

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 15, 2011

Advice Letter 3793-E-A

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177

**Subject: Supplemental – Modifications to Export Addendum to
Electric Rule 21 Standard Form 79-973 – Generating
Facility Interconnection Agreement**

Dear Ms. Yura:

Advice Letter 3793-E-A is effective June 24, 2011.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division

May 25, 2011

Advice 3793-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Modifications to Export Addendum to Electric Rule
21 Standard Form 79-973 – Generating Facility Interconnection
Agreement**

Pacific Gas and Electric Company (“PG&E”) hereby submits for filing a modification to its export (“Export”) addendum, Standard Form 79-1070, to PG&E’s Electric Rule 21 – Standard Form 79-973, “Generating Facility Interconnection Agreement” (“GFIA”). The affected tariff sheets are listed on the enclosed Attachment I.

Purpose

The purpose of this Advice Letter is to modify the existing Export addendum to standard Form 79-973, “Generating Facility Interconnection Agreement,” to provide an additional interconnection option for customers seeking to interconnect a generating facility two megawatts or less under Form 79-973 where the customer anticipates that their power production may exceed power usage at times.

This advice letter supersedes Advice Letter (“AL”) 3793-E¹ in its entirety.

Background

PG&E originally filed its Export addendum, Standard Form 79-1070, on February 8, 2006, in AL 2781-E.² It applied to the Customer’s inverter-based, solar and/or wind Generating Facility sized 1 megawatt (“MW”) or less provided that the generating facility otherwise satisfies all other applicable requirements of Electric Rule 21. It modified the GFIA only as it pertains to Export. Export is defined as the uncompensated and unscheduled flow of electrical energy from Customer’s Generating facility onto PG&E’s Distribution System. By signing this addendum, the Customer agreed that such Export is solely for Customer’s operating convenience and understands that there will be no

¹ http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_3793-E.pdf

² http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_2781-E.pdf

compensation made by PG&E, or third parties, for such Export. The Customer understands that it is obligated to manage Export in compliance with current and future guidelines established by regulatory agencies having jurisdiction over such Export. These Export provisions continue unchanged.

On January 20, 2011, PG&E filed AL 3793-E to expand the applicability of the Export addendum. AL 3793-E provided an additional interconnection option for customers seeking to interconnect a inverter-based fuel cell (in addition to a solar and/or wind) generating facility under Form 79-973 where the customer anticipates that their power production may exceed power usage at times. AL 3793-E also asked to increase the maximum generating facility size from 1 megawatt to 2 megawatts.

This advice letter, intended to replace AL 3793-E, was reworded at the request of Tecogen, a generator supplier. In it, PG&E expands the applicability of the addendum. Specifically, the addendum is now applicable to *any* electrical generating facility type two megawatts or less that interconnects with PG&E when there may be uncompensated export and that meets all the pertinent requirements of Electric Rule 21 and the applicable California Independent System Operator (“CAISO”) tariffs.

Tariff Revisions

This advice letter:

- 1) Changes the title of the addendum (Form 79-1070) from:

EXPORT ADDENDUM TO GENERATING FACILITY INTERCONNECTION AGREEMENT (FORM 79-973) FOR INVERTER BASED SOLAR AND WIND GENERATORS SIZED 1 MW OR LESS

to:

EXPORT ADDENDUM TO GENERATING FACILITY INTERCONNECTION AGREEMENT (FORM 79-973) FOR GENERATORS SIZED 2 MEGAWATTS OR LESS

(Underlined text represents added text)

- 2) In the first paragraph of the addendum, adds a line for the customer’s name in place of the text “[INSERT NAME].”
- 3) Modifies the addendum section 1.2 under “Purpose and Scope” to read:

This Addendum shall apply to Customer’s Generating Facility that is 2 megawatts (MW) or less provided that the Generating Facility otherwise satisfies all other applicable requirements of PG&E’s Electric Rule 21.

- 4) Modifies section 1.4 under “Purpose and Scope” to read:

1.4 All other capitalized terms used and not defined herein, whether in singular or plural, shall have the meanings assigned to them in PG&E’s Electric Rule 21.

