ALJ/EW2/jt2/ilz **Date of Issuance 2/28/2020**

Decision 20-02-047 February 27, 2020

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Adoption of Electric Revenue Requirements and Rates Associated with its 2020 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation. (U39E).	Application 19-06-001

DECISION ADOPTING PACIFIC GAS AND ELECTRIC COMPANY'S 2020 ENERGY RESOURCE RECOVERY ACCOUNT FORECAST AND GENERATION NON-BYPASSABLE CHARGES FORECAST AND GREENHOUSE GAS FORECAST REVENUE RETURN AND RECONCILIATION

Table of Contents

DECISION ADOPTING PACIFIC GAS AND ELECTRIC COMPANY'S 2020 ENERGY RESOURCE RECOVERY ACCOUNT FORECAST AND GENERATION NON-BYPASSABLE CHARGES FORECAST AND GREENHOUSE GAS FORECAST REVENUE RETURN AND RECONCILIATION

Summary

This decision adopts and approves for Pacific Gas and Electric Company (PG&E): 1) a 2020 electric procurement forecast for rate setting purposes for PG&E of $5,274 million, consisting of the following revenue requirements: $205 million for the Cost Allocation Mechanism (CAM); $3,056 million for the Power Charge Indifference Adjustment (PCIA); $112 million for the Ongoing Competition Transition Charge (Ongoing CTC); $102 million for the Tree Mortality Non-Bypassable Charge (TMNBC); and $1,798 million for the Energy Resource Recovery Account (ERRA); 2) PG&E's 2020 ERRA Application revenue requirement of $3,014 million, following exclusion of $2,260 million of Utility Owned Generation (UOG)-related costs; 3) PG&E's 2020 forecast electric sales; 4) a $382 million 2020 net forecast Greenhouse Gas (GHG) allowance revenue return following the set aside of $61 million for Clean Energy and Energy Efficiency programs including $51 million for Solar on Multifamily Affordable Housing and a 2020 semi-annual residential California Climate Credit of $35.73 per household; 5) a 2020 GHG forecast of $1.065 million for administrative and outreach expenses pertaining to implementation of GHG allowance proceeds return; finds 2018 recorded administrative and outreach expenses of $0.901 million pertaining to implementation of GHG allowance proceeds return, are reasonable; and determines PG&E's rate proposals associated with its electric procurement related revenue requirements to be effective in rates on or after January 1, 2020.

Revenue Requirements *in thousands*	2020 Cost with Revenue Fees and Uncollectibles Net of GTSR Program Cost	Year-End 2019 Balance	Total 2020 Revenue Requirements
CAM/NSGC	$161,578	$43,784	$205,361
PCIA/PABA[1]	2,559,623	496,622	3,056,245
Ongoing CTC/MTCBA	79,915	32,188	112,390
TMNBC	36,163	66,217	102,380
ERRA	2,405,933	(607,760)	1,798,173
Rev. Req. for Rate Setting	$5,243,212	$31,050	$5,274,262
Less: UOG Related Costs	(2,260,117)		(2,260,117)
Total	$2,983,095	$31,050	$3,014,145

1. Background

On June 3, 2019, Pacific Gas & Electric Company (PG&E) filed its Application for Adoption of Electric Revenue Requirements and Rates Associated with its 2020 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas (GHG) Forecast Revenue Return and Reconciliation (Application). In its Application, PG&E requested: 1) Adoption of its 2020 electric procurement revenue requirement forecast to become effective in rates on January 1, 2020; 2) adoption of its forecasted electric sales for 2020; and 3) adoption of its forecast of GHG revenues, revenue return, and administrative and customer outreach costs for 2020 and approval of PG&E's 2018 GHG administrative and customer outreach costs as reasonable.

On June 13, 2019, Resolution ALJ 176-3439 preliminarily determined that this proceeding was ratesetting and that hearings would be necessary. The Modesto Irrigation District and the Merced Irrigation District filed a response on

[1] Portfolio Allocation Balancing Account

July 3, 2019. Also, on July 3, 2019, The City and County of San Francisco and the Direct Access Customer Coalition (DACC) filed their responses. A protest to the Application was filed on July 3, 2019 by the Agricultural Energy Consumers Association (AECA). On July 5, 2019 the Public Advocates Office (Cal Advocates) and the California Farm Bureau Federation (CFBF) filed protests. East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy, Pioneer Community Energy, San Jose Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy Alliance (collectively the Joint CCAs) also filed their protest on July 5, 2019. Sunrun Inc. (Sunrun) appeared at the Prehearing Conference (PHC) and was granted party status at that time.

PG&E filed its reply to the protests and responses on July 15, 2019.

On August 15, 2019, a PHC took place in San Francisco to establish the service list, discuss the scope, and develop a procedural timetable for the management of this proceeding.

The Scoping Memorandum and Ruling of Assigned Commissioner (Scoping Memo) was issued August 22, 2019. Evidentiary hearing was held on October 2, 2019 at the Commission's San Francisco Office. PG&E, the Joint CCAs, and Sunrun, submitted opening briefs on October 21, 2019. PG&E, Cal Advocates, the Joint CCAs, and Sunrun, submitted reply briefs on October 31, 2019. AECA and CFBF (the Agricultural Parties) jointly submitted a reply brief the same day.

PG&E served its initial testimony on June 3, 2019, supplemental testimony on July 29, 2019, and rebuttal testimony on September 24, 2019. The Joint CCAs and the Agricultural Parties served testimony on September 10, 2019. PG&E

served corrections to its supplemental testimony and errata to its rebuttal testimony on October 2, 2019.

On November 12, 2019, the Joint CCAs and DACC filed a motion regarding the November Update seeking evidentiary hearings and additional briefing, or alternatively, to amend the schedule, and to shorten time for response. Following response of PG&E, on November 15, 2019, a ruling was issued revising the schedule extending the time for comments on the November Update to noon on December 6, 2019.

On December 6, 2019 the Joint CCAs moved for admission of exhibits into evidence. On December 12, 2019 the Joint CCAs moved for leave to reopen the record and for admission of additional evidence and for leave to submit a confidential version of the motion. PG&E filed its opposition to both motions of the Joint CCAs on December 19, 2019. On December 30, 2019, the Joint CCAs – with permission of the Administrative Law Judge – filed their reply.

2. PG&E's Updated Request

On November 8, 2019, PG&E served its update of its requested 2020 ERRA forecast. Errata to the update was served on November 18, 2019. Revised work papers were served on November 20, 2019. PG&E served an Amended Update to the November Update on December 2, 2019. The November Update provides updated forecasts of ERRA revenue requirements, GHG data, departing load data and is intended to update information already presented with more current information.

