposals associated with its proposed total electric procurement related revenue requirements to be effective in rates on January 1, 2019; and,

6. Grant such additional relief as the Commission may in its judgment deem proper.

Respectfully submitted,

FONG WAN

By: /s/ Fong Wan

FONG WAN

Senior Vice President, Energy Policy and
Procurement

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Attorneys for

PACIFIC GAS AND ELECTRIC COMPANY

Dated: June 1, 2018

VERIFICATION

I, Fong Wan, say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the CPUC to make this Verification for and on behalf of said corporation, and I make this Verification for that reason. I have read the foregoing Application and I am informed and believe that the matters therein concerning Pacific Gas and Electric Company are true. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Francisco, California, this ____ day of May, 2018.

/s/ Fong Wan

FONG WAN

Senior Vice President, Energy Policy and
Procurement

Exhibit A

PG&E's Proposed Changes in Electric Rates

Exhibit A - Table 1
Pacific Gas and Electric Company
Illustrative Revenue Increase and Class Average Rates
Tuesday, January 01, 2019

<u>Line No.</u>	<u>Customer Class</u>	<u>Proposed Revenue Increase (000's)</u>	<u>Present Rates (\$/kWh)</u>	<u>Proposed Rates (\$/kWh)</u>	<u>Percentage Change</u>	<u>Line No.</u>
Bundled Service*						
1	Residential	\$ (107,902)	\$ 0.19967	\$ 0.19242	-3.6%	1
2	Small Commercial	\$ (29,426)	\$ 0.24348	\$ 0.22866	-6.1%	2
3	Medium Commercial	\$ (62,589)	\$ 0.22972	\$ 0.21458	-6.6%	3
4	Large Commercial	\$ (71,833)	\$ 0.19195	\$ 0.17894	-6.8%	4
5	Streetlights	\$ (1,568)	\$ 0.24687	\$ 0.23550	-4.6%	5
6	Standby	\$ (6,640)	\$ 0.16409	\$ 0.14188	-13.5%	6
7	Agriculture	\$ (59,444)	\$ 0.20212	\$ 0.18918	-6.4%	7
8	Industrial	\$ (73,936)	\$ 0.15006	\$ 0.13745	-8.4%	8
9	Total	\$ (413,339)	\$ 0.19659	\$ 0.18554	-5.6%	9
Direct Access and Community Choice Aggregation Service**						
10	Residential	\$ 65,526	\$ 0.16013	\$ 0.16505	3.1%	10
11	Small Commercial	\$ 8,544	\$ 0.15248	\$ 0.15450	1.3%	11
12	Medium Commercial	\$ 11,041	\$ 0.12375	\$ 0.12569	1.6%	12
13	Large Commercial	\$ 12,134	\$ 0.09571	\$ 0.09701	1.4%	13
14	Streetlights	\$ 73	\$ 0.14502	\$ 0.14561	0.4%	14
15	Standby	\$ 24	\$ 0.15211	\$ 0.15268	0.4%	15
16	Agriculture	\$ 2,054	\$ 0.14491	\$ 0.14691	1.4%	16
17	Industrial	\$ 5,965	\$ 0.06454	\$ 0.06513	0.9%	17
18	Total	\$ 105,360	\$ 0.11847	\$ 0.12087	2.0%	18
Departing Load***						
19	Residential	\$ (1)			-1.9%	19
20	Small Commercial	\$ (2)			-1.6%	20
21	Medium Commercial	\$ (7)			0.0%	21
22	Large Commercial	\$ (58)			-2.3%	22
23	Streetlights	\$ (0)			-0.3%	23

* Customers who receive electric generation as well as transmission and distribution service from PG&E.

** Customers who purchase energy from non-PG&E suppliers.

*** Customers who purchase their electricity from a non-utility supplier and receive transmission and distribution service from a publicly owned utility or municipality.

A rate comparison cannot be provided for Departed Load as the applicable rates vary by specific departed load customer categories and any average rate that could be derived, would not be representative of any particular departed load category.

Exhibit B

List of governmental entities, including the State of California and cities and counties served by PG&E, to whom PG&E will mail a notice stating in general terms the proposed revenues, rate changes, and ratemaking mechanisms requested in this Application, within twenty days after filing this Application

SERVICE OF NOTICE OF APPLICATION

In accordance with Rule 3.2(b), Applicant will mail a notice to the following, stating in general terms its proposed change in rates.

State of California

To the Attorney General and the Department of General Services.