- 5) Modifies section 3.1.2 under “Interconnection of Generating Facility” to read:

3.1.2 Customer shall set and maintain relay settings as specified by PG&E, as an attachment to this Addendum, if applicable:

applicable
 not applicable

- 6) Modifies section 3.1.3 under “Interconnection of Generating Facility” to read:

3.1.3. Customer shall meet all requirements specified by PG&E, in the Special Facilities Agreement for items such as, but not limited to, a grounding/stabilizing transformer, fault detection schemes, and/or transfer trip as an attachment to this Addendum, if applicable:

applicable
 not applicable

- 7) Modifies section 3.1.4 under “Interconnection of Generating Facility” to read:

3.1.4 This Addendum does not provide for, or otherwise obligate PG&E to measure, purchase, transmit, distribute, or store the electrical power delivered to PG&E’s Electric System by Customer.

- 8) Modifies section 3.2 under “Interconnection of Generating Facility” to read:

3.2 PG&E retains the right, without notice, to require Customer to curtail Export during times of Emergency or under circumstances where such Export might interfere with the safe and reliable operation of PG&E’s Electric System.

- 9) Adds a new provision to the addendum section 3.3, “Interconnection of Generating Facility,” to address any interconnection requirements of the CAISO, since the form now includes generators over 1 megawatt:

3.3 *Generating Facilities may have additional requirements and charges pursuant to applicable California Independent System Operator (CAISO) tariffs.*

- 10) Modifies section 4.1 under “Compliance” to read:

4.1 In the event Customer operates its Generating Facility in a manner that exceeds the parameters for Export established in Section 3 of this Addendum, Customer understands that 1) its Generating Facility will be subject to curtailment or disconnection as provided in PG&E's Electric Rule 21 Section B.9 for Unsafe Operating Conditions, and 2) PG&E reserves the right to change this Export Addendum to a non-export interconnection at its sole discretion in order to meet system operation or reliability needs, and all interconnection facilities and labor required to enact this change will be at Customer's expense.

- 11) Modifies section 5 under *Signatures*, to remove a specific PG&E manager's name and instead leave the line blank for a name to be written in, and adds a PG&E Title line.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **June 14, 2011**, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jnj@cpuc.ca.gov and mas@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 also should be sent via U.S. mail (and by facsimile and electronically, 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, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

PG&E requests that this advice filing become effective on regular notice, **June 24, 2011**, 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 parties on the service list for R.10-05-004 (Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues). Address changes to the General Order 96-B service list and all electronic approvals should be directed to PG&E at e-mail 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. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

A handwritten signature in black ink that reads "Brian Cherry" followed by a vertical line and the word "lmt" written in a cursive style.

Vice President - Regulation and Rates

cc: Service List R.10-05-004

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

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 M)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Linda Tom-Martinez

Phone #: (415) 973-4612

E-mail: lmt1@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3793-E-A**

Tier: **2**

Subject of AL: **Supplemental : Modifications to Export Addendum to Electric Rule 21 Standard Form 79-973 – Generating Facility Interconnection Agreement**

Keywords (choose from CPUC listing): Forms

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

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 AL¹: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

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: _____

Resolution Required? Yes No

Requested effective date: **June 24, 2011**

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 Sample Form 79-1070

Service affected and changes proposed¹: N/A

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

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

CPUC, Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Ave.,
San Francisco, CA 94102
jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Brian Cherry
Vice President, Regulation and Rates
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3793-E-A**

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

30370-E	Electric Sample Form No. 79-1070 Export Addendum to Generating Facility Interconnection Agreement (Form 79-973) for Generators Sized 2 Megawatts or Less	24333-E
30371-E	ELECTRIC TABLE OF CONTENTS Sheet 1	30261-E
30372-E	ELECTRIC TABLE OF CONTENTS SAMPLE FORMS Sheet 24	29912-E



Electric Sample Form No. 79-1070
Export Addendum to Generating Facility Interconnection Agreement (Form 79-973)
for Generators Sized 2 Megawatts or Less

