

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 10, 2016

**Advice Letter 4716-E**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: Modifications to Schedule NEM and Rule 21 Pursuant  
to SB 83 for the United States Armed Forces**

Dear Mr. Jacobson:

Advice Letter 4716-E is effective November 1, 2015.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph  
Director, Energy Division

October 2, 2015

**Advice 4716-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Modifications to Schedule NEM and Rule 21 Pursuant to Senate Bill 83 for the United States Armed Forces****Purpose**

The purpose of this advice filing is to modify Pacific Gas and Electric Company's (PG&E's) Electric Schedule NEM – *Net Energy Metering Service*, and Electric Rule 21 – *Generating Facility Interconnections*, pursuant to Senate Bill (SB) 83, for changes limited to facilities of the United States Armed Forces.

**Background**

SB 83 (2015) was signed into law on June 24, 2015, adding a new definition of a NEM Eligible Customer-Generator to Public Utilities (PU) Code Section 2827(b)(4)(C) specifically for an Armed Forces “base or facility” with a renewable generator whose total capacity does not exceed the lesser of (a) 12 megawatts (MW) or (b) 1 MW greater than its minimum load over the prior 36 months. The statute includes the following additional provisions, which are applicable only to Armed Forces NEM Eligible Customer-Generators as newly defined under Section 2827(b)(4)(C). In compliance with the new SB 83 language, PG&E makes the following changes:

- A) “From PU Code Section 2827 (b)(4)(C)(i) *“For purposes of this subparagraph, a “United States Armed Forces base or facility” is an establishment under the jurisdiction of the United States Army, Navy, Air Force, Marine Corps, or Coast Guard.”*

PG&E incorporates this definition of “Armed Forces” into the NEM tariff in the applicability section, and in a new Special Condition 9. PG&E understands this to include the National Guard as well.

- B) From PU Code Section 2827 (b)(4)(C)(ii) *“Notwithstanding subparagraph (A), a United States Armed Forces base or facility is an “eligible customer-generator” if the base or facility uses a renewable electrical generation facility, or a combination of*

*those facilities, the renewable electrical generation facility is located on premises owned, leased, or rented by the United States Armed Forces base or facility, the renewable electrical generation facility is interconnected and operates in parallel with the electrical grid, the renewable electrical generation facility is intended primarily to offset part or all of the base or facility's own electrical requirements, and the renewable electrical generation facility has a generating capacity that does not exceed the lesser of 12 megawatts or one megawatt greater than the minimum load of the base or facility over the prior 36 months."*

PG&E incorporates this special extension of the definition of "eligible customer-generator" for the Armed Forces in to the NEM tariff in the Applicability Section and in Special Condition 9.

- C) Also From PU Code Section 2827 (b)(4)(C)(ii): *"Unless prohibited by federal law, a renewable electrical generation facility shall not be eligible for net energy metering for privatized military housing pursuant to this subparagraph if the renewable electrical generation facility was procured using a sole source process. A renewable electrical generation facility procured using best value criteria, if otherwise eligible, may be used for net energy metering for privatized military housing pursuant to this subparagraph. For these purposes, "best value criteria" means a value determined by objective criteria and may include, but is not limited to, price, features, functions, and life-cycle costs."*

PG&E incorporates this into a new affidavit. Each base would need to attest that they meet this requirement.

- D) From PU Code Section 2827 (b)(4)(C)(iii) *"A United States Armed Forces base or facility that is an eligible customer generator pursuant to this subparagraph shall not receive compensation for exported generation."*

PG&E incorporates this requirement in the Special Condition 2 – Billing – and in Special Condition 5 – Net Surplus Compensation.

- E) From PU Code Section 2827 (b)(4)(C)(iv): *"Notwithstanding paragraph (2) of subdivision (e), an electrical corporation shall be afforded a prudent but necessary time, as determined by the executive director of the commission but not less than 60 working days, to study the impacts of a request for interconnection of a renewable electrical generation facility with a capacity of greater than one megawatt pursuant to this subparagraph. If the study reveals the need for upgrades to the transmission or distribution system arising solely from the interconnection, the electrical corporation shall be afforded the time necessary to complete those upgrades before the interconnection and the costs of those upgrades shall be borne by the eligible customer-generator. Upgrade projects shall comply with applicable state and federal requirements, including requirements of the Federal Energy Regulatory Commission. For any renewable generation facility that interconnects directly to the*

*transmission grid or that requires transmission upgrades, the United States Armed Forces base or facility shall comply with all Federal Energy Regulatory Commission interconnection procedures and requirements.”*

PG&E incorporates these interconnection requirements in its Electric Rule 21, and in an accompanying advice letter, AL 4717-E, with a deviation to the NEM interconnection agreement to support interconnections under these provisions.

- F) From PU Code Section 2827 (b)(4)(C)(v) *“An electrical corporation shall make a tariff, as approved by the commission, available pursuant to this subparagraph by November 1, 2015.”*

This advice letter is accompanied by a second, advice letter (submitted as Tier 3 pursuant to General (GO) 96-B, General Rule Section 8.2.3) which addresses a deviation to the NEM interconnection agreement 79-978 to support interconnections under these provisions.