On December 6, 2019, the Joint CCAs submitted comments to the November Update. The Joint CCAs filed errata to their comments on December 19, 2019. Also, on December 19, 2019, PG&E served its Second Amended Update.

3. Issues and Discussions

3.1. Uncontested Issues

After reviewing PG&E's application, supporting workpapers, and conducting discovery, parties generally agreed with or did not contest the following PG&E requests:

1. PG&E's proposed ERRA revenue requirement of $1,705 million (excepting a dispute as to RPS held for compliance and exclusive of the amount related to the Power Charge Indifference Adjustment (PCIA)), Ongoing Competition Transition Charge (CTC) of $112.4 million, and Cost Allocation Mechanism (CAM) revenue requirement of $205.4 million;
2. PG&E's 2020 forecast of electric sales;
3. PG&E's rate proposals associated with its proposed total electric procurement related revenue requirements to be effective in rates on January 1, 2020;
4. PG&E's proposed 2020 GHG administrative and outreach expense of $1.065 million;
5. PG&E's 2018 recorded administrative and outreach expenses of $0.901 million related to the 2018 GHG revenue return to be found as reasonable; and
6. PG&E's 2020 forecast of direct and indirect GHG emissions and related costs to be found as reasonable and consistent with Commission and state policies and laws.

3.1.1. PG&E's 2020 ERRA Forecast Requests

PG&E's application requests Commission approval of several procurement related revenue requirement forecasts which are not disputed by the parties. With its November Update, PG&E requests approval of the 2020 ERRA forecast revenue requirement of $1,705 million, Ongoing CTC of $112.4 million, CAM revenue requirement of $205.4 million, and Tree Mortality Non-Bypassable

Charge (TMNBC) of $102 million. PG&E also seeks approval of PCIA of $3,149 million.

The ERRA revenue requirement (excepting a dispute as to RPS held for compliance), Ongoing CTC, CAM, and TMNBC revenue requirements are not in dispute. The Joint CCAs dispute the PCIA and the Portfolio Allocation Balancing Account (PABA). We discuss these below in Section 3.2, Contested Issues.

The ERRA forecast revenue requirement represents procurement-related costs based on bundled load including: energy purchases; volumetric load charges for ancillary services, uplift charges, and grid management charges; and other non-volumetric Request for Service List Update (CAISO) costs.[2] It also includes the imputed costs of Resource Adequacy (RA) and Renewable Energy Credits (RECs) retained by PG&E for bundled load.[3]

CTCs are established by statute for the "above market costs associated with eligible contract arrangements entered into before December 20, 1995, and Qualifying Facility contract restructuring costs."[4]

The CAM revenue requirement is intended to recover procurement costs under the Qualifying Facility and Combined Heat and Power Settlement approved by D.10-12-035 and of resources providing system-wide benefits for all customers.[5]

---

[2] PG&E-1 at 12-1.

[3] *Id.*

[4] *See* Decision (D.) 12-12-008 at 5.

[5] PG&E-1 at 8-1 to 8-2.

The TMNBC was established for recovery of net costs of tree mortality-related biomass energy procurement mandated by Pub. Util. Code § 399.20.3(f).[6] The Commission determined recovery of the TMNBC should occur through the Public Purpose Programs Charge, with each utility establishing a TMNBC Balancing Account to collect the net costs associated with this non-bypassable charge.[7]

PG&E proposes to recover these revenue requirements through rates to be implemented on January 1, 2020, and excepting disputes impacting the PCIA and PABA, no parties have disputed these proposals.

3.1.2. PG&E's Electric Sales Forecast

PG&E's electric sales forecast is based on econometric models that forecast electric customer demand using individual regression equations.[8] PG&E also makes post-regression adjustments to account for factors such as distributed generation, energy efficiency, electric vehicles and line loss.[9] PG&E then calculates departing customer load by using historic information for departing load and by working with CCAs to develop load forecasts.[10]

The Agricultural Parties made three recommendations in their testimony:

1. Direct PG&E to present an analysis including surface water availability data as an input in its agricultural sales forecast for the 2021 ERRA forecast;

---

[6] D.18-12-003 at 2.

[7] D.18-12-003, Ordering Paragraph 9.

[8] PG&E-1 at 2-3 to 2-7.

[9] PG&E-1 at 2-8 to 2-11.

[10] PG&E-1 at 2-16 to 2-17.

2. Determine sales volatility and forecasting challenges for agricultural customers should be addressed in a GRC Phase 2; and,
3. Find Agricultural parties may address the development of a mechanism to address volatility and challenges in PG&E's next Phase 2 proceeding.[11]

Although PG&E is agreeable to presenting an analysis including surface water availability data as an input into its agricultural sales forecast, it states it cannot provide an adequate adjustment to address the deviation between forecasted sales and actual sales. Therefore, it would continue to rely on historical averages.[12] Due to the lack of resolution through an improved forecasting mechanism, PG&E does not object to the Agricultural Parties proposing a ratemaking adjustment in the next GRC Phase 2.[13]

3.1.3. PG&E's Rate Proposals

The Phase 1 of the PCIA Order Instituting Rulemaking decision, D.18-10-019, set a cap of 0.5 cent per kWh for non-exempt departing load customers' PCIA rate, differentiated by vintage, and established a trigger mechanism for the PCIA cap.[14] The Phase 2 decision, D.19-10-01 approved the use of vintage billing determinants for PCIA rate design. This is reflected in the rates presented in PG&E's November Update.[15]

[11] AG-1 at 16-17.

[12] PG&E-3 at 3-2.

[13] PG&E-3 at 3-3.

[14] D.18-10-019, Ordering Paragraphs 9 and 10.

[15] D.19-10-001, Ordering Paragraph 6.

Additionally, adjustments have been made in the ERRA, the Modified Transition Cost Balancing Account (MTCBA), and New System Generation Charge to return revenue originally collected through the generation rate to customers.[16]

Although the parties differ in the results obtained (owing to the use of differing inputs), it is not evident there is a dispute as to the rate design and implementation of the PCIA rate cap methodology.[17]

3.1.4. CAM Misallocation

The Joint CCAs have "largely" agreed with PG&E to credit $141 million of misallocated CAM and Ongoing CTC adjustments in PCIA rates to bundled and departing customers.[18] Consistent with the discussion by PG&E, this should be accomplished by reliance on historic forecast sales, not vintaged forecast sales, thereby providing refunds to the customers who actually paid incorrect amounts.[19]

3.1.5. Tax Cuts and Jobs Act

PG&E has agreed with the Joint CCAs proposal to reflect in the 2020 PCIA forecast reductions of the revenue requirement required by D.19-08-023 due to the Tax Cuts and Jobs Act of 2017, with any variations between forecasted and

[16] PG&E-2 at 7-12.

