

Docket No.: A.23-02-018

Exhibit No.: \_\_\_\_\_

Date: September 22, 2023

Witness: Brian Shuey

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

**Public Version**

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## Attachments

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

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

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

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

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

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

3 2. Whether the entries recorded in the ERRRA and the Portfolio Allocation  
4 Balancing Account are reasonable, appropriate, accurate, and in compliance  
5 with Commission decisions.

6 5. Whether PG&E administered resource adequacy procurement and sales  
7 consistent with its Bundled Procurement Plan;

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

10 • PG&E should be required to provide a detailed reconciliation between the  
11 resource adequacy (**RA**) position reports used as the basis for its solicitations  
12 offering to sell RA for delivery in 2022 and its final RA positions resulting in  
13 excess capacity in June through October 2022.

14 • The Commission should scrutinize PG&E's assumptions about resource  
15 availability and the adjustments made to its RA position to ensure reductions  
16 to capacity made available to the market are justified and to eliminate  
17 potential overlap among categories.

18 • PG&E's Bundled Procurement Plan (**BPP**) should be updated to ensure excess  
19 capacity is made available to the market, either through refined adjustments to  
20 available capacity in RA position reports or through market offers outside of  
21 the scheduled solicitation process.

22 • The Commission should consider whether disallowance, penalty, or other  
23 remedy is warranted for the 2022 record year based on PG&E's non-  
24 compliance with Decision (**D.**) 21-12-015.

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

4             In its Prepared Testimony, PG&E reported it transferred a total of 923 MW of  
5     excess RA capacity from its existing PCIA-eligible resource portfolio to its Cost  
6     Allocation Mechanism (CAM) portfolio to be counted toward its 2022 System Reliability  
7     Incremental Procurement requirement established in D.21-03-056.<sup>2</sup> According to D.21-  
8     12-015 if PG&E has not met its minimum contingency procurement target for June and  
9     October it may:

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

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

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

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

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

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

<sup>4</sup> *Id.*, page 184 (emphasis added).

(NSGBA)).

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

**Table 1: System RA Transfer from PABA to NSGBA<sup>6</sup>**

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

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

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

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

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

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

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

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

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<sup>7</sup> See PG&E's Bundled Procurement Plan Appendix S Section B.3.b.1.a

<sup>8</sup> See PG&E's response to Joint CCA Master Data Request 1.08.

**Table 2: Summer System RA Position (MW)**

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

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

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

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

<sup>10</sup> See PG&E’s response to CalCCA data request 3.26.

<sup>11</sup> See CAISO Open Access Transmission Tariff Section 40.4.7.1.b.

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

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

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

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

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<sup>12</sup> PG&E held no solicitations after April 11, 2022, offering to sell RA capacity in July 2022.  
<sup>13</sup> See PG&E's response to CalCCA data request 2.54.

PG&E's BPP

also states,

<sup>14</sup>

Table 3 summarizes the System RA offered for sale in each solicitation with delivery periods from June through October 2022 based on PG&E's projected System RA positions prepared at the time of each solicitation.<sup>15</sup> Consistent with PG&E's BPP Appendix S,

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

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

As Table 3 demonstrates,

<sup>16</sup>

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

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

<sup>16</sup> See PG&E's response to CalCCA data request 3.31.

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

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

14           [REDACTED]

15           [REDACTED]

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

22           [REDACTED]

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<sup>17</sup> See PG&E’s response to CalCCA data request 2.55 (emphasis added).

<sup>18</sup> See PG&E’s response to CalCCA data request 2.56.

Table 4 summarizes the number of bids rejected

. As Table 4 demonstrates,

.<sup>19</sup>

**Table 4: Bids Rejected**

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

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

<sup>19</sup> See PG&E’s response to CalCCA data requests 2.21, 2.23, and 2.54 Supplemental.

<sup>20</sup> See PG&E’s response to CalCCA data request 3.28.

