

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE



February 24, 2020

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SUBJECT: Southern California Edison (SCE) Company Advice Letter (AL) 4118-E/-A/-B, Pacific Gas and Electric (PG&E) Company AL 4186-G/-A/-B/5701-E/-A/-B, Southern California Gas Company (SoCalGas) AL 5551-G/-A/-B, and Center for Sustainable Energy® (CSE) AL 104-E/-A/-B, Revisions to the Self-Generation Incentive Program Handbook Incorporating Changes Related to Greenhouse Gas Emissions Reduction Requirements pursuant to Ordering Paragraph 2 of Decision 19-08-001

Dear Dr. Stern, Ms. Ninow, Mr. Jacobson, and Mr. Ortiz:

Pursuant to CPUC decision (D.) 19-08-001 Ordering Paragraph (OP) 2, the Self-Generation Incentive Program (SGIP) Program Administrators (PAs) jointly filed Advice Letters (ALs) seeking approval of their proposed revisions to the SGIP Handbook: SCE AL 4118-E/-A/-B, PG&E AL 4186-G/-A/-B/5701-E/-A/-B, SoCalGas AL 5551-G/-A/-B, and CSE AL 104-E/-A/-B (collectively, the Joint SGIP PAs ALs¹). D.19-08-001 OP 2 ordered this AL to be filed within 120 days of the adoption of the decision or no later than November 29, 2019. SCE jointly filed these ALs on behalf of the SGIP PAs on November 27, 2019.¹

¹ The SGIP PAs are Southern California Edison (SCE), the Center for Sustainable Energy (CSE), Pacific Gas and Electric Company (PG&E), and Southern California Gas Company (SoCalGas).

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After review and analysis, the Energy Division staff (staff) has determined that the Joint SGIP PAs ALs are in compliance with OP 2 of Decision (D.)19-08-001 and are effective as of February 24, 2020.

The California Solar & Storage Association (CALSSA) and Douglass & Liddell, on behalf of Trane, and DN Tanks timely filed protests on December 17, 2019. Also, on December 17, 2019 the California Energy Storage Alliance (CESA) timely filed a response. On December 20, 2019, staff suspended the Joint SGIP PAs ALs to allow more time for review. On December 24, 2019, the SGIP PAs filed a reply to the above-stated protests.

On January 3, 2020, SCE submitted a first joint supplemental advice letter to further revise the proposed SGIP Handbook. On February 4, 2020, SCE submitted a second joint supplemental advice letter to revise the cover letter to fully identify all changes to the proposed SGIP Handbook.

Attachment 1 contains a detailed discussion of the comments, protests, replies, and staff's determination that the Joint SGIP PAs ALs are compliant with D.19-09-001 OP 2.

Please contact Asal Esfahani of the Energy Division at ae3@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ed Randolph", followed by the word "for" in a smaller, less distinct script.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: Donald C. Liddell, Counsel for Trane US, Inc. and DN Tanks, Douglass & Liddell
Alex Morris, Executive Director, California Energy Storage Alliance
Scott Murtishaw, Senior Advisor, California Solar & Storage Association

Attachment 1:
Staff Technical Review and Disposition

Background

On November 27, 2019, pursuant to OP 2 of D.19-08-001, SCE jointly filed SCE AL 4118-E, PG&E AL 4186-G/5701-E, SoCalGas AL 5551-G, and CSE AL 104-E. OP 2 directed the PAs to file a joint Tier 2 advice letter proposing revisions to the SGIP Handbook (Handbook) to incorporate that decision's new operational, verification, and enforcement requirements to ensure SGIP energy storage systems reduce GHG emissions. The decision further requested that the PAs provide a list of meter standards suitable for use by new non-residential projects sized less than 30 kW, address contingencies having to do with data quality, availability, and access to the SGIP data upload portal.

On December 17, 2019, CALSSA and Douglass & Liddell, on behalf of Trane, and DN Tanks, filed protests to the AL. CALSSA expressed general agreement with the AL's proposed Handbook revisions but offered "recommendations for clarifying edits" discussed in further detail below. Trane and DN Tanks argued that the PAs failed to include certain compliance requirements related to Large Thermal Energy Storage (L-TES) established in D.19-08-001.