## **Tariff Revisions**

### **A) Modifications to Schedule NEM, Net Energy Metering**

- Applicability – adds a special definition of Eligible Renewable Customer Generator for United States Armed Forces; allows for exceptions to the 1 megawatt net energy metering limitation
- Provides that network or distribution upgrade cost responsibility is treated pursuant to Rule 21.D.13.e.
- Adds a rate designation (subschedule) NEMMILT to help in the tracking, billing and administration of these accounts. (This also adds NEMCD<sup>1</sup> for the California Department of Corrections and Rehabilitation accounts.)
- Special Condition 1 – Metering – adds statement providing that metering costs are the responsibility of the Armed Forces customer-generator.
- Special Condition 2 – Billing – adds statement relating to the requirement no compensation is to be given for exported generation.
- Special Condition 5 – Net Surplus Compensation – adds a statement that the Armed Forces are not eligible for net surplus compensation.
- Special Condition 9 – Armed Forces – adds full definition of Armed Forces Customer Generator.

### **B. Modifications to Rule 21, Generating Facility Interconnections**

- Section D.13.e is modified to incorporate the Armed Forces and reflect the special interconnection provisions enacted by SB 83. Section D.13.b is also modified to reference Section D.13.e.

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<sup>1</sup> While not related to this filing, PG&E makes this change for administrative purposes.

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 22, 2015, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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:

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Effective Date**

PG&E requests that this Tier 2 advice filing become effective on November 1, 2015.

**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 lists for R.11-09-011, R.12-11-005 and R.14-07-002. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

\_\_\_\_\_  
/S/

Erik Jacobson  
Director, Regulatory Relations

**Attachments**

cc: Service Lists R.11-09-011, R.12-11-005 and R.14-07-002  
Marc Monbouquette, Energy Division

# 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 E)**

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@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) #: **4716-E**

Tier: **2**

Subject of AL: **Modifications to Schedule NEM and Rule 21 Pursuant to Senate Bill 83 for the United States Armed Forces**

Keywords (choose from CPUC listing): Compliance, Metering, Rules

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

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

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: \_\_\_\_\_

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

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: **November 1, 2015**

No. of tariff sheets: **20**

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 Schedule NEM and Electric Rule 21**

Service affected and changes proposed: **See Attachment 1**

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:

**California Public Utilities Commission**  
**Energy Division**  
**EDTariffUnit**  
**505 Van Ness Ave., 4<sup>th</sup> Flr.**  
**San Francisco, CA 94102**  
**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**  
**Attn: Erik Jacobson**  
**Director, Regulatory Relations**  
**c/o Megan Lawson**  
**77 Beale Street, Mail Code B10C**  
**P.O. Box 770000**  
**San Francisco, CA 94177**  
**E-mail: PGETariffs@pge.com**

**ATTACHMENT 1  
Advice 4716-E**

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
35635-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 1	35273-E
35636-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 4	35275-E
35637-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 6	33902-E*
35638-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 7	33903-E*
35639-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 9	33905-E
35640-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 10	33906-E
35641-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 11	33907-E*
35642-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 12	34802-E
35643-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 18	33914-E*
35644-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 21	35488-E
35645-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 23	35277-E
35646-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 24	



**ATTACHMENT 1  
Advice 4716-E**

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
35647-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 39	34855-E
35648-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 40	35279-E
35649-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 41	35280-E
35650-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 42	35281-E
35651-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 43	34859-E
35652-E	ELECTRIC TABLE OF CONTENTS Sheet 1	35629-E
35653-E	ELECTRIC TABLE OF CONTENTS RATE SCHEDULES Sheet 6	35597-E
35654-E	ELECTRIC TABLE OF CONTENTS RULES Sheet 21	35424-E



**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 1

**APPLICABILITY:** This net energy-metering schedule is applicable to a customer who uses a Renewable Electrical Generation Facility as defined below with a capacity of not more than 1,000 kilowatts that is located on the customer's owned, leased, or rented premises, is interconnected and operates in parallel with PG&E's transmission and distribution systems, including wind energy co-metering customers as defined in California Public Utilities Code Section 2827.8, and is intended primarily to offset part or all of the customer's own electrical requirements (hereinafter "eligible customer-generator" or "customer"). Notwithstanding the definition of "eligible customer-generator" above, eligible customer generator also includes (i) the California Department of Corrections and Rehabilitation (CDCR) pursuant to Special Condition 8 of this tariff and (ii) the United States Armed Forces ("Armed Forces") pursuant to Special Condition 9 of this tariff.

(T)  
 (N)  
 (N)

Subject to the requirements of Special Condition 7, Load Aggregation to determine the customer's own electrical requirements is permitted. Certain incremental billing and metering costs set forth in this schedule that are related to net energy metering are applicable to Electric Service Providers (ESPs) serving eligible customer-generators.

This service is not applicable to a Direct Access (DA) customer where the customer's ESP does not offer a net energy metering tariff. In addition, if the tariffs for the customer's ESP do not permit Load Aggregation, as described in Special Condition 7, this option is not available to the DA customer. In addition, if an eligible customer-generator participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide net energy metering to the customer.

**NEM Cap:** This rate schedule is available on a first-come, first-served basis to customers that provide PG&E with:

- (a) a completed Net Energy Metering Application including all supporting documents and required payments; AND
- (b) a completed signed Net Energy Metering Interconnection Agreement; AND
- (c) evidence of the customer's final inspection clearance from the governmental authority having jurisdiction over the Electrical Generation Facility,

until the earlier of:

- (i) July 1, 2017, or
- (ii) such time as the Total Rated Generating Capacity used by eligible customer-generators and Qualified Customers on Rate Schedules NEM, NEMV and NEMVMASH exceeds the larger of five (5) percent of PG&E's Aggregate Customer Peak Demand or 2409 megawatts of nameplate generating capacity. Customers meeting these conditions are referred to as "NEM Transition Eligible Customers".

