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May 12, 2014

Advice 4416-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Submittal of Electric Service Provider (ESP) Financial Security Requirements in Compliance With D.13-01-021, D.13-02-017, and D.13-04-001

Pacific Gas and Electric Company (PG&E) hereby submits its calculation of the financial security requirements for the ESPs serving customers within its service territory.

Purpose

In compliance with Ordering Paragraph (OP) 6 of Decision (D.) 13-01-021~~14~~ advice filing is to provide the California Public Utilities Commission (Commission or CPUC) with the updated ESP financial security requirements.

Background

On January 24, 2013, the Commission issued D.13-01-021, which adopted a methodology to derive incremental procurement costs for the financial security requirement and re-entry fees for an involuntary return of Direct Access (DA) residential and small commercial customers. On February 25, 2013, the Commission issued D.13-02-017 and on April 2, 2013, the Commission issued D.13-04-001. These two decisions corrected inadvertent technical errors in D.13-01-021.

OP6 of D.13-01-021 requires the Investor Owned Utilities to update the applicable ESP financial security amounts by the 10th of ~~May~~² November of each year and to submit them in a Tier 2 Advice Letter.

Attachment B contains a table showing, by ESP, the calculated financial security

¹ As corrected by D.13-02-017, issued on February 25, 2013, and D.13-04-001, issued on April 2, 2013.

² May 10, 2014, is a Saturday. Commission Rules of Practice and Procedure Rule 1.15 provides that when the last day falls on a Saturday, Sunday, holiday, or other day when the Commission offices are closed, the time limit is extended to include the first day thereafter. Therefore, this advice letter is timely submitted.

amount based upon the methodology adopted in Appendix 1 of D.13-01-021. The table has been redacted of any confidential ESP data utilized in the calculation. An unredacted version with the relevant supporting data and calculation of each respective ESP's financial security amount will be filed under confidential seal to the Energy Division. A Declaration supporting confidential treatment is found in Attachment A.

The version of this advice letter posted at www.pge.com is redacted.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile E-mail, no later than June 2, 2014, which is 21 ~~days~~ the date of this filing. Protests should be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via E-mail or U.S. Mail (and by facsimile, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal

³ The 20-day protest period ends on a weekend date so PG&E's moving the protest period end date to the next business day.

address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 advice filing become effective on regular notice, June 11, 2014, which is 30 calendar days after the date of filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for Rulemaking (R.) 07-05-025. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at <http://www.pge.com/tariffs>.

Handwritten signature of Brian Cherry in cursive script.

Vice President, Regulatory Relations

cc: Service List R.07-05-025

Attachments:

Attachment A – Declaration of Ronald Jang supporting confidential treatment
Confidential Attachment B – ESP Financial Security Requirement
(Redacted copy provided in public version)

ADVICE LETTER FILING SUMMARY
ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. Pacific Gas and Electric Company (ID U39 E)

Utility type: ELC ffi GAS PLC HEAT WATER
Contact Person: Shirley Wong
Phone#: (415) 972-5505
E-mail: slwb@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE (Date Filed/ Received Stamp by CPUC)
ELC= Electric GAS= Gas
PLC= Pipeline HEAT= Heat WATER Water

Advice Letter (AL) #4416-E Tier: 2
Subject of AL: Submittal of Electric Service Provider (ESP) Financial Security Requirements in Compliance With D.13-01-021, D.13-02-017, and D.13-04-001

Keywords (choose from CPUC listing): Compliance

AL filing type: Monthly Quarterly Annual ffi One-Time ffi Other Bi-annual

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution # D.13-01-021, D.13-02-017, and D.13-04-001

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No
Summarized differences between the AL and the prior withdrawn or rejected AL:

Is AL requesting confidential treatment? Yes

If so, what information is the utility seeking confidential treatment? Confidential Attachment B - ESP Financial Security Requirement

Confidential information will be made available to those who have executed a nondisclosure agreement? Yes No
Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Ronald Jang, (415) 973-2973

Resolution Required? Yes No

Requested effective date June 11, 2014 No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 21 days the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC Energy Division Pacific Gas and Electric Company
Energy Division Attn: Brian K. Cherry
ED Tariff Unit Vice President, Regulatory Relations
505 Van Ness Ave., 4th Fl. 77 Beale Street, Mail Code B10C
San Francisco, CA 94102 P.O. Box 770000
E-mail: EDTariffUnit@cpuc.ca.gov San Francisco, CA 94177
E-mail: PGETariffs@pge.com

¹ The 20-day protest period ends on a weekend so PG&Es moving the protest period end date to the next business day.