Also, on December 17, 2019, CESA filed a response to the AL to request additional clarifications to certain programmatic revisions to support SGIP applicants and developers to better understand and navigate the new GHG requirements. In addition, CESA echoed the protest by Trane and DN Tanks that the AL fails to address the L-TES GHG compliance requirements established in D.19-08-001.

On December 24, 2019, the SGIP PAs filed a reply to the above-stated protests. The reply letter included revisions to the proposed SGIP Handbook submitted to Energy Division for approval in the initial AL filing. In accordance with Section 7.5.1 of General Order (GO) 96-b, staff requested the PAs file major changes to the proposed Handbook in a supplemental AL filing.

On January 3, 2020, SCE submitted the first joint supplemental advice letter (SCE AL 4118-E-A, PG&E AL 4186-G-A/5701-E-A, SoCalGas AL 5551-G-A, and CSE AL 104-E-A) to further revise the SGIP Handbook based on CALSSA's protest to the SGIP PAs' initial AL. On February 4, 2020, SCE submitted a second joint supplemental advice letter (SCE AL 4118-E-B, PG&E AL 4186-G-B/5701-E-B, SoCalGas AL 5551-G-B, and CSE AL 104-E-B) to revise the cover letter of to fully identify all changes to the proposed SGIP Handbook. The cover letter erroneously omitted summary explanations for revisions made to Section 5.2.1 of the proposed Handbook. Staff requested that the PAs submit a second supplemental to clearly identify these changes in the cover letter.

Protests, Response, and Reply Comments to the Initial AL Filing

Implementation of the GHG Signal

In their protest to the original AL, CALSSA argues that the proposed Handbook revisions are not in compliance with OP 1 of D.19-08-001 as the updates do not list the longer-term (72-

hour ahead and longer) GHG forecasting tools required in Attachment A of the decision.¹ CALSSA recommends that the Energy Division's disposition of the AL should establish a clear deadline of July 1 for the availability of longer-term forecasts. CALSSA also states that the PAs should hold at least one webinar followed by informal comments to give parties the opportunity to participate in the development of these forecast methodologies.

In their reply to CALSSA's protest, the PAs clarify that the GHG Signal vendor will work with industry stakeholders to develop a methodology for the longer-term forecasting tools by April 1, 2020, or three months earlier than CALSSA's recommended deadline. The PAs also agree that the longer-term forecasts should be included in the proposed Handbook's list of GHG emissions forecasting tools.²

CALSSA's protest raises concern with the PAs' definition of a GHG Signal in the proposed Handbook. CALSSA recommends modifying the Handbook language to directly match the D.19-08-001 requirement that the GHG signal be available in an API format, with marginal GHG emission rates specific to the NP15 and SP15 California Independent System Operator (CAISO) zones.³ The proposed Handbook language is less specific and describes the signal as "a digitally-accessible, real-time marginal GHG emissions factor for the appropriate [CAISO] sub-regions."⁴

In their reply letter, the PAs agree with CALSSA that explicitly stating that the GHG signal will be available in API format is more in line with requirements established in D.19-08-001.

However, the PAs argue that the proposed Handbook's broad language regarding the appropriate sub-regions used to calculate marginal GHG emissions is responsive to D.19-08-001, even if it does not completely correspond to the definition provided in Attachment A of the decision. The PAs point to the direction in D.19-08-001 that the PAs jointly propose an agreed-upon method to calculate marginal GHG emissions in their Tier 2 AL and to explore PG&E's proposal to use CAISO energy prices at the Investment-Owned Utilities' (IOUs) Default Load Aggregation Points (DLAPs) to calculate marginal emissions. Given that the GHG signal vendor contracted by the PAs agrees with PG&E, the PAs have jointly proposed that the interim GHG Signal use the DLAP-based methodology and have kept the Handbook language broad to allow flexibility in testing their proposal prior to the release of the Final GHG Signal and forecasting tools on March 28, 2020.

Non-Residential Projects

CALSSA's protest contends that the AL, in its treatment of the Performance Based Incentive (PBI) term as strictly equaling five years, leaves a gap for projects that cycle more often than the minimum 104 times per year and receive full PBI payment before their fifth year of operation. The PAs' reply agrees with CALSSA that projects can potentially complete their PBI obligations before the 5-year deadline and that less strict language is needed to clarify projects' GHG reduction requirements once PBI payment is received in full.

