



Virtual Dual Tariff (VDT)

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Introduction to the Virtual Dual Tariff (VDT) Option

PG&E's **Virtual Dual Tariff** option¹ allows a benefiting account in a virtual tariff arrangement to interconnect a Renewable Electrical Generation Facility (REGF) with or without paired storage under the Net Billing Tariff (NBT)² or as a Rule 21-compliant non-export facility. If the REGF is interconnected under NBT, the benefiting account will receive the dual benefit of credits from both the NBT and the applicable virtual tariff (e.g., NEMV, NEM2V, NBTV or any other eligible tariff) subject to certain conditions summarized below. PG&E's website, [interconnection forms](#),³ online interconnection application portal [YourProjects](#),⁴ and associated webpages offer additional guidance. The six applicable virtual tariffs and the NBT are available at www.pge.com/tariffs under "Electric Rate Schedules."

¹ Pursuant to California Public Utilities Commission (CPUC) [Resolution E-5374](#) Ordering Paragraph 2
² Please note this option is anticipated to be available in September 2026
³ <https://www.pge.com/tariffs/en.html#ELECTRIC%20FORMS>
⁴ <https://yourprojects-pge.com/login>



Virtual Dual Tariff (VDT)

VDT Table of Options for Benefiting Accounts

The Virtual Dual Tariff (VDT) option allows for the interconnection of certain types of Renewable Electrical Generation Facilities on Benefiting Accounts as summarized in the table below.

Note, an “NBT System” is defined as the NBT Generating Facility and, if applicable, Paired Storage.

Allowed Virtual Dual Tariff (VDT) Benefiting Account Generating Facility Additions by Virtual Tariff				
<u>Virtual Tariff</u>	<u>NEM systems</u>	<u>NEM2 systems</u>	<u>NBT Systems</u>	<u>Rule 21 Non-export Generating Facilities</u> ⁵
NEMV	n/a	n/a	VDT allows ⁶	VDT allows
NEM2V	n/a	n/a	VDT allows ⁶	VDT allows
NBTV	n/a	n/a	VDT allows ⁶	VDT allows
NEMVMASH	n/a	n/a	n/a	VDT allows
NEM2VMSH	n/a	n/a	n/a	VDT allows
NEM2VSOM	n/a	n/a	n/a	VDT allows

⁵ Behind the meter (BTM) Rule 21 compliant, non-export Generating Facility. If this application is for BTM Rule 21 non-export storage, the storage size should not be factored to the annual load limit under the virtual tariff.

⁶ Pursuant to Resolution E-5374, this option will become effective September 30, 2026.



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Virtual Tariff Benefiting Account Back-Up or Isolated Generating Facility Operation

If Generating Facilities in a VDT are to be operated in grid-isolated mode, ***the use of the on-site energy shall not cause the generating account or benefiting account meters to run during isolated operations.*** Furthermore, such installations must meet PG&E's safety or engineering requirements for non-grid "islanding" or "isolated operation." (PG&E will update Rule 21⁷ to incorporate a new Section Hh(1)(h) for microgrid interconnection requirements.⁸) PG&E's Greenbook manuals,⁹ PG&E's back-up power safety guidelines,¹⁰ and PG&E's interconnection guidelines on our application portal, depending on the nature of the operation.¹¹

⁷ [Current 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)

⁸ See Rule 21, **Section Hh (1)(h)** on operating as a microgrid (new addition that is current pending update)

⁹ [PG&E Greenbook - https://www.pge.com/greenbook](https://www.pge.com/greenbook)

¹⁰ [Backup Power Safety | PG&E https://www.pge.com/en/outages-and-safety/safety/electric-safety/backup-power-safety.html](https://www.pge.com/en/outages-and-safety/safety/electric-safety/backup-power-safety.html)

[Backup Power and Safety FAQ https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/cwsp-backup-power-and-safety-fact-sheet.pdf](https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/cwsp-backup-power-and-safety-fact-sheet.pdf)

[Backup-Power-Installation-Guide https://www.pge.com/content/dam/pge/docs/clean-energy/battery-storage/Backup-Power-Installation-Guide.pdf](https://www.pge.com/content/dam/pge/docs/clean-energy/battery-storage/Backup-Power-Installation-Guide.pdf)

¹¹ Also see **Backup operation** in the associated virtual tariff (*i.e.*, NEMV, NEM2V, NBTV, NEMVMASH, NEM2VMSH, and NEM2VSOM)



Virtual Dual Tariff (VDT)

Virtual Dual Tariff applicability and requirements

- **Virtual Dual Tariff (VDT) Special Condition** - a Special Condition was added to each of the 6 virtual tariffs noted above. Under this new Special Condition, Benefiting Accounts are allowed to interconnect an NBT and/or Rule 21 compliant non-export Generating Facility under one of the six virtual tariff arrangements noted above. (This option is not available for aggregated arrangements.)
- **Applicability:** A Benefiting Account customer can now interconnect a Rule 21 non-export Generating Facility under VDT. The NBT interconnection option on a benefiting account will become available September 30, 2026, once billing has been implemented. There is no limit on the number of such VDT customers per virtual tariff arrangement or network. VDT is not offered for the generating account of the virtual arrangement.
 - VDT customers are not allowed to install a Net Energy Metering (NEM/NEM2) eligible generator behind the customer's PG&E meter, nor is the VDT customer eligible to participate in existing Schedule(s) NEM or NEM2.
- **Safety Requirements:** The eligible VDT customer Rule 21 non-export Generating Facility or NBT System must meet all applicable safety and performance standards established by the National Electrical Code, the Institute of Electrical and Electronics Engineers, and accredited testing laboratories such as Underwriters Laboratories and, where applicable, rules of the California Public Utilities Commission regarding safety and reliability.



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Rule 21 non-export Generating Facility (VDT-NE):

- A customer taking service under this Special Condition is a Virtual Dual Tariff Non-Export (VDT-NE) customer.
- A VDT-NE customer must install at their cost, or the property owner's cost, any necessary equipment to prevent the Rule 21 non-export Generating Facility from exporting to the grid. A PG&E approved physical non-export relay or a functionally equivalent non-export configuration that meets the requirements of Rule 21 to prevent the system from exporting to the grid is permitted.

a. NBT Systems (VNBT/VNEM-NBT)¹²

- A customer taking service under this Special Condition is a Virtual Dual Tariff Net Billing Tariff (VDT-NBT) customer.
- **System Sizing:** The eligible VDT-NBT customer with an NBT System may not have the capacity of their combined facilities' (installed and allocated capacity) together generate more than their individual prior annual usage (kWh).
 - **Annual usage (kWh)** will be determined based on that individual customer's past annual usage as the NBT renewable generation facility is for individual, behind-the-meter use.
- **Metering:** VDT-NBT customer is responsible for the cost of any metering or equipment that allows PG&E to bill the customer on NBT and the applicable virtual NEM/NBT tariff.

¹²

Please note this option is anticipated to be available in September 2026