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

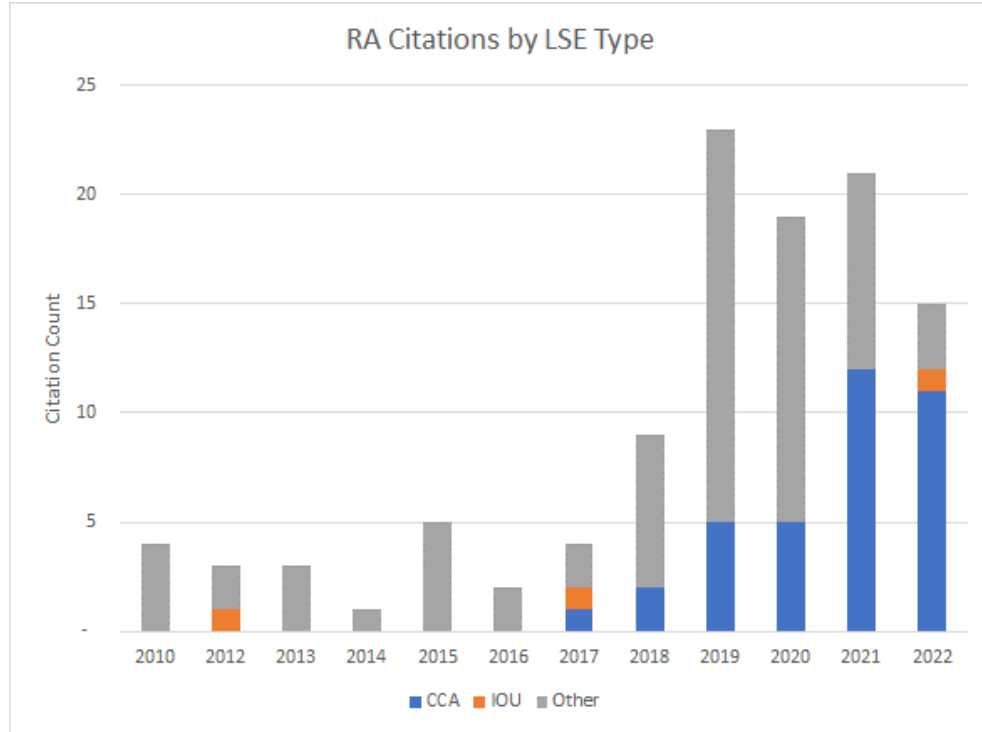
4 **V. LSES HAVE PAID SUBSTANTIAL FINES BECAUSE THEY WERE UNABLE TO**  
5 **PROCURE SUFFICIENT RA CAPACITY.**

6 Allowing PG&E to count RA from existing resources toward its System  
7 Reliability Incremental Procurement target without first making that capacity available to  
8 other LSEs cannibalizes an already constrained RA market and increases costs to all  
9 customers. One symptom of the constrained RA market is that many LSEs have been  
10 unable to meet their System RA requirements despite being willing to pay. The  
11 Enforcement Actions Spreadsheet updated by the Consumer Protection and Enforcement  
12 Division in July 2023 tracks RA citations issues to various entities from October 2009  
13 through July 2023. As shown in Figure 1, there was a sharp increase in the number of  
14 citations in 2019, and elevated levels continued through 2022.<sup>21</sup>

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

1

**Figure 1: RA Citations by LSE Type**

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

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> 2021 Resource Adequacy Report, [https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2021\\_ra\\_report\\_040523.pdf](https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2021_ra_report_040523.pdf).

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

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

2021 Resource Adequacy Report

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



Source: 2017-2021 price data submitted by LSEs.

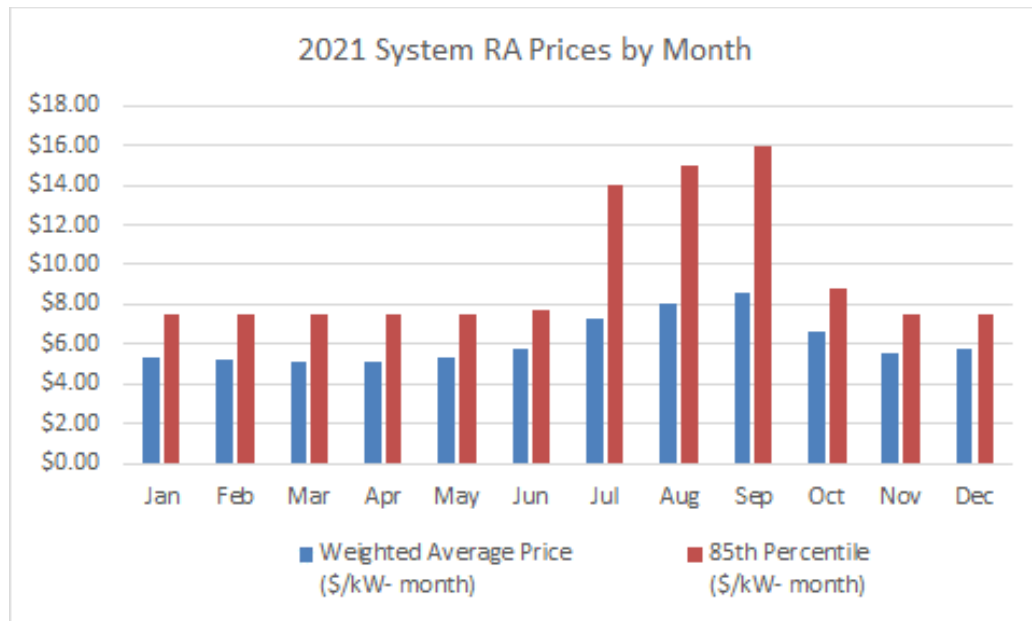
As Figure 2 shows, Energy Division's 2021 Resource Adequacy Report illustrates that the average price of System RA transactions executed for August 2021 was 158% higher than for August 2017.<sup>26</sup> The RA market price benchmarks calculated by Energy Division in September 2022 report that System RA prices in 2022 averaged \$8.11/kW-month over the entire year, and the forecast for average System RA prices in 2023 is \$7.39/kW-month.