¹ D.19-08-001, Attachment A at 3.

² AL 4118-E-A, Attachment A at 47.

³ D.19-08-001, Attachment A at 3.

⁴ AL 4118-E et al. Appendix A at 47.

CALSSA's protest also suggests a revision to the proposed Handbook's requirement to allow five-minute rather than 15-minute interval data reporting, given that, under the new GHG emissions reduction rules, compliance is measured using the five-minute real-time GHG signal.

In their reply, the PAs express their willingness to consider CALSSA's suggested revision by first ensuring the current program database will support the change. The PAs state that current database operates on preset formatting protocols, and, if feasible, CALSSA's suggested revision will be addressed in a future Handbook proposed update.

Multifamily Residential Projects

CALSSA's protest argues for the need for clarification of the new rules to resolve potential developer uncertainties around how the new SGIP GHG reduction scheme for residential projects would apply to multifamily projects interconnecting under the virtual net energy metering (VNEM) tariff. CALSSA proposes several solutions which are not considered or approved in D.19-08-001.

CESA's response requests that the AL include discussion on the specific applicability of various GHG requirements to multifamily projects and argues that although these projects fall under the residential category, the new commercial GHG rules may be more applicable.

In their reply to CALSSA, the PAs state SGIP eligibility requirements for systems taking service under a VNEM tariff are similarly addressed in D.19-09-027, and the corresponding proposed changes to the Handbook are also forthcoming in a separate AL then-scheduled to be filed February 18, 2020.

Additionally, the PAs' reply explains that the February 18, 2020 AL will include proposed changes to the Handbook based on the requirements for multifamily residential applications outlined in D.19-09-027 and will address these concerns.

Recommendations for Other Handbook Language Clarifications

In their protest, CALSSA includes recommendations for revising certain sections of the Handbook for improved clarity. First, CALSSA recommends reordering subsection headings and bullets under Section 5.5.1, "Minimum Electrical Meter Requirements" suggesting that the explanation of program rules under this section is confusing. Furthermore, CALSSA suggests deleting the definition of "Commercial" under the "Definitions and Glossary" section and that all instances of "Commercial" in the Handbook and other SGIP documentation be replaced with the more widely used SGIP term "Non-Residential."

In their joint reply, the PAs agree with CALSSA that Section 5.5.1 could be organized better for enhanced clarity on the new metering and monitoring requirements. The PAs also agree that the definition of "Commercial" is less precise than the more widely used SGIP term "Non-Residential."

Large Thermal Energy Storage (L-TES) GHG Requirements

Trane and DN Tanks protest the joint AL arguing that it fails to comply with Section 9 of D.19-08-001 as no Handbook revisions were made to propose modifications to the new GHG and existing rules to ensure Thermal Energy Storage (TES) systems are able to comply with SGIP GHG reduction requirements.

In their response, CESA echoed the concern presented by Trane and DN Tanks that the AL is not in compliance with the Decision's order that the PAs propose specific modifications to program rules to ensure L-TES "accurately meet GHG requirements."⁵

CESA, Trane, and DN Tanks further explain that industry has been advocating for a dynamic approach to calculating L-TES incentives, as detailed in a Program Modification Request (PMR) submitted more than two years ago without any action on the part of the PAs. At a September 2019 TES Workshop ordered by D.19-08-001⁶ Trane representatives demonstrated the methodology proposed in the PMR aligns with the SGIP 5-minute GHG compliance signal. These parties state that the program's continued lack of a proposed incentive methodology for L-TES systems creates an undue barrier to their participation in the program.

In their reply, the PAs disagree that the AL is not in compliance with the requirements set out in Section 9 of D.19-09-001. The PAs point to language in the section that instructs them to propose "minor modifications to SGIP ... requirements to accommodate TES systems' conformance with the GHG rules adopted in [the] decision."⁷ The PAs' reply states that the "minor modifications" to the GHG rules authorized by the decision do not provide authority to the PAs to submit a proposal for a wholly new methodology for calculating L-TES incentives based on the aforementioned PMR. Furthermore, based on the TES Workshop and discussions with industry, the PAs determined that modifications specific to the TES compliance with SGIP GHG rules were not necessary.