Once this cap has been reached, Schedules NEM, NEMV and NEMVMASH will be closed to new customers. The NEM Transition Provisions below will apply here.

**Total Rated Generating Capacity:** The total rated generating capacity of eligible customer-generators will be calculated as the sum of all of the following:

- 1) For each PV generating facility, PG&E will use the California Energy Commission's (CEC) AC rating; or where the CEC AC rating is not available, PG&E will multiply the inverter AC nameplate rating by 0.86.

(Continued)



**ELECTRIC SCHEDULE NEM  
 NET ENERGY METERING SERVICE**

Sheet 4

APPLICABILITY: Schedule NEM applies also to specified net energy metering eligible (NEM-eligible) generators in a generating facility comprised of multiple NEM- and non-NEM-eligible generators, served through the same Point of Common Coupling (PCC), where the NEM-eligible generating capacity is not more than 1 MW, or in the case of the CDCR or Armed Forces, for CDCR and Armed Forces accounts satisfying Special Condition 8 or 9, respectively. Such facilities will be referred to as Multiple Tariff Facilities, and any group of generators within such a facility that is subject to the same tariff provisions for billing and metering purposes will be referred to as a Constituent Generator Group. In order to be eligible for this rate schedule in a Multiple Tariff Facility, the customer-generator must meet all the requirements of Special Condition 4 for the schedule NEM-eligible generator, and must also meet any other applicable tariffs.

(N)  
 (N)

Due to the complexity of Load Aggregation Arrangements and/or Multiple Tariff Facilities NEM generating facilities interconnecting under the provisions of Special Conditions 4 and 7 may require additional review and/or interconnection facilities and other equipment, and may incur interconnection costs, as provided for in electric Rule 21.

CDCR and Armed Forces Eligible Customer Generators as defined in Special Condition 8 and 9, respectively, are subject to Network and/or Distribution upgrade costs in accordance with Rule 21 Section D.13.e.

(N)  
 (N)

A Customer who owns, rents or leases a premises that includes solar and/or wind turbine electrical generating facilities, or a hybrid of both with a capacity of 30kW or less, that were previously approved by PG&E for NEM interconnection prior to the Customer moving in and/or taking electric service with PG&E (Change of party Customer) will take service on this tariff as long as the requirements of this section are met. To be eligible, the Change of party Customer must: 1) ensure that the generating facility is compliant with all applicable safety and performance standards as delineated in PG&E's Electric Rule 21 and other applicable tariffs; 2) understand that PG&E may from time to time release to the California Energy Commission and/or the California Public Utilities Commission, information regarding the Change of party Customer's facility, including Change of party Customer's name and Generating Facility location, capacity and operational characteristics. Any type of Renewable Electrical Generation Facility other than a solar and/or wind turbine electrical generating facilities, or a hybrid of both with a capacity of 30kW or less, may at PG&E's request be required to complete and submit to PG&E a new Interconnection Agreement (79-1137) and/or Affidavit (Appendix C).

Change of party Customers making any modification to previously approved PG&E NEM solar and/or wind turbine electrical generating facilities or other Renewable Electrical Generation Facility are not eligible for this provision and must complete the interconnection process in Special Condition 3 of this tariff.

Change of party Customers also must agree to comply with all rules and requirements of PG&E's Net Energy Metering tariffs.

When the builder/developer of a subdivision sells a new home during the NEM application process, after the builder/developer completes the Net Energy Metering Application and Interconnection Agreement and otherwise meets all of PG&E's requirements for the NEM project, but prior to PG&E providing final written approval for Parallel Operation on Schedule NEM, PG&E may treat the new home owner/Customer as a Change of-party Customer, as defined above.

(Continued)



**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 6

RATES: PG&E rates and rate design, including the rates and rate design reflected in this Tariff, are  
 (Cont'd.) subject to change from time to time. Customers should take this into consideration when making any long term decisions based on rate structures that are currently in place.

SUB- Eligible customer-generators will be placed on the appropriate sub-schedule as described  
 SCHEDULES: below:

1. NEMS – For Small Customer (as defined in Rule 1) customer-generators taking service with solar and/or wind generating facilities of 30 kilowatts or less.
2. NEMEXP – For Small Customer (as defined in Rule 1) customer-generators with (i) solar and/or wind generating facilities of 1,000 kilowatts or less, other than facilities of 30 kilowatts or less, or (ii) any other Renewable Electrical Generation Facility of 1,000 kilowatts or less.
3. NEMEXPM – For all other commercial, industrial customer-generators, and agricultural customers billed monthly under Special Condition 2.
4. NEMMT – For customer-generators taking service as a Multiple Tariff Facility under Special Condition 4 of this tariff.
5. NEMA – For a customer-generator with a Load Aggregation Arrangement pursuant to Special Condition 7 of this tariff.
6. NEMCDCR – For a CDCR customer-generator pursuant to Special Condition 8. (N)
7. NEMUSAF – For an Armed Forces customer-generator pursuant to Special Condition 9. (N)

(Continued)



