

Docket: A.96-08-043
Commissioner:
Admin. Law Judge:



PUBLIC ADVOCATES OFFICE
California Public Utilities Commission

MONITORING AND EVALUATION REPORT
November 1, 2020 through October 31, 2021

**Pacific Gas and Electric Company's
Core Procurement Incentive Mechanism
Performance Results
(CPIM Year 28)**

Application 96-08-043

**San Francisco, California
August 23, 2024**

TABLE OF CONTENTS

1	SUMMARY AND RECOMMENDATIONS	
1.1	Introduction and Summary	1
1.2	Background	1
1.3	Procurement and Sales	3
1.4	Financial Hedging Activities	4
1.5	Natural Gas Storage	5
1.6	Core Intrastate Capacity	6
1.7	Core Interstate Capacity	6
1.8	Review of CPIM Performance	7
1.9	Conclusion	8
2	MONITORING AND EVALUATION AUDIT	
2.1	Cal Advocates' CPIM Reward Evaluation	9
2.2	Summary of Benchmark and Actual Costs	11
2.3	Review of Benchmark Commodity and Reservation Charges	12
2.4	Actual Natural Gas Costs	13
2.5	Natural Gas Storage Costs	15
2.6	Review of Purchase Gas Account (PGA)	16
2.7	Review of Core Pipeline Demand Charge Account (CPDCA)	17
2.8	Review of Miscellaneous Costs and Revenue	18
2.9	Examination of Hedging Costs	19
2.10	Review of Sales and Volume Transactions	20
2.11	Review of Volumetric Transport Costs	21
2.12	Review of Reservation Charges	22
2.13	Review of Benchmark Commodity Indices	23
2.14	Review of Fixed Storage and Transportation Costs	24
2.15	Utilization of Firm Interstate and Intrastate Pipeline Assets	25

Exhibits for CPIM Report

CHAPTER 1

SUMMARY AND RECOMMENDATIONS

1.1 Introduction and Summary

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) performed an audit and evaluation of the data and documents submitted by Pacific Gas and Electric Company (PG&E) for its Core Procurement Incentive Mechanism (CPIM) Annual Performance Reports for the period November 1, 2020, through October 31, 2021 (Year 28). Chapter 2 of this report presents the details and results of Cal Advocates' review. Cal Advocates' evaluation of PG&E's recorded natural gas costs confirms that PG&E's costs were below the benchmark for CPIM Year 28, which resulted in ratepayer savings.

PG&E submitted its CPIM Performance Report on July 11, 2023, which covered the period of November 1, 2020, through October 31, 2021. Cal Advocates' examination of PG&E's recorded costs for CPIM Year 28 shows that PG&E's actual gas costs were \$105,054,992 below the CPIM benchmark. In accordance with the CPIM sharing formula, the CPIM Year 28 shareholder reward is capped at \$10,209,005, and the ratepayer savings is \$94,845,987.¹

1.2 Background

The objective of the CPIM is to provide PG&E an incentive to reduce natural gas procurement costs. These costs include fixed transportation costs for Canadian and U.S. interstate, intrastate, and reservation charges. Other procurement costs include pipeline volumetric transportation costs, natural gas storage costs, and hedge costs. The incentive mechanism is used as a ratemaking tool and is designed to increase efficiency in administering regulatory controls.

The CPIM structure establishes procedures on performance evaluation and

¹ See calculation on Cal Advocates CPIM Year 28 Report, Table 1-1.

reporting for PG&E's gas procurement costs. It sets forth guidelines for standard operating conditions and for special circumstances. The allowed monthly benchmark dollars are totaled over the annual CPIM period and compared to actual costs for the year to determine PG&E's performance. A tolerance band is constructed around the benchmark and defines a range of costs considered reasonable. If PG&E's actual gas costs as measured against the CPIM benchmark are between the upper and lower limit specifications for the tolerance band, there is no shareholder reward or penalty for the CPIM period. If actual costs fall outside the tolerance band, there will be sharing of the gains or losses that occur outside the tolerance band between ratepayers and PG&E shareholders. In Chapter 2 of this report, Cal Advocates presents detailed results of the tolerance band calculation.

The CPIM program was originally approved by the California Public Utilities Commission (Commission) in Decision (D.) 97-08-055 as set forth in the PG&E/ORA² Post-1997 CPIM Agreement and PG&E's Supplemental Report describing the Post-1997 CPIM. This decision established the framework to recover core gas procurement and transportation costs through rates. Since then, numerous changes and extensions have been made to modify and refined the CPIM program structure and incentives.

In D.07-06-013, the Commission approved a settlement agreement between PG&E, Cal Advocates, The Utility Reform Network (TURN), and Aglet Consumer Alliance (Aglet). The settlement modified the CPIM to increase benefits to ratepayers in situations where natural gas purchases are less than the lower range of the tolerance band. The specific CPIM changes that resulted from the settlement agreement included:

- A 20/80 shareholder/ratepayer sharing of savings below the tolerance band, in contrast to the previous 25/75 shareholder/ratepayer sharing;

² The Office of Ratepayer Advocates (ORA) was renamed the Public Advocates Office of the California Public Utilities Commission pursuant to Senate Bill No. 854, which was signed by the Governor on June 27, 2018 (Chapter 51, Statutes of 2018).

- The 2.5 Billion cubic feet (Bcf) of un-sequenced storage withdrawal adjustment was eliminated and is included proportionately to the storage withdrawal sequence blocks;
- A change in the sequencing steps for San Juan Basin and Alberta Energy Company (AECO) for natural gas purchases;
- A savings of five-percent (5%) from full tariff rates on pipeline or storage contracts in order to offset CPIM gas costs;
- A change in the index used to calculate the benchmark for daily swing from the NGI daily Topock index to the NGI daily PG&E Citygate index;
- For storage acquired via the Incremental Storage Capacity Request for Offers process, the daily benchmark will be adjusted to accommodate the incremental storage injection and withdrawal requirements to improve savings in gas costs.

In D.10-01-023, the Commission adopted a settlement agreement between PG&E, Cal Advocates, and TURN which addressed the treatment of hedging costs for PG&E. The key provisions of the adopted settlement call for the following treatment of hedging transactions:

- 80% of net realized gains or losses and associated transaction costs will be included in the CPIM benchmark;
- 100% of the net hedging realized gains or losses and associated transaction costs will be included in the cost side of the CPIM calculation. Any gains will be subtracted, and losses will be added to CPIM costs;
- A modification to the CPIM sharing mechanism such that total shareholders earnings will be capped solely at 1.5 percent of annual gas commodity costs and a removal of the dollar cap of \$25 million on shareholder gains effective November 1, 2009.

In D15-10-050, the Commission adopted a new interstate pipeline capacity range for PG&E's core customers and the Core Transport Agents (CTAs). PG&E established an April through October interstate pipeline capacity range between 80% and 105% of forecast average annual daily core demand, and between 100% and 115% for November through March. Later, in D.19-09-025, the GT&S Rate Case Final

Decision, the Commission approved a new interstate pipeline capacity range: the winter range maximum increased from 115% to 162% of the average annual daily core demand, and the March range minimum was reduced from 100% to 80% of the average annual daily demand.

In D.19-09-025, the Commission adopted the modifications of CPIM in the pipeline sequence, storage profile, benchmark load and storage inventory requirements. An MOU for the CPIM modification was signed by Cal Advocates and PG&E's CGS, becoming effective on April 1, 2020.

1.3 Procurement and Sales

For the CPIM Year 28 period, PG&E's recorded actual commodity gas costs (excluding transportation, hedging, and storage costs) for core customers totaled \$981,625,115 which was associated with a purchase volume of 305,964,976 MMBtus.³

On a daily basis, PG&E utilizes gas sales to help manage its assets and reduce gas costs. It purchases and sells gas supplies to comply with daily pipeline balancing requirements, responds to changes in core loads, and captures price arbitrage opportunities. For CPIM Year 28, PG&E reported total gas sales of (\$373,205,994) in revenue with an associated sales volume of (65,229,062) MMBtus.⁴

1.4 Financial Hedging Activities

Per D.07-06-013, all derivative gains, losses, and related transaction costs associated with PG&E's winter hedging plan were excluded from CPIM costs. These costs flowed directly to PG&E's retail customers. D.07-06-013 authorized PG&E, under the terms of the settlement, to place financial hedges on a rolling three-year basis via an Annual Plan filing. PG&E was required to file five Annual Plans beginning with the 2007/2008 winter season, that authorized a hedging plan for the current winter season and the subsequent two winter seasons. In addition, the settlement created a

³ See Cal Advocates CPIM Year 28, Exhibits 2-5 and 2-16.

⁴ Id., Exhibits 2-7 and 2-17.

Core Hedging Advisory Group where Cal Advocates, Aglet, TURN and PG&E met quarterly to discuss PG&E's Annual Plan, and related hedging operations. By April 1 of each year, PG&E is required to report financial results of its Annual Plan including total funds spent on hedging instruments, total losses and gains for each category of hedging instrument, amount of monthly natural gas supplies hedged, and the impact of hedging results on customer rates.⁵

Pursuant to D.10-01-023, PG&E remains responsible for managing hedges proactively to ensure stability in customer rates. This includes implementing controls and selecting appropriate hedging instruments to mitigate derivative risks. PG&E is also required to take proactive steps by adjusting its hedging positions in response to changing market conditions.

On January 25, 2010, the Commission issued D.10-01-023 and adopted the associated Settlement Agreement, which requires eighty percent (80%) of winter hedging gains and losses and related transaction costs to be included in the CPIM benchmark. The Settlement Agreement also requires one hundred percent (100%) of winter hedging gains and losses and related transaction costs be included in the CPIM actual commodity costs. These CPIM changes was incorporated starting in CPIM Year 18.