<sup>25</sup> 2021 Resource Adequacy Report, [https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2021\\_ra\\_report\\_040523.pdf](https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2021_ra_report_040523.pdf).

<sup>26</sup> *Id.* at 28-29.

Energy Division's data also shows that variation in RA prices during 2021 was significantly greater during high-demand summer months relative to other periods; prices for 15 percent of transactions exceeded \$14/kW-month during July – September 2021.<sup>27</sup> Figure 3 below presents Energy Division's monthly price data for 2021 in graph form.

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



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

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

The fact that [REDACTED]

[REDACTED] but then

<sup>27</sup> *Id.* at 27-28.

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

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

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]<sup>30</sup> Table 5 below details each of those line items as  
12 calculated by PG&E in its RA position reports for the summer 2022 delivery period.

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

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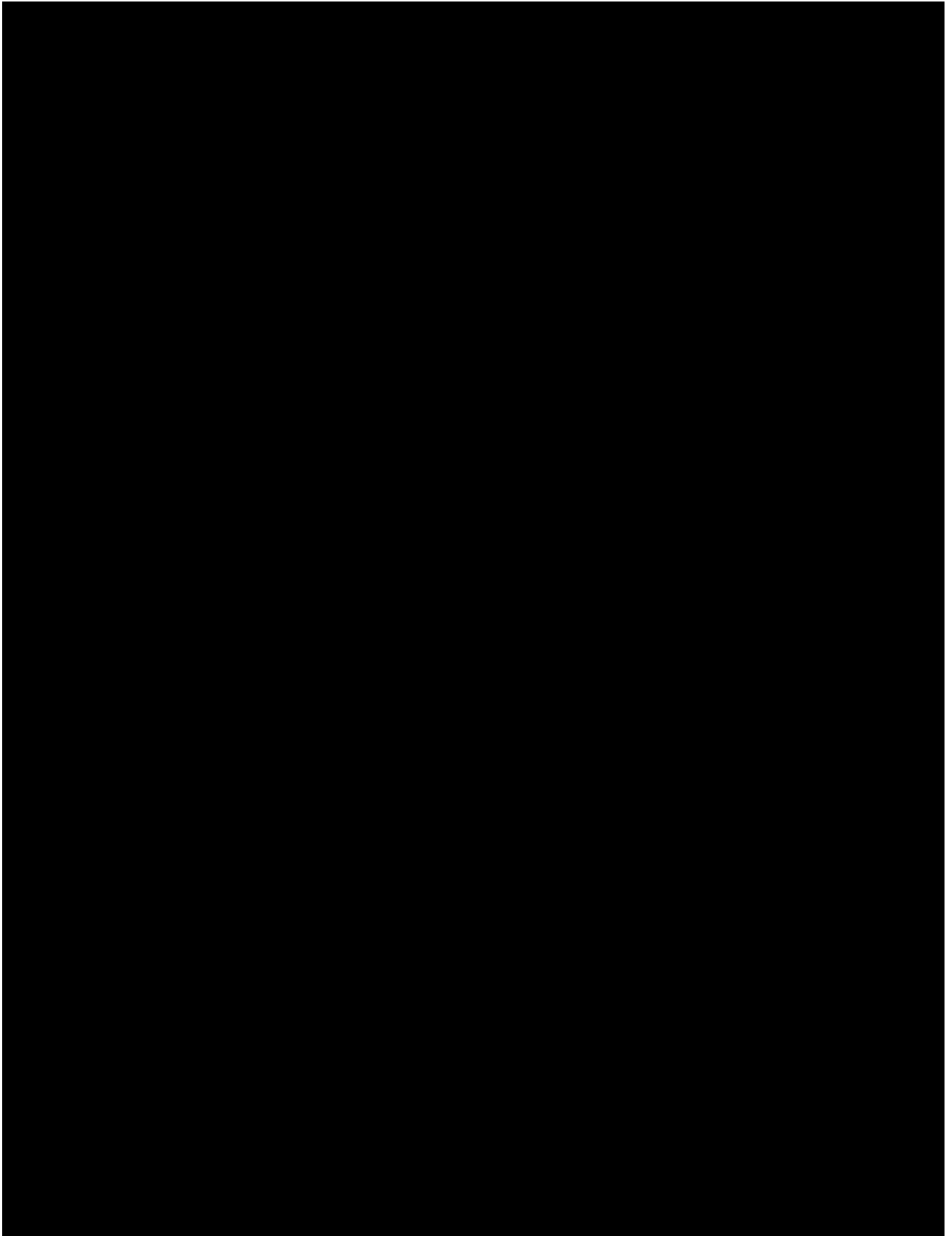
<sup>28</sup> See PG&E’s response to CalCCA data requests 3.27, 4.14 and 4.15.