[17] PG&E Opening Brief, at 28-29; Joint CCAs Reply Brief, at 3.

[18] Joint CCAs Reply Brief at 9.

[19] PG&E Reply Brief at 8-9.

approved allocation implemented through the PABA.[20] We find the adjustments resulting from D.19-08-023 are correct.[21]

3.2. Contested Issues

The issues in dispute generally relate to the PCIA. The Joint CCAs contend the proposed increase to the PCIA is unreasonable and the calculations and entries underlying the PCIA are not in compliance with applicable rules, regulations, resolutions, and decisions and should not be approved.[22] Except as specifically discussed, we find the proposed PCIA reasonable and the calculations and entries underlying the PCIA in compliance with applicable rules, regulations, resolutions, and decisions and approve them. We agree with the Joint CCAs that the net ERRA overcollection must be reflected in the PCIA rate. The Joint CCAs propose the ERRA overcollection credit should be applied to the 2020 vintage,[23] however, this proposal deprives those customers that depart in the latter half of 2019 and first half of 2020 from receiving their full refund. We find the overcollection credit should benefit all customers who paid into the overcollection, not only those who depart in the latter half of 2020.

With the introduction of the PCIA cap for the 2020 record year,[24] implementing a $700 million credit to a specific sub-account would cause substantial PABA undercollection issues in future years by artificially reducing

---

[20] PG&E-3 at 1-16.

[21] PG&E-6R at 11:21-12:2.

[22] Joint CCAs' Reply Brief at 1 - 2.

[23] *See*, Joint CCAs Comments, at 26-28.

[24] D.18-10-019, at 162.

the PCIA in the credited subaccount and future subaccounts. A $700 million credit could introduce rate volatility in the future and unnecessarily force PCIA undercollection trigger proceedings as the rate returns to normalcy. Therefore, we direct PG&E to determine a method to properly credit vintage 2019 and 2020 departed load customers that does not have adverse effects on PCIA vintage subaccounts. PG&E should submit that proposal in its 2021 ERRA Forecast Proceeding.

The Joint CCAs further contend the "key shortcoming" is the PABA undercollection and review of recorded PABA balances is insufficient to support a finding that proposed PCIA rates are just and reasonable.[25] Coupled with this contention is an argument for greater transparency.[26] The Joint CCAs also seek to allocate a portion of unsold RA capacity to pre-2009 vintage customers and customers subject to the CTC.[27]

3.2.1. PABA

The Joint CCAs contend PG&E's use of net data is insufficient to support the forecasted PABA undercollection and that gross data must be required to "confirm that only authorized costs and revenues are flowing through the PABA balance, and test PG&E's explanation of the cause of the undercollection."[28] We find PG&E's use of recorded data through September 2019, plus a forecast of the remaining three months is appropriate and sufficient for its forecast.

---

[25] *See*, Joint CCAs Comments, at 2.

[26] *Id.* at 1 - 3.

[27] *Id.* at 3.

[28] *Id.* at 2.

Furthermore, PG&E is correct that review of the PABA recorded balance is to occur within the ERRA Compliance Review proceeding and not the ERRA Forecast.[29] PG&E's PABA forecast is reasonable and justified and is approved.

3.2.2. RPS

The Joint CCAs contend PG&E undercounted its retained Renewables Portfolio Standards (RPS), failing to account for 5,650 GWh required to meet the 2019 compliance requirement of 11,252 GWh. They further contend correcting this error reduces the PABA by $92.9 million.[30] We agree actual retained RPS is based on the volume of RPS used for compliance.[31] PG&E notes however, the volumes used for investor-owned utility (IOU) compliance are not readily determined at this time.[32] This Decision does not set, alter, nor create policy surrounding Compliance Period 3 and PG&E's compliance amounts. However, D.11-12-020, Ordering Paragraph 3 clearly states that utilities are to have procured *no less* than 31% of retail sales in RPS by 2019.[33] Further, D.19-10-001 anticipated utilities would have an annual RPS compliance amount, as reflected by the requirement to value "RPS retained for Compliance" each year during the PABA true-up in the ERRA forecast proceeding. PG&E argues that the quantity of RPS required by Ordering Paragraph 3 of D.11-12-020 is not binding. This decision does not comment on whether that quantity is binding on an annual

---

[29] PG&E Reply Brief at 4.

[30] Joint CCAs Comments, December 6, 2019, at 9.

[31] D.19-10-001, at 28.

[32] Joint CCAs-29.

[33] D.11-12-020, at 24

basis, however, this decision *does* find that the quantities provided in D.11-12-020 serve as an appropriate minimum quantity to be considered retained for purposes of the PABA true-up.

Joint CCAs contend all RPS energy PG&E claims was unsold in 2019 can be attributed to the utility's use of 20% of its starting bank to increase the amount if offered for sale by 4,609 GWh.[34] Joint CCAs then argue that either 4,609 GWh of RECs should be removed from the calculation of Unsold RPS or PG&E's need to use those banked RECs to meet its 2019 RPS compliance obligations should result in those RECs being valued at the RPS adder. Either change would result in a $92.9 million reduction to PABA.

PG&E contends that pre-2019 RECs should not be re-valued now because they were previously "paid for" under methodologies that applied prior to 2019. Bundled customers have paid for all RECs retained prior to 2019 whether those RECs were used for RPS compliance or banked for future compliance. PG&E argues that changes to the PD would result in bundled customers paying twice for some of their RPS obligation: once for the pre-2019 RECs used for compliance which have already been paid for, and a second time for 2019 RPS not needed for compliance, which PG&E tried but was unable to sell.[35]

Finally, PG&E argues,

> Joint CCAs appear to take the position that D.19-10-001 dictates specific types of RPS portfolio management or compliance activities (i.e., REC's generated in a particular year can only be used for

[34] Joint CCAs Opening Comments, at 5

[35] PG&E Reply Comments, at 2.

compliance in that particular year such that banked RECs can never be used for compliance in subsequent years).