For the current CPIM Year 28, the total costs of winter hedges included in the CPIM were \$12,487,624, comprised of \$12,632,386 in option premiums, (\$26,600) in option and swap settlements, and \$18,238 in commissions and fees.⁶

1.5 Natural Gas Storage

Pursuant to D.06-07-010 and D.07-06-013, PG&E is authorized to acquire incremental storage to meet a 1-day-in-10-year peak-planning standard for its core customers. The incremental storage costs are included in the benchmark and

⁵ Settlement Agreement – Regarding PG&E Long-Term Core Hedge Program (D.06-05-007), the Core Procurement Incentive Mechanism (CPIM), and Transportation Capacity held on Behalf of Core Customers, December 15, 2006.

⁶ See Cal Advocates CPIM Year 28, Exhibits 2-10.

inventory schedules are adjusted by the number of injections and withdrawals daily. This enables PG&E to track costs for the benchmark and adjust the amount of daily actual incremental natural gas injection and withdrawals.

Under the CPIM, PG&E uses a daily injection and withdrawal schedule for managing core customer demands and balancing purposes. For CPIM Year 28, beginning inventory including incremental storage was reported at 15,000,205 MMBtus, and ending inventory was 16,666,393 MMBtus.⁷

1.6 Core Intrastate and Interstate Capacity

Pursuant to D.04-12-050, the Commission allowed PG&E's Core Procurement Department to recover costs for firm reservation of intrastate backbone pipeline capacity. In the current CPIM, PG&E holds core intrastate capacity on Redwood Path and Baja Path. Redwood path capacity provides approximately 605 MDth/d annually, two seasonal contracts provide approximately 305 MDth/d (Nov.-Jan.) and 100 MDth/d (Nov.-Mar.); Baja path capacity is a Seasonal contract providing approximately 300 MDth/d (Dec.-Feb.).⁸

PG&E holds interstate capacity for the core on NOVA Gas Transmission Ltd. (NGTL/NOVA), Foothills Pipelines, Ltd. (Foothills), Gas Transmission Northwest (GTN), El Paso Natural Gas Company LLC (El Paso), and Ruby Pipeline, LLC. (Ruby).

For the CPIM Year 28, the core interstate capacity was reported as follows: NGTL contracts for a total of 370 MDth/d; Foothills contracts for a total of 366 MDth/d; GTN contracts for a total of 360 MDth/d. Additionally, Ruby contracts for a total of 250 MDth/d were reported, along with an additional winter season contract with El Paso Pipeline for 162 MDth/d.⁹

1.8 Review of CPIM Performance

⁷ See calculation on Cal Advocates CPIM Year 28 Report, Table 2-5.

⁸ See PG&E Annual Performance Report, Year 28, page 19.

⁹ Id.

Table 1-1 below compares benchmark gas costs to actual costs of natural gas (including commodity, transportation, hedges, reservation, and storage costs) in total dollars.

Table 1-1		
Pacific Gas and Electric Company		
CPIM Year 28		
Gas Costs Comparison		
November 1, 2020 - October 31, 2021		
Benchmark Gas Costs	\$ 1,067,235,060	
Actual Gas Costs	\$ 962,180,068	
Cal Advocates Audited Total Savings		\$ 105,054,992
PG&E Reported Savings		105,054,991
Variance		1
Rounding		(1)
Total Variance		\$ -
Savings and Rewards		
Ratepayer Savings		\$ 85,614,909
Shareholder Rewards		\$ 19,440,083
CPIM Savings		\$ 105,054,992
Ratepayer Savings after Cap		\$ 94,845,987
Shareholder Rewards after Cap		\$ 10,209,005
CPIM Savings		\$ 105,054,992

Source: See Cal Advocates CPIM Report, Exhibits 2-1.

For the CPIM Year 28, Cal Advocates found no material variance for PG&E reported savings and Cal Advocates audited total savings. For this period, the total saving for the period is \$ 105,054,992. The ratepayer benefit associated with the total savings amounts to \$94,845,987 and PG&E's shareholder savings amount to \$10,209,005.

1.9 Conclusion: CPIM Year 28

Based on the foregoing, Cal Advocates recommends a shareholder reward in the amount of \$10,209,005 for CPIM Year 28 to be recovered through PG&E's Purchased Gas Account. Cal Advocates will continue to monitor and evaluate the CPIM and collaborate with PG&E and other parties to identify any modifications needed to enhance the CPIM's effectiveness.

CHAPTER 2
MONITORING AND EVALUATION AUDIT
YEAR 28

2.1 Cal Advocates' CPIM Reward Evaluation

On July 11, 2023, PG&E filed CPIM Year 28 Performance Report, which reports on natural gas procurement and performance results for the period from November 1, 2020 through October 31, 2021. Cal Advocates conducted a review and evaluation of PG&E's accompanying performance report. The results from the review are reflected in the work papers, which are incorporated as exhibits in Appendix A. This report is in compliance with the Gas Accord Decision, (D.)97-08-055, dated August 1, 1997, which approved the CPIM method for PG&E's recovery of core gas procurement and transportation costs.¹⁰ On August 22, 2002, the Commission issued D.02-08-070, the Gas Accord II Decision, extending the initial Gas Accord market structure including the CPIM, through 2003. On December 18, 2003, the Commission issued D.03-12-061, extending the CPIM through Year 2005, or until a revised CPIM is adopted by the Commission. Pursuant to D.07-06-013, the Commission adopted a Settlement Agreement that address long-term hedging for PG&E's core customers, as well as CPIM related modifications.

The CPIM assesses gas costs, tolerance band limits, and performance results that compare actual costs to the benchmark. The CPIM benchmark consists of four components: a) variable costs which include commodity costs, Canadian and U.S. interstate, and California intrastate pipeline fuel and volumetric capacity costs; b) fixed transportation costs which include Canadian, U.S. interstate, and California intrastate reservation costs; c) storage costs for fixed reservation charges and variable costs; and d) Hedging costs which included 80% of net realized gains or losses and

¹⁰ In D.97-08-055, the Commission approved a CPIM mechanism for core gas costs incurred after December 31, 1997. In this decision, the Commission ordered PG&E to file quarterly and annual reports on core procurement operations starting after completion of one year of Gas Accord operations.

associated transaction costs of winter hedges. The total combined cost of these four components serves as the benchmark to compare to the actual costs.

The actual commodity costs of gas are measured on an annual basis against the benchmark and the calculated tolerance band. The benchmark commodity cost is based on the prevailing published natural gas price indices for gas delivered from the gas production areas, borders, and PG&E's Citygate.

PG&E's CPIM Year 28 performance as set forth in Table 2-1 shows total benchmark costs of \$1,067,235,060 and PG&E's total actual costs of \$962,180,068. The difference between the total benchmark costs and PG&E's total actual costs results in a total of \$105,054,992 in natural gas procurement savings. The ratepayer benefits total after the cap is \$94,845,987 and the shareholder reward after the cap is \$10,209,005. The calculation of the shared savings between PG&E's customers and shareholders is shown in Table 2-1.

TABLE 2-1
Pacific Gas & Electric Company
Ratepayer Savings and Shareholder Award Calculation
CPIM 28
November 1, 2020 Through October 31, 2021

CPIM Reward Calculation	
Total Benchmark Costs	\$ 1,067,235,060
Total Actual Costs	<u>\$ 962,180,068</u>
Under/(Over)	\$ 105,054,992
Upper Tolerance Band (Benchmark + 2% of Commodity Cost)	\$ 1,082,944,210
Lower Tolerance Band (Benchmark - 1% of Commodity Cost)	\$ 1,059,380,485
Add Amount of Lower Tolerance Band (Not Subject to Share: 0%-1%)	\$ 7,854,575
Lower Tolerance Band Less Actual Commodity Cost (Subject to Share)	\$ 97,200,417
Ratepayer Shared Savings (80%)	\$ 77,760,334
Shareholder Shared Savings (20%)	<u>\$ 19,440,083</u>
	<u>\$ 97,200,417</u>
Cap On Shareholder Reward=1.5% of commodity costs:	
Total Commodity Costs	<u>\$ 680,600,361</u>
CPIM Year 28 Shareholder Award After 1.5% Cap	<u>\$ 10,209,005</u>
Total Shareholders' share:	\$ 19,440,083
Total Ratepayers' share:	<u>\$ 85,614,909</u>
Total Savings:	<u>\$ 105,054,992</u>
Total Shareholder Share after Cap:	\$ 10,209,005
Total Ratepayer Share after Cap:	<u>\$ 94,845,987</u>
Total Savings:	\$ 105,054,992

Source: See Cal Advocates CPIM Report, Exhibits 2-1.

2.2 Summary of Benchmark and Actual Costs

The overall annual results of the actual commodity costs compared to the benchmark commodity costs of gas operation are summarized in Table 2-2. Cal Advocates examined and reconciled all gas commodity costs, hedging costs, and transportation reservation charges that were reported in the current CPIM period. The natural gas sale and miscellaneous costs and revenues are included in the actual costs as costs or credits depending on the result of natural gas operation. The

following sections in this chapter provide a detailed review and breakdown of these related costs.

Table 2-2 Pacific Gas & Electric Company Summary of Benchmark and Actual Costs CPIM 28 November 1, 2020 Through October 31, 2021			
	Actual Costs	Benchmark Costs	Under/(Over)
Purchased Gas Costs	\$ 981,625,119	\$ 775,321,409	\$ (206,303,710)
Volumetric Transportation Costs	\$ 50,251,282	\$ -	\$ (50,251,282)
Gas Sales	\$ (373,205,994)	\$ -	\$ 373,205,994
Other Costs and Revenues	\$ 9,296,330	\$ -	\$ (9,296,330)
Hedge Costs	\$ 12,487,624	\$ 9,990,099	\$ (2,497,525)
Reservation Charges	\$ 228,060,599	\$ 228,060,599	\$ -
Custom and Border Protection Fee	\$ 146,000	\$ 146,000	\$ -
Discount	\$ (63,555)	\$ -	\$ 63,555
Capacity Release Revenues	\$ (134,290)	\$ -	\$ 134,290
Storage Costs	\$ 53,716,953	\$ 53,716,953	\$ -
Total	\$ 962,180,068	\$ 1,067,235,060	\$ 105,054,992

Source: See Cal Advocates CPIM Report, Exhibits 2-2.

