



Wholesale Generation Interconnection Services

Frequently Asked Questions

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- [Right of Way for Third Party Lines](#)

Pre-Application Process

How much will interconnection cost?

The interconnection cost to PG&E's electric system is site specific. PG&E's electric system is designed and built to serve PG&E's retail and wholesale customers. The electric system that is nearest to your site may or may not have the capacity to receive the amount of generation proposed. As a result, there may be specific interconnection facilities, distribution upgrades, and network upgrades necessary to accommodate the interconnection request. The study process is designed to provide the interconnection customer the scope, schedule, and cost of these project specific upgrades required.

Where are the Substations?

The [Solar Photovoltaic \(PV\) and Renewable Auction Mechanism \(RAM\) Program Map](#) identifies areas with a circuit voltage of 12kV or 21kV and substation capacities that suggest a higher likelihood for successful photovoltaic generator interconnection. Each highlighted area contains at least one substation transformer, and the approximate capacity of the largest transformer is shown.

This map is a tool to help PV developers identify potential PV project sites, but it is not a guarantee that generators can interconnect at any particular time and place. Several factors influence the ability and cost of interconnecting photovoltaic systems to the electric distribution system, including the size of the PV system, substation and circuit load and capability, and voltage considerations. Actual interconnection requirements and costs will be determined following detailed studies that consider your specific project location, size, and application date compared to other projects in the same vicinity. Additionally, government permitting procedures designed to minimize environmental and land use impacts are independent of our interconnection process and may limit the suitability of a particular site, including sites that are highlighted in this map.

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Where should I connect?

PG&E distribution and transmission system runs throughout our service territory. The interconnection site that you propose may be near distribution or transmission facilities (60kV and above is considered PG&E's transmission system. Southern California Edison's transmission system voltage is 230kV and above). PG&E will review and connect your generating facility to your proposed point of interconnection whether that is transmission or distribution. However it is important to note that it is the interconnection customer's responsibility to transform their power to the interconnection voltage level. This cost should be accounted for in your project economics.

If you are unclear of what voltage the electric facility nearest to your project site is, please refer to the [Solar Photovoltaic \(PV\) and Renewable Auction Mechanism \(RAM\) Program Map](#)

What are Power Purchase Agreements?

[Attachment I: Generation Interconnection Procedures \(GIP\)](#) of the Wholesale Distribution Tariff governs how PG&E accepts requests to interconnect to PG&E's electric grid. The GIP does not constitute an agreement by PG&E to purchase the electric output of the generator.

For more information about selling power to PG&E, please visit PG&E's [Energy Supply website](#).

Who handles the Interconnection application process?

PG&E handles the interconnection procedure for generators interconnecting with the **Wholesale Distribution** system. New applicants for interconnection under this system should follow the procedures and forms in [Attachment I of PG&E's Wholesale Distribution Tariff](#).

The California Independent System Operator (CAISO) handles the interconnection procedures for generators interconnection with the **Wholesale Transmission** system. New applicants for interconnection under this system should follow the procedures and forms which can be found in [Appendix Y of the CAISO Generator Interconnection Procedures \(GIP\)](#).

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Interconnection Requests

How do I submit a Generation Interconnection Request?

PG&E encourages **Wholesale Distribution** Generation Interconnection Requests (Attachment 2) filings to be done online via a [web application form](#). An [Application Checklist](#) is available to guide you through this process. Customers can refer to Section 1.3 [Attachment I: Generation Interconnection Procedures \(GIP\)](#) of the Wholesale Distribution Tariff for more information.

Wholesale Transmission Generation Interconnection Requests must be submitted to the California Independent System Operator (CAISO) using [this form](#). Customers can refer to [Appendix Y of the Generator Interconnection Procedures \(GIP\)](#) of the CAISO Tariff for more information.

What is required for Administrative Data Adequacy and to be assigned a Queue position for a Wholesale Distribution project?

PG&E maintains a public queue for the Federal Energy Regulatory Commission (FERC) Generation Interconnection Procedures (GIP) distribution level projects. PG&E has established the following criteria for Interconnection Requests to be deemed complete (Administrative Data Adequacy) and to be provided a Queue position.

1. Complete [Wholesale Distribution Interconnection Request Form \(Attachment 2\)](#)
2. Complete [Appendix A](#)
3. Application Fee – Generation Interconnection Services will send an Invoice Letter when an Interconnection Request is received with instructions on a wire payment.
4. [Single Line Diagram](#)
5. [Site Plan](#)
6. [Site Control or Exclusivity per Section 1.5 of Attachment I: Generation Interconnection Procedures \(GIP\)](#)

Please refer to the documents for each interconnection process posted on [Wholesale Generation Interconnection Services \(GIS\) webpage](#) for timelines to deem an Interconnection Request complete.

When the Interconnection Request is deemed complete, a queue position based on the original date and time stamp of the Interconnection Request will be assigned.

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Can I submit simultaneous Interconnection Requests to both PG&E and CAISO?

PG&E has recently received a number of Wholesale Generation Interconnection applications that appear to be duplicates, applying to both transmission and distribution levels at the same time.

Due to the growing number of projects and the importance of accurately modeling systems and identifying critical upgrades necessary to accommodate the interconnection requests, PG&E cannot allow applicants to submit a distribution GIP application and a transmission GIP application for the same project. Interconnection Customers may choose to submit applications in a serial fashion but not in parallel; i.e., the former Interconnection Request must be withdrawn prior to submittal of the latter.

PG&E is establishing this policy to maintain equitable treatment for all developers, by ensuring that all projects given a queue position will be active and continue to move forward.

Can I ask PG&E for an extension during the Wholesale Distribution Interconnection Application Process?

PG&E maintains a public queue for the Federal Energy Regulatory Commission (FERC) Generation Interconnection Procedures (GIP) distribution level projects. PG&E will enforce the following guidelines to ensure equitable treatment:

1. PG&E will grant one extension of twenty (20) Business Days wherever the GIP allows for an extension.
2. Interconnection Customers cannot request to place projects on hold.

Do I qualify for the Wholesale Distribution Fast Track Interconnection Process?

Per Section 2.1 of [Attachment I: Generation Interconnection Procedures \(GIP\)](#) of the Wholesale Distribution Tariff there are a number of requirements that must be met in order to qualify for the Fast Track Process. Please refer to the Screens in Section 2.2.1 of [Attachment I: GIP](#) for qualifications for the Fast Track Process.

The Fast Track Procedure is for existing facilities with infrastructure already built and able to accommodate the proposed interconnection without any new construction of facilities. PG&E now interprets that as no construction of Upgrades (Interconnection Facilities are permissible).

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How often will I receive updates throughout the Wholesale Distribution study process?

Studies are conducted with assumptions established at the beginning of the study process. In the event that these assumptions are changed, an updating study may be required to re-evaluate the Project's impact on the distribution system. The Interconnection Customer would be responsible for paying for any such updating study. Examples of changes that might prompt such a study are:

1. Withdrawal of a higher queued project.
2. Change in interconnection date.
3. Change in Interconnection Customer's Queue position.
4. Change in interconnection plan.
5. Change in Project's generating size.

Please Note: After the Scoping Meeting, Interconnection Customers can request to adjust the generating size. For modifications after the Scoping Meeting, please refer to Section 1.4 from [Attachment I: Generation Interconnection Procedures \(GIP\)](#) of the Wholesale Distribution Tariff.

Can I make a modification to my Wholesale Distribution Interconnection Request after I submit?

Any modification to machine data or equipment configuration or to the interconnection site of the Generating Facility not agreed to in writing by the Distribution Provider and the Interconnection Customer may be deemed a withdrawal of the Interconnection Request and may require submission of a new Interconnection Request, unless proper notification of each Party by the other and a reasonable time to cure the problems created by the changes are undertaken.

For further information regarding Modifications permitted please see Section 3.5.8 Modifications in Between the System Impact and Facilities Study and Section 4.11.2 Modifications in between the Phase I and Phase II Interconnection Studies of [Attachment I: Generation Interconnection Procedures \(GIP\)](#) of the Wholesale Distribution Tariff.

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Right of Way for Third Party Lines

Can PG&E provide the Right of Wayⁱ or Easementⁱⁱ for a third party line?

PG&E acquires Right of Ways or Easements from land owners for Utility purposes only. A third party line does not qualify because it is not an asset that PG&E owns and maintains and will not assume the liability for.

Can PG&E allow a third party line to be built in PG&E's easement or Right of Way?

PG&E acquires land to build transmission lines or distribution lines or substations, etc. PG&E acquires land rights on a case by case basis and seeks the proper amount of land to build facilities in compliance with [California Public Utility Commission's \(CPUC\) General Order 95 \(GO95\)](#). PG&E typically does not acquire more land than necessary unless expansion needs are present and upcoming. In addition, the land owner grants PG&E rights via a Right of Way or Easement to land for very specific purposes. PG&E cannot unilaterally extend the right to another party or make changes without the involvement of the land owner.

Will PG&E build and own my gen-tie?

For Generating Facilities connecting to PG&E's **Wholesale Distribution** service voltage, PG&E considers gen-ties as Distribution Provider's Interconnection Facilities. This indicates that PG&E will own and maintain these facilities at the Interconnection Customer's expense. The engineering and construction of these facilities can be completed by either the Interconnection Customer or PG&E.

For Generating Facilities connecting to PG&E's **Wholesale Transmission** service voltage, PG&E and the California Independent System Operator (CAISO) considers gen-ties as Interconnection Facilities. This indicates that PG&E will not own and maintain these facilities. The engineering and construction of these facilities can be completed by Interconnection Customer only.

Will PG&E acquire an Easement or Right of Way for gen-ties?

Gen-ties are considered either Distribution Provider's Interconnection Facilities (**Wholesale Distribution** service voltage) or Interconnection Facilities (**Wholesale Transmission** service voltage). In both situations, the Interconnection Customer is responsible for acquiring land rights for

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the construction of gen-ties. This includes gen-ties that will be built by PG&E (distribution service voltage option only).

Will PG&E allow me to build on your poles?

PG&E does allow other types of facilities to utilize PG&E's poles pursuant to California Public Utility Commission (CPUC) rules and programs. These programs are also implemented in compliance with GO95. In order to add additional **Wholesale Transmission and Distribution** lines to existing poles, PG&E would need to evaluate whether the existing poles can support them with a double circuit configuration side by side or on top of each other. The later configuration would typically require a taller pole in order to maintain GO95 compliance. Regardless of pole replacement or modifications to existing pole, PG&E is also required to submit and request a permit per GO 131D to conduct the work.

PG&E understands the financial impact and schedule impact new transmission or distribution lines may have on the feasibility of projects. This typically drives these types of requests but unfortunately, PG&E does not anticipate any time savings or cost savings from connecting to existing PG&E poles or replacing PG&E poles. In addition to the cost and permitting factors, PG&E is very limited in obtaining clearances to redirect power and maintain service to our customers.

PG&E is here to help

If you have questions about the transmission interconnection process and its rules, PG&E is here to help. Our Wholesale Generation Interconnection Services team can help you ensure a successful project and a safe, reliable interconnection to the grid. For assistance, please email wholesalegen@pge.com.

ⁱ Right of way is a term first used to describe the right to travel unhindered, to access a route regardless of land ownership or any other legality. The right of way may be limited. If one person owns a piece of land which is bordered on all sides by lands owned by others, a court will be obliged to grant the right of way to those approved by the owner or owners of the isolated land area. It is also common practice for the public to be granted the right of way on a path or track which is in common use for a lengthy period of time (see [Easement](#)). Public right of way is not restricted by land ownership and grants travel access to all.

ⁱⁱ An easement is a certain right to use the [real property](#) of another without possessing it. It is "best typified in the right of way which one landowner, A, may enjoy over the land of another, B. Easements are helpful for providing pathways across two or more pieces of property or allowing an individual to [fish](#) in a privately owned pond." An easement is considered as a property right in itself at [common law](#) and is still treated as a type of property in most jurisdictions.