State of California
Office of Attorney General
1300 I St Ste 1101
Sacramento, CA 95814

and

Department of General Services
Office of Buildings & Grounds
505 Van Ness Avenue, Room 2012
San Francisco, CA 94102

Counties

To the County Counsel or District Attorney and the County Clerk in the following counties:

Alameda	Mariposa	Santa Clara
Alpine	Mendocino	Santa Cruz
Amador	Merced	Shasta
Butte	Modoc	Sierra
Calaveras	Monterey	Siskiyou
Colusa	Napa	Solano
Contra Costa	Nevada	Sonoma
El Dorado	Placer	Stanislaus
Fresno	Plumas	Sutter
Glenn	Sacramento	Tehama
Humboldt	San Benito	Trinity
Kern	San Bernardino	Tulare
Kings	San Francisco	Tuolumne
Lake	San Joaquin	Yolo
Lassen	San Luis Obispo	Yuba
Madera	San Mateo	
Marin	Santa Barbara	

Municipal Corporations

To the City Attorney and the City Clerk of the following municipal corporations:

Alameda	Colusa	Hanford
Albany	Concord	Hayward
Amador City	Corcoran	Healdsburg
American Canyon	Corning	Hercules
Anderson	Corte Madera	Hillsborough
Angels Camp	Cotati	Hollister
Antioch	Cupertino	Hughson
Arcata	Daly City	Huron
Arroyo Grande	Danville	Ione
Arvin	Davis	Isleton
Atascadero	Del Rey Oaks	Jackson
Atherton	Dinuba	Kerman
Atwater	Dixon	King City
Auburn	Dos Palos	Kingsburg
Avenal	Dublin	Lafayette
Bakersfield	East Palo Alto	Lakeport
Barstow	El Cerrito	Larkspur
Belmont	Elk Grove	Lathrop
Belvedere	Emeryville	Lemoore
Benicia	Escalon	Lincoln
Berkeley	Eureka	Live Oak
Biggs	Fairfax	Livermore
Blue Lake	Fairfield	Livingston
Brentwood	Ferndale	Lodi
Brisbane	Firebaugh	Lompoc
Buellton	Folsom	Loomis
Burlingame	Fort Bragg	Los Altos
Calistoga	Fortuna	Los Altos Hills
Campbell	Foster City	Los Banos
Capitola	Fowler	Los Gatos
Carmel	Fremont	Madera
Ceres	Fresno	Manteca
Chico	Galt	Maricopa
Chowchilla	Gilroy	Marina
Citrus Heights	Gonzales	Mariposa
Clayton	Grass Valley	Martinez
Clearlake	Greenfield	Marysville
Cloverdale	Gridley	McFarland
Clovis	Grover Beach	Mendota
Coalinga	Guadalupe	Menlo Park
Colfax	Gustine	Merced
Colma	Half Moon Bay	Mill Valley

Millbrae
Milpitas
Modesto
Monte Sereno
Monterey
Moraga
Morgan Hill
Morro Bay
Mountain View
Napa
Newark
Nevada City
Newman
Novato
Oakdale
Oakland
Oakley
Orange Cove
Orinda
Orland
Oroville
Pacific Grove
Pacifica
Palo Alto
Paradise
Parlier
Paso Robles
Patterson
Petaluma
Piedmont
Pinole
Pismo Beach
Pittsburg
Placerville
Pleasant Hill
Pleasanton
Plymouth
Point Arena
Portola
Portola Valley
Rancho Cordova
Red Bluff
Redding
Redwood City
Reedley
Richmond

Ridgecrest
Rio Dell
Rio Vista
Ripon
Riverbank
Rocklin
Rohnert Park
Roseville
Ross
Sacramento
Saint Helena
Salinas
San Anselmo
San Bruno
San Carlos
San Francisco
San Joaquin
San Jose
San Juan Bautista
San Leandro
San Luis Obispo
San Mateo
San Pablo
San Rafael
San Ramon
Sand City
Sanger
Santa Clara
Santa Cruz
Santa Maria
Santa Rosa
Saratoga
Sausalito
Scotts Valley
Seaside
Sebastopol
Selma
Shafter
Shasta Lake
Soledad
Solvang
Sonoma
Sonora
South San Francisco
Stockton
Suisun City

Sunnyvale
Sutter Creek
Taft
Tehama
Tiburon
Tracy
Trinidad
Turlock
Ukiah
Union City
Vacaville
Vallejo
Victorville
Walnut Creek
Wasco
Waterford
Watsonville
West Sacramento
Wheatland
Williams
Willits
Willows
Windsor
Winters
Woodland
Woodside
Yountville
Yuba City