2.3 Review of Benchmark Commodity and Reservation (Demand) Charges

The total benchmark commodity costs consist of three main components, benchmark gas costs, other costs, and benchmark reservation costs. Table 2-3 shows a breakdown for total benchmark commodity costs of \$1,067,235,060. Cal Advocates confirmed the total benchmark gas costs of \$775,321,409, the other costs of \$10,136,099, and total benchmark reservation charges of \$281,777,552.

TABLE 2-3
Benchmark Commodity Costs and Reservation Charges
CPIM Year 28
November 1, 2020 Through October 31, 2021

	Market	
	Benchmark	*Reference
Benchmark Purchased Gas Costs - by Pipelines:		
Ruby	\$ 222,814,949	2-14
Nova	\$ 303,266,567	2-14
El Paso	\$ 35,605,395	2-14
Malin	\$ 88,612,442	2-14
Topock	\$ 52,663,763	2-14
PG&E Citygate	\$ 72,358,293	2-14
Total Benchmark Gas Costs:	\$ 775,321,409	
Other Costs		
80% of Winter Hedging Cost	\$ 9,990,099	2-15
MPF	\$ 146,000	2-19
Total Other Costs	\$ 10,136,099	
Benchmark Reservation Charges:		
El Paso Natural Gas Company	\$ 6,160,598	2-8
Gas Transmission Northwest Corp	\$ 26,221,960	2-8
Pacific Gas and Electric Company	\$ 122,682,190	2-8
Ruby Pipeline	\$ 51,266,107	2-8
Transcanada Foothills Pipelines Ltd	\$ 6,060,747	2-8
Transcanada Nova Gas Transmission Ltd	\$ 15,668,997	2-8
Storage	\$ 53,716,953	2-13
Total Benchmark Reservation Charges:	\$ 281,777,552	
Total Benchmark Commodity Costs:	\$ 1,067,235,060	

*Source: See Cal Advocates CPIM Report, Exhibits.

2.4 Actual Natural Gas Costs

The actual costs for commodity purchases and reservation charges reported by PG&E is summarized in Table 2-4. On a monthly basis, PG&E will sell some of its unused assets. The net sale is treated as a credit to the procurement costs. In addition to the calculation of actual commodity costs of CPIM, one hundred percent of winter hedging realized gains or losses and associated transaction costs are included in the actual costs. Reservation charges include intrastate and interstate charges which include PG&E's California Gas Transmission, El Paso Natural Gas Company LLC,

Foothills Pipe Line Ltd., Nova Gas Transmission, Ltd., Gas Transmission Northwest Corporation, Ruby Pipeline LLC, and Transwestern Pipeline Company.¹¹

PG&E's net total actual commodity costs are \$962,180,068, which include interstate and intrastate purchased gas costs of \$658,670,407, other costs of 21,929,954, and reservation charges of \$281,579,707.

<p>TABLE 2-4 Summary of Actual Commodity Costs & Reservation Charges CPIM Year 28 November 1, 2020 Through October 31, 2021</p>
--

Actual Purchased Gas Costs - by Pipeline:	Actual Costs	*Reference
CGT - Citygate	\$ 129,875,068	2-5
CGT	\$ 84,349,862	2-5
El Paso	\$ 56,668,123	2-5
GTN	\$ 204,772,789	2-5
Nova	\$ 274,235,656	2-5
Ruby	\$ 214,806,970	2-5
WFS	\$ 16,916,651	2-5
Kern	\$ -	2-5
Volumetric Transportation Cost	\$ 50,251,282	2-6
Gas Sale	\$ (373,205,994)	2-7
Total Purchased Gas Costs:	\$ 658,670,407	
Other Costs:		
100% Winter Hedging Cost	\$ 12,487,624	2-10
MPF	\$ 146,000	2-19
Miscellaneous Costs & Revenues	\$ 9,296,330	2-9
Total Other Costs:	\$ 21,929,954	
Actual Reservation Charges:		
El Paso Natural Gas Company LLC	\$ 6,160,598	2-8
Foothills Pipelines Ltd	\$ 6,060,747	2-8
Nova Gas Transmission Ltd	\$ 15,668,997	2-8
Gas Transmission Northwest Corp	\$ 26,221,960	2-8
Ruby Pipeline	\$ 51,266,107	2-8
Transwestern Pipeline Company	\$ -	2-8
PG&E's California Gas Transmission	\$ 122,682,190	2-8
Storage Costs	\$ 53,716,953	2-13
Discount Demand Charges	\$ (63,555)	2-11
Capacity Release Revenue	\$ (134,290)	2-12
Total Reservation Charges:	\$ 281,579,707	
Net Actual Commodity Costs:	\$ 962,180,068	

¹¹ PG&E Annual Performance Report, CPIM Year 28, page 12.

*Source: See Cal Advocates CPIM Report, Exhibits

2.5 Natural Gas Storage Costs

In Table 2-5, a summary of storage inventory shows the status of physical inventories (measured in MMBtus) for beginning and ending balances for core customers. PG&E reported beginning storage inventory levels as of November 1, 2020, at 15,000,205 MMBtus and ending inventory as of October 31, 2021 at 15,666,393 MMBtus.

TABLE 2-5 Pacific Gas and Electric Company Summary of Storage Inventory Injections and Withdrawals CPIM Year 28 November 1, 2020 Through October 31, 2021		
Gas Storage Providers	Beginning Inventory 11/01/20 (MMBtus)	Ending Inventory 10/31/21 (MMBtus)
Firm Storage CGT	13,312,205	15,666,393
Incremental Storage	1,688,000	0
Total Storage Inventory	15,000,205	15,666,393

Source: See Cal Advocates CPIM Report, Exhibits 2-20.

2.6 Review of Purchase Gas Account (PGA)

PG&E submitted its reconciliation of its regulatory balancing account, the Purchase Gas Account (PGA). For the reporting period, PG&E's accounting entries represent amounts expected to be received from, or refunded to, PG&E's customers through authorized adjustments within a twelve-month period. The PGA shows the tracking of gas related costs and revenues for recovery. The under-or-over collected position of this account is dependent upon the seasonality and volatility in gas volumes. Table 2-6 below illustrates the PGA, and shows immaterial timing differences in the bottom row. Supporting documentation is presented in PG&E's Performance Report.¹²

¹² See PG&E July 23, 2023 Response to Cal Advocates Date Request A.96-08-04_CPIM Year 28_01_Q6 issued July 14, 2023.

As part of the PGA audit, Cal Advocates selected three months in the CPIM period, January 2021, February 2021, and August 2021 to review PG&E’s supporting records. PG&E provided copies of supporting documents and purchase invoices for the purpose of the verification. Cal Advocates traced the costs of these purchase invoices to the monthly statement and then to the CPIM annual and determined that the selected purchase invoices reconciled with recorded amounts in the annual report.

TABLE 2-6
Pacific Gas and Electric Company
Purchase Gas Account Review
CPIM Year 28
November 1, 2020 through October 31, 2021

CPIM Purchase Costs	Commodity Purchases	Volumetric Transportation	Subtract True-up	Add True-up	Total CPIM
CPIM Costs:					
Purchases and Sales:	\$ 608,457,038	\$ 50,146,195			\$ 658,603,233
Cochrane Extraction Rev	\$ (3,892,073)				\$ (3,892,073)
SubTotal	\$ 604,564,965	\$ 50,146,195	\$ -	\$ -	\$ 654,711,160
Misc. Revenues and Expenses	\$ 401,702				\$ 401,702
Total	\$ 604,966,667	\$ 50,146,195	\$ -	\$ -	\$ 655,112,862
SAP Journal Entries:					
SAP Total	\$ 646,170,330	\$ 52,302,591	\$ (125,585,523)	\$ 82,225,458	\$ 655,112,856
Total PGA	\$ 646,170,330	\$ 52,302,591	\$ (125,585,523)	\$ 82,225,458	\$ 655,112,856
Timing Difference	\$ (41,203,663)	\$ (2,156,396)	\$ 125,585,523	\$ (82,225,458)	\$ 6

2.7 Review of Core Pipeline Demand Charge Account (CPDCA)

As part of the CPIM Year 28 filing, PG&E submitted its reconciliation for regulatory balancing account Core Pipeline Demand Charge Account (CPDCA). This account is used to record costs associated with backbone transmission, interstate capacity, and Canadian capacity for core procurement. Cal Advocates reviewed PG&E’s documentation, which shows total charges by pipeline for the period to be \$281,684,804.¹³

¹³ See PG&E July 14, 2023 Response to Cal Advocates Date Request A.96-08-04_CPIM Year 28_01_Q07 issued July 28, 2023.

Cal Advocates' audit showed the CPIM demand costs were \$281,684,804 which included demand charges, discount demand charges, capacity release revenue and release revenue charges. Cal Advocates compared the reported CPIM demand costs to the SAP journal entries, and no material difference is found.

TABLE 2-7 Pacific Gas and Electric Company CPDCA and CFSa Accounts Review CPIM Year 28 November 1, 2020 through October 31, 2021				
CPIM Demand Costs	Demand Charges	Subtract True-up	Add True-up	Total CPIM
Foothills Pipe Lines Ltd	\$ 6,060,747			\$ 6,060,747
California Gas Transmission	\$ 124,566,113			\$ 124,566,113
Firm Storage Costs	\$ 20,688,008			\$ 20,688,008
El Pas Natural Gas	\$ 5,962,753			\$ 5,962,753
Ruby Pipeline	\$ 51,266,107			\$ 51,266,107
Third Party Gas Storage	\$ 31,250,098			\$ 31,250,098
NOVA Gas Transmission	\$ 15,668,999			\$ 15,668,999
Gas Transmission	\$ 26,221,979			\$ 26,221,979
Transwestern Pipeline Company	\$ -			\$ -
Total Demand Charges:	\$ 281,684,804	\$ -	\$ -	\$ 281,684,804
SAP Journal Entries				
Total SAP Entries	\$ 282,274,773	\$ (27,491,500)	\$ 26,901,531	\$ 281,684,804
Total CPDCA:	\$ 282,274,773	\$ (27,491,500)	\$ 26,901,531	\$ 281,684,804
Timing Difference:	\$ (589,969)	\$ 27,491,500	\$ (26,901,531)	\$ -

2.8 Review of Miscellaneous Costs and Revenues

Table 2-8 shows a summary of miscellaneous costs and revenues from PG&E's Annual Performance Report for the period. The revenues in this section also offset reported procurement costs and assist management in managing net costs that impact CPIM performance. Results show total annual miscellaneous costs and revenues at \$9,296,330. This amount consists of Cochrane extraction revenue of (\$3,892,073), non-winter hedge cost and revenues of \$12,678,917, and miscellaneous costs and revenues of \$509,486.

