



# Limited Generation Profile

Pursuant to CPUC Decision 20-09-035

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## Processes for Limited Generation Profile (LGP) Projects

**A Guide for Interconnection  
Customers Submitting  
Interconnection Applications for  
Generating Facilities Using Limited  
Generation Profiles**

**Effective July 9, 2025**

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# Limited Generation Profile

## Pursuant to CPUC Decision 20-09-035

### Background

- The California Public Utilities Commission (Commission or CPUC) directed Pacific Gas & Electric Company (PG&E) in Decision 20-09-035<sup>1</sup> to allow distributed energy resources (DER) customers to include a Limited Generation Profile (LGP) with their applications. The LGP option allows DERs to perform within existing Integration Capacity Analysis (ICA) hosting capacity to avoid some distribution grid upgrades.
- The LGP option allows the generator to use Interconnection Capacity Analysis-Static Grid (ICA-SG) values to maximize their generation using a time-varying export profile.
- PG&E customers may select the LGP option as part of their interconnection applications starting July 9, 2025.
- PG&E publishes this Interconnection Process Guide for LGP in compliance with Ordering Paragraph 4 of Commission Resolution E-5296.<sup>2</sup>

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<sup>1</sup> CPUC Decision 20-09-035:  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M347/K953/347953769.PDF>

<sup>2</sup> If any definition or term in this guide conflicts with or is inconsistent with definitions and terms set forth in PG&E's Electric Rule 21 ([https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC\\_RULES\\_21.pdf](https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_21.pdf)), the definitions and terms in PG&E's Electric Rule 21 controls.



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### Limited Generation Profile (LGP) Option Process

#### 1. Customer Preparation Phase

- a. In this phase, a Customer who intends to use this operational method must retrieve the Integration Capacity Analysis (ICA) profiles from PG&E's Grid Resource Integration Portal<sup>3</sup> (when ICA values are available) for the three-phase electrical node that will be used for the interconnection request. If the interconnection request is for a single-phase electrical connection, the Customer should use the electrically-closest three-phase electrical node.

On PG&E's Grid Resource Integration Portal, there are multiple ways to get the ICA profiles necessary to define the Limited Generation Profile. In each of these processes, 576 ICA-SG values are consolidated to 288 ICA SG values. 90% of the 288 ICA-SG values (calculated as the minimum of each hour from the 576 ICA SG) defines the highest allowed value for the project's Limited Generation Profile.

- Method 1: Export data from Chart with Hourly ICA-SG Results.
- Method 2: Export data from Table with Hourly ICA-SG Results.
- Method 3: Download zipped csv files, open the appropriate circuit file, then find or filter the data to the appropriate line section. In this method, the Customer must calculate the 288 ICA-SG values and the 90% LGP maximum themselves.

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<sup>3</sup> PG&E Grid Resource Integration Portal: <https://www.pge.com/en/about/doing-business-with-pge/interconnections/distributed-resource-planning-data-and-maps.html>



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### 1. Customer Preparation Phase (continued)

- b. The Customer should examine the downloaded ICA-SG profile to identify the minimum ICA-SG values from the ICA-SG profile that corresponds with each of the specific time periods associated with the Limited Generation Profile configuration the Customer seeks to utilize.
- c. The Customer shall determine the Limited Generation Profile values to not exceed 90% of the minimum ICA-SG values as determined in (b). The format for submitting the Limited Generation Profile values requires populating a profile that contains 24 values per month for each of the 12 months, totaling 288 data points. During operation of the Customer's generator, the Limited Generation Profile value for each hour will depend on the Limited Generation Profile configuration selected by the Customer.
- d. The Customer shall select a power control system certified to UL3141 standard from an IOU-provided list of certified Power Control Systems (PCS) that can control the exports at the PCC to not exceed the values determined in (c).



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### 1. Customer Preparation Phase (continued)

- e. The Customer shall capture the name or ID of the Distribution Feeder (circuit), the three-phase electrical node identifier (for PG&E, specify the “Global ID”), and the date when the data extraction took place. [See footnote for resources<sup>4</sup>] The Customer will submit information consistent with the format below as part of the Interconnection Request.