PG&E contends D.19-10-001 does not adopt new compliance rules within the RPS program and thus it must not be ordering a true-up based on a compliance quantity.[36]

The issue of the RPS true-up is multifaceted and complex. We share PG&E's concern that bundled customers could be put in the position of being charged twice for some of their RPS obligation. We also share the Joint CCAs' concern that the PABA does not currently identify the specific RECs that are "unsold" or "retained for compliance" in each year and the potential harmful double-counting that this framework could create.

We are not persuaded by PG&E's argument that the CCAs' proposal suggests RECs can never be used for compliance in subsequent years. The Joint CCAs concern is that PG&E used 20% of its bank to inflate its REC quantity in 2019 allowing PG&E to bid its resources aggressively while assuming no risk of non-compliance if it is successful in its bidding, or if not wholly successful, able to inflate its unsold RPS numbers for the year.

The Joint CCAs are persuasive. PG&E should not use banked RECs to increase its REC generation for a given year beyond its compliance and sales commitments. Under the current PABA framework, it cannot be determined whether retired RECs in PABA were "unsold" or "retained for compliance." A tracking framework within PABA and mechanisms to value banked RECs at the end of the compliance period may help resolve these issues. These issues are

---

[36] *Ibid.*

however, more appropriately addressed by the Commission in the PCIA proceeding.

We find the 20% of starting bank RECs included in PG&E AL 5554-E should not be counted as unsold RPS. Those RECs are not being paid for twice by bundled load, they are simply not permitted to be included as part of the calculation. Therefore $92.9 million should be deducted from the PABA balance according to proper sub-account allocation and added to the ERRA balance.

3.2.3. Unsold RA

The Joint CCAs contend a portion of excess, unsold "RA capacity should be allocated to the resources acquired through the CAM and paid for through NSGBA [New System Generation Balancing Account]."[37] Specifically, the Joint CCAs assert there is a prohibited cost shift due to the exemption of "CTC customers and pre-2009 vintage direct access customers who are designated as exempt in the newly vintaged PCIA rates proposed by PG&E…"[38]

PG&E correctly notes the ERRA Forecast is not the appropriate venue to make changes to the pre-2009 vintage exemption from PCIA or the treatment of CAM resources.[39]

The Joint CCAs further contend RA identified as unsold should be counted as retained due to questions concerning the amount of RA offered for sale. We

---

[37] Joint CCAs Opening Brief at 28.

[38] *Id.* at 30.

[39] PG&E Reply Brief at 10-11; *see* also, DACC Reply Brief.

do not agree. The IOUs are required to bid all unallocated RA in the CAISO markets and the Energy Division closely monitors this requirement.[40]

3.2.4. GHG Issues

PG&E records GHG allowance revenues, expenses, and corresponding revenue return to customers in its GHG Revenue Balancing Account. In its testimony, PG&E describes how it intended to distribute GHG allowance revenues in accordance with the methodologies adopted by the Commission in D.12-12-033 and D.14-02-037.[41] PG&E also provides detailed explanations of how it calculated the semi-annual residential climate credit and specific expense items and amounts for both administrative and outreach expenses. PG&E forecasts for 2020, GHG allowance revenue of $418.731 million,[42] net GHG revenue return of $393 million, a semi-annual residential California Climate Credit of $36.75 and administrative and outreach expenses of $1.065 million.[43] For 2018, PG&E recorded administrative and outreach expenses of $0.901 million.[44] The total amount of GHG allowance revenues, and amounts recorded for 2018 and forecast for 2020 administrative and outreach expenses are not disputed.

Under Pub. Util. Code § 748.5(c), the Commission may allocate up to 15 percent of the revenue received by an electric corporation from its sales of allocated GHG allowances to specific Clean Energy and Energy Efficiency (EE)

---

[40] *See*, CAISO Fifth Replacement FERC Electric Tariff, § 40.6.1 (1), at 998.

[41] PG&E-1 at 17-10 to 17-13.

[42] *Id.* at 17-15, Table 17-4.

[43] PG&E-6R at 20.

[44] PG&E-1 at 16-10, Table 16-3.

projects that are not funded by another source. 15 percent of PG&E's 2020 forecast allowance is $61.994 million.[45]

With D.18-06-027, the Commission created the Disadvantaged Community-Single-Family Solar Homes (DAC-SASH) program, the Disadvantaged Community Green Tariff (DAC-GT) program, and the Community Solar Green Tariff (CS-GT) programs to incentivize the installation of solar generating systems in low-income households. D.18-06-027 set an annual $10 million budget for the DAC-SASH program (with funding apportioned to the participating utilities). Although that decision set no budget for the DAC-GT or CS-GT programs, it authorized utilities to fund both programs first through available GHG allowance proceeds, and then through public purpose program funds if the GHG allowance funds were exhausted.

PG&E proposes to set-aside $4.37 million, its share of the annual $10 million budget, for the DAC-SASH program. PG&E further proposes to set aside $2.012 million for the DAC-GT program and $3.142 for the CS-GT program.[46]

The proposed funding for Clean Energy and EE programs for 2020 is summarized in the table below (in millions). Excepting the amount for Solar on Multifamily Housing (SOMAH), the proposals are not disputed.

---

[45] PG&E-6R at 21, Table 17-1.

[46] *Ibid.*

Proposed Clean Energy and EE	**$61.994**
SOMAH	$41.329
DAC-SASH	$4.370
DAC GT	$2.012
CS-GT	$3.142
Total Program Funds	$50.853

PG&E forecasts for 2020 a semi-annual residential California Climate Credit of $36.75 based on a 2020 net GHG revenue return of $393 million (including $25.920 million returned to Emission Intensive and Trade Exposed Customers).

Sunrun opposes PG&E's proposal for distribution of the GHG revenue, specifically, PG&E's proposed funding of $41.329 million for SOMAH. We discuss SOMAH and the impact on the return of GHG revenue, below.

3.2.4.1. SOMAH

Sunrun contends SOMAH has been underfunded and this underfunding should be corrected now.[47] PG&E states their allocations for SOMAH have been consistent with applicable law and approved by Commission decisions. Nevertheless, we find this is the appropriate time to address any underfunding.

We begin, first, with the recognition that review of "funding of GHG clean energy programs such as the Solar on Multifamily Affordable Housing (SOMAH) program" is within the scope of the proceeding.[48] We also reiterate

[47] Sunrun Opening and Reply Briefs.

[48] Assigned Commissioner's Scoping Memo and Ruling, August 22, 2019.

our recognition that initially "the amount of funding for SOMAH had been the subject of some uncertainty"[49] and the statement from D.17-12-022 that revisiting the funding for 2016 and 2017 may be appropriate in a future ERRA proceeding. Whatever the initial uncertainty, Pub. Util. Code § 2870(c) established the annual authorization is to be $100,000,000 or 66.67 percent of available funds (10 percent of recorded GHG allowance revenue), whichever is less.