(T)

**Please Refer to Attached
Sample Form**



WE DELIVER ENERGY.SM

EXPORT ADDENDUM TO GENERATING FACILITY INTERCONNECTION AGREEMENT (FORM 79-973) FOR GENERATORS SIZED 2 MEGAWATTS OR LESS

Pacific Gas and Electric Company (PG&E), a California Corporation, and _____ (Customer) hereby enter into this Addendum to the Generation Facility Interconnection Agreement (GFIA) (Form 79-973) between PG&E and Customer. Customer and PG&E are sometimes referred to in this Addendum jointly as “Parties” or individually as “Party.” The Parties agree as follows:

1. PURPOSE AND SCOPE

1.1 This Addendum represents mutual agreement between PG&E and Customer to provide for Export as described in Section 1.3 below, notwithstanding Section 5.1 of the GFIA.

1.2 This Addendum shall apply to Customer’s Generating Facility that is 2 megawatts (MW) or less provided that the Generating Facility otherwise satisfies all other applicable requirements of PG&E’s Electric Rule 21.

1.3 For purposes of this Addendum, Export is defined as the uncompensated and unscheduled flow of electrical energy from Customer’s Generating Facility onto PG&E’s Distribution System. The Export shall fully comply with Section 3 of this Addendum. Customer agrees that such Export is solely for Customer’s operating convenience and understands that there will be no compensation made by PG&E, or third parties, for such Export. Customer understands that it is obligated to manage Export in compliance with current and future guidelines established by regulatory agencies having jurisdiction over such Export.

1.4 All other capitalized terms used and not defined herein, whether in singular or plural, shall have the meanings assigned to them in PG&E’s Electric Rule 21.

2. TERM AND TERMINATION

2.1 This Addendum shall become effective as of the later of the effective date of the GFIA or the last date entered in Section 5 of this Addendum.

2.2 This Addendum shall continue in full force and effect until termination of the GFIA, or unless terminated in accordance with Section 4.2 of this Addendum.

3. INTERCONNECTION OF GENERATING FACILITY

3.1 In addition to the requirements of Electric Rule 21 and the GFIA, Customer will abide by the following requirements in the interconnection and operation of its Generating Facility:

3.1.1 The maximum amount of electric power to be delivered to PG&E's Distribution System shall not exceed _____[INSERT MAXIMUM AMOUNT OF EXPORT CAPACITY].

3.1.2 Customer shall set and maintain relay settings as specified by PG&E, as an attachment to this Addendum, if applicable:

____ applicable

____ not applicable

3.1.3. Customer shall meet all requirements specified by PG&E, in the Special Facilities Agreement for items such as, but not limited to, a grounding/stabilizing transformer, fault detection schemes, and/or transfer trip as an attachment to this Addendum, if applicable:

____ applicable

____ not applicable

3.1.4 This Addendum does not provide for, or otherwise obligate PG&E to measure, purchase, transmit, distribute, or store the electrical power delivered to PG&E's Electric System by Customer.

3.1.5 The Generating Facility shall be operated with all of Customer's Protective Functions specified in Section 3 in service whenever the Generating Facility is operated in parallel with PG&E's Distribution System. Any deviation from these requirements may occur only when the Parties have agreed to such deviations in writing.

3.1.6 Customer shall understand that if PG&E needs to reconfigure the Distribution System and that if after such reconfiguration is complete, a voltage regulation problem arises due to Export by Customer, then Customer will correct, at its cost, Customer's Generating Facility as may reasonably be necessary to resolve the voltage regulation issue. Customer agrees that until such voltage regulation issue is resolved to PG&E's reasonable satisfaction, Customer will not be permitted to make Exports to the Distribution System.

3.2 PG&E retains the right, without notice, to require Customer to curtail Export during times of Emergency or under circumstances where such Export might interfere with the safe and reliable operation of PG&E's Electric System.

3.3 Generating Facilities may have additional requirements and charges pursuant to applicable California Independent System Operator (CAISO) tariffs.