<sup>29</sup> See PG&E’s response to CalCCA data requests 3.33.

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

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**Table 5: RA Position Reports Detail**



2

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

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

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

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

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

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

18 This concludes my testimony.

**Attachment A**

**Curriculum Vitae of Brian Shuey**

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

## EDUCATION

Bachelor of Science in Accounting, The Pennsylvania State University

## PROFESSIONAL CERTIFICATIONS

Certified Internal Auditor; Institute of Internal Auditors

## KEY EXPERTISE

Adjustment Clause Rate Filing Review

Cost Recovery

Enterprise Risk Management

Financial Statement Audits

IT Consulting

Management Consulting

Process Improvement

Project Management

Regulatory Compliance

Utility Rate Design

## RELEVANT EXPERIENCE

### Litigation Support

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

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

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

# Brian Shuey

SENIOR MANAGER

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## PRIOR RELEVANT EXPERIENCE

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

### PA Public Utility Commission Auditor & Supervisor

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

### Enterprise Risk Management/Internal Audit

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

**Attachment B**

**PG&E Responses to CalCCA Data Requests**

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

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

**QUESTION 08**

Provide Resource Adequacy (RA) information as follows:

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

**ANSWER 08**

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

- (1) Sold, unsold, and retained resource adequacy by resource and balancing account are included in the attachment "ERRA-2022-PGE-Compliance\_DR\_JointCCAs\_001-Q08\_Atch01-2022\_20221231\_Retained\_RA\_Tracker\_December\_2022\_CONF.xlsx" in the "2022 RA Tracker" tab.
- (2) Positions for solicitations governed by Appendix S for (a) each solicitation in which RA for delivery in the record year was offered for sale (b) at the time each solicitation took place are included in ERRA-2022-PGE-Compliance\_DR\_JointCCAs\_001-Q08\_Atch02-2022\_Positions\_CONF.xlsx. Each RA Position Table reflects the system, flex, or local area position at the time of solicitation and the quantity available for sale at that point in time.
- (3) All Tier 1 Advice Letter filings addressing Operational Constraints, including confidential attachments are included in ERRA-2022-PGE-Compliance\_DR\_JointCCAs\_001-Q08\_Atch03-Advice\_Letter\_Filings\_CONF.zip.

Attachment is confidential.

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

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

**QUESTION 019**

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

**ANSWER 019**

Yes. Attached is the public version of PG&E's progress towards the minimum procurement target of 900 MW (ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002\_Q019\_Atch01.xlsx). This document can also be found on the CPUC's RA Compliance website at the following link: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/oct-2022pge-template-for-excess-resource-reporting-d2112015-public-083122.xlsx>.

## IOU EXCESS RESOURCE REPORTING SUMMARY

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

### Instructions:

General: Report actual MW values for previous months and estimates for future months. At the top, enter the subset of the resources from Sections 1 and 2 shown on the IOU's supply plan for each summer month.

**1. Supply-Side Emergency Reliability OIR Procurement:** Report all approved contracts for supply-side resources authorized under D.21-12-015 showing the amount being claimed toward the IOU's monthly incremental procurement target, even if the amount for any given month is zero MW.

**2. Excess Resources from IOU Portfolio Above 15% PRM:** Report any additional "excess resources" above the IOU's 15% PRM requirement being applied to CAM for each month.

**3. Demand-Side Emergency Reliability OIR Procurement:** Report a demand-side resources authorized under D.21-12-015 and being claimed toward the IOU's monthly incremental procurement target.