The following table sets forth the actual funding shortfalls of the SOMAH program to date for PG&E only.[50]

Calendar Year ERRA Forecast	Recorded GHG Allowance Revenues	Set-Aside Based On 10% Of Recorded GHG Allowance Revenue	Actual Set-Aside	Difference (Actual Set-Aside – 10% Set-Aside)
2016*	$128,962,310	$12,896,231	$1,934,435	-$10,961,796
2017	$322,897,048	$32,289,705	$4,843,456	-$27,446,249
2018	$348,099,000	$34,809,900	$43,700,000	$8,890,100
2019	$389,965,000	$38,996,500	$37,737,000	-$1,259,500
TOTAL*	$1,189,923,358	$118,992,336	$88,214,891	**-$30,777,445**

Template D 1 PG&E 2020 Forecast ERRA, A.19 06 001 November Update; PG&E AL 5228 E A
**AB 693 Implemented SOMAH mid-way through 2016, therefore GHG Revenues and set aside amount are pro-rated 50% and totals reflect the pro-rated amounts.*

Pub. Util. Code § 2870(c) requires the Commission to authorize funding for SOMAH for four fiscal years (from July 1, 2016 through June 30, 2020), and to continue authorizing funds through June 30, 2026 if it finds that there are revenues available and adequate interest and participation in the program. The

49 D.17-12-022 at 31.

50 Sunrun projects a significantly greater funding shortfall based on consideration of illustrative and not actual funds and the misalignment of fiscal years to forecast years (S-1, at 13 – 15).

Commission may fulfill the statutory objectives of the SOMAH program prospectively by extending the program allocation through 2026.

Sunrun seeks additional funding to correct prior SOMAH underfunding, contending there are "53 properties with 3,615 affordable rental units on the waitlist in PG&E's territory and they have requested $26,413,901 in SOMAH incentives."[51] Testimony at hearing established the allocation for 2019 exceeds the value of applications on the waitlist. Regardless, Sunrun seeks to fund during the current year the cumulative funding shortfall. As shown above, this amount would be $30.777 million.

The Commission's commitment to running a successful SOMAH program remains strong. We confirm the SOMAH program has been underfunded in prior years. We direct PG&E to set aside the entire past under-allocation of $30.777 million from 2020 GHG revenues as a true-up to correct the under-allocation and bring its SOMAH Program funding amounts into compliance with the law. We also note that PG&E proposed to allocate a full calendar year of funding for 2020; however, at this time, GHG Revenue allocation to the SOMAH Program is only authorized through June 30, 2020. Therefore, PG&E is directed to set aside $20.665 million for its 2020 SOMAH Program allocation (50% of the requested amount). If the Commission determines that revenues are available after 2020, and that there is adequate interest, we may continue authorization of funding through June 30, 2026.

This decision will work in conjunction with any Commission decisions adopting extensions of the SOMAH program through 2026, in order to allow

[51] S-1, at 14.

PG&E to fully fund the SOMAH program for up to 10 years. All unused funds set aside for the SOMAH program shall be returned to PG&E's customers through an ERRA forecast true-up in the year following the program's end. PG&E should also transfer approved set-asides to the SOMAH Balancing Account on a quarterly basis as needed to meet project incentive demand and avoid SOMAH application waitlists. With these modifications, PG&E's set aside for SOMAH in 2020 is reasonable and complies with D.17-12-022.

With the addition of the funding of $30.777 million, the net funding for Clean Energy and EE Programs for 2020 is $60.966 million and the GHG revenue return is reduced to $382.471 million. Therefore, there is a corresponding reduction of the forecast per household credit and we modify the authorized amount for the semi-annual Climate Credit to eligible households and approve $35.73.

Approved 2020 Clean Energy and EE Forecast Set-asides (millions)**.**

2020 SOMAH	$20.665
2016-2019 SOMAH Shortfall	$30.777
2020 DAC-SASH	$4.370
2020 DAC-GT	$2.012
2020 CSGT	$3.142
Total	**$60.966**

3.3. Procedural and Transparency Issues

The Joint CCAs express concerns with "inconsistencies" "driving the Joint CCAs' requests for more timely data and transparency."[52] We agree their request for a venue "in which PG&E, Energy Division and the Joint CCAs can discuss …

[52] Joint CCAs' Reply Brief, at 12.

support for modifying the September 1 deadline for PG&E's AET," "to address and reconcile the issues posed by Rule 3.2 that PG&E reasonably raises", "to better understand why the generation revenue requirements are calculated using different methodologies between the AET and the ERRA", "to discuss how more up-to-date information can be communicated to interested parties in a more timely manner", and "to ensure customers can better understand the changes that will happen to their rates with reasonable notice of those changes taking place" is "modest and reasonable."[53] Cal Advocates similarly supports "greater transparency and streamlining… "[54] These requests are reasonable but should only be considered in a rulemaking proceeding in which all parties and affected utilities participate.

[53] *Id.,* at 12-13.

[54] Cal Advocates Reply Brief

4. Safety

The health and safety impacts of GHGs are among the many reasons that the Legislature enacted Assembly Bill (AB) 32. Specifically, the Legislature found and declared that global warming caused by GHG "poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."[55]

This decision implements a key part of the GHG reduction program envisioned by AB 32 and Public Utilities Code Section 748.5 and, as a result, will improve the health and safety of California residents.

4.1. Public Safety Power Shutoffs

All three large energy utilities experienced Public Safety Power Shutoffs (PSPS) events in 2019. The question of whether and how each utility's revenue collections were impacted by any PSPS events has not previously been examined. In order for the Commission to consider any potential impact of PSPS events on revenue collections and whether sales forecast adjustments or other adjustments to revenue collections are appropriate, PG&E is directed to include in its ERRA Compliance application for 2019 an accounting of the PSPS

[55] AB 32 Section 38501(a).

events that occurred in its service territory in that calendar year and how the PSPS impacted its revenue collections. The 2019 ERRA Compliance case scope may include the following questions:

- Should sales forecasting methods for adjusting revenue requirement under current decoupling policy be adjusted to account for power not sold during a PSPS event?
  - If so, describe how.
- What methods could be used to account for sales lost during a PSPS distinct from sales reductions due to conservation?
- If a utility does not collect its full revenue requirement due to lower volumetric sales during a PSPS, should it be prevented from adjusting future revenue requirements to make up for any undercollection?
  - If so, describe how.