#### Sample LGP .csv File

MT_FILE_INFO_TYPE	SCH-PS							
MT_SCHEDULE_FORMAT_VERSION		1						
MT_UTILITY_NAME	SCE							
MT_ASSOCIATED_FEEDER	Weeks							
MT_ASSOCIATED_NODE		64325901						
COMMENT	LAST_ICA_REFRESH_DATE:March 10	2023						
COMMENT								
						MAXIMU M_24- HOURLY_ LGP_VAL	MAXIMU M_BLOCK _LGP_VAL	MAXIMU M_18_23_ FIXED_LG
			EFFECTIV E_DAY_TY PE	START_TI ME	EXPORT_LIMIT_ WATTS	UE_WATT S	UE_WATT S	P_VALUE_ WATTS
SCHEDULE_ENTRY	START_DATE							
SCHEDULE_ENTRY		1-Jan	ALL	0:00	[INSERT VALUE]	9119223	9171882	9138951
SCHEDULE_ENTRY		1-Jan	ALL	1:00	[INSERT VALUE]	9033714	9155286	9138951
SCHEDULE_ENTRY		1-Jan	ALL	2:00	[INSERT VALUE]	9106884	9155286	9138951
SCHEDULE_ENTRY		1-Jan	ALL	3:00	[INSERT VALUE]	8941815	9155286	9138951
SCHEDULE_ENTRY		1-Jan	ALL	4:00	[INSERT VALUE]	8553123	9155286	9138951
SCHEDULE_ENTRY		1-Jan	ALL	5:00	[INSERT VALUE]	8838270	9138951	9138951
SCHEDULE_ENTRY		1-Jan	ALL	6:00	[INSERT VALUE]	8990694	9138951	9138951
SCHEDULE_ENTRY		1-Jan	ALL	7:00	[INSERT VALUE]	8623782	9138951	9138951

<sup>4</sup> See the GRIP map & user guides to understand the Global IDs.

#### User Guide:

- Quick start guide: [pge.com/assets/pge/docs/about/doing-business-with-pge/pge-grip-quick-start-guide.pdf](https://www.pge.com/assets/pge/docs/about/doing-business-with-pge/pge-grip-quick-start-guide.pdf)
- User guide: <https://www.pge.com/assets/pge/docs/about/doing-business-with-pge/pge-grip-user-guide.pdf>



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### 2. Interconnection Request Phase

- a. The Customer is to provide the information that is typical and general to all interconnection requests.<sup>5</sup>
- b. The Customer is to provide the Limited Generation Profile Values as determined in 1(c) and the information for 1(e) within PG&E's interconnection application portal, Your Projects.<sup>6</sup>
  - i. In the event PG&E's Interconnection Portal is unable to accept the upload of a CSV file, PG&E will accept e-mailed CSV files as an alternative method to provide the Customer's proposed Limited Generation Profile values. Customers can send to [Rule21Gen@pge.com](mailto:Rule21Gen@pge.com). Please include the project's Notification Number in the email.
- c. The Customer is to provide information on their certified Power Control System within the PG&E's Your Projects interconnection application portal.
- d. If the Customer does not resolve deficiencies to the Interconnection Request within the time frames consistent with the Tariff, Distribution Provider will deem the Interconnection Request withdrawn per PG&E's Electric Rule 21 Section F.6. The Customer may submit a new Interconnection Request.