Option 2 Compliance Pathway for Legacy Commercial Projects

In their response, CESA recommends the SGIP PAs include a list of specific economic Demand Response (DR) programs that meet the requirements set out in the Option 2, Storage Rate/Demand Response pathway for legacy commercial project developers. CESA argues that a comprehensive list of economic DR programs would benefit developers, and that the list should include Critical Peak Pricing (CPP) and Real-Time Pricing (RTP) tariffs. CESA argues that because Option 2 provides enrollment in storage rates as a compliance pathway, "economic DR *tariffs*...not just economic DR *programs*" should be considered eligible and listed in the Handbook as eligible economic DR programs.⁸

In their reply to CESA, the PAs note that they do not draw a distinction between "tariffs" and "programs" informed by CAISO wholesale price triggers, as CESA recommends. The PAs counter that providing a comprehensive list of eligible DR programs would require advice letters each time a revision to the Handbook adding or removing programs from the list becomes necessary, which could cause delay in information and confusion as to which DR programs are eligible. Furthermore, unlike the requirement in D.19-08-001 that PAs maintain

⁵ CESA Response at 5.

⁶ D.19-08-001 authorized the PAs and ED staff to convene a TES Working Group within 60 days of the adoption of the decision to discuss whether there is a need for minor modifications to the new system, operation, measurement, verification and performance evaluation requirements to ensure TES technologies can comply with the new GHG rules.

⁷ D.19-08-001 at 71.

⁸ CESA Response at p 2.

an updated list of approved rates, the decision is silent on the need for a similar list of economic DR programs.⁹

Eligible Residential Municipal Utility Rates

CESA recommends that the PAs proactively identify and provide an explicit list of eligible Time-of-Use (TOU) rates available in non-IOU territories that meet the requirements set out in D.19-08-001. Thus, developers and the PAs would not have to contend with the administrative burden of determining whether an eligible TOU rate is available on a per application basis.

In their reply, the PAs cite provisions in D.19-08-001 that direct the PAs to work with storage developers in non-IOU territories to identify eligible rates that meet the D.19-08-001 requirements. The PAs assert that municipal utilities are not obliged to engage with the SGIP or the PAs, and therefore, requiring customers/developers to provide documentation in support of project eligibility is in line with the decision.

Clarification on Required Documentation for Verification of Solar-only Charging and Solar Self-Consumption Manufacturer Certified Settings

CESA's response to the AL requests details on the type of documentation required for the upfront technical settings or configurations for new residential projects looking to substantiate their eligibility through solar-only charging or solar self-consumption pathway.

In their reply, the PAs argue that the variation in energy storage equipment precludes the availability of one type of required documentation. Therefore, their proposed Handbook updates includes general instructions for the documentation to demonstrate the system will operate in the solar-only charging or solar self-consumption mode. The PAs further explain that they are in the process of developing a template document that applicant will have the option of completing and uploading as part of the Incentive Claim Form.

New Residential Storage Compliance Grace Period

CESA's response further recommends a grace period be extended to new residential developers that are verified as having increased GHGs or for failing to submit data for less than 90 percent of the fleet of SGIP storage projects.

The PAs argue in their reply that Section 6.4.1 of D.19-08-001 provides explicit direction for the implementation of the new residential fleet verification and enforcement rules. Therefore, the PAs are not given authority to provide a compliance grace period or other relief that is not in line with the provisions in the decision.

Supplemental Filings

In the first supplemental filing, the PAs submitted additional proposed revisions to the SGIP Handbook in direct response to a number of suggestions outlined in CALSSA's protest.

The PAs revised the Handbook's proposed language to clarify that once new non-residential projects receive PBI payment in full at less than or equal to the fifth year of their operation, they must continue to reduce GHG emissions by five kg/kWh through the tenth year of their

⁹ D.19-08-001 at 44.

permanency period, verified on a fleet basis. Further, the PAs provided edits Section 5.5.1 to improve clarity on the metering and monitoring requirements.

The PAs also removed the definition of “Commercial” from the Definitions and Glossary as proposed in the initial AL and replaced the term with “Non-Residential” throughout the SGIP Handbook.