TABLE 2-8
Pacific Gas and Electric Company
Miscellaneous Costs and Revenues
CPIM Year 28
November 1, 2020 through October 31, 2021

Month	Cochrane Extraction Revenue	Non-Winter Hedge Cost and Revenues	Miscellaneous Costs and Revenues	Total
Nov-20	\$ (185,303)	\$ (1,512,480)	\$ 63,876	\$ (1,633,907)
Dec-20	\$ (243,555)	\$ 462,908	\$ 54,241	\$ 273,594
Jan-21	\$ (363,920)	\$ (2,908,908)	\$ 73,996	\$ (3,198,832)
Feb-21	\$ (267,976)	\$ 604,284	\$ 33,576	\$ 369,884
Mar-21	\$ (312,665)	\$ 485,817	\$ 63,562	\$ 236,714
Apr-21	\$ (256,433)	\$ (13,425)	\$ 27,438	\$ (242,420)
May-21	\$ (314,598)	\$ (274,583)	\$ 48,252	\$ (540,929)
Jun-21	\$ (332,229)	\$ (48,450)	\$ 29,014	\$ (351,665)
Jul-21	\$ (345,901)	\$ 3,434,320	\$ 26,071	\$ 3,114,490
Aug-21	\$ (327,024)	\$ 5,368,658	\$ 23,283	\$ 5,064,917
Sep-21	\$ (457,179)	\$ 6,960,225	\$ 30,817	\$ 6,533,863
Oct-21	\$ (485,290)	\$ 120,551	\$ 35,360	\$ (329,379)
Total	\$ (3,892,073)	\$ 12,678,917	\$ 509,486	\$ 9,296,330

Source: See Cal Advocates CPIM Report, Exhibits 2-9.

2.9 Examination of Financial Derivatives

Pursuant to D.07-06-013, the Commission authorized PG&E's Annual Core Hedge Implementation Plan for 2008 for long term hedging for purchases of call options and swaps for a three-year period. This decision provided guidelines for the long-term core hedging program as well as reporting requirements.

In D.10-01-023, the Commission approved a policy incorporating winter hedging transactions into the CPIM. The winter hedging transactions executed on or after November 1, 2009, would be included in PG&E's CPIM calculation beginning on or after November 1, 2010. CPIM Year 18 was the first year to include the winter hedging costs and this change was adopted for future CPIM calculations. The financial results for the winter 2020-2021 are summarized in Table 2-9.

PG&E reported \$12,487,624 in CPIM Year 28 for actual winter hedging costs. The total option premiums costs are \$12,632,386, Option and Swap Settlement are (\$163,000), and commission and fees are \$18,238.

Table 2-9
Pacific Gas and Electric Company
Winter Hedge Costs
CPIM Year 28
November 1, 2020 - October 31, 2021

	Option Premiums	Option and Swap Settlements	Commissions and Fees	Winter Hedge Cost Total
Nov-20	\$ -	\$ -	\$ -	\$ -
Dec-20	\$ 3,751,853	\$ -	\$ 5,503	\$ 3,757,356
Jan-21	\$ 4,666,043	\$ (136,400)	\$ 6,853	\$ 4,536,496
Feb-21	\$ 4,214,490	\$ (26,600)	\$ 5,882	\$ 4,193,772
Mar-21	\$ -	\$ -	\$ -	\$ -
Apr-21	\$ -	\$ -	\$ -	\$ -
May-21	\$ -	\$ -	\$ -	\$ -
Jun-21	\$ -	\$ -	\$ -	\$ -
Jul-21	\$ -	\$ -	\$ -	\$ -
Aug-21	\$ -	\$ -	\$ -	\$ -
Sep-21	\$ -	\$ -	\$ -	\$ -
Oct-21	\$ -	\$ -	\$ -	\$ -
Total	\$ 12,632,386	\$ (163,000)	\$ 18,238	\$ 12,487,624

Source: See Cal Advocates CPIM Report, Exhibits 2-10.

2.10 Review of Sales and Volume Transactions

Table 2-10 shows PG&E's total sales of (\$373,205,994), and total reported volume of (65,229,062) MMBtus. A breakdown by pipeline shows sales for CGT Citygate of (\$140,804,018), CGT-All of (\$47,153,950), El Paso of (\$109,647,943), GTN of (\$22,904,026), Kern of (\$1,573,675), Nova of (\$10,983,049), Ruby of (\$33,760,485), and Williams Field Service (WFS) of (\$6,378,848).

The same period shows sales volumes for CGT Citygate of (28,868,415) MMBtus, CGT-All of (4,832,264) MMBtus, El Paso (12,736,275) MMBtus, GTN of (5,008,328) MMBtus, Kern of (495,200) MMBtus, Nova of (3,830,887) MMBtus, Ruby of (7,386,293) MMBtus, and WFS of (2,071,400) MMBtus.

Table 2-10
Pacific Gas and Electric Company
Gas Sales and Volumes
CPIM Year 28
November 1, 2020 through October 31, 2021

Sale by Pipeline:	Volume (MMBtus)	Dollars
CGT Citygate	(28,868,415)	\$ (140,804,018)
CGT - All	(4,832,264)	\$ (47,153,950)
El Paso	(12,736,275)	\$ (109,647,943)
GTN	(5,008,328)	\$ (22,904,026)
Kern	(495,200)	\$ (1,573,675)
Nova	(3,830,887)	\$ (10,983,049)
Ruby	(7,386,293)	\$ (33,760,485)
WFS	(2,071,400)	\$ (6,378,848)
Total:	(65,229,062)	\$ (373,205,994)
*Reference	2-17	2-7

*Source: See Cal Advocates CPIM Report, Exhibits.

2.11 Review of Volumetric Transport Costs

Table 2-11 provides a summary of PG&E's reported volumetric transportation costs by pipelines. It shows that trends in transport activity are consistent with purchase and sales transactions.

The total volumetric transport costs were \$50,251,282. In addition, costs were broken down by pipeline: PG&E CGT \$46,355,975, El Paso \$83,937, GTN \$1,088,546, Ruby Pipeline \$2,591,012, WFS \$17,684, and ISP \$114,128. These costs are included in the CPIM and are part of the reconciliation of the PGA balancing account.

<p>TABLE 2-11 Pacific Gas and Electric Company Commodity Volumetric Transport Costs CPIM Year 28 November 1, 2020 through October 31, 2021</p>

Pipeline	Costs	*Reference
PG&E CGT	\$ 46,355,975	
El Paso	\$ 83,937	
GTN	\$ 1,088,546	
Ruby Pipeline	\$ 2,591,012	
WFS	\$ 17,684	
ISP	\$ 114,128	
Total Volumetric Transport Costs:	\$ 50,251,282	2-6

*Source: See Cal Advocates CPIM Report, Exhibits.

2.12 Review of Reservation Charges

To identify any variances, Cal Advocates performed a reconciliation of the benchmark reservation charges to the actual reservation charges reported in PG&E's Annual Performance Report for the subject period. Table 2-12 provides a summary of adjustments that were offset against the benchmark. The results show no discrepancies. The reconciliation account for actual reservation charges was \$281,579,707 which included total actual demand charges of \$228,060,599, adjustments of demand charges discount of (\$63,555), capacity release revenue of (\$134,290), and storage costs of \$53,716,953.

TABLE 2-12
Pacific Gas and Electric Company
Reconciliation of Reservation Charges
CPIM Year 28
November 1, 2020 through October 31, 2021

Actual Demand Charges by Pipeline System:	Benchmark Demand Charges:	Reference
<u>Canadian</u>	\$ 228,060,599	
Foothills Pipelines Ltd.	\$ 6,060,747	
Nova Gas Transmission Ltd.	\$ 15,668,997	
Canadian Subtotal	\$ 21,729,744	
<u>Interstate</u>		
Gas Transmission Northwest Corporation	\$ 26,221,960	
El Paso Natural Gas Company	\$ 6,160,598	
Ruby Pipeline	\$ 51,266,107	
Transwestern Pipeline Company	\$ -	
Interstate Subtotal	\$ 83,648,665	
<u>Intrastate</u>		
PG&E California Gas Transmission	\$ 122,682,190	
Intrastate Subtotal	\$ 122,682,190	
Total Actual Demand Charges:	\$ 228,060,599	\$ 228,060,599 2-8
Discount Demand Charges:		
El Paso Natural Gas Company	\$ (63,555)	
Transwestern Pipeline Company	\$ -	
Gas Transmission Northwest LLC	\$ -	
Demand Charge Discount Subtotal:	\$ (63,555)	\$ - 2-11
Capacity Release Revenue:		
Interstate Pipeline	\$ (134,290)	
Total Capacity Release Revenue:	\$ (134,290)	\$ - 2-12
Storage Cost:		
California Gas Transmission Firm Storage	\$ 22,567,073	
Other Storage Costs	\$ 31,149,880	
Storage Cost Subtotal:	\$ 53,716,953	\$ 53,716,953 2-13
Reconciliation of Reservation Charges:	\$ 281,579,707	\$ 281,777,552

2.13 Review of Benchmark Commodity Indices

The benchmark gas price indices are published by various natural gas publications. Each index is then adjusted with fuel costs from supplying regions to PG&E's Citygate and the adjusted gas indices are used to calculate the monthly commodity costs benchmark.