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

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

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

Project/Resource Name	Resource Type	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Advice Letter and/or Resolution	Notes
<b>1. Supply-Side Emergency Reliability OIR Procurement - Itemize each new project/resource by name</b>	<i>Indicate whether the resource is new build, firm import, short-term energy, only call option, etc.</i>	<i>MW to be claimed for CAM Cost Recovery</i>					<i>List # if applicable</i>	<i>E.g. exp. air, monthly variability, discrepancies between contract values, etc.</i>
Sierra Pacific Industries	Short-term Energy-Only Call-Option	7.00	7.00	7.00	7.00	10.00	AL-6604	
Chevron Taft/Cadet	Short-term Energy-Only Call-Option	2.20	2.20	2.20	2.20	2.20	AL-6604	
Chevron Cymric	Short-term Energy-Only Call-Option	1.50	1.50	1.50	1.50	1.50	AL-6604	
Chevron Coalina	Short-term Energy-Only Call-Option	3.20	3.20	3.20	3.20	3.20	AL-6604	
Chevron SE Kern River	Short-term Energy-Only Call-Option	15.00	15.00	15.00	15.00	15.00	AL-6604	
Chevron East Ridge	Short-term Energy-Only Call-Option	3.00	3.00	3.00	3.00	3.00	AL-6604	
Chevron McKittick	Short-term Energy-Only Call-Option	4.50	4.50	4.50	4.50	4.50	AL-6604	
Wheelabrator Shasta	Short-term Energy-Only Call-Option	15.90	15.90	15.90	15.90	15.90	AL-6604	
Import RA: PowerEx	Firm Import	125.00	125.00	125.00	125.00		AL-6504	
Import RA: PowerEx	Firm Import	75.00	75.00	75.00	75.00			
Import RA: PowerEx	Firm Import	200.00	200.00	200.00	200.00			
Import RA: Morgan Stanley	Firm Import	50.00	50.00		41.00	100.00		
Import RA: TransAlta	Firm Import		50.00	50.00	50.00	50.00		
Import RA: Guzman Energy LLC	Firm Import				25.00		AL-6323	
Import RA: Dynasty Power Inc.	Firm Import				25.00			
Import RA: BPA	Firm Import				100.00			
Tesoro Martinez	PPA extension	45.00	100.00	100.00	100.00	100.00		
Import RA: ConocoPhillips	Firm Import		25.00	25.00	75.00			
Calpine	Short-term RA only	190.00					AL-6604	
E k Hills	Short-term RA only	70.00					AL-6604	
Vistra	Short-term RA only	30.00					AL-6604	
New build	New build					150.00		
New build	New build			63.00	63.00	63.00		
New build	New build			47.00	47.00	47.00		
UOG Enhancements - Gateway	UOG Enhancement	10.00	10.00	10.00	10.00	10.00	AL-6088 page 6	Not included in Cost Recovery for System Reliability OIR
UOG Enhancements - Colusa	UOG Enhancement	10.00	10.00	10.00	10.00	10.00	AL-6088 page 6	Not included in Cost Recovery for System Reliability OIR
<b>2. Excess Resources from IOU Portfolio Above 15% PRM</b>		<i>MW to be claimed for CAM Cost Recovery</i>						
Excess Resources from IOU Portfolio	Excess Resources	103.70	183.14	148.97	156.70	330.00		Amount to be Shown on RA/Supply Plan
<b>SUBTOTAL SUPPLY-side Excess Procurement</b>		<b>961</b>	<b>855</b>	<b>906</b>	<b>1,105</b>	<b>990</b>		
<b>3. Demand-Side Emergency Reliability OIR Procurement</b>	<i>Indicate subcategories of resource, if applicable</i>	<i>MW reported</i>						
ELRP Enrollment		378.00	423.00	466.00	466.00		N/A	
DR program expansion		19.00	15.00	14.00	14.00	12.00	N/A	
Other (Smart Thermostat)		12.00	13.00	14.00	13.00	5.00	N/A	
DRAM					5.00		AL-6619	Amount to be Shown on RA/Supply Plan
<b>SUBTOTAL DEMAND-side Excess Procurement</b>		<b>409</b>	<b>451</b>	<b>494</b>	<b>498</b>	<b>483</b>		

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

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

### D.21-12-015 Ordering Paragraph 74:

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

### D.21-12-015 Ordering Paragraph 74:

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

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

"PG&E bids resources with bid rights into the CAISO markets based on the incremental costs of opportunity costs. By bidding its resources into the CAISO markets at the incremental opportunity costs, PG&E enables total procurement to meet customer demand in the CA ISO markets at least cost. Resources with contracted physical contracts that limit the ability to be bid may be fully or partially self-scheduled into the CAISO markets." Page 17, 2020 PG&E EBR Compliance Testimony

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

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

**QUESTION 021**

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

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

**ANSWER 021**

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

- a) Please see the following attachments for the bid summary or shortlist files for each solicitation that were submitted to the PRG.