5. Procedural Issues

5.1. Categorization and Need for Hearings

In Resolution ALJ 176-3439, dated June 13, 2019, the Commission preliminarily categorized this proceeding as ratesetting, and preliminarily determined that hearings were necessary. Pursuant to the scoping memo, we held an evidentiary hearing on October 2, 2019. We affirm the preliminary categorization.

5.2. Motions for Confidential Treatment and to Admit Evidence

PG&E filed motions for confidential treatment of its November Update and a subsequent correction, PG&E-6 and PG&E-6-C, and the revised version, PG&E-6R and PG&E 6R-C, pursuant to D.06-06-066, D.08-04-023, and D.14-10-033, Rule 11.5, Pub. Util. Code §§ 454.5(g) and 583, and General Order (GO) 66-C. PG&E states that these documents contain information that complies with the confidentiality requirements of the above listed Decisions, Rules, Codes and GOs, and should therefore be treated confidentially. No party commented on PG&E's requests.

By D.06-06-066, D.08-04-023, and D.14-10-033, the Commission sets forth guidelines for confidential information as it applies to the confidentiality of electric procurement and GHG data (that may be market sensitive) submitted to the Commission. GO 66-C addresses access to records in the Commission's possession. Pub. Util. Code §§ 454.5(g) and 583 address the Commission processes regarding confidential documents in general, while Rule 11.5 addresses sealing all or part of an evidentiary record.

PG&E has been granted similar requests in previous ERRA Forecast Applications. We agree that the information contained in the November Update is market sensitive electric procurement-related information. PG&E identified its November Update as PG&E-6 and PG&E-6-C and the revised update as PG&E-6R and PG&E 6R-C in its motions. On November 15, 2018 PG&E served its amended updates as PG&E-6 and PG&E-6-C. PG&E-6R and PG&E 6R-C were served on December 19, 2019. We grant PG&E's requests to treat as confidential its Exhibit PG&E-6-C and PG&E 6R-C as detailed in Ordering Paragraph 5, of this decision.

We also grant PG&E's motion to offer and admit into the evidentiary record its amended and revised November Update, PG&E-6 and PG&E-6-C and PG&E-6R and PG&E 6R-C pursuant to Rule 13.8(c).

We also grant the motion of the Joint CCAs to Move Exhibits Into Evidence and Admit Exhibits Into The Record consisting of the following documents:

Exhibit No.	**Description**
Joint CCAs-8	PG&E Response to Joint CCAs Data Request 2.23 (including attachments)
Joint CCAs-9	PG&E Response to Joint CCAs Data Request 11.01
Joint CCAs-10	PG&E Response to Joint CCAs Data Request 12.02
Joint CCAs-11	PG&E Response to Joint CCAs Data Request 12.09
Joint CCAs-12	PG&E Response to Joint CCAs Data Request 12.10
Joint CCAs-13	PG&E Response to Joint CCAs Data Request 12.11
Joint CCAs-14	PG&E Response to Joint CCAs Data Request 12.12
Joint CCAs-15	PG&E Response to Joint CCAs Data Request 12.14
Joint CCAs-16	PG&E Response to Joint CCAs Data Request 12.23
Joint CCAs-17	PG&E Response to Joint CCAs Data Request 12.24
Joint CCAs-18	PG&E Response to Joint CCAs Data Request 12.25
Joint CCAs-19	PG&E Response to Joint CCAs Data Request 12.26
Joint CCAs-20	PG&E Response to Joint CCAs Data Request 12.27
Joint CCAs-21	PG&E Response to Joint CCAs Data Request 12.28
Joint CCAs-22	PG&E Response to Joint CCAs Data Request 12.32
Joint CCAs-23	PG&E Response to Joint CCA Data Request 13.01
Joint CCAs-24	PG&E Response to Joint CCAs Data Request 13.02
Joint CCAs-25	PG&E Response to Joint CCAs Data Request 14.01
Joint CCAs-26	PG&E Response to Joint CCAs Data Request 14.02 (including attachment)
Joint CCAs-27	PG&E Response to Joint CCAs Data Request 14.04
Joint CCAs-28	PG&E Response to Joint CCAs Data Request 14.05
Joint CCAs-29	PG&E Supp. Response to Joint CCAs Data Request 14.06
Joint CCAs-30	PG&E Response to Joint CCAs Data Request 14.09
Joint CCAs-31	PG&E Response to Joint CCAs Data Request 14.10
Joint CCAs-32	PG&E Response to Joint CCAs Data Request 14.11
Joint CCAs-33	PG&E Response to Joint CCAs Data Request 15.01

We also grant the motion of the Joint CCAs to Reopen the Record, Move Exhibit Into Evidence, and Admit Exhibit Into The Record concerning the following:

Exhibit No.	Description
Joint CCAs-34	PG&E Supplemental Response to Joint CCAs Data Request No. 14.08 and attachments.

Furthermore, we grant the Joint CCAs' request to treat this exhibit as confidential consistent with the confidential treatment of other exhibits discussed above.

Lastly, we grant the joint motion of the Agricultural Parties to move Exhibit AG-1 into evidence as follows:

Exhibit No.	Description
AG-1	**Direct Testimony of Richard McCann and Brandon Charles**

All other pending motions are denied.

6. Compliance with the Authority Granted Herein

In order to implement the authority granted herein, PG&E must file a Tier 2 Advice Letter (AL) within 15 days of the date of this decision. The tariff sheets filed in the AL shall be effective on or after the date filed subject to the Commission's Energy Division determining they are in compliance with this decision.

7. Comments on Proposed Decision

The proposed decision of Administrative Law Judge Wildgrube in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on February 13, 2020 by PG&E and the Joint CCAs, and reply comments were filed on February 18, 2020 by Sunrun, PG&E and the Joint CCAs. Revisions responsive to comments have been made. Comments which continued to argue positions which were previously presented during the course of the proceedings have not been discussed further.

8. Assignment of Proceeding

Martha Guzman Aceves is the assigned Commissioner and Eric Wildgrube is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. By Resolution ALJ 176-3439, dated June 13, 2019, Application (A.) 19-06-001 was categorized as ratesetting with hearings needed.

2. In A.19-06-001, PG&E requests, pursuant to its Application, and Update: 1) Adoption of its 2020 electric procurement revenue requirement forecast to become effective in rates on January 1, 2020; 2) adoption of its forecasted electric sales for 2020; and 3) adoption of its forecast of GHG revenues, revenue return, and administrative and customer outreach costs for 2020 and approval of PG&E's 2018 GHG administrative and customer outreach costs as reasonable.