**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 7

**SPECIAL  
 CONDITIONS:**

1. **METERING:** Multiple Tariff Facilities will be metered under one of the options described in Special Condition 4. All other net energy metering shall be accomplished using a single meter capable of registering the flow of electricity in two directions. If the eligible customer-generator's existing electrical meter is not capable of measuring the flow of electricity in two directions, the eligible customer-generator shall be responsible for all expenses involved in purchasing and installing a meter that is able to measure electricity flow in two directions. An additional meter or meters, installed in a dual meter socket ("dual metering"), to monitor the flow of electricity in each direction may be installed with the consent of the eligible customer-generator, at the expense of PG&E, and the dual metering shall be used only to provide the information necessary to accurately bill or credit the customer according to the utility's OAS or to collect Renewable Electrical Generation Facility electric generating system performance information for research purposes. PG&E shall determine whether dual metering is required under this provision. If dual metering is installed, the net energy metering calculation (see below) shall yield a result identical to that of a single meter capable of measuring the flow of electricity in two directions.

PG&E shall not require dual metering except where necessary for billing accuracy. If none of the normal metering options available at PG&E's disposal which are necessary to render accurate billing are acceptable to the customer-generator, PG&E shall have the right to refuse interconnection.

Customer-generators with Load Aggregation Arrangements will need metering on the Generating Account capable of separately measuring exports in a manner commensurate with the smallest time interval used by PG&E to establish billing determinates for any of the Aggregated Account meters. If a newly installed Renewable Electrical Generation Facility can use the existing metering, the metering charges will be based on applicable meter charges in the Generating Account OAS; if a new meter is requested by the customer for a new service as allowed in Special Condition 3, it must be installed at the customer's expense as a Special Facility using incremental costs, pursuant to Section I, Electric Rule 2.

For each Aggregated Account other than the Generating Account, an appropriate load account meter is required, consistent with the rate schedule for that account, and customer is responsible for all metering charges provided for in each Aggregated Account's OAS.

Armed Forces customer-generators pursuant to Special Condition 9 below shall be required to have metering that is capable of measuring kilowatt-hours imported from PG&E in addition to any other requirements necessary for PG&E to render bills pursuant to the Armed Forces customer-generator's otherwise applicable rate schedule.

(N)  
 I  
 I  
 (N)

(Continued)





**ELECTRIC SCHEDULE NEM  
 NET ENERGY METERING SERVICE**

Sheet 10

SPECIAL  
 CONDITIONS:  
 (Cont'd.)

2. NET ENERGY METERING AND BILLING: (Cont'd.)

g. Relevant Period:

(T)

A Relevant Period consists of any twelve monthly billing cycles commencing on the date PG&E provides the Customer-Generator with PG&E's written approval to begin parallel operation of the generating facility for purposes of participating in NEM, and on every subsequent anniversary thereof. If an eligible customer-generator terminates service, or experiences a change in ESP or CCA prior to the end of any 12 monthly billing cycles the Relevant Period will consist of that period from the anniversary date until the effective date of that termination or ESP or CCA change.

(L)  
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 |  
 (L)

For Load Aggregation, the Generating Account and all Aggregated Accounts will have the same billing cycle and Relevant Period, based on the interconnection date, or Anniversary thereof as described earlier in this paragraph. However, if an Aggregated Account terminates service, or experiences a change in ESP or CCA prior to the end of any 12 monthly billing cycles, its Relevant Period will consist of that period from the anniversary date until the effective date of that termination or ESP or CCA change. If an Aggregated Account is subsequently added, its Relevant Period will consist of that period from its effective date of inclusion in Load.

h. Energy True Up:

(T)

Net energy is defined as measuring the difference between the energy (kWh) supplied by PG&E, ESP or CCA, as applicable, through the electric grid to the eligible customer-generator and energy (kWh) generated by an eligible customer-generator and fed back into the electric grid over a Relevant Period.

For an Aggregated Account, (including a Generating Account) Net Energy is defined as measuring the difference between the energy (kWh) supplied by PG&E, ESP or CCA, as applicable, through the electric grid to the eligible customer-generator and the total energy (kWh) allocated to that Aggregated Account over a Relevant Period.

Armed Forces customer-generators pursuant to Special Condition 9 will not have an energy true-up.

(N)  
 (N)

A true up is performed by PG&E and/or ESP or CCA, as applicable, at the end of each Relevant Period following the date the customer-generator was first eligible for Schedule NEM, or the date of PG&E's written approval to begin parallel operation of the generating facility for purposes of participating in NEM, whichever is later, and at each anniversary date thereafter. The eligible customer-generator shall be billed for energy (kWh) used during that period.

Where the residential minimum bill applies at the true up for a Bundled Service customer, no further amounts will be billed to the customer-generator as a result of the true up. Where the minimum bill applies at the true up for a customer generator that has taken DA, CCA Service or transitional bundled commodity cost service for all or part of the Relevant period, the customer-generator will be billed for all applicable energy-related components, provided no credit will be allowed for negative components unless the rate for such component is also negative.

(Continued)



**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 11

SPECIAL  
 CONDITIONS:  
 (Cont'd.)

2. NET ENERGY METERING AND BILLING: (Cont'd.)

h. Energy True Up: (Cont'd) (T)

If the customer-generator is taking service under DA or CCA Service, separate true-ups will be calculated for the applicable PG&E charges and credits and the ESP or CCA charges and credits. If PG&E is the electric commodity service provider, this condition may be modified where the customer has signed a contract to sell electricity to PG&E. (L)

For a DA or CCA Service customer-generator, Generation Rate Component credits, if any, do not reduce the charges owed to PG&E for energy supplied to the eligible customer-generator.