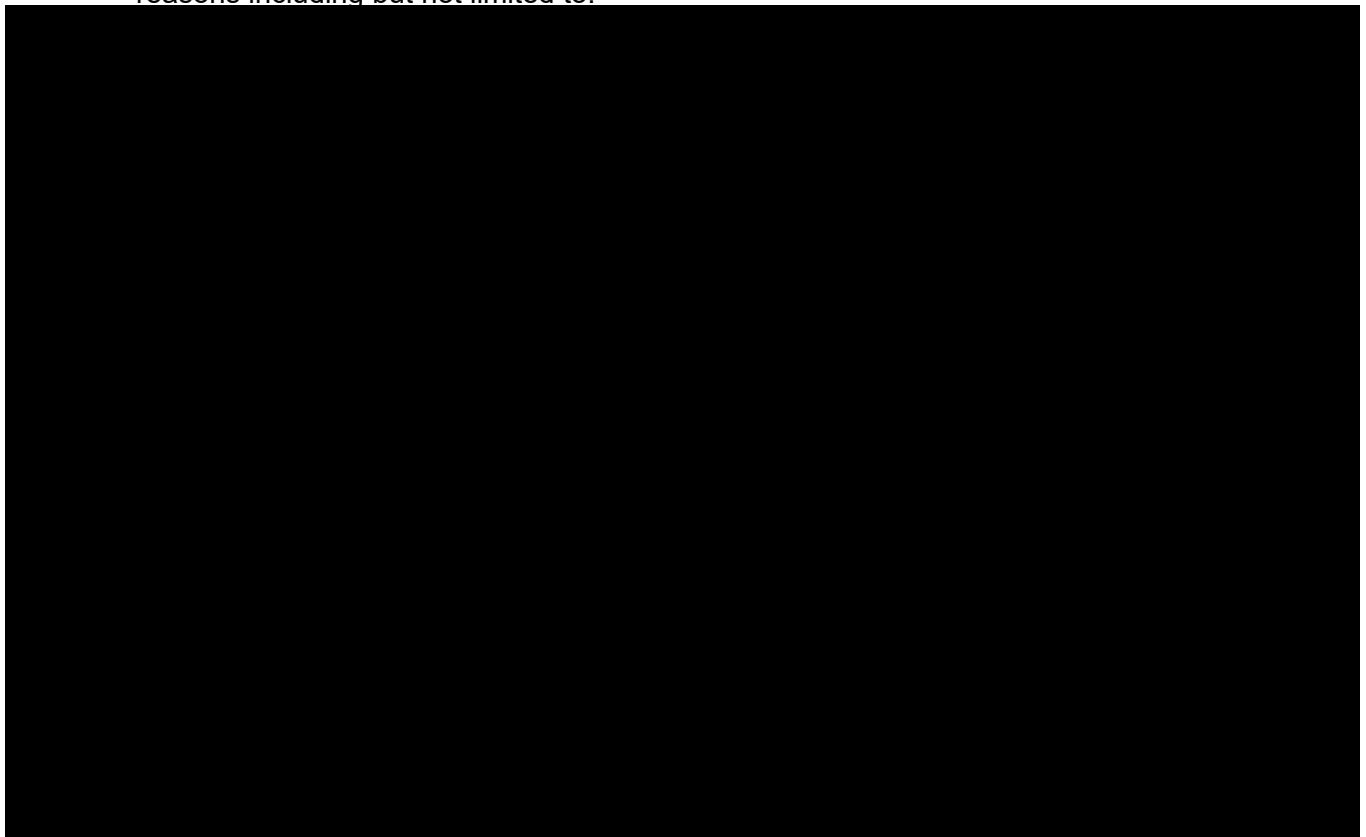
- **Q2 2022 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q021\_Atch1-CONF
- **Q3 2022 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q021\_Atch2-CONF
- **Q4 2022 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q021\_Atch3-CONF
- **Q3 2023 Year Ahead Phase 1 Solicitation:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q021\_Atch4-CONF)
- **Q3 2023 Year Ahead Phase 2 Solicitation:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q021\_Atch5-CONF)
- **Q2 2023 Balance of Year Solicitation:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q021\_Atch6-CONF

