

From: Schultz, Adam  
Sent: 2/10/2012 2:10:48 PM  
To: Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe)  
Cc: Simon, Sean A. (sean.simon@cpuc.ca.gov); Simon, Jason (jason.simon@cpuc.ca.gov)  
Bcc:  
Subject: RE: Shiloh IV follow-up

Thanks for getting back to me, Meredith.

I do not believe that D.06-12-009 is the relevant decision on this issue though. After talking with Sean Simon about this issue at some length, I have come to the conclusion that PG&E needs to provide more detail of the 'net ratepayer benefit' resulting from these two QF amendments being bundled with the Shiloh IV PPA.

The standard of review here seems to be the Restructuring Advice Letter Filing (RALF) requirements pursuant to the RALF procedure adopted in D.98-12-066. I am checking with our Legal Division on this issue. It seems that, at a minimum, Energy Division staff needs to evaluate a comprehensive overview of the QF's history and PG&E's analysis for calculating the net ratepayer benefits resulting from the amendments. I know that PG&E included some language to this effect in its Supplemental Advice Letter, but it does not seem sufficient for us to make the determination of net ratepayer benefit.

For an example of this, I had to go back to 2007. Resolution E-4084 deals with these type of QF Amendments. So you might reference that as an example.

If PG&E cannot provide this information today (realizing that it's already 2pm on a Friday), it could jeopardize the timing of Shiloh IV making the March 8<sup>th</sup> Meeting. The next meeting would be March 22<sup>nd</sup>.

I'll give you a call on this to follow-up.

Thanks,

Adam

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**From:** Allen, Meredith [mailto:MEAe@pge.com]  
**Sent:** Friday, February 10, 2012 10:49 AM  
**To:** Schultz, Adam  
**Subject:** Re: Shiloh IV follow-up

Adam,

The ERRA decision, D.06-12-009, at pp. 7-9 explains (including with a reference to a prior decision, D.98-12-006) that QF contract changes (for less than 5 years) may be submitted through the AL process.

Please let me know if you need more information.

Thanks,  
Meredith

**From:** Schultz, Adam [mailto:[adam.schultz@cpuc.ca.gov](mailto:adam.schultz@cpuc.ca.gov)]  
**Sent:** Friday, February 10, 2012 10:47 AM  
**To:** Allen, Meredith  
**Subject:** RE: Shiloh IV follow-up

Meredith,

Have you come up with anything on this?

Thanks,

Adam

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**From:** Allen, Meredith [<mailto:MEAe@pge.com>]  
**Sent:** Thursday, February 09, 2012 9:17 PM  
**To:** Schultz, Adam  
**Subject:** Re: Shiloh IV follow-up

Hi Adam,

I will send to you tomorrow.

Thanks,  
Meredith

**From:** Schultz, Adam [<mailto:adam.schultz@cpuc.ca.gov>]  
**Sent:** Thursday, February 09, 2012 04:46 PM  
**To:** Allen, Meredith  
**Subject:** Shiloh IV follow-up

Meredith,

I'm working on the Shiloh IV resolution and was hoping you could provide some information for me.

I am attempting to track down the appropriate Commission Decision that allows for Commission consideration of the Amended QF and the Terminated QF through the Advice Letter process.

I was hoping you might be able to have someone at PG&E quickly locate the supporting Decision on these two QFs.

Thanks,

Adam

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