The Canadian benchmark commodity indices are established using the exchange rates in effect when the indices are issued prior to the availability of closing currency exchange rates. However, the final indices, which determine the actual gas supply prices, reflect closing exchange rates.

For the reporting period, PG&E's gas operations applied a pipeline sequencing methodology for purposes of purchasing gas at the lowest cost. PG&E has the discretion to change the sequence to select a different pipeline at any time to meet reliability requirements.

Cal Advocates reviewed and verified gas price in each publication that PG&E used to compute the benchmark. Cal Advocates has not found any discrepancies.

2.14 Examination of Benchmark Storage Charges and Transportation Costs

Cal Advocates reviewed PG&E's reported benchmark reservation (demand) and fixed storage charges and identified any changes in activity in the report. The total transportation and storage costs are \$281,777,552, which consisted of Canadian pipeline demand charges of \$21,729,744, U.S. interstate pipeline reservation costs of \$83,648,665, California intrastate pipeline costs of \$122,682,190, and storage costs of \$53,716,953. Table 2-14 provides a summary of these costs.

TABLE 2-14
Pacific Gas and Electric Company
Summary of Fixed Transport and Storage Costs
CPIM Year 28
November 1, 2020 through October 31, 2021

Benchmark Demand Charges			Reference
<u>Canadian</u>			
Foothills Pipelines Ltd.	\$	6,060,747	
Nova Gas Transmission Ltd.	\$	15,668,997	
	Canadian Subtotal	<u>\$ 21,729,744</u>	
<u>Interstate</u>			
Gas Transmission Northwest Corporation	\$	26,221,960	
El Paso Natural Gas Company	\$	6,160,598	
Ruby Pipeline	\$	51,266,107	
Transwestern Pipeline Company	\$	-	
	Interstate Subtotal	<u>\$ 83,648,665</u>	
<u>Intrastate</u>			
PG&E California Gas Transmission	\$	122,682,190	
	Intrastate Subtotal	<u>\$ 122,682,190</u>	
	Total Demand Charges	<u>\$ 228,060,599</u>	2-8
CA Intrastate Storage Costs:			
California Gas Transmission Firm Storage	\$	22,567,073	
Other Storage Costs	\$	31,149,880	
	Total Storage Costs	<u>\$ 53,716,953</u>	2-13
Total Transportation & Storage Costs:		<u>\$ 281,777,552</u>	

2.15 Utilization of Firm Interstate and Intrastate Pipeline Assets

PG&E has short and long-term contracts to meet core gas demand for purchases of natural gas resources transported from Canadian, U.S. interstate and California intrastate pipeline systems. During CPIM Year 28, PG&E transported natural gas resources using firm transportation contracts. PG&E estimates its utilization proportionally based on capacity available in order to transport supplies or releases to other parties. Pursuant to D.04-09-022, PG&E is authorized to recover the costs associated with its Canadian and U.S. interstate capacity, allocate firm intrastate capacity, and recover associated costs. Table 2-15 below shows PG&E's estimated utilization for the period and notes changes in contract activity from prior years.¹⁴

¹⁴ PG&E Annual Performance Report, CPIM Year 28, page 18-19.

Table 2-15
Pacific Gas and Electric Company
Core Gas Supply - Utilization of Interstate, Intrastate and Canadian Pipeline Assets
CPIM Year 28
November 1, 2020 through October 31, 2021

Pipeline Capacity:	Quantity (Dth/d)	Contract Expiration Date	Utilization Rate
Trans Canada Pipelines:			
NGTL	287,745	10/31/2027	
	82,223	10/31/2027	
Total NOVA:	369,968		99%
Foothills-BC System	284,810	10/31/2027	
	81,384	10/31/2027	
Total Foothills-BC System:	366,194		99%
Interstate Pipelines:			
Gas Transmission Northwest	279,968	10/31/2027	
Seasonal	80,000	10/31/2027	
Total Gas Transmission Northwest:	359,968		94%
El Paso Natural Gas (Nov-Mar)	162,000		
Total El Paso Natural Gas:	162,000	3/31/2023	48%
Ruby			
Total Ruby:	250,000	10/31/2026	81%
PG&E Core Gas Supply- Intrastate Pipelines:			
Redwood Path			
Annual	605,088		
Seasonal (Nov-Jan)	350,000		
Seasonal (Feb-Mar)	100,000		
Total Redwood:	Varies		98%
Baja Path			
Seasonal	300,000		
Total Baja:	300,000		88%

Exhibits

2-1a
Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021

CPIM Costs/Savings

Benchmark Costs	\$	1,067,235,060
Actual Costs	\$	<u>962,180,068</u>
CPIM Saving	\$	105,054,992
Lower Tolerance Band (1%)	\$	1,059,380,485
Amount for Lower Tolerance Band Not Subject to Sharing (0% - 1%)	\$	97,200,417
Amount for Subject to 80% - 20% Sharing (1% - 5%)	\$	<u>97,200,417</u>
Ratepayers' Share: 80%	\$	77,760,334
Shareholders' Share: 20%	\$	19,440,083
Total Shareholder Reward	\$	19,440,083
Total Ratepayer Saving	\$	<u>85,614,909</u>
CPIM Saving	\$	105,054,992
Total Shareholder Reward	\$	19,440,083
Rounding	\$	<u>-</u>
Total Shareholder Reward	\$	19,440,083

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021

CPIM Performance

	Actual		Benchmark		Under/(Over)
Commodity Costs	\$ 981,625,119	\$	775,321,409	\$	(206,303,710)
Volumetric Transportation Costs	\$ 50,251,282	\$	-	\$	(50,251,282)
Commodity Sales	\$ (373,205,994)	\$	-	\$	373,205,994
Total Gas Purchase Costs	\$ 658,670,407	\$	775,321,409	\$	116,651,002
Other Costs and Revenues	\$ 9,296,330	\$	-	\$	(9,296,330)
Winter Hedging Costs	\$ 12,487,624	\$	9,990,099	\$	(2,497,525)
Customs & Border Protection					
Merchandise Processing Fee	\$ 146,000	\$	146,000	\$	-
Total Commodity Costs	\$ 680,600,361	\$	785,457,508	\$	104,857,147
Demand Charges	\$ 228,060,599	\$	228,060,599	\$	-
Discount Demand Charges	\$ (63,555)	\$	-	\$	63,555
Capacity Release Revenues	\$ (134,290)	\$	-	\$	134,290
Firm Storage Costs	\$ 53,716,953	\$	53,716,953	\$	-
Total Reservation Costs	\$ 281,579,707	\$	281,777,552	\$	197,845
Total	\$ 962,180,068	\$	1,067,235,060	\$	105,054,992

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021

Monthly Actual Costs

	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Total
Commodity Costs	\$ 102,851,329	\$ 118,416,644	\$ 101,863,353	\$ 126,201,342	\$ 101,129,888	\$ 55,978,742	\$ 49,628,796	\$ 46,732,150	\$ 64,048,562	\$ 67,601,343	\$ 61,008,343	\$ 86,164,627	\$ 981,625,119
Volumetric Transportation Costs	\$ 4,452,404	\$ 6,388,014	\$ 7,882,468	\$ 4,273,351	\$ 3,897,663	\$ 3,319,382	\$ 3,546,191	\$ 3,416,439	\$ 3,290,849	\$ 3,405,892	\$ 3,211,425	\$ 3,167,204	\$ 50,251,282
Commodity Sales	\$ (23,110,987)	\$ (16,685,533)	\$ (13,532,915)	\$ (150,130,047)	\$ (16,067,448)	\$ (4,342,984)	\$ (4,858,458)	\$ (17,136,715)	\$ (37,075,081)	\$ (41,881,248)	\$ (32,708,343)	\$ (15,676,235)	\$ (373,205,994)
Total Gas Purchase Costs	\$ 84,192,746	\$ 108,119,125	\$ 96,212,906	\$ (19,655,354)	\$ 88,960,103	\$ 54,955,140	\$ 48,316,529	\$ 33,011,874	\$ 30,264,330	\$ 29,125,987	\$ 31,511,425	\$ 73,655,596	\$ 658,670,407
Other Costs and Revenues	\$ (1,633,907)	\$ 273,594	\$ (3,198,832)	\$ 369,884	\$ 236,714	\$ (242,420)	\$ (540,929)	\$ (351,665)	\$ 3,114,490	\$ 5,064,917	\$ 6,533,863	\$ (329,379)	\$ 9,296,330
100% Winter Hedging Costs	\$ -	\$ 3,757,356	\$ 4,536,496	\$ 4,193,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,487,624
Custom and Border Protection													
Merchandise Processing Fee	\$ 12,000	\$ 12,400	\$ 12,400	\$ 11,200	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,400	\$ 12,000	\$ 12,400	\$ 146,000
Total Commodity Costs	\$ 82,570,839	\$ 112,162,475	\$ 97,562,970	\$ (15,080,498)	\$ 89,209,217	\$ 54,724,720	\$ 47,788,000	\$ 32,672,209	\$ 33,391,220	\$ 34,203,304	\$ 38,057,288	\$ 73,338,617	\$ 680,600,361
Demand Charges	\$ 21,252,781	\$ 26,305,870	\$ 28,073,739	\$ 24,104,768	\$ 18,660,181	\$ 15,838,460	\$ 15,894,568	\$ 15,796,418	\$ 15,471,074	\$ 15,528,709	\$ 15,496,472	\$ 15,637,559	\$ 228,060,599
Discount Demand Charges	\$ (12,719)	\$ (12,719)	\$ (12,719)	\$ (12,719)	\$ (12,679)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (63,555)
Capacity Release Revenues	\$ -	\$ -	\$ -	\$ -	\$ (134,290)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (134,290)
Firm Storage Costs	\$ 4,821,027	\$ 4,821,027	\$ 4,886,020	\$ 4,886,020	\$ 3,282,420	\$ 4,429,405	\$ 4,429,405	\$ 4,429,405	\$ 4,429,405	\$ 4,429,405	\$ 4,436,707	\$ 4,436,707	\$ 53,716,953
Total Reservation Costs	\$ 26,061,089	\$ 31,114,178	\$ 32,947,040	\$ 28,978,069	\$ 21,795,632	\$ 20,267,865	\$ 20,323,973	\$ 20,225,823	\$ 19,900,479	\$ 19,958,114	\$ 19,933,179	\$ 20,074,266	\$ 281,579,707
Actual Costs	\$ 108,631,928	\$ 143,276,653	\$ 130,510,010	\$ 13,897,571	\$ 111,004,849	\$ 74,992,585	\$ 68,111,973	\$ 52,898,032	\$ 53,291,699	\$ 54,161,418	\$ 57,990,467	\$ 93,412,883	\$ 962,180,068