If any Eligible customer-generator has any credits calculated pursuant to this Section 2 remaining at the end of the Relevant Period, that credit will be set to zero. However, in the event the energy (kWh) generated exceeds the energy (kWh) consumed during the Relevant Period, compensation shall be made for the excess energy (kWh) as described and allowed for in Special Condition 5.

Once the true-up is completed at the end of the Relevant Period, any overpayment for energy (kWh) from the true-up will be credited to future bill charges.

i. Billing Information: (T)

If PG&E supplies the eligible customer-generator with energy (kWh), PG&E shall provide the eligible customer-generator with net energy (kWh) consumption information with each regular bill. That information shall include the current monetary balance owed PG&E for the net energy (kWh) consumed since the last Relevant Period ended.

j. Electric Service Provider (ESP) Charges: (T)

If PG&E provides direct access (DA) metering for the ESP, UDC consolidated billing (that is, PG&E Consolidated Billing as described on PG&E's Rule 22), or ESP dual or consolidated billing support services for DA customer-generators served under PG&E's rates or their ESP's rates, PG&E may recover the incremental costs related to net energy metering from the customer's ESP, as described in Schedule E-ESP – *Services To Electric Service Providers, and Schedule E-EUS – End User Service.*

All accounts in a Load Aggregation Arrangement, including the Generating Account and all of its Aggregated Accounts, will normally all take service either only from PG&E, a single ESP or a single CCA. However, if PG&E is the billing agent, a mixture of electric commodity service providers may be permitted as long as PG&E agrees and recovers the additional incremental costs related to billing this Load Aggregation Arrangement from the customer's ESP and/or CCA based on the applicable rates in Schedules E-ESP and E-CCA.

(Continued)





**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 12

SPECIAL  
 CONDITIONS:  
 (Cont'd.)

3. INTERCONNECTION: Prior to receiving approval for Parallel Operation, the customer-generator must submit a completed PG&E application form and interconnection agreement as follows:

Rate Option	Application	Interconnection Agreement
NEMS	For Solar and/or Wind Electric Generating Facilities of 30 Kilowatts or Less:  <i>Application - Net Energy Metering Interconnection for Solar and/or Wind Electric Generating Facilities of 30 Kilowatts or Less (Form 79-1151B)<sup>3</sup></i>	<i>Agreement and Customer Authorization – Net Energy Metering Interconnection for Solar and/or Wind Electric Generating Facilities of 30 Kilowatts or Less (Form 79-1151A)<sup>4</sup></i>
NEMEXP	For Solar and/or Wind Net Energy Metering Generating Facilities of 1,000 Kilowatts or Less, other than Facilities of 30 Kilowatts or Less:  <i>Generating Facility Interconnection Application, (Form 79-974)</i>  <i>Expanded Net Energy Metering (NEM) Supplemental Application Form (Form 79-998)</i>	<i>Interconnection Agreement for Net Energy Metering of Solar or Wind Electric Generating Facilities of 1,000 Kilowatts or Less, other than Facilities of 30 Kilowatts or Less (Form 79-978)</i>
	For Renewable Electrical Generating Facilities other than Solar and/or Wind Electric Generating Facilities of 1,000 Kilowatts or Less:  <i>(same as for Solar and/or Wind NEMEXP)</i>	<i>Interconnection Agreement for Net Energy Metering For A Renewable Electrical Generation Facility Of 1,000 Kilowatts Or Less (Form 79-1137)</i>
NEMEXPM	For all other commercial, industrial customer-generators, and agricultural customers billed monthly under Special Condition 2 with (i) Solar and/or Wind Generating Facilities of 1,000 Kilowatts or Less, other than Facilities of 30 Kilowatts or Less, (ii) or any other Renewable Electrical Generation Facility of 1,000 Kilowatts or Less:  <i>(same as for NEMEXP)</i>	<i>(same as for NEMEXP)</i>
NEMMT	For customer-generators taking service as a Multiple Tariff Facility under Special Condition 4 of this tariff:  <i>Generating Facility Interconnection Application (Form 79-974)</i>	<i>Generating Facility Interconnection Agreement (Multiple Tariff) (Form 79-1069)</i>
NEM Inspection Report	To accompany a new interconnection agreement, as required under Special Condition 6 of this tariff:	<i>NEM/NEMVMASH Inspection Report – (Form 79-1125)</i>
NEMCDRCR	See Special Condition 8	(N)
NEMUSAF	See Special Condition 9	(N)

<sup>3</sup> Both the Agreement and Customer Authorization (79-1151A) and Application (79-1151B) forms must have been submitted before PG&E will issue the Permission to Operation (PTO) letter. Information in the Application can be submitted by the Company or Customer in an electronic format, subject to approval by PG&E.

(Continued)



**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 18

SPECIAL  
 CONDITIONS:  
 (Cont'd.)

5. Net Surplus Electricity Compensation (NSC):

Pursuant to P.U. Code Sections 2827 (h)(4)(A), this Special Condition was established to provide a NEM customer having **Net Surplus Electricity**, (defined as all electricity generated by an eligible customer measured in kilowatt-hours over a Relevant Period – as defined in Special Condition 2(e) of this tariff – that exceeds the amount of electricity consumed by that eligible customer), with **Net Surplus Electricity Compensation (NSC)** for the Net Surplus Electricity, while leaving other ratepayers unaffected. A NEM customer who has Net Surplus Electricity will be known as a **Net Surplus Generator**. Armed Forces customer-generators pursuant to Special Condition 9 of this tariff are not eligible for net surplus compensation.