3. PG&E submits the following requests to which the parties generally agreed or did not contest:

    1. PG&E's proposed ERRA revenue requirement of $1,705 million (excepting a dispute as to RPS held for compliance and exclusive of the amount related to the PCIA), Ongoing CTC of $112.4 million, and CAM revenue requirement of $205.4 million;
    2. PG&E's 2020 forecast of electric sales;
    3. PG&E's rate proposals associated with its proposed total electric procurement related revenue requirements to be effective in rates on January 1, 2020;
    4. PG&E's proposed 2020 GHG administrative and outreach expense of $1.065 million;

5. PG&E's 2018 recorded administrative and outreach expenses of $0.901 million related to the 2018 GHG revenue return to be found as reasonable; and
6. PG&E's 2020 forecast of direct and indirect GHG emissions and related costs to be found as reasonable and consistent with Commission and state policies and laws.

4. The Agricultural Parties made three recommendations in their testimony:
   1. Direct PG&E to present an analysis including surface water availability data as an input in its agricultural sales forecast for the 2021 ERRA forecast;
   2. Determine sales volatility and forecasting challenges for agricultural customers should be addressed in a GRC Phase 2; and,
   3. Find Agricultural parties may address the development of a mechanism to address volatility and challenges in PG&E's next Phase 2 proceeding.

5. It is not evident there is a dispute as to the rate design and implementation of the PCIA rate cap methodology.

6. $141 million of misallocated CAM and Ongoing CTC adjustments in PCIA rates should be credited to bundled and departing customers by reliance on historic forecast sales, not vintaged forecast sales, thereby providing refunds to the customers who actually paid incorrect amounts. The "Class Specific PCIA Rates for CAM Adjustment" by vintage of PG&E's rate proposal is reasonable. To effectuate this rate implementation, PG&E is authorized to transfer the misallocated CAM credit amounts from the ERRA to the PABA.

7. Reductions of the revenue requirement required by D.19-08-023 due to the Tax Cuts and Jobs Act of 2017 should be reflected in the 2020 PCIA forecast.

8. Application of the ERRA undercollection to a specific PABA subaccount could have unintended consequences due to the PCIA cap and cause significant rate volatility in coming years.

9. PG&E should develop a transparent and fair method for returning the proper funding amount to 2019 and 2020 vintage departed load customers that does not have an adverse impact on PABA accounting and submit its proposal with its 2021 Forecast ERRA Application.

10. We find PG&E's use of recorded data through December 2019, is appropriate and sufficient for its forecast.

11. PG&E included 20% of its starting bank of renewable energy credits to increase the amount of RPS it offered for sale in 2019, resulting in an increase of Unsold RPS in 2019.

12. PG&E forecasts for 2020, GHG allowance revenue of $418.731 million, net GHG revenue return of $393 million, a semi-annual residential California Climate Credit of $36.75 and administrative and outreach expenses of $1.065 million. For 2018, PG&E recorded administrative and outreach expenses of $0.901 million.

13. PG&E proposes to set aside $4.37 million, its share of the annual $10 million budget, for the DAC-SASH program. PG&E further proposes to set aside $2.012 million for the DAC-GT program and $3.142 for the CS-GT program.

14. With funding to date (2016-2019) for SOMAH of $88.215 million and an additional $20.665 million to be allocated by PG&E in 2020, a total of $108.88 million would be allocated, to date, if the current application were approved, as modified.

15. PG&E is currently only authorized to allocate GHG Revenues to the SOMAH Program through June 30, 2020, reducing its proper forecast set-aside amount to $ 20.665 million.

16. There is a cumulative funding shortfall for the SOMAH Program of $30.777 million.

17. The entire cumulative funding shortfall for the SOMAH Program should be funded from 2020 GHG Revenues to bring PG&E's historic SOMAH Program allocations into compliance with SB 92.

18. Following the funding of $30.777 million, and accounting for the SOMAH program being authorized only through June 30, 2020, the net funding for Clean Energy and Energy Efficiency Programs for 2020 is $60.966 million and the GHG revenue return is reduced to $382.471 million. Therefore, there is a corresponding reduction of the forecast per household credit semi-annual Climate Credit to eligible households to $35.73.

19. All three large energy utilities experienced PSPS events in 2019. The question of whether and how each utility's revenue collections were impacted by any PSPS events has not previously been examined.

20. The Agricultural Parties filed a motion to offer and admit into evidence direct testimony identified as AG-1.

21. The Joint CCAs filed a motion to offer and admit into evidence documents that have been identified as Joint CCAs-8 through Joint CCAs-33.

22. The Joint CCAs filed a motion to reopen the record and offer and admit into evidence documents that have been identified as Joint CCAs-34.

23. PG&E filed a motion to offer and admit into evidence its November Update and the revised November Update, identified as PG&E-6 and PG&E-6-C and PG&E-6R and PG&E 6R-C.

24. PG&E filed a motion requesting confidential treatment of certain exhibits containing information that complied with the confidential requirements as set out by the Commission.

25. Rule 11.5 addresses sealing all or part of an evidentiary record.

26. By D.06-06-066, D.08-04-023, and D.14-10-033, we set forth guidelines for confidential information, as it applies to the confidentiality of electric procurement and GHG data (that may be market sensitive) submitted to the Commission.

27. GO 66-C addresses access to records in the Commission's possession.

28. Pub. Util. Code §§ 454.5(g) and 583 addresses the Commission processes regarding confidential documents in general.

Conclusions of Law

1. This decision adopts and approves for PG&E: 1) a 2020 electric procurement forecast for rate setting purposes for PG&E of $5,274 million, consisting of the following revenue requirements: $205 million for the CAM; $3,056 million for the PCIA; $112 million for the Ongoing CTC; $102 million for the TMNBC; and $1,798 million for the ERRA; 2) PG&E's 2020 ERRA Application revenue requirement of $3,014 million, following exclusion of $2,260 million of UOG-related costs; 3) PG&E's 2020 forecast electric sales; 4) a $382 million 2020 net forecast GHG allowance revenue return following the set aside of $61 million for Clean Energy and Energy Efficiency programs, including $31 million for historic SOMAH under-allocation, and a 2020 semi-annual residential California Climate Credit of $35.73 per household; 5) a 2020 GHG forecast of $1.065 million for administrative and outreach expenses pertaining to implementation of GHG allowance proceeds return; finds 2018 recorded administrative and outreach expenses of $0.901 million pertaining to implementation of GHG allowance

proceeds return are reasonable; determines PG&E's rate proposals associated with its electric procurement related revenue requirements to be effective in rates on or after January 1, 2020.