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<sup>5</sup> Please see  
PG&E's Electric Grid Interconnection site  
<https://www.pge.com/en/about/doing-business-with-pge/interconnections/electric-generation-interconnection.html#accordion-1ed8fee76d-item-4639538a94>  
PG&E's Your Projects Applications User Guide  
<https://pge-prod-icportal-s3-1nc9x0sgwsxf-bucketwebassets-1n84r8wvlz415.s3.us-east-1.amazonaws.com/s3-static/webassets/Applications%20User%20Guide%202025-01-13.pdf>

<sup>6</sup> PG&E Your Projects, <https://www.yourprojects-pge.com/login>



# Limited Generation Profile

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### 3. Technical Evaluation Phase

- a. PG&E, consistent with applicable existing Rule 21 timelines, will analyze all the applicable Initial Review Screens (A-L) based on the Nameplate capacity where applicable. Screen D, J, and K will use the maximum LGP value. Screen M will use the individual LGP values. During Supplemental Review, if the project failed Initial Review due to exceeding 90% ICA-SG values, the study will use the generator Gross Nameplate Rating, otherwise, the Screens N, O, and P will use the maximum LGP value except for those aspects involving fault current calculation to ensure safety and reliability
- b. The published interconnection queue will reflect the nameplate capacity for all projects, including LGP projects.
- c. PG&E will verify that it has the most updated ICA-SG profile corresponding to the Customer-provided three phase electrical node (Node ID/Line Section ID) from 1(e).
- d. PG&E will evaluate the proposed LGP against the most updated ICA-SG profile and determine if the requested export values are at or below 90% of the minimum ICA- SG value for each specific time period within the selected LGP configuration.
  - i. If the export request for each specific time period is at or below 90% of the time period's minimum ICA-SG value, then the project can continue with its evaluation.
  - ii. If all Initial Review screens (A-L) pass and (all requested values are below 90% of each specific time period's ICA SG values), then the project would pass Fast Track.





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### 3. Technical Evaluation Phase (continued)

- iii. If the export request for one or more of the specific time periods is not at or below 90% of the specific time period's minimum ICA-SG value, the project will fail Initial Review. PG&E will inform the Customer via e-mail to the customer and offer an optional review results meeting. Customer will have 5 Business Days (BD) after the notification, or after the optional result reviews meeting to update their proposed limited generation profile such that all values for all specific time periods are at or below 90% of the ICA-SG values.
- iv. If the Customer responds with a conforming export request, the Customer's queue position will not change. The update to the LGP values should abide by the existing material modification criteria in section F.2.b of Rule 21, with the exception that when the project fails Screen M due to PG&E finding the ICA values are outdated then the LGP project is exempted from the 20% reduction limit.
- v. Customers have 10 Business Days from the Optional Initial Review Results Meeting to pay the Supplemental Review fee to proceed to Supplemental Review.



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### **3. Technical Evaluation Phase (continued)**

- vi. If the Customer does not update their proposed limited generation profile per 3.d.iii above within 5 business days of the notification or the Optional Initial Review Results Meeting, PG&E will proceed to evaluate the project using full nameplate during supplemental review, and the Customer will be responsible for the costs of any distribution upgrades necessary to allow interconnection at the generator's full nameplate value. The Customer's queue position will not change.



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#### 4. Interconnection Agreement/PTO Phase

- a. Provisions of the Interconnection Agreements. The interconnection agreements will contain the operational requirements of the Limited Generation Profile including:
  - i. Provisions in the Interconnection Agreements to ensure that the Generating Facility control systems meet the approved operating specification.
  - ii. Provisions in the Interconnection Agreement to (i) require prompt remedial action by the Customer if the Limited Generation Profile attached to the Customer's interconnection agreement is not followed, and (ii) clarify that if prompt remedial action is not taken or if multiple instances of not operating according to the Limited Generation Profile values occurs, PG&E may terminate the interconnection agreement.
    - For exports at the PCC which exceed the Limited Generation Profile values, but which do not immediately cause a safety and/or reliability concern, PG&E reserves the right to notify the Customer. Customer will then be required to take remedial action within 15 business days of notification to conform to the Limited Generation Profile values. If remedial action is not taken within 15 business days from being notified, the Permission To Operate (PTO) will be revoked in accordance with the Customer's interconnection agreement and the generator must disconnect from the grid. PG&E reserves the right to confirm that the generator has not reconnected.



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#### 4. Interconnection Agreement/PTO Phase (continued)

- For exports at the PCC which exceed the Limited Generation Profile values, and which impose an immediate safety and reliability concern, PG&E will take immediate action to disconnect the generator from the grid until remedial action is taken. If remedial actions are not taken within 15 business days from being notified (or being disconnected), the PTO will be revoked in accordance with the Customer's interconnection agreement. PG&E reserves the right to confirm the generator has not reconnected.
  - PG&E will not impose additional requirements on a Customer whose PTO is revoked as a result of failure to take remedial action. As such, the Customer can request interconnection of generation under any CPUC approved procedure.
- iii. Provisions in the Interconnection Agreement to require that a Customer without Automated Metering Infrastructure must provide telemetry to the distribution operations control center designated by PG&E, where the telemetry monitors power flows at the Customer's PCC.
- b. Conduct field performance verification
- i. Prior to issuing a PTO, PG&E may, at its sole discretion, conduct or witness field performance verification to ensure that equipment installed by the Customer is configured and operating consistent with (i) the Limited Generation Profile values attached to the Customer's interconnection agreement, and (ii) the requirements of Rule 21. Where feasible, PG&E may choose to conduct or witness field performance verification remotely.



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#### **4. Interconnection Agreement/PTO Phase (continued)**

- ii. At the request of PG&E, Customer shall provide PG&E with a written field performance verification procedure per Rule 21, Section L.5.a, 10 Business Days prior to the date of the field performance verification. PG&E will coordinate the field performance verification procedure with the Customer.
- c. PTO will be issued by PG&E if (i) the field performance verification demonstrates compliance with the Limited Generation Profile values attached to the Customer's interconnection agreement, and (ii) all applicable agreements and documentation (such as a release from the Authority Having Jurisdiction (AHJ)) have been completed and copies provided to PG&E.



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### 5. Operation Performance Phase:

- a. PG&E will monitor compliance with the Limited Generation Profile attached to the Customer's interconnection agreement as follows:
  - i. For a Limited Generation Profile project with generator nameplate under 1 MW, Automated Metering Infrastructure (AMI) data will be used to monitor export at the PCC, if AMI is available. If AMI is not available, telemetry monitoring export at the PCC will be required. The interconnection agreements should be updated to include the requirement that telemetry at the PCC will be required, at Customer's expense, if AMI is not available.
  - ii. For a Limited Generation Profile project with generator nameplate greater than or equal to 1 MW, telemetry is required. If telemetry is monitoring only the generator output, PG&E has the ability to use AMI data, if available, to monitor export at the PCC. If AMI is not available, or Customer opts out, telemetry at the point of common coupling will be required at the Customer's expense.



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### Procedure and Steps for Limited Generation Profile Curtailment

There may be situations in which an LGP customer's export power level may need to be reduced on their normal distribution and/or transmission feed. In such an event:

#### **Step 1.**

For conditions that warrant urgent action, PG&E will take initial actions in accordance with good utility practice.

#### **Step 2.**

Following Step 1, PG&E will assess whether low-cost mitigation measures can be implemented to restore some or all of the LGP exports and output of non-LGP generating facilities

#### **Step 3.**

If there is a continuing need to reduce an LGP customer's exports after considering any identified low-cost mitigation measures, PG&E will undertake a study to establish the updated LGP. The study will incorporate the system conditions to determine current hosting capacity in order to determine the export levels at which safety and reliability concerns are addressed. PG&E will identify upgrades to restore LGP values to those in the facility's interconnection agreement and also upgrades to restore LGP values to at least the lowest ICA-SG level as set forth in the LGP customer's generator interconnection agreement.

Upgrades shall be performed to restore LGP values to those in the facility's interconnection agreement, at ratepayer expense. The upgrades will be conducted in accordance with the Large IOUs' standard practices and timelines for design, permitting, and construction and recover the costs of these upgrades from ratepayers--the utilities do not believe any further commission action is required for the utilities to pursue such upgrades or recover the costs from these upgrades from ratepayers. Once the upgrades are operational, the Utility will provide the LGP customer with the original LGP in the interconnection agreement reflecting the hosting capacity made available by the upgrades.