(N)  
 I  
 (N)

(a) **NSC Applicability** – All bundled Net Surplus Generators that satisfy the conditions in the Applicability Section of this tariff and take service under this rate schedule are eligible to receive NSC if they have a true-up on, or following, the effective date below. This includes Net Surplus Generators on sub-schedules NEMS, NEMEXP, and NEMEXPM. A NEMMT Net Surplus Generator is also eligible to receive NSC but only for the one or more generators at the same metered account eligible for billing treatment under Special Condition 2 (a through f) of this NEM schedule.

Net Surplus Generators who receive Direct Access (DA) Service from an ESP or who receive Community Choice Aggregation Service from a CCA are not eligible to receive NSC from PG&E but may contact their ESP or CCA Provider to see if they provide NSC.

If an eligible customer-generator elects Load Aggregation as described in Special Condition 7, the Generating Account shall be permanently ineligible to receive net surplus electricity compensation, and PG&E shall retain any kilowatt-hours and zero out any credits remaining on each account in the Load Aggregation Arrangement at the end of the Relevant Period. However, if an Aggregated Account that is not a Generating Account is separated from the Arrangement, and subsequently qualifies for NEM, it is also eligible for NSC.

The effective date for a Net Surplus Generator to begin to receive NSC will be no earlier than the end of their Relevant Period following January 1, 2011 unless (i) the Net Surplus Generator customer was a change-of-party Customer or became a new NEM customer in January 2010 and the meter read date for their twelfth billing month following enrollment in NEM falls in December of 2010; or (ii) a Net Surplus Generator's NEM meter was set to be read in January 2011 but due to PG&E's schedule of meter read dates, the read occurred on December 27, 2010 or later. Customers covered by subsections (i) or (ii) will be eligible to receive NSC for their Relevant Period ending in December 2010.

(Continued)



**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 21

SPECIAL  
 CONDITIONS:  
 (Cont'd.)

6. Re-Inspection

Pursuant to Public Utilities Code Section 2827(c)(2), any customer with an existing electrical generating facility and meter who enters into a new net energy metering contract (for example, Sample Form 79-978, *Interconnection Agreement for Net Energy Metering of Solar and Wind Electric Generating Facilities of 1,000 Kilowatts or Less, other than Facilities of 30 Kilowatts or Less*) shall complete and submit a copy of form 79-1125 – *NEM / NEMV / NEMVMASH Inspection Report* to PG&E, unless the electrical generating facility and meter have been installed or inspected within the previous three years. The *NEM Inspection Report* shall be prepared by a California licensed contractor who is not the owner or operator of the facility and meter. A California licensed electrician shall perform the inspection of the electrical portion of the facility and meter and sign the *NEM / NEMV / NEMVMASH Inspection Report*. If an inspection is required, the customer shall submit the fully completed *NEM / NEMV / NEMVMASH Inspection Report* to PG&E within 90 days of the customer becoming the customer of record at this account, or else the customer agrees to disconnect their Generating Facility and inform PG&E it no longer will take service on schedule NEM, NEMV or NEMVMASH. By signing the interconnection agreement, the *NEM / NEMV / NEMVMASH Inspection Report* shall be incorporated into it.

7. Load Aggregation

Load Aggregation is available to an eligible customer-generator, except for an Armed Service customer-generator pursuant to Special Condition 9, that has load served by multiple meters ("**Aggregated Accounts**") located on the property where the Renewable Electrical Generation Facility ("**Generating Account**") is located and on property adjacent or contiguous to the property on which the Renewable Electrical Generation Facility is located, only if those properties are solely owned, leased, or rented by the eligible customer-generator, subject to the terms of this Special Condition and elsewhere in this tariff. All of the Aggregated Accounts, including a single Generating Account, that are billed together under this Special Condition are referred to as an **Arrangement**. Customer-generators are eligible to participate in Load Aggregation provided that all meters in a Load Aggregation Arrangement are located (i) on the property where the renewable electrical generation facility is located, or (ii) are located within an unbroken chain of contiguous parcels that are all solely owned, leased or rented by the customer-generator. For purposes of Load Aggregation, parcels that are divided by a street, highway, or public thoroughfare are considered contiguous, provided they are within an unbroken chain of otherwise contiguous parcels that are all solely owned leased or rented by the customer-generator, as verified in Form 79-1153. For purposes of determining parcel contiguity under this provision, "public thoroughfare" will include a canal, railroad track or transmission right-of-way, when these features are isolated on third party owned property. When a third party owned easement is located on a NEMA customer-generator's property, there is no impairment to parcel contiguity. In addition, an irrevocable easement granting sole use and control to the NEM customer-generator for an entire parcel can be used to establish contiguity. Otherwise, a customer-generator's easement on a third party owned parcel will not be sufficient to establish parcel contiguity for NEMA.

(N)  
 (N)

(Continued)





**ELECTRIC SCHEDULE NEM**  
**NET ENERGY METERING SERVICE**

Sheet 24

SPECIAL  
 CONDITIONS:  
 (Cont'd.)