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

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

Solicitation	Q2 through Balance of Year 2022	Q3 through Balance of Year 2022	Q4 through Balance of Year 2022	Q3 2023 Year Ahead (Phase 1)	Q3 2023 Year Ahead (Phase 2)	February through Balance of Year 2023
Date Issued to the Market	1/26/2022	3/31/2022	7/21/2022	8/11/2022	9/29/2022	11/9/2022
Attachment	ERRA-2022- PGE- Compliance_DR_ _CalCCA_002- Q021_Atch1- CONF	ERRA-2022 PGE- Compliance_DR_ _CalCCA_002- Q021_Atch2- CONF	ERRA-2022- PGE- Compliance_ DR_CalCCA_0 02- Q021_Atch3- CONF	ERRA-2022- PGE- Compliance_D R_CalCCA_002 -Q021_Atch4- CONF	ERRA-2022-PGE- Compliance_DR_ CalCCA_002- Q021_Atch5- CONF	ERRA-2022- PGE- Compliance_ _DR_CalCCA _002- Q021_Atch6 -CONF

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



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

Attachment is confidential.

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

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

**QUESTION 023**

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

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

**ANSWER 023**

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

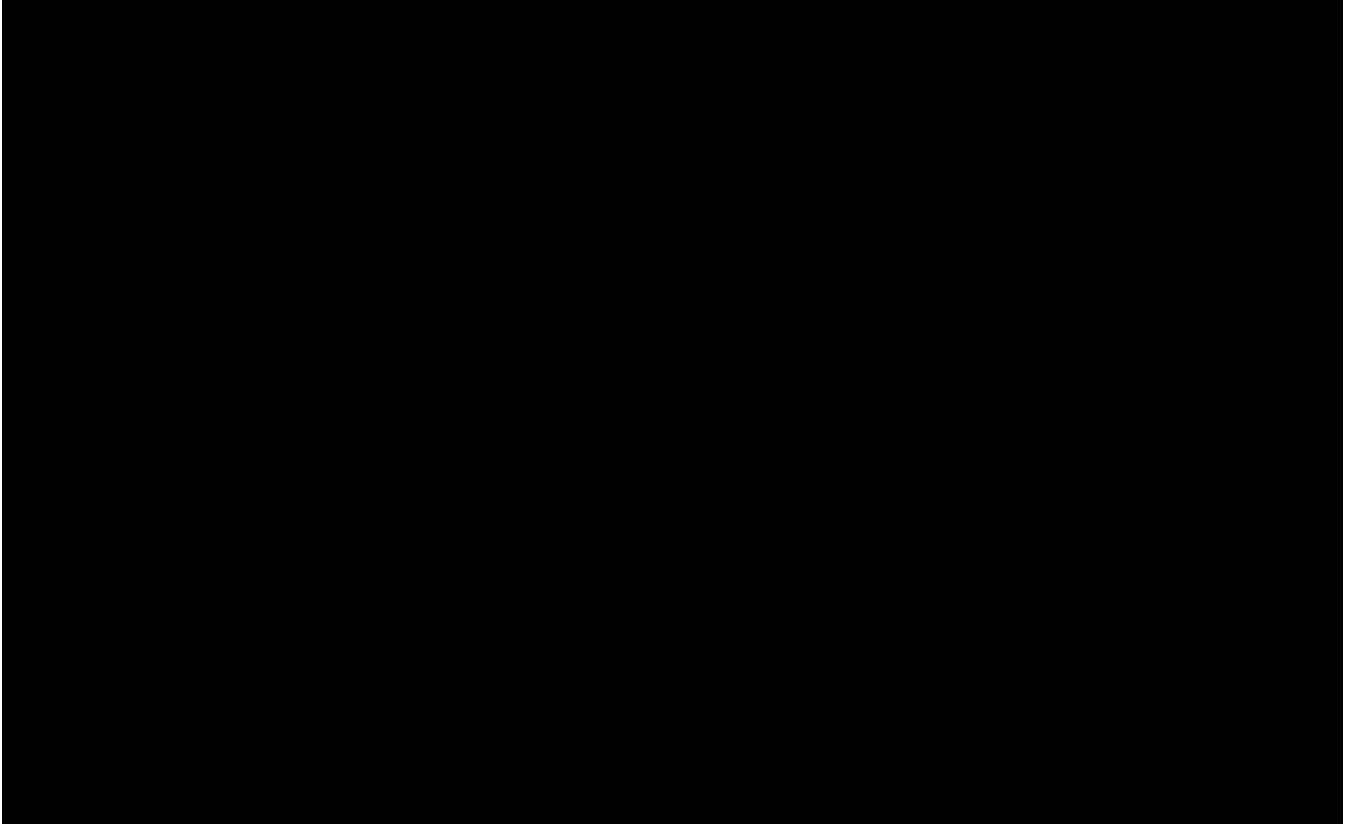
- a) Refer to the following Attachments for PG&E's 2022 year ahead RA solicitation(s) that were submitted to the PRG.