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021

Monthly Benchmark Costs

	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Total
Commodity Cost	\$ 85,090,075	\$ 97,726,055	\$ 89,517,363	\$ 94,346,002	\$ 74,227,426	\$ 47,063,644	\$ 43,020,861	\$ 37,297,256	\$ 42,001,690	\$ 43,230,245	\$ 46,011,303	\$ 75,789,489	\$ 775,321,409
Volumetric Transportation Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Commodity Sales	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Gas Purchase Cost	\$ 85,090,075	\$ 97,726,055	\$ 89,517,363	\$ 94,346,002	\$ 74,227,426	\$ 47,063,644	\$ 43,020,861	\$ 37,297,256	\$ 42,001,690	\$ 43,230,245	\$ 46,011,303	\$ 75,789,489	\$ 775,321,409
Other Costs and Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
100% Winter Hedging Cost	\$ -	\$ 3,005,884	\$ 3,629,197	\$ 3,355,018	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,990,099
Custom and Border Protection													
Marchandise Processing Fee	\$ 12,000	\$ 12,400	\$ 12,400	\$ 11,200	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,000	\$ 12,400	\$ 12,400	\$ 12,000	\$ 12,400	\$ 146,000
Total Commodity Cost	\$ 85,102,075	\$ 100,744,339	\$ 93,158,960	\$ 97,712,220	\$ 74,239,826	\$ 47,075,644	\$ 43,033,261	\$ 37,309,256	\$ 42,014,090	\$ 43,242,645	\$ 46,023,303	\$ 75,801,889	\$ 785,457,508
Demand Charge	\$ 21,252,781	\$ 26,305,870	\$ 28,073,739	\$ 24,104,768	\$ 18,660,181	\$ 15,838,460	\$ 15,894,568	\$ 15,796,418	\$ 15,471,074	\$ 15,528,709	\$ 15,496,472	\$ 15,637,559	\$ 228,060,599
Discount Demand Charges	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Capacity Release Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Firm Storage Cost	\$ 4,821,027	\$ 4,821,027	\$ 4,886,020	\$ 4,886,020	\$ 3,282,420	\$ 4,429,405	\$ 4,429,405	\$ 4,429,405	\$ 4,429,405	\$ 4,429,405	\$ 4,436,707	\$ 4,436,707	\$ 53,716,953
Total Reservation Cost	\$ 26,073,808	\$ 31,126,897	\$ 32,959,759	\$ 28,990,788	\$ 21,942,601	\$ 20,267,865	\$ 20,323,973	\$ 20,225,823	\$ 19,900,479	\$ 19,958,114	\$ 19,933,179	\$ 20,074,266	\$ 281,777,552
Benchmark CPIM Commodity Cost	\$ 111,175,883	\$ 131,871,236	\$ 126,118,719	\$ 126,703,008	\$ 96,182,427	\$ 67,343,509	\$ 63,357,234	\$ 57,535,079	\$ 61,914,569	\$ 63,200,759	\$ 65,956,482	\$ 95,876,155	\$ 1,067,235,060

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021
 Actual Commodity Purchases Summary

	CGT- PGE Citygate		CGT		El Paso		GTN		Kern		Nova		Ruby		WFS		Total	
Nov-20	\$	13,686,923	\$	5,744,626	\$	10,832,053	\$	40,073,385	\$	-	\$	22,055,877	\$	9,949,696	\$	508,769	\$	102,851,329
Dec-20	\$	18,778,213	\$	13,186,238	\$	10,999,842	\$	33,345,133	\$	-	\$	21,819,333	\$	12,040,654	\$	8,247,231	\$	118,416,644
Jan-21	\$	4,136,838	\$	12,143,121	\$	11,397,209	\$	31,447,627	\$	-	\$	19,955,785	\$	17,391,144	\$	5,391,629	\$	101,863,353
Feb-21	\$	13,040,734	\$	53,275,877	\$	10,776,126	\$	19,266,238	\$	-	\$	21,204,397	\$	8,577,970	\$	60,000	\$	126,201,342
Mar-21	\$	35,010,763	\$	-	\$	12,662,893	\$	21,659,729	\$	-	\$	24,613,076	\$	7,183,427	\$	-	\$	101,129,888
Apr-21	\$	19,263,677	\$	-	\$	-	\$	2,507,231	\$	-	\$	19,257,954	\$	14,544,490	\$	405,390	\$	55,978,742
May-21	\$	6,742,444	\$	-	\$	-	\$	3,291,905	\$	-	\$	21,275,922	\$	18,318,525	\$	-	\$	49,628,796
Jun-21	\$	2,733,665	\$	-	\$	-	\$	4,533,725	\$	-	\$	21,089,860	\$	18,303,860	\$	71,040	\$	46,732,150
Jul-21	\$	340,045	\$	-	\$	-	\$	16,531,071	\$	-	\$	23,518,376	\$	23,659,070	\$	-	\$	64,048,562
Aug-21	\$	274,098	\$	-	\$	-	\$	18,269,904	\$	-	\$	23,250,608	\$	25,196,541	\$	610,192	\$	67,601,343
Sep-21	\$	559,572	\$	-	\$	-	\$	10,209,754	\$	-	\$	24,682,897	\$	23,933,720	\$	1,622,400	\$	61,008,343
Oct-21	\$	15,308,096	\$	-	\$	-	\$	3,637,087	\$	-	\$	31,511,571	\$	35,707,873	\$	-	\$	86,164,627
Total	\$	129,875,068	\$	84,349,862	\$	56,668,123	\$	204,772,789	\$	-	\$	274,235,656	\$	214,806,970	\$	16,916,651	\$	981,625,119

981,625,120

\$ (1)

2-6
Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021
Volumetric Transportation Costs

	El Paso Natural Gas Company, LLC	Gas Transmission Northwest LLC	Kern River Gas Transmission Company	Independent Storage Providers	PG&E California Gas Transmission	Ruby Pipeline, LLC	Transcanada	Transwestern Pipeline Company	Williams Field Services Complany, LLC	Total
Nov-20	\$ 4,020	\$ 94,229	\$ -	\$ 4,435	\$ 4,185,600	\$ 163,318	\$ -	\$ -	\$ 802	\$ 4,452,404
Dec-20	\$ 27,913	\$ 97,080	\$ -	\$ 2,800	\$ 6,002,178	\$ 250,912	\$ -	\$ -	\$ 7,131	\$ 6,388,014
Jan-21	\$ 34,688	\$ 98,914	\$ -	\$ 26,150	\$ 7,393,899	\$ 322,825	\$ -	\$ -	\$ 5,992	\$ 7,882,468
Feb-21	\$ 14,959	\$ 83,546	\$ -	\$ 36,260	\$ 4,034,734	\$ 103,852	\$ -	\$ -	\$ -	\$ 4,273,351
Mar-21	\$ 2,357	\$ 96,060	\$ -	\$ 14,720	\$ 3,682,357	\$ 102,169	\$ -	\$ -	\$ -	\$ 3,897,663
Apr-21	\$ -	\$ 90,061	\$ -	\$ 9,350	\$ 2,954,050	\$ 265,063	\$ -	\$ -	\$ 858	\$ 3,319,382
May-21	\$ -	\$ 91,313	\$ -	\$ 15,348	\$ 3,155,397	\$ 284,133	\$ -	\$ -	\$ -	\$ 3,546,191
Jun-21	\$ -	\$ 85,520	\$ -	\$ 3,405	\$ 3,067,991	\$ 259,443	\$ -	\$ -	\$ 80	\$ 3,416,439
Jul-21	\$ -	\$ 87,387	\$ -	\$ 1,660	\$ 3,067,887	\$ 133,915	\$ -	\$ -	\$ -	\$ 3,290,849
Aug-21	\$ -	\$ 81,768	\$ -	\$ -	\$ 3,066,399	\$ 256,932	\$ -	\$ -	\$ 793	\$ 3,405,892
Sep-21	\$ -	\$ 88,526	\$ -	\$ -	\$ 2,901,269	\$ 219,602	\$ -	\$ -	\$ 2,028	\$ 3,211,425
Oct-21	\$ -	\$ 94,142	\$ -	\$ -	\$ 2,844,214	\$ 228,848	\$ -	\$ -	\$ -	\$ 3,167,204
Total	\$ 83,937	\$ 1,088,546	\$ -	\$ 114,128	\$ 46,355,975	\$ 2,591,012	\$ -	\$ -	\$ 17,684	\$ 50,251,282

50,251,282

\$ -

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021
 Commodity Sales Revenue