4. COMPLIANCE

4.1 In the event Customer operates its Generating Facility in a manner that exceeds the parameters for Export established in Section 3 of this Addendum, Customer understands that 1)

its Generating Facility will be subject to curtailment or disconnection as provided in PG&E's Electric Rule 21, Section B.9, for Unsafe Operating Conditions, and 2) PG&E reserves the right to change this Export Addendum to a non-export interconnection at its sole discretion in order to meet system operation or reliability needs, and all interconnection facilities and labor required to enact this change will be at Customer's expense.

4.2 This Addendum shall at all times be subject to such changes or modifications by the Public Utilities Commission of the State of California, as said Commission may, from time to time, direct in the exercise of its jurisdiction.

5. SIGNATURES

IN WITNESS WHEREOF, the Parties hereto have caused three originals of this Addendum to be executed by their duly authorized representatives.

PACIFIC GAS AND ELECTRIC COMPANY

By: _____

Date: _____

Name: _____

Title: Manager, Generator Interconnection Services

CUSTOMER

By: _____

Date: _____

Name: _____

Title: _____



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
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	Rate Schedules	30469,30470,30471,30290 ,30314,30098,30401, 29897, 30472-E	
	Preliminary Statements	30068,29900,30376,30262,30174,30382,30383-E	
	Rules	30402, 30473, 29908-E	
	Maps, Contracts and Deviations.....	29909-E	
	Sample Forms	29910,30353,30372,29913,30354,29915,29916,29917,30271,29919,29920,29921-E	(T)

(Continued)

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

AT&T	Dept of General Services	Northern California Power Association
Alcantar & Kahl LLP	Douglass & Liddell	Occidental Energy Marketing, Inc.
Ameresco	Downey & Brand	OnGrid Solar
Anderson & Poole	Duke Energy	Praxair
Arizona Public Service Company	Dutcher, John	R. W. Beck & Associates
BART	Economic Sciences Corporation	RCS, Inc.
Barkovich & Yap, Inc.	Ellison Schneider & Harris LLP	Recurrent Energy
Bartle Wells Associates	Foster Farms	SCD Energy Solutions
Bloomberg	G. A. Krause & Assoc.	SCE
Bloomberg New Energy Finance	GLJ Publications	SMUD
Boston Properties	GenOn Energy, Inc.	SPURR
	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
Braun Blaising McLaughlin, P.C.	Green Power Institute	Santa Fe Jets
Brookfield Renewable Power	Hanna & Morton	Seattle City Light
CA Bldg Industry Association	Hitachi	Sempra Utilities
CLECA Law Office	In House Energy	Sierra Pacific Power Company
CSC Energy Services	International Power Technology	Silicon Valley Power
California Cotton Ginners & Growers Assn	Intestate Gas Services, Inc.	Silo Energy LLC
California Energy Commission	Lawrence Berkeley National Lab	Southern California Edison Company
California League of Food Processors	Los Angeles Dept of Water & Power	Spark Energy, L.P.
California Public Utilities Commission	Luce, Forward, Hamilton & Scripps LLP	Sun Light & Power
Calpine	MAC Lighting Consulting	Sunshine Design
Cardinal Cogen	MBMC, Inc.	Sutherland, Asbill & Brennan
Casner, Steve	MRW & Associates	Tabors Caramanis & Associates
Chris, King	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto	McKenzie & Associates	Tiger Natural Gas, Inc.
City of Palo Alto Utilities	Merced Irrigation District	TransCanada
Clean Energy Fuels	Modesto Irrigation District	Turlock Irrigation District
Coast Economic Consulting	Morgan Stanley	United Cogen
Commercial Energy	Morrison & Foerster	Utility Cost Management
Consumer Federation of California	NLine Energy, Inc.	Utility Specialists
Crossborder Energy	NRG West	Verizon
Davis Wright Tremaine LLP	Navigant Consulting	Wellhead Electric Company
Day Carter Murphy	Norris & Wong Associates	Western Manufactured Housing Communities Association (WMA)
		eMeter Corporation
Defense Energy Support Center	North America Power Partners	
Department of Water Resources	North Coast SolarResources	