- **Phase 1 2022 Year-Ahead:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q023\_Atch1-CONF
- **Phase 2 2022 Year-Ahead:** ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q023\_Atch2-CONF

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

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

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



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

Attachment is confidential.

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

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

**QUESTION 054**

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

**ANSWER 054**

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

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

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

**QUESTION 054**

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

**ANSWER 054**

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

**ANSWER 001\_SUPP**

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

PG&E's February-December 2022 Balance of Year solicitation held in Q4 of 2021 was not included in PG&E's original response to 2.54. Please see attachment 1 (ERRA-2022-PGE-Compliance\_DR\_CalCCA\_002-Q54\_Atch1-CONF) for the results of this solicitation.

Attachment is confidential.

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

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

**QUESTION 055**

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

**ANSWER 055**

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

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

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

**QUESTION 056**

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

**ANSWER 056**

Please see answer to CalCCA DR 002 Q55.

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

PG&E Data Request No.:	CalCCA 002-Q057		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q057		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 057**

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

**ANSWER 057**

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

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

PG&E Data Request No.:	CalCCA 002-Q058		
PG&E File Name:	ERRA-2022-PGE-Compliance DR CalCCA 002-Q058		
Request Date:	March 15, 2023	Requester DR No.:	002
Date Sent:	April 5, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 058**

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

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

**ANSWER 058**

**This data response contains confidential information protectable under Decision 14-10-033, Decision 06-06-066, and/or Public Utilities Code Section 454.5(G) – Subject to NDA**

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

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

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

**QUESTION 026**

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

**ANSWER 026**

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

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

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

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

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

**QUESTION 027**

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

**ANSWER 027**

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

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

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

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

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

**QUESTION 028**

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

**ANSWER 028**

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

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

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

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

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

**QUESTION 031**

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

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

**ANSWER 031**

***THIS DATA RESPONSE CONTAINS CONFIDENTIAL INFORMATION PROTECTABLE UNDER DECISION 14-10-033, DECISION 06-06-066, PUBLIC UTILITIES CODE SECTION 454.5(G) AND/OR PURSUANT TO NON-PROCUREMENT DECLARATION DATED MAY 23, 2023 – SUBJECT TO NDA.***

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

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



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

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

**QUESTION 033**

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

**ANSWER 033**

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

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

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

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

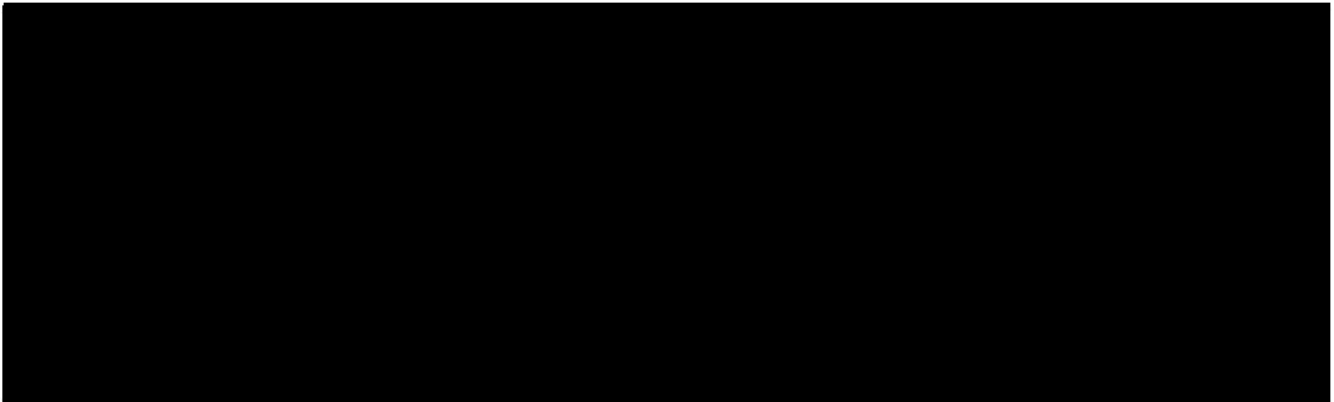
PG&E Data Request No.:	CalCCA_004-Q014		
PG&E File Name:	ERRA-2022-PGE-Compliance_DR_CalCCA_004-Q014CONF		
Request Date:	June 29, 2023	Requester DR No.:	004
Date Sent:	July 14, 2023	Requesting Party:	California Community Choice Association
PG&E Witness:	Robert Gomez	Requester:	Nikhil Vijaykar

**QUESTION 014**

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

**ANSWER 014**

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



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

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

**QUESTION 015**

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

**ANSWER 015**

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

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