In the second supplemental, the PAs remedy the omission from the cover letter identifying all additional changes to the proposed SGIP Handbook. The revised cover letter describes the language added to the proposed Handbook to clearly state the GHG Signal will be delivered via API to avoid uncertainties about the format in which the signal will be made available to SGIP participants. The cover letter also describes the addition of the 72-hour ahead, month-ahead, and year-ahead marginal emissions data to the proposed Handbook’s list of GHG emissions forecasting tools.

Disposition

Staff finds that the PAs appropriately address certain concerns raised in CALSSA’s protest letter in their first and second supplemental filings.

Regarding the remaining issues raised by CALSSA, CESA, Trane, and DN Tanks, staff finds that the PAs’ proposed SGIP Handbook revisions are fully responsive to the requirements in D.19-08-001. The CPUC has delegated the day-to-day implementation of the SGIP to the PAs. Where D.19-08-001 is silent on an issue, the PAs have the authority to determine whether they will take comments on program implementation into consideration.

However, staff sees merit in the argument put forth by CESA, Trane, and DN Tanks that the lack of an approved incentive calculation methodology is an undue barrier to L-TES participation in the SGIP. It is not a goal of the SGIP to favor specific energy storage technologies over others, and the question of L-TES participation should be resolved as soon as possible. Therefore, staff recommends the PAs file a separate joint advice letter that proposes a specific methodology for L-TES incentive calculation within 30 days of the effective date of this joint AL.

February 4, 2020

ADVICE 4118-E-B
(Southern California Edison Company U 338-E)

ADVICE 4186-G-B/5701-E-B
(Pacific Gas and Electric Company U 39-M)

ADVICE 5551-G-B
(Southern California Gas Company U 904-G)

ADVICE 104-B
(Center for Sustainable Energy®)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Joint Program Administrators' Second Supplement to Advice Letter regarding Revisions and Updates to the Self-Generation Incentive Program Handbook Incorporating Program Changes Related to Greenhouse Gas Emissions Reduction Requirements pursuant to Decision 19-08-001

PURPOSE

The purpose of this joint Supplemental Advice Letter is to revise the cover letter of Advice Letter (AL) 4118-E-A, et.al., submitted on January 3, 2020.¹ Southern California Edison Company (SCE), on behalf of the Self-Generation Incentive Program (SGIP) Program Administrators' (PAs),² is updating AL 4118-E-A in response to feedback from the California Public Utilities Commission's (Commission) Energy Division (ED) staff, which was communicated to SCE via electronic mail on January 28, 2020. The ED requested SCE submit a substitute sheet to the AL because additional changes were made to the *Revised Redline SGIP Handbook*; however, the changes were not identified in the advice letter.

¹ SCE Advice 4118-E-A, PG&E Advice 4186-G-A/5701-E-A, SoCal Gas Advice 5551-G-A, and CSE Advice 104-A ("Joint PA Advice Letter" or "Advice Letter").

² The SGIP PAs are Pacific Gas and Electric Company (PG&E), SCE, Southern California Gas Company (SoCalGas), and Center for Sustainable Energy® (CSE) in the service territory of San Diego Gas & Electric Company (SDG&E).

Per General Order (GO) 96-B, General Rule 7.5.1, SCE is instead submitting a *Supplemental Advice Letter*, not a substitute sheet, on behalf of the SGIP PAs because the requested effective date of AL 4118-E was December 27, 2019.

ADVICE LETTER REVISIONS

The SGIP PAs modified the following text in Section 5.2.1 of the *Revised Redline SGIP Handbook* attachment³ but did not identify the modifications in Advice 4118-E-A, et al.

The following are the modifications proposed by the SGIP PAs in Section 5.2.1:

- The signal is a digitally accessible (in API format), real-time, marginal GHG emissions factor for the appropriate California Independent System Operator (CAISO) sub-regions, at five-minute intervals, in units of kgCO₂/kWh;

A five-minute real time GHG signal is used as the basis of determining compliance with the GHG requirements adopted in the decision; as such, this signal is referred to as the “GHG compliance signal”. The GHG compliance signal is used for verification of both project and fleet GHG emission compliance. The following forecasting tools are also available:

- Fifteen-minute forecast, with five-minute granularity and updated every fifteen minutes;
- One hour-ahead forecast, with five-minute granularity and updated every fifteen minutes;
- Day-ahead forecast, with five-minute granularity and updated every fifteen minutes;
- Longer Term Forecasts: 72-Hour Ahead, Month-Ahead and Year-Ahead

The GHG signal and forecasting tools are available online at selfgenca.com.