ATTACHMENT

DECLARATION OF RONALD JANG
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN ADVICE LETTER 1416-E
(PACIFIC GAS AND ELECTRIC COMPANY U39 E)

I, Ronald Jang, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee at PG&E since 1977. My current title is Principal Account Manager within PG&E's Customer Impact organization. In this position, my responsibilities include maintaining the ongoing business relationship with electric service providers (ESPs) participating in PG&E's direct access service program carrying out these responsibilities, have acquired knowledge of the operations of electric service providers in general. Through this experience, I have become familiar with the type of information that ESPs consider confidential and proprietary.

2. Based on my knowledge and experience, I hereby declare that I am seeking confidential treatment of "Attachment B to Advice Letter 1416-E," submitted on May 12, 2014. By this Advice Letter, PG&E is seeking this Commission's approval of a calculation of the financial security requirements for individual ESPs in accordance with Ordering Paragraph 6 of Decision 13-01-021.

3. PG&E is seeking confidential treatment of the number of customers served by each ESP, historic usage information, forecasted pricing information, and the calculated financial security requirement. The information PG&E is seeking to protect constitutes information that should be protected under Public Utilities Code § 562 and General Order 66-C. Finally, PG&E states that: (1) information is not already public and (2) the data cannot be aggregated, redacted, summarized, or otherwise protected in a way that allows partial disclosure.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on May 12, 2014 at San Francisco, California.

/s/ Ronald O. Jang
Ronald O. Jang

ATTACHMENT
Redacted Public Version

ESP FINANCIAL SECURITY REQUIREMENT	
Pacific Gas and Electric Company	
Advice 4416-E	
May 12, 2014	
Electric Service Provider	Total Financial Security
3phases Renewables LLC	
Calpine Power America LLC	
Commerce Energy	
Commercial Energy of Montana, Inc	
Constellation Newenergy, Inc	
Direct Energy Business LLC	
EDF Industrial Power Services (CA), LLC	
Gexa Energy of California Inc	
Glacial Energy of California Inc	
Liberty Power Holdings LLC	
Noble Americas Energy Solutions LLC	
Pilot Power Group Inc	
Shell Energy North America (US) LP	
Tiger, Inc.	

PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV

1st Light Energy	Division of Ratepayer Advocates	North America Power Partners
AT&T	Douglass & Liddell	Occidental Energy Marketing, Inc.
Alcantar & Kahl LLP	Downey & Brand	OnGrid Solar
Anderson & Poole	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
BART	G. A. Krause & Assoc.	Praxair
Barkovich & Yap, Inc.	GenOn Energy Inc.	Regulatory & Cogeneration Service, Inc.
Bartle Wells Associates	GenOn Energy, Inc.	SCD Energy Solutions
Braun Blasing McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SCE
CENERGY POWER	Green Power Institute	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Hanna & Morton	SPURR
California Energy Commission	In House Energy	San Francisco Public Utilities Commission
California Public Utilities Commission	International Power Technology	Seattle City Light
California State Association of Counties	Intestate Gas Services, Inc.	Sempra Utilities
Calpine	K&L Gates LLP	SoCalGas
Casner, Steve	Kelly Group	Southern California Edison Company
Center for Biological Diversity	Linde	Spark Energy
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
City of San Jose	Los Angeles Dept of Water & Power	Sunshine Design
Clean Power	MRW & Associates	Tecogen, Inc.
Coast Economic Consulting	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Commercial Energy	Marin Energy Authority	TransCanada
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Cost Management
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Utility Specialists
Davis Wright Tremaine LLP	Morgan Stanley	Verizon
Day Carter Murphy	NLine Energy, Inc.	Water and Energy Consulting
Defense Energy Support Center	NRG Solar	Wellhead Electric Company
Dept of General Services	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)