	CGT- PG&E Citygate	CGT -All	El Paso	GTN	Kern	Nova	Ruby	TW	WFS	Total
Nov-20	\$ (6,695,985)	\$ (6,405,696)	\$ (8,632,088)	\$ (894,120)	\$ -	\$ (398,820)	\$ (44,408)	\$ -	\$ (39,870)	\$ (23,110,987)
Dec-20	\$ (5,442,393)	\$ (55,825)	\$ (4,118,085)	\$ (911,997)	\$ (757,392)	\$ (494,973)	\$ (102,817)	\$ -	\$ (4,802,051)	\$ (16,685,533)
Jan-21	\$ (8,439,903)	\$ (1,786)	\$ (2,592,312)	\$ (22,900)	\$ (799,240)	\$ (256,674)	\$ (47,978)	\$ -	\$ (1,372,122)	\$ (13,532,915)
Feb-21	\$ (4,926,873)	\$ (40,155,911)	\$ (82,843,616)	\$ (11,652,068)	\$ -	\$ (1,741,200)	\$ (8,757,879)	\$ -	\$ (52,500)	\$ (150,130,047)
Mar-21	\$ (2,965,323)	\$ (534,732)	\$ (11,461,842)	\$ (147,849)	\$ -	\$ (809,424)	\$ (148,278)	\$ -	\$ -	\$ (16,067,448)
Apr-21	\$ (3,481,830)	\$ -	\$ -	\$ (78,410)	\$ -	\$ (682,153)	\$ (88,841)	\$ -	\$ (11,750)	\$ (4,342,984)
May-21	\$ (3,563,132)	\$ -	\$ -	\$ (3,568)	\$ -	\$ (1,283,103)	\$ (8,655)	\$ -	\$ -	\$ (4,858,458)
Jun-21	\$ (15,611,219)	\$ -	\$ -	\$ (103,773)	\$ -	\$ (1,199,268)	\$ (192,262)	\$ -	\$ (30,193)	\$ (17,136,715)
Jul-21	\$ (25,369,242)	\$ -	\$ -	\$ (350,067)	\$ -	\$ (703,845)	\$ (10,651,927)	\$ -	\$ -	\$ (37,075,081)
Aug-21	\$ (29,359,520)	\$ -	\$ -	\$ (3,763,513)	\$ -	\$ (1,533,042)	\$ (7,205,485)	\$ -	\$ (19,688)	\$ (41,881,248)
Sep-21	\$ (25,867,538)	\$ -	\$ -	\$ (210,310)	\$ (17,043)	\$ (84,881)	\$ (6,477,897)	\$ -	\$ (50,674)	\$ (32,708,343)
Oct-21	\$ (9,081,060)	\$ -	\$ -	\$ (4,765,451)	\$ -	\$ (1,795,666)	\$ (34,058)	\$ -	\$ -	\$ (15,676,235)
Total	\$ (140,804,018)	\$ (47,153,950)	\$ (109,647,943)	\$ (22,904,026)	\$ (1,573,675)	\$ (10,983,049)	\$ (33,760,485)	\$ -	\$ (6,378,848)	\$ (373,205,994)

\$ (373,205,991)

\$ (3)

2-8
Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021
Demand Charges Summary

	El Paso Natural Gas Company LLC	Gas Transmission Northwest LLC	PG&E California Transmission	Ruby Pipeline, LLC	Transcanada-Foothills Pipelines Ltd	Transcanda Nova Gas Transmission Ltd	Transwestern Pipeline Company	Total
Nov-20	\$ 1,232,897	\$ 2,254,570	\$ 11,591,250	\$ 4,311,822	\$ 643,911	\$ 1,218,331	\$ -	\$ 21,252,781
Dec-20	\$ 1,232,897	\$ 2,302,353	\$ 16,564,014	\$ 4,313,509	\$ 654,580	\$ 1,238,517	\$ -	\$ 26,305,870
Jan-21	\$ 1,232,897	\$ 2,329,722	\$ 18,457,563	\$ 4,313,463	\$ 470,398	\$ 1,269,696	\$ -	\$ 28,073,739
Feb-21	\$ 1,232,897	\$ 2,099,557	\$ 14,701,220	\$ 4,309,465	\$ 476,220	\$ 1,285,409	\$ -	\$ 24,104,768
Mar-21	\$ 1,229,010	\$ 2,322,334	\$ 9,050,224	\$ 4,299,367	\$ 475,579	\$ 1,283,667	\$ -	\$ 18,660,181
Apr-21	\$ -	\$ 2,192,316	\$ 7,552,425	\$ 4,298,457	\$ 485,314	\$ 1,309,948	\$ -	\$ 15,838,460
May-21	\$ -	\$ 2,208,283	\$ 7,552,425	\$ 4,299,617	\$ 495,852	\$ 1,338,391	\$ -	\$ 15,894,568
Jun-21	\$ -	\$ 2,078,555	\$ 7,552,425	\$ 4,298,446	\$ 484,816	\$ 1,382,176	\$ -	\$ 15,796,418
Jul-21	\$ -	\$ 2,089,662	\$ 7,415,161	\$ 4,157,539	\$ 469,682	\$ 1,339,030	\$ -	\$ 15,471,074
Aug-21	\$ -	\$ 2,096,075	\$ 7,415,161	\$ 4,224,102	\$ 465,698	\$ 1,327,673	\$ -	\$ 15,528,709
Sep-21	\$ -	\$ 2,078,182	\$ 7,415,161	\$ 4,217,807	\$ 463,608	\$ 1,321,714	\$ -	\$ 15,496,472
Oct-21	\$ -	\$ 2,170,351	\$ 7,415,161	\$ 4,222,513	\$ 475,089	\$ 1,354,445	\$ -	\$ 15,637,559
Total	\$ 6,160,598	\$ 26,221,960	\$ 122,682,190	\$ 51,266,107	\$ 6,060,747	\$ 15,668,997	\$ -	\$ 228,060,599

Demand charge are net of CTA stranded cost, CTA capacity release,

\$ 228,060,599

\$ -

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021
 Other Commodity Costs and Revenues

	Cochrane Extraction Revenue	Non-Winter Hedge Costs and Revenues	Miscellaneous Costs and Revenues	Total
Nov-20	\$ (185,303)	\$ (1,512,480)	\$ 63,876	\$ (1,633,907)
Dec-20	\$ (243,555)	\$ 462,908	\$ 54,241	\$ 273,594
Jan-21	\$ (363,920)	\$ (2,908,908)	\$ 73,996	\$ (3,198,832)
Feb-21	\$ (267,976)	\$ 604,284	\$ 33,576	\$ 369,884
Mar-21	\$ (312,665)	\$ 485,817	\$ 63,562	\$ 236,714
Apr-21	\$ (256,433)	\$ (13,425)	\$ 27,438	\$ (242,420)
May-21	\$ (314,598)	\$ (274,583)	\$ 48,252	\$ (540,929)
Jun-21	\$ (332,229)	\$ (48,450)	\$ 29,014	\$ (351,665)
Jul-21	\$ (345,901)	\$ 3,434,320	\$ 26,071	\$ 3,114,490
Aug-21	\$ (327,024)	\$ 5,368,658	\$ 23,283	\$ 5,064,917
Sep-21	\$ (457,179)	\$ 6,960,225	\$ 30,817	\$ 6,533,863
Oct-21	\$ (485,290)	\$ 120,551	\$ 35,360	\$ (329,379)
Total	\$ (3,892,073)	\$ 12,678,917	\$ 509,486	\$ 9,296,330

2-10

Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021
Winter Hedge Transaction

	Option	Option and Swap		Winter Hedge
	Premiums	Settlements	Commissoin and Fee	Costs
				Total
Nov-20	\$ -	\$ -	\$ -	\$ -
Dec-20	\$ 3,751,853	\$ -	\$ 5,503	\$ 3,757,356
Jan-21	\$ 4,666,043	\$ (136,400)	\$ 6,853	\$ 4,536,496
Feb-21	\$ 4,214,490	\$ (26,600)	\$ 5,882	\$ 4,193,772
Mar-21	\$ -	\$ -	\$ -	\$ -
Apr-21	\$ -	\$ -	\$ -	\$ -
May-21	\$ -	\$ -	\$ -	\$ -
Jun-21	\$ -	\$ -	\$ -	\$ -
Jul-21	\$ -	\$ -	\$ -	\$ -
Aug-21	\$ -	\$ -	\$ -	\$ -
Sep-21	\$ -	\$ -	\$ -	\$ -
Oct-21	\$ -	\$ -	\$ -	\$ -
Total	\$ 12,632,386	\$ (163,000)	\$ 18,238	\$ 12,487,624

2-11

Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021
Demand Charge Discounts Summary

	El Paso Natural Gas Company LLC	Gas Transmission Northwest LLC	Transwestern Pipeline Company	Total
Nov-20	\$ (12,719)	\$ -	\$ -	\$ (12,719)
Dec-20	\$ (12,719)	\$ -	\$ -	\$ (12,719)
Jan-21	\$ (12,719)	\$ -	\$ -	\$ (12,719)
Feb-21	\$ (12,719)	\$ -	\$ -	\$ (12,719)
Mar-21	\$ (12,679)	\$ -	\$ -	\$ (12,679)
Apr-21	\$ -	\$ -	\$ -	\$ -
May-21	\$ -	\$ -	\$ -	\$ -
Jun-21	\$ -	\$ -	\$ -	\$ -
Jul-21	\$ -	\$ -	\$ -	\$ -
Aug-21	\$ -	\$ -	\$ -	\$ -
Sep-21	\$ -	\$ -	\$ -	\$ -
Oct-21	\$ -	\$ -	\$ -	\$ -
Total	\$ (63,555)	\$ -	\$ -	\$ (63,555)

2-13
Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021
Firm Incremental Storage

	PG&E California Transmission	Independent Storage Providers	Total
Nov-20	\$ 1,813,262	\$ 3,007,765	\$ 4,821,027
Dec-20	\$ 1,813,262	\$ 3,007,765	\$ 4,821,027
Jan-21	\$ 1,878,255	\$ 3,007,765	\$ 4,886,020
Feb-21	\$ 1,878,255	\$ 3,007,765	\$ 4,886,020
Mar-21	\$ 1,878,255	\$ 1,404,165	\$ 3,282,420
Apr-21	\$ 1,898,740	\$ 2,530,665	\$ 4,429,405
May-21	\$ 1,898,740	\$ 2,530,665	\$ 4,429,405
Jun-21	\$ 1,898,740	\$ 2,530,665	\$ 4,429,405
Jul-21	\$ 1,898,740	\$ 2,530,665	\$ 4,429,405
Aug-21	\$ 1,898,740	\$ 2,530,665	\$ 4,429,405
Sep-21	\$ 1,906,042	\$ 2,530,665	\$ 4,436,707
Oct-21	\$ 1,906,042	\$ 2,530,665	\$ 4,436,707
Total	\$ 22,567,073	\$ 31,149,880	\$ 53,716,953