9. Armed Forces (Cont'd.) (N)
- (e) Unless prohibited by federal law, a renewable electrical generation facility shall not be eligible for net energy metering for privatized military housing pursuant to this subparagraph if the renewable electrical generation facility was procured using a sole source process. A renewable electrical generation facility procured using best value criteria, if otherwise eligible, may be used for net energy metering for privatized military housing pursuant to this subparagraph. For these purposes, "best value criteria" means a value determined by objective criteria and may include, but is not limited to, price, features, functions, and life-cycle costs. Armed Forces applicant will need to attest to this using Form 79-978A. |
- Customer-generators meeting all of the above condition will be referred to as Armed Forces customer generators. |
- Armed Forces customer generators shall use the Application and Interconnection Form 79-974 to apply under this Special Condition. In addition to submitting the application form, Armed Forces will notify PG&E at [rule21gen@pge.com](mailto:rule21gen@pge.com) of the Generating Facility's size, and if applicable, any allocation between NEM and non-NEM generation. (N)



**ELECTRIC RULE NO. 21**  
**GENERATING FACILITY INTERCONNECTIONS**

Sheet 39

**D. GENERAL, RULES, RIGHTS AND OBLIGATIONS (Cont'd.)**

**13. SPECIAL PROVISIONS APPLICABLE TO NET ENERGY METERED APPLICANTS (Cont'd.)**

- b. Except as provided in Section D.13.e, for Generating Facilities qualifying for service under PUC Sections 2827 and 2827.8 Distribution Provider approval for Interconnection shall normally be processed not later than thirty (30) Business Days following Distribution Provider's receipt of 1) a completed Net Energy Metering Interconnection Request including all supporting documents and required payments; 2) a completed signed Net Energy Metering Generator Interconnection Agreement; and 3) evidence of Applicant's final electric inspection clearance from the Governmental Authority having jurisdiction over the Generating Facility. If the 30-day period cannot be met, Distribution Provider shall notify Applicant and the Commission of the reason for the inability to process the Interconnection Request and the expected completion date. However, Applicants with PUC Section 2827 Generating Facilities that include non-inverter based Generators and/or Generators with non-Certified Equipment should plan to submit a completed Net Energy Metering Interconnection Request including all supporting documents sufficient for Distribution Provider to start the review process in Section F.2.a without waiting for the final inspection clearance. Applicants with such Generating Facilities are advised to submit their Interconnection Request at least six (6) months in advance of their planned Commercial Operation Date. Depending on the size and location of these Generating Facilities, additional time for review may be required and could include Supplemental Review an Interconnection System Impact Study, and an Interconnection Facilities Study as set out in Section F. The advance submission of the Interconnection Request will better accommodate Distribution Provider's review and studies in a manner consistent with the timelines established in this Rule that may be required to complete the processing for interconnection of non-inverter based Generators and/or Generators with non-Certified Equipment. (T)

(Continued)



**ELECTRIC RULE NO. 21**  
**GENERATING FACILITY INTERCONNECTIONS**

Sheet 40

**D. GENERAL, RULES, RIGHTS AND OBLIGATIONS (Cont'd.)**

**13. SPECIAL PROVISIONS APPLICABLE TO NET ENERGY METERED APPLICANTS (Cont'd.)**

- c. Unless Net Generator Output Metering is required, Metering Equipment necessary to obtain service under PUC Sections 2827 and 2827.8 shall be installed and operational within the timeframe required to complete Interconnection.
- d. An Applicant with a Fast Track Interconnection Request for a Net Energy Metering or Non-Export Generating Facility that 1) goes for more than one year from the date of Distribution Provider's written notification that the Interconnection Request is valid without a signed Generator Interconnection Agreement, or 2) has a Generating Facility that has not been approved for Parallel Operation within one year of completion of all applicable review and/or studies, is subject to withdrawal by Distribution Provider; however, Distribution Provider may not deem the Interconnection Request to be withdrawn if i) Applicant provides reasonable evidence that the Interconnection Request is still active or ii) the delay is at no fault of Applicant.
- e. For the purposes of establishing the interconnection requirements for Net Energy Metering Generating Facilities with a capacity greater than one megawatt (1MW) qualifying for service under PUC Section 2827(b)(4)(B) (i.e., the California Department of Corrections and Rehabilitation) or under PUC Section 2827(b)(4)(C) (i.e., the United States Armed Forces), Distribution Provider shall be afforded a prudent but necessary time, as determined by the executive director of the Commission, to study the impacts of the Interconnection Request. If the study reveals the need for upgrades to the Transmission and/or Distribution System arising solely from the Interconnection Request, Distribution Provider shall be afforded the time necessary to complete those upgrades before the Generating Facility is interconnected. The costs of the Network and/or Distribution Upgrades shall be borne by the Applicant, but the exemption from application fees and study costs applicable to Generating Facilities eligible for Net Energy Metering under PUC Section 2827 shall apply. Distribution Provider shall consider the receipt date of the completed Interconnection Request when completing the study allowed for herein and for purposes of determining the appropriate cost responsibility for the necessary Network and/or Distribution Upgrades triggered solely by the Interconnection Request. All Generating Facilities interconnected pursuant to this section shall comply with applicable state and federal requirements, including requirements of the FERC.

(N)  
 (N)

(Continued)



**ELECTRIC RULE NO. 21**  
**GENERATING FACILITY INTERCONNECTIONS**

Sheet 41

**D. GENERAL, RULES, RIGHTS AND OBLIGATIONS (CONT'D.)**

**13. SPECIAL PROVISIONS APPLICABLE TO NET ENERGY METERED APPLICANTS (Cont'd.)**

For Rate Schedule NEM interconnections, the United States Armed Forces shall comply with all FERC interconnection procedures and requirements for any Generating Facility that interconnects directly to the Transmission System or that requires upgrades to the Transmission System.