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to Ordering Paragraph 2 of D.19-08-001, this Supplemental Advice Letter is submitted with a Tier 2 designation, which is the same designation as Advice 4118-E, et al.

EFFECTIVE DATE

The SGIP PAs request that this Supplemental Advice Letter become effective on December 27, 2019, which is the 30th calendar day after the submittal of the original advice Letter, Advice 4118-E, et al.

³ Joint PA Advice Letter 4118-E-A SCE, 4186-G-A/5701-E-A PGE, 5551-G-A SoCalGas, 104-A CSE, Attachment A, *Revised Redline SGIP Handbook*, p. 47.

PROTESTS

The SGIP PAs respectfully request that the Commission maintain the original protest period designated in Advice 4118-E, et al. pursuant to GO 96-B, General Rule 7.5.1, and not reopen the protest period. The modifications included in this Supplemental Advice Letter do not make any substantive changes that would affect the overall evaluation of the Advice Letter.

NOTICE

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this Supplemental Advice Letter to the interested parties on SCE's GO 96-B and R.12-11-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the Advice Letter at SCE's corporate headquarters.

To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Eric Lee at (626) 302-0647 or by electronic mail at eric.lee@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:el:jm



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Darrah Morgan

Phone #: (626) 302-2086

E-mail: AdviceTariffManager@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4118-E-B

Tier Designation: 2

Subject of AL:

Joint Program Administrators' Second Supplement to Advice Letter regarding, Revisions and Updates to the Self-Generation Incentive Program Handbook Incorporating Program Changes Related to Greenhouse Gas Emissions Reduction Requirements pursuant to Decision 19-08-001

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 19-08-001

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 12/27/19

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
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Email: EDTariffUnit@cpuc.ca.gov

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Name: Laura Genao c/o Karyn Gansecki
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ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	Redwood Coast Energy Authority
Alta Power Group, LLC	Engineers and Scientists of California	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Evaluation + Strategy for Social	SCD Energy Solutions
	Innovation	
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz &	SDG&E and SoCalGas
	Ritchie	
Barkovich & Yap, Inc.	Green Charge Networks	SPURR
P.C. CalCom Solar	Green Power Institute	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Assn	Hanna & Morton	Seattle City Light
California Energy Commission	ICF	Sempra Utilities
California Public Utilities Commission	IGS Energy	Southern California Edison Company
California State Association of Counties	International Power Technology	Southern California Gas Company
Calpine	Intestate Gas Services, Inc.	Spark Energy
	Kelly Group	Sun Light & Power
Cameron-Daniel, P.C.	Ken Bohn Consulting	Sunshine Design
Casner, Steve	Keyes & Fox LLP	Tecogen, Inc.
Cenergy Power	Leviton Manufacturing Co., Inc. Linde	TerraVerde Renewable Partners
Center for Biological Diversity	Los Angeles County Integrated	Tiger Natural Gas, Inc.
	Waste Management Task Force	
Chevron Pipeline and Power	Los Angeles Dept of Water & Power	TransCanada
City of Palo Alto	MRW & Associates	Troutman Sanders LLP
	Manatt Phelps Phillips	Utility Cost Management
City of San Jose	Marin Energy Authority	Utility Power Solutions
Clean Power Research	McKenzie & Associates	Utility Specialists
Coast Economic Consulting		
Commercial Energy	Modesto Irrigation District	Verizon
County of Tehama - Department of Public	Morgan Stanley	Water and Energy Consulting Wellhead
Works	NLine Energy, Inc.	Electric Company
Crossborder Energy	NRG Solar	Western Manufactured Housing
Crown Road Energy, LLC		Communities Association (WMA)
Davis Wright Tremaine LLP	Office of Ratepayer Advocates	Yep Energy
Day Carter Murphy	OnGrid Solar	
	Pacific Gas and Electric Company	
Dept of General Services	Peninsula Clean Energy	
Don Pickett & Associates, Inc.		
Douglass & Liddell		