2-14

Pacific Gas and Electric Company
 CPIM Year 28
 November 1, 2020 - October 31, 2021
 Benchmark Commodity Cost

	Ruby	Nova	El Paso	Malin	Topock	Citygate	Total
Nov-20	\$ 19,255,970	\$ 23,526,613	\$ -	\$ 25,666,653		\$ 16,640,839	\$ 85,090,075
Dec-20	\$ 20,462,543	\$ 23,190,620	\$ 11,829,179	\$ 25,776,342	\$ 10,382,703	\$ 6,084,668	\$ 97,726,055
Jan-21	\$ 22,174,299	\$ 21,581,701	\$ 12,411,372	\$ 20,710,160	\$ 8,879,553	\$ 3,760,278	\$ 89,517,363
Feb-21	\$ 16,759,811	\$ 21,697,197	\$ 11,364,844	\$ 7,215,094	\$ 33,401,507	\$ 3,907,549	\$ 94,346,002
Mar-21	\$ 19,295,380	\$ 25,989,863	\$ -	\$ 8,531,143	\$ -	\$ 20,411,040	\$ 74,227,426
Apr-21	\$ 15,599,385	\$ 21,853,930	\$ -	\$ 217,180	\$ -	\$ 9,393,149	\$ 47,063,644
May-21	\$ 16,790,173	\$ 24,132,225	\$ -	\$ 120,350	\$ -	\$ 1,978,113	\$ 43,020,861
Jun-21	\$ 12,383,225	\$ 24,572,358	\$ -	\$ 33,246	\$ -	\$ 308,427	\$ 37,297,256
Jul-21	\$ 14,480,674	\$ 27,521,016	\$ -	\$ -	\$ -	\$ -	\$ 42,001,690
Aug-21	\$ 15,410,822	\$ 27,819,423	\$ -	\$ -	\$ -	\$ -	\$ 43,230,245
Sep-21	\$ 17,724,206	\$ 28,287,097	\$ -	\$ -	\$ -	\$ -	\$ 46,011,303
Oct-21	\$ 32,478,461	\$ 33,094,524	\$ -	\$ 342,274	\$ -	\$ 9,874,230	\$ 75,789,489
Total	\$ 222,814,949	\$ 303,266,567	\$ 35,605,395	\$ 88,612,442	\$ 52,663,763	\$ 72,358,293	\$ 775,321,409

2-15

Pacific Gas and Electric Company

CPIM Year 28

November 1, 2020 - October 31, 2021

Benchmark Winter Hedge Costs

	Option Premiums	Option and Swap Settlements	Commision and Fees	Total
Nov-20	\$ -	\$ -	\$ -	\$ -
Dec-20	\$ 3,001,482		\$ 4,402	\$ 3,005,884
Jan-21	\$ 3,732,834	\$ (109,120)	\$ 5,483	\$ 3,629,197
Feb-21	\$ 3,371,592	\$ (21,280)	\$ 4,706	\$ 3,355,018
Mar-21	\$ -	\$ -	\$ -	\$ -
Apr-21	\$ -	\$ -	\$ -	\$ -
May-21	\$ -	\$ -	\$ -	\$ -
Jun-21	\$ -	\$ -	\$ -	\$ -
Jul-21	\$ -	\$ -	\$ -	\$ -
Aug-21	\$ -	\$ -	\$ -	\$ -
Sep-21	\$ -	\$ -	\$ -	\$ -
Oct-21	\$ -	\$ -	\$ -	\$ -
Total	\$ 10,105,908	\$ (130,400)	\$ 14,591	\$ 9,990,099

Pacific Gas and Electric Company

CPIM Year 28

November 1, 2020 - October 31, 2021

Actual Commodity Purchases Volume Summary in MMBtu

	CGT-									
	PGE Citygate	CGT	El Paso	GTN	Kern	Nova	Ruby	TW	WFS	Total
Nov-20	3,634,575	2,494,182	3,940,940	12,239,820	-	9,262,068	3,248,217	-	165,900	34,985,702
Dec-20	5,152,890	5,075,407	4,297,373	10,498,954	-	9,639,394	3,946,806	-	2,635,144	41,245,968
Jan-21	1,206,500	4,609,878	4,299,012	9,968,212	-	9,651,526	5,214,557	-	1,548,428	36,498,113
Feb-21	2,851,564	4,520,384	3,959,455	6,613,959	-	8,874,126	2,972,369	-	5,000	29,796,857
Mar-21	9,687,362	-	4,255,677	7,366,318	-	9,606,504	2,376,354	-	-	33,292,215
Apr-21	5,203,800	-	-	965,300	-	8,844,459	5,936,592	-	165,000	21,115,151
May-21	1,673,100	-	-	1,181,825	-	9,085,584	6,453,934	-	-	18,394,443
Jun-21	698,628	-	-	1,388,800	-	8,512,913	6,202,691	-	24,000	16,827,032
Jul-21	64,700	-	-	4,313,740	-	8,527,320	6,166,851	-	-	19,072,611
Aug-21	49,967	-	-	4,305,215	-	8,382,778	6,212,004	-	152,548	19,102,512
Sep-21	89,684	-	-	2,261,900	-	8,503,624	5,744,151	-	390,000	16,989,359
Oct-21	2,207,626	-	-	658,610	-	9,452,863	6,325,914	-	-	18,645,013
Total	32,520,396	16,699,851	20,752,457	61,762,653	-	108,343,159	60,800,440	-	5,086,020	305,964,976

Total Sale Volume: (65,229,062)
Total Net Purchase Volume: 240,735,914

Pacific Gas and Electric Company

CPIM Year 28

November 1, 2020 - October 31, 2021

Actual Commodity Sale Volume in MMBtu Summary

	CGT- PGE Citygate	CGT- All	El Paso	GTN	Kern	Nova	Ruby	TW	WFS	Total
Nov-20	(1,703,500)	(2,784,697)	(3,556,725)	(288,034)	-	(193,923)	(16,590)	-	(12,000)	(8,555,469)
Dec-20	(1,554,900)	(21,500)	(1,629,736)	(273,906)	(228,600)	(254,584)	(30,150)	-	(1,467,700)	(5,461,076)
Jan-21	(2,374,400)	(800)	(987,633)	(8,500)	(262,700)	(127,007)	(17,710)	-	(521,100)	(4,299,850)
Feb-21	(1,100,400)	(1,805,372)	(2,531,480)	(2,367,891)	-	(291,833)	(1,083,022)	-	(5,000)	(9,184,998)
Mar-21	(819,015)	(219,895)	(4,030,701)	(63,300)	-	(369,649)	(63,898)	-	-	(5,566,458)
Apr-21	(923,300)	-	-	(32,200)	-	(305,671)	(35,499)	-	(5,000)	(1,301,670)
May-21	(933,000)	-	-	(974)	-	(504,523)	(3,093)	-	-	(1,441,590)
Jun-21	(3,530,834)	-	-	(30,793)	-	(431,825)	(56,147)	-	(9,400)	(4,058,999)
Jul-21	(4,995,291)	-	-	(102,600)	-	(268,896)	(2,837,166)	-	(35,000)	(8,238,953)
Aug-21	(5,314,534)	-	-	(897,338)	-	(619,398)	(1,710,718)	-	(5,000)	(8,546,988)
Sep-21	(4,357,241)	-	-	(43,877)	(3,900)	(33,648)	(1,526,100)	-	(11,200)	(5,975,966)
Oct-21	(1,262,000)	-	-	(898,915)	-	(429,930)	(6,200)	-	-	(2,597,045)
Total	(28,868,415)	(4,832,264)	(12,736,275)	(5,008,328)	(495,200)	(3,830,887)	(7,386,293)	-	(2,071,400)	(65,229,062)

(65,229,062)

-

2-18

Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021
Benchmark Load

	Ruby	Nova	El Paso	Malin	Topock	Citygate	Total
Nov-20	5,849,852	8,739,270	-	7,573,063	-	4,428,071	26,590,256
Dec-20	6,379,583	9,027,386	4,134,005	7,464,463	3,622,381	1,656,146	32,283,964
Jan-21	6,275,908	8,992,635	4,134,036	6,517,549	3,026,685	1,097,915	30,044,728
Feb-21	5,501,301	8,116,696	3,733,968	2,247,675	2,110,975	679,327	22,389,942
Mar-21	5,794,287	8,899,804		2,723,125		5,695,454	23,112,670
Apr-21	5,825,433	8,821,590		76,734		2,515,450	17,239,207
May-21	5,464,584	9,108,513		40,385		498,818	15,112,300
Jun-21	3,891,825	8,843,100		10,983		80,495	12,826,403
Jul-21	3,555,683	8,991,261					12,546,944
Aug-21	3,562,718	8,937,276					12,499,994
Sep-21	4,055,776	8,621,040					12,676,816
Oct-21	5,496,672	8,953,265		60,502		1,432,387	15,942,826
Total	61,653,622	106,051,836	12,002,009	26,714,479	8,760,041	18,084,063	233,266,050

2-19

Pacific Gas and Electric Company

CPIM Year 28

November 1, 2020 - October 31, 2021

Custom & Border Protection Merchandise

Processing Fee

	<u>Merchandise Processing Fee</u>	
Nov-20	\$	12,000
Dec-20	\$	12,400
Jan-21	\$	12,400
Feb-21	\$	11,200
Mar-21	\$	12,400
Apr-21	\$	12,000
May-21	\$	12,400
Jun-21	\$	12,000
Jul-21	\$	12,400
Aug-21	\$	12,400
Sep-21	\$	12,000
Oct-21	\$	12,400
Total	\$	<u>146,000</u>

Pacific Gas and Electric Company
CPIM Year 28
November 1, 2020 - October 31, 2021

Storage Inventory Summary

Gas Storage Providers	Beginning Inventory 11/01/20 (MMBtus)	Ending Inventory 10/31/2021 (MMBtus)
Firm Storage CGT	13,312,205	15,666,393
Incremental Storage	1,688,000	0
Total Storage Inventory	15,000,205	15,666,393