2. This decision implements a key part of the GHG reduction program envisioned by AB 32 and Public Utilities Code Section 748.5 and, as a result, will improve the health and safety of California residents.

3. The Commission should consider any potential impact of PSPS events on revenue collections and whether sales forecast adjustments or other adjustments to revenue collections are appropriate in ERRA compliance applications.

4. D.19-10-001 requires PG&E to value all renewable energy credits used to meet its 2019 RPS compliance obligation at the RPS Adder. D.11-12-020 establishes an RPS requirement for PG&E in 2019 equal to 31% of PG&E's retail sales.

5. PG&E's Exhibits PG&E-6 and PG&E-6-C and PG&E-6R and PG&E-6R-C, should be identified and received into the evidentiary record.

6. PG&E's request to seal the confidential version of its testimony should be granted, as detailed herein.

7. The Joint CCAs exhibits Joint CCAs-8 through Joint CCAs-34, inclusive, should be identified and received into the evidentiary record.

8. The Agricultural Parties exhibit, AG-1, should be identified and received into the evidentiary record.

9. This decision should be effective immediately so that it may be reflected in rates on January 1, 2020 or as soon thereafter as reasonably practicable.

O R D E R

IT IS ORDERED that:

1. This decision adopts and approves for Pacific Gas and Electric Company its requests in Application 19-06-001 as modified and adopted as follows: 1) a 2020 electric procurement forecast for rate setting purposes for Pacific Gas and Electric Company (PG&E) of $5,274 million, consisting of the following revenue requirements: $205 million for the Cost Allocation Mechanism; $3,056 million for the Power Charge Indifference Adjustment; $112 million for the Ongoing Competition Transition Charge; $102 million for the Tree Mortality Non-Bypassable Charge; and $1,798 million for the Energy Resource Recovery Account (ERRA); 2) PG&E's 2020 ERRA Application revenue requirement of $3,014 million, following exclusion of $2,260 million of Utility Owned Generation-related costs; 3) PG&E's 2020 forecast electric sales; 4) a $382 million 2020 net forecast Greenhouse Gas (GHG) allowance revenue return following the set aside of $61 million for Clean Energy and Energy Efficiency programs, including $31 million for a historic Solar on Multifamily Affordable Housing under-allocation, and a 2020 semi-annual residential California Climate Credit of $35.73 per household; 5) a 2020 GHG forecast of $1.065 million for administrative and outreach expenses pertaining to implementation of GHG allowance proceeds return; finds 2018 recorded administrative and outreach expenses of $0.901 million pertaining to implementation of GHG allowance proceeds return, are reasonable; and determines PG&E's rate proposals associated with its electric

procurement related revenue requirements to be effective in rates on or after January 1, 2020 or as soon thereafter as reasonably practicable.

2. Pacific Gas and Electric Company must file a Tier 2 Advice Letter within 15 days of the date of this decision including tariff sheets in compliance with this decision.

3. Pacific Gas and Electric Company's updated 2020 electric sales forecast and rate proposals associated with its electric procurement related revenue requirements is approved to be effective in rates January 1, 2020 or as soon thereafter as reasonably practicable, subject to the Annual Electric True-up process.

4. Pacific Gas and Electric Company shall include in its Energy Resource Recovery Account Forecast application for 2021 a method to properly credit vintage 2019 and 2020 departed load customers that does not have adverse effects on PCIA vintage subaccounts.

5. Pacific Gas and Electric Company shall include in its Energy Resource Recovery Account Compliance application for 2019 an accounting of the Public Safety Power Shutoff events that occurred in its service territory in that calendar year and how the Public Safety Power Shutoff events impacted its revenue collections. This accounting may be included within supplemental testimony filed 45 days after the effective day of the 2020 ERRA Forecast Decision.

6. Pacific Gas and Electric Company's request for receipt of the public and confidential versions of its Exhibits PG&E-6 and PG&E-6-C and PG&E-6R and PG&E-6R-C, into the record is granted.

7. Pacific Gas and Electric Company's (PG&E) request to treat as confidential, its Exhibit PG&E-6-C and PG&E-6-RC, is granted. These exhibits shall remain sealed and confidential for a period of three years after the date of this order, and

shall not be made accessible or disclosed to anyone other than the Commission staff or on further order or ruling of the Commission, the assigned Commissioner, the assigned Administrative Law Judge (ALJ), the Law and Motion Judge, the Chief ALJ, or the Assistant Chief ALJ, or as ordered by a court of competent jurisdiction. If PG&E believes that it is necessary for this information to remain under seal for longer than three years, PG&E may file a new motion stating the justification of further withholding of the information from public inspection. This motion shall be filed at least 30 days before the expiration of this limited protective order.

8. The Joint Community Choice Aggregators' requests for receipt of Joint CCAs-8, Joint CCAs-11, Joint CCAs-12, Joint CCAs-13, Joint CCAs-14, Joint CCAs-15, Joint CCAs-16, Joint CCAs-17, Joint CCAs-18, Joint CCAs-19, Joint CCAs-20, Joint CCAs-21, Joint CCAs-22, Joint CCAs-23, Joint CCAs-24, Joint CCAs-25, Joint CCAs-26, Joint CCAs-27, Joint CCAs-28, Joint CCAs-29, Joint CCAs-30, Joint CCAs-31, Joint CCAs-32, Joint CCAs-33, and Joint CCAs-34, into the record are granted.

9. Joint CCAs' request to treat as confidential its Exhibit Joint CCA-34 is granted. This exhibit shall remain sealed and confidential for a period of three years after the date of this order, and shall not be made accessible or disclosed to anyone other than the Commission staff or on further order or ruling of the Commission, the assigned Commissioner, the assigned ALJ, the Law and Motion Judge, the Chief ALJ, or the Assistant Chief ALJ, or as ordered by a court of competent jurisdiction. If PG&E believes that it is necessary for this information to remain under seal for longer than three years, PG&E may file a new motion stating the justification of further withholding of the information from public

inspection. This motion shall be filed at least 30 days before the expiration of this limited protective order.

10. The joint request of Agricultural Energy Consumers and California Farm Bureau Federation for receipt into the record of AG-1 is granted.

11. Application 19-06-001 is closed.

This order is effective today.

Dated February 27, 2020, at San Francisco, California.

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners