

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 12, 2019

Advice Letter 5419-E

Erik Jacobsen
Director of Regulatory Operations
Pacific Gas & Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Subject: Fire Risk Mitigation Memorandum Account, Pursuant to Senate Bill 901

Dear Mr. Jacobsen:

Summary

The Energy Division has determined that Advice Letter (AL) 5419-E is in compliance with Public Utilities Code Section 8386, as amended by Senate Bill (SB) 901 (2018, Dodd) and is effective as of January 1, 2019.

The Utility Reform Network (TURN) filed a protest in response to this advice letter raising several concerns. In its reply, Pacific Gas & Electric Company (PG&E) responded to the issues raised by TURN. Based on PG&E's response and our review, the Energy Division approves PG&E Advice Letter 5419-E as it complies with Public Utilities Code Section 8386(j).

Background

On August 31, 2018, the California Legislature passed SB 901, and Governor Edmund Brown Jr. signed it into law on September 21, 2018. SB 901 addresses numerous issues surrounding wildfire prevention, response, and recovery. Among other things, SB 901 amends Public Utilities Code Section 8386, requiring each electric investor-owned utility to submit an annual Wildfire Mitigation Plan to the Commission. The Commission opened Rulemaking (R.) 18-10-007 to consider the Wildfire Mitigation Plans in compliance with the legislation.

On November 1, 2018, PG&E submitted Advice Letter 5419-E to open a Fire Risk Mitigation Memorandum Account (FRMMA) effective January 1, 2019. PG&E proposes the FRMMA will track costs incurred for fire risk reduction that are not otherwise covered in the utility's revenue requirement, pursuant to SB 901.¹

Public Utilities Code Section 8386 contains two provisions regarding memorandum accounts to record costs to mitigate wildfire risk. The first memorandum account described in SB 901

¹ Public Utilities Code Section 8386(j)

relates to the Wildfire Mitigation Plan being considered in R.18-10-007. Section 8386(e) provides that “[a]t the time it approves each plan, the commission shall authorize the utility to establish a memorandum account to track costs incurred to implement the plan.” Additionally, Section 8386(j) provides that “[e]ach electrical corporation shall establish a memorandum account to track costs incurred for fire risk mitigation that are not otherwise covered in the electrical corporation’s revenue requirements.” In the instant advice letter, PG&E requests a memorandum account pursuant to Section 8386(j) to track costs not otherwise included in its 2017 GRC or other wildfire-related mitigation memorandum accounts.

Protest

TURN filed a timely protest on November 21, 2018. TURN does not oppose the establishment of the FRMMA, effective January 1, 2019, but raises several issues with PG&E’s request. Namely, TURN outlines concerns regarding: 1) the proper procedural vehicle for request and approval of PG&E’s FRMMA; 2) the interpretation of the two provisions of SB 901 that address memorandum accounts; 3) the potential for “double recovery” of costs booked to the FRMMA; and 4) the appropriate duration of the FRMMA.

PG&E filed a reply to the protest on November 30, 2018. PG&E contests TURN’s first claim that Advice Letter 5419-E should have been filed as a motion in R.18-10-007. PG&E argues there is no provision in Public Utilities Code Section 8386 requiring the memorandum account requested in this advice letter filing to be addressed in conjunction with the Wildfire Mitigation Plan.

PG&E also expresses its disagreement with TURN’s interpretation that SB 901 only requires one memorandum account per utility. PG&E points to the two separate descriptions of memorandum accounts, and the need to start tracking costs before the Wildfire Mitigation Plans are finalized.

In response to the third concern raised by TURN, PG&E agrees the legislature did not intend to allow double recovery of fire mitigation expenses in its direction to open two memorandum accounts.

PG&E disagrees with TURN’s final requests that the Commission: 1) reject PG&E’s request to allow the FRMMA to remain open after adoption of PG&E’s Wildfire Mitigation Plan and related memorandum account; and 2) transfer the balance in the FRMMA to the new Wildfire Mitigation Plan memorandum account once approved. PG&E argues the FRMMA should be allowed to remain open to record any costs not captured in the Wildfire Mitigation Plan.

Discussion

First, Energy Division finds that PG&E’s request for a fire risk mitigation memorandum account pursuant to Pub. Util. Code Section 8386(j) through an advice letter is consistent with General Order (GO) 96-B Section 5.1. GO 96-B states that matters appropriate to advice letters include the “review [of] a utility’s request to change its tariffs in a manner previously authorized by *statute* or Commission order [...]” (emphasis added). Pub. Util. Code Section 8386(j) does not refer to the Wildfire Mitigation Plan or include a procedural requirement for a motion in that proceeding.

TURN's protest expresses its view that SB 901 only intended to create one new memorandum account per utility. TURN does not oppose the creation of the FRMMA as a bridge to the memorandum account to be created upon Commission adoption of the Wildfire Mitigation Plan. At that time, TURN proposes the FRMMA be closed and its balance transferred to the new account. Conversely, PG&E requests that upon approval of the memorandum account authorized in conjunction with the Wildfire Mitigation Plan, PG&E would stop recording costs for work approved in its Wildfire Mitigation Plan to the FRMMA. The FRMMA would remain open to record costs of any additional wildfire mitigation activities not included in the approved Wildfire Mitigation Plan.

Energy Division finds that Pub. Util. Code Section 8386(j) provides for one memorandum account that Energy Division may approve by disposition letter. This letter approves PG&E's request to establish an account to track fire mitigation costs pursuant to Pub. Util. Code Section 8386(j). Reconciliation of TURN and PG&E's positions regarding whether an additional account should be opened and whether the FRMMA should at that time be closed may be appropriate for determination in the Wildfire Mitigation Plan proceeding, R.18-10-007.

Disposition

PG&E submitted AL 5419-E as a tier 2 advice letter. Upon review, the Energy Division has determined that this AL should be processed as a tier 1 AL that is effective on the requested date of January 1, 2019. While pursuant to GO 96-B, General Rule 7.3.3, a tier 1 advice letter is usually effective on the date of submittal, in this case the law allowing for the establishment of this memorandum account did not go into effect until January 1, 2019. As such, we find the effective date is January 1, 2019 instead of the earlier date of advice letter submission. Additionally, PG&E requested an effective date later than the submission date which is allowable under GO 96-B General Rule 7.3.2.

Energy Division also notes that the tier in which an advice letter is submitted is not binding upon the reviewing Industry Division. (GO 96-B, General Rule 7.6.1 ("The utility's designation is not binding on the reviewing Industry Division.")) In this instance, the Energy Division finds that AL 5419-E should be processed as a tier 1 advice letter because: (1) there is an urgent need to reasonably remove any possible hindrance an electric utility may assert in delaying fire risk mitigation measures; (2) the January 1, 2019 start date was not protested; (3) processing AL 5419-E, which has been officially suspended by the reviewing Industry Division, as a tier 2 advice letter would delay the start of the memorandum account until the date of this letter pursuant to GO 96-B General Rule 7.3.4(2); and, (4) GO 96-B Energy Division Industry Rule 5.1(1) read in conjunction with GO 96-B General Rule 1.3 allows the Energy Division to construe the wording of this advice letter such that it follows directly Public Utilities Code Section 8386(j) in order to secure a just, speedy, and inexpensive handling of this matter for the reasons listed herein.

The Energy Division has determined that Advice Letter (AL) 5419-E complies with Public Utilities Code Section 8386(j), as enacted by Senate Bill 901. AL 5419-E is approved and is effective as of January 1, 2019.

Sincerely,



FOR

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

November 1, 2018

Advice 5419-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Fire Risk Mitigation Memorandum Account Pursuant to Senate Bill 901

Purpose

Pursuant to Senate Bill (SB) 901, Pacific Gas and Electric Company (PG&E) submits this advice letter to establish the Fire Risk Mitigation Memorandum Account (FRMMA) effective January 1, 2019.¹ The purpose of the FRMMA is “to track costs incurred for fire risk mitigation that are not otherwise covered in [PG&E’s] revenue requirements,” as required by SB 901.²

Background

Governor Edmund G. Brown Jr. signed SB 901 on September 21, 2018. The legislation sets in motion activities to strengthen California’s ability to prevent and recover from catastrophic wildfires. In addition to measures directed at other entities, SB 901 mandates additional requirements for utility operations, maintenance, and infrastructure improvements to address wildfire risk, including the implementation of comprehensive fire prevention plans.

SB 901 describes the requirements of the annual Wildfire Mitigation Plans to be submitted by the California electric investor-owned utilities (IOUs) to the California Public Utilities Commission (CPUC or Commission) and sets forth the timing and cost recovery related to those plans.³ In compliance with the Rulemaking issued on October 25, 2018,⁴ PG&E will submit its first Wildfire Mitigation Plan in compliance with the legislation in February 2019.

¹ Section 5.1 of General Order 96-B states that the advice letter process is appropriate “to review a utility’s request to change its tariffs in a manner previously authorized by statute or Commission order.”

² Public Utilities (PU) Code § 8386 (j) (effective Jan. 1, 2019).

³ PU Code § 8386 (c) (effective Jan. 1, 2019).

⁴ Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901, R. 18-10-007 (2018).

The legislation includes two memorandum accounts to record costs incurred to mitigate wildfire risk. One memorandum account, which PG&E proposes to establish in this advice letter, is intended to “track costs incurred for fire risk mitigation that are not otherwise covered in the electrical corporation’s revenue requirement.”⁵ An additional memorandum account is required to be established upon approval of a utility’s Wildfire Mitigation Plan “. . . to track costs incurred to implement the plan.”⁶ Upon approval of the memorandum account in conjunction with the Commission’s approval of PG&E’s first annual Wildfire Mitigation Plan, PG&E would stop recording costs for work approved in its Wildfire Mitigation Plan to the FRMMA and, instead, would record any costs not included in rates to the new memorandum account established concurrently with its Wildfire Mitigation Plan. The FRMMA would remain open to record costs of any additional wildfire mitigation activities not included in the approved Wildfire Mitigation Plan.

PG&E is not waiting for approval of its Wildfire Mitigation Plan to take steps to reduce the risk of wildfires in its service area. In advance of submitting its first annual Wildfire Mitigation Plan and the Commission’s review and approval of the plan, PG&E is significantly enhancing its wildfire risk mitigation efforts. These efforts go beyond what was included in PG&E’s 2017 General Rate Case (GRC) Application (A. 15-09-001) and 2018 Catastrophic Event Memorandum Account Application (A.18-03-015). PG&E’s efforts also exceed the activities required by the Fire Safety OIR (R. 08-11-005), the costs of which are recorded in the Fire Hazard Prevention Memorandum Account (FHPMA).

PG&E’s additional currently planned activities fall within broad categories set forth in SB 901. Specific areas of focus include:

- Investment in advanced system hardening and resiliency, e.g., installing tree wire, installing stronger poles with covered power lines in high fire threat areas, targeted undergrounding;
- Expanded automation and protection;
- Improved wildfire risk prevention and wildfire detection, e.g., expanded weather station and weather station camera deployment, enhanced wire down detection; and
- Enhanced event response capacity, e.g., aviation resources.

While these additional activities – and likely others – will be proposed in PG&E’s first annual Wildfire Mitigation Plan and 2020 GRC, the Wildfire Mitigation Plan is unlikely to be approved prior to May 2019. Funding for the activities in PG&E’s Wildfire Mitigation Plan will be requested in PG&E’s 2020 GRC (likely not approved before December 31, 2019) or, where incremental to the 2020 GRC, recorded to the new memorandum account established with the Wildfire Mitigation Plan as required by SB 901.⁷ To provide for the critical wildfire mitigation activities that PG&E has already begun to implement, PG&E

⁵ PU Code § 8386 (j) (effective Jan. 1, 2019).

⁶ PU Code § 8386 (e) (effective Jan. 1, 2019).

⁷ PU Code § 8386 (g) (effective Jan. 1, 2019).

proposes to record those costs to the FRMMA. Additionally, as indicated above and consistent with SB 901, PG&E proposes to continue the FRMMA to record the costs of wildfire mitigation activities – if any – that are not included in the approved annual Wildfire Mitigation Plan. These activities could fall into the categories described above or could include new areas, including additional vegetation management activities, not already reflected in the FHPMA, GRC or other cost recovery mechanisms.

PG&E anticipates that the recovery of the costs recorded to the FRMMA would occur through a future application at which time the Commission would review the costs for reasonableness as required by SB 901.⁸

Tariff Revisions

Attachment 1 is a proposed Electric Preliminary Statement Part HQ that describes the purpose of and accounting procedures for the FRMMA.

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than November 21, 2018, which is 20 days after the date of this submittal. Protests must 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 of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

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

⁸ PU Code § 8386 (j) (effective Jan. 1, 2019).

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
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 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 submittal become effective on January 1, 2019, which is more than 30 calendar days after the date of submittal.

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 parties on the service list for A.15-09-001, A.18-03-015 and R.08-11-005. 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 submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List A.15-09-001, A.18-03-015 and R.08-11-005



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5419-E

Tier Designation: 2

Subject of AL: Fire Risk Mitigation Memorandum Account Pursuant to Senate Bill 901

Keywords (choose from CPUC listing): Memorandum Account

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: A.15-09-001, A.18-03-015 and R.08-11-005

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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information: N/A

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: N/A

Resolution required? Yes No

Requested effective date: 1/1/19

No. of tariff sheets: 3

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: Electric Preliminary Statement Part HQ - Fire Risk Mitigation Memorandum Account

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
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43316-E	ELECTRIC TABLE OF CONTENTS Sheet 17	43021-E



ELECTRIC PRELIMINARY STATEMENT PART HQ
FIRE RISK MITIGATION MEMORANDUM ACCOUNT (FRMMA)

Sheet 1

(N)

(N)

HQ. Fire Risk Mitigation Memorandum Account (FRMMA)

(N)

1. **PURPOSE:** The purpose of the Fire Risk Mitigation Memorandum Account (FRMMA) is to record, pursuant to Senate Bill (SB) 901 (Public Utilities Code Section 8386 (j)), incremental costs of fire risk mitigation work that is not otherwise recovered in PG&E's adopted revenue requirements. Such costs shall include, but are not limited to, expense and capital expenditures for: advanced system hardening and resiliency; expanded automation and protection; improved wildfire detection; enhanced event response capacity, and vegetation management activities. Costs recorded to the FRMMA will not include costs approved for recovery in PG&E General Rate Cases (GRCs) or recovered through PG&E's Catastrophic Event Memorandum Account (CEMA), Fire Hazard Prevention Memorandum Account (FHPMA) or other cost recovery mechanisms including the memorandum account approved as part of PG&E's annual Wildfire Mitigation Plan, as set forth in SB 901 (Public Utilities Code Section 8386 (e)).
2. **APPLICABILITY:** The FRMMA applies to all customer classes, except for those specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balance in this account will be established by a Commission decision through a subsequent application or through other appropriate filing as otherwise authorized by the Commission.
4. **RATES:** The FRMMA does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the FRMMA by making entries to this account at the end of each month, or as applicable, as follows (these amounts will exclude costs that have already been authorized in PG&E GRCs or recorded in PG&E's CEMA, FHPMA or other cost recovery mechanisms):
 - a. A debit entry equal to the expenses incurred related to fire risk mitigation work.
 - b. A debit or credit entry equal to the revenue requirement based on the recorded capital costs, net of RF&U, associated with the incremental costs of plant related to fire risk mitigation work. Capital revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment.
 - c. A credit entry to transfer all or a portion of the balance in this FRMMA to other adjustment clauses for future rate recovery, as may be approved by the CPUC.
 - d. An entry equal to the interest on the average of the balance in the account at the beginning of the month and the balance in the account after the above entries, at a rate equal to one-twelfth the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

(Continued)

Advice 5419-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

November 1, 2018



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Sheet 1

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Advice 5419-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

November 1, 2018



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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	Ellison Schneider & Harris LLP	Praxair
Alcantar & Kahl LLP	Energy Management Service	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Charge Networks	SPURR
Braun Blaising Smith Wynne P.C.	Green Power Institute	San Francisco Water Power and Sewer
CalCom Solar	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	ICF	Sempra Utilities
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Keyes & Fox LLP	Sunshine Design
Cenergy Power	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity	Linde	TerraVerde Renewable Partners
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	Los Angeles Dept of Water & Power	TransCanada
Clean Power Research	MRW & Associates	Troutman Sanders LLP
Coast Economic Consulting	Manatt Phelps Phillips	Utility Cost Management
Commercial Energy	Marin Energy Authority	Utility Power Solutions
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Specialists
Crossborder Energy	Modesto Irrigation District	Verizon
Crown Road Energy, LLC	Morgan Stanley	Water and Energy Consulting
Davis Wright Tremaine LLP	NLine Energy, Inc.	Wellhead Electric Company
Day Carter Murphy	NRG Solar	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	Office of Ratepayer Advocates	Yep Energy
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	