(N)  
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 (N)

**14. COMPLIANCE WITH ESTABLISHED TIMELINES**

Distribution Provider shall use Reasonable Efforts in meeting all the timelines provided for under this Rule. In the event Distribution Provider is not able to meet a particular timeline set forth in this Rule, Distribution Provider shall notify Applicant as soon as practicable and provide an estimated completion date with an explanation of the reasons why additional time is needed. Any Applicant dissatisfied with the Reasonable Efforts of Distribution Provider may use the informal procedures set out in Section F.1.d and/or the Dispute Resolution process in Section K.

**15. MODIFICATION OF TIMELINES**

Distribution Provider and Applicant, for good cause, may agree to modify any of the timelines in this Rule. The modified timeline shall be mutually agreed upon, in writing, between Distribution Provider and Applicant.

**E. INTERCONNECTION REQUEST SUBMISSION PROCESS**

**1. OPTIONAL PRE-APPLICATION REPORT**

Upon receipt of a completed Pre-Application Report Request and a non-refundable processing fee of \$300, Distribution Provider shall provide pre-application data described in this section within ten (10) Business Days of receipt. The Pre-Application Report Request shall include a proposed Point of Interconnection, generation technology and fuel source. The proposed Point of Interconnection shall be defined by latitude and longitude, site map, street address, utility equipment number (e.g. pole number), meter number, account number or some combination of the above sufficient to clearly identify the location of the point of interconnection.

(L)

(Continued)





**ELECTRIC RULE NO. 21**  
**GENERATING FACILITY INTERCONNECTIONS**

Sheet 42

**E. INTERCONNECTION REQUEST SUBMISSION PROCESS (Cont'd.)**

**1. OPTIONAL PRE-APPLICATION REPORT (Cont'd.)**

The Pre-Application Report will include the following information if available: (L)

- a. Total Capacity (MW) of substation/area bus or bank and circuit likely to serve proposed site. |
- b. Allocated Capacity (MW) of substation/area bus or bank and circuit likely to serve proposed site. |
- c. Queued Capacity (MW) of substation/area bus or bank and circuit likely to serve proposed site. |
- d. Available Capacity (MW) of substation/area bus or bank and circuit most likely to serve proposed site. |
- e. Substation nominal distribution voltage or transmission nominal voltage if applicable. |
- f. Nominal distribution circuit voltage at the proposed site. |
- g. Approximate circuit distance between the proposed site and the substation. |
- h. Relevant Line Section(s) peak load estimate, and minimum load data, when available. |
- i. Number of protective devices and number of voltage regulating devices between the proposed site and the substation/area. |
- j. Whether or not three-phase power is available at the site. |
- k. Limiting conductor rating from proposed Point of Interconnection to distribution substation. |
- l. Based on proposed Point of Interconnection, existing or known constraints such as, but not limited to, electrical dependencies at that location, short circuit interrupting capacity issues, power quality or stability issues on the circuit, capacity constraints, or secondary networks. |

(L)

(Continued)



**ELECTRIC RULE NO. 21**  
**GENERATING FACILITY INTERCONNECTIONS**

Sheet 43

**E. INTERCONNECTION REQUEST SUBMISSION PROCESS (Cont'd.)**

**1. OPTIONAL PRE-APPLICATION REPORT (Cont'd.)**

The Pre-Application Report need only include pre-existing data. A Pre-Application Report request does not obligate Distribution Provider to conduct a study or other analysis of the proposed project in the event that data is not available. If Distribution Provider cannot complete all or some of a Pre-Application Report due to lack of available data, Distribution Provider will provide Applicant with a Pre-Application Report that includes the information that is available. (L)

In requesting a Pre-Application Report, Applicant understands that 1) the existence of "Available Capacity" in no way implies that an interconnection up to this level may be completed without impacts since there are many variables studied as part of the interconnection review process, 2) the distribution system is dynamic and subject to change and 3) data provided in the Pre-Application Report may become outdated and not useful at the time of submission of the complete Interconnection Request. Notwithstanding any of the provisions of this Section, Distribution Provider shall, in good faith, provide Pre- Application Report data that represents the best available information at the time of reporting.

**2. INTERCONNECTION REQUEST PROCESS**

**a. Applicant Initiates Contact with Distribution Provider**

Upon request, Distribution Provider will provide information and documents (such as sample agreements, Interconnection Request, technical information, listing of Certified Equipment, Initial and Supplemental Review fee information, applicable tariff schedules and Metering requirements) to a potential Applicant. Unless otherwise agreed upon, all such information shall normally be sent to an Applicant within three (3) Business Days following the initial request from Applicant. Distribution Provider will establish an individual representative as the single point of contact for Applicant, but may allocate responsibilities among its staff to best coordinate the Interconnection of an Applicant's Generating Facility.

**b. Applicant Selects a Study Process**

An Applicant may select one of two interconnection evaluation processes in accordance with the following eligibility requirements:

(Continued)



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Advice Letter No: 4716-E  
 Decision No.

Issued by  
**Steven Malnight**  
 Senior Vice President  
 Regulatory Affairs

Date Filed October 2, 2015  
 Effective \_\_\_\_\_  
 Resolution No. \_\_\_\_\_



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