

## PUBLIC UTILITIES COMMISSION

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April 9, 2020

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**SUBJECT: Pacific Gas and Electric (PG&E) Company AL 4218-G/-A/5764-E/-A, Southern California Edison (SCE) AL 4167-E/-A, Southern California Gas Company (SoCalGas) AL 5589-G/-A, and Center for Sustainable Energy® (CSE) AL 109-E/-A, Proposed Revisions to the Self-Generation Incentive Program Handbook to Further Incorporate Requirements Pursuant to Decision D.19-09-027**

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

Pursuant to California Public Utilities Commission (CPUC) decision (D.) 19-09-027 Ordering Paragraph (OP) 7, the Self-Generation Incentive Program (SGIP) Program Administrators (PAs) jointly filed Advice Letters (ALs) seeking approval of their proposed revisions to the SGIP Handbook: PG&E AL 4218-G/-A/5764-E/-A, SCE AL 4167-E/-A, SoCalGas AL 5589-G/-A, and CSE AL 109-E/-A (collectively, the "Joint SGIP PAs' ALs").

After review and analysis, the Energy Division staff (staff) has determined that the Joint SGIP PAs' ALs are in compliance with OP 7 of Decision (D.)19-09-027 and are approved, effective as of April 9, 2020.

Staff renders two recommendations for the PAs in finalizing the proposed SGIP Handbook revisions. First, while the PAs indicated they would accept CALSSA's recommended edits to SGIP Handbook Section 4.1.1.3, the supplemental filing to the Joint SGIP PAs' ALs did not include these revisions.

Staff recommends the PAs include these edits when finalizing the SGIP Handbook in accordance with this disposition.

Second, because PG&E submitted a Marketing, Education and Outreach (ME&O) plan specific to their customer region in AL 4219-G/5765-E on February 20, 2020, staff recommends that the remaining PAs submit their respective ME&O plans via Tier 2 Advice Letter within 45 days of the effective date of this disposition.

The Joint SGIP PAs' ALs partially address the requirements of OP 7 of D. 19-09-027, which directed the SGIP PAs to submit an AL within 90 days of the issuance of the decision. That AL would propose modifications to the SGIP Handbook to implement the decision's adopted program changes, particularly those required to open the newly established Equity Resiliency budget. On December 5, 2019, the SGIP PAs filed a request for an extension of time to comply with OP 7 and sought approval to bifurcate the compliance filing into two separate ALs. The Executive Director of the CPUC granted this request on December 17, 2019.

This joint AL seeks approval for SGIP Handbook revisions specific to the establishment of the new Equity Resiliency budget for non-residential customers, a statewide ME&O plan, and other required program revisions not included in the first AL filed in response to D.19-09-027 OP 7, which was filed on December 17, 2019 and approved on February 26, 2020.

The California Solar & Storage Association (CALSSA), the California Energy Storage Alliance (CESA), Tesla, Inc. (Tesla), and Mr. Jason Coolman timely filed protests on March 9, 2020. Also, on March 9, 2020, GRID Alternatives (GRID) timely filed a response.

On March 16, 2020, PG&E filed a reply on behalf of the SGIP PAs to the above-stated protests and responses, followed by a joint supplemental AL filed on March 20, 2020.

Attachment 1 contains a detailed discussion of the procedural background, responses, protests, replies, and staff's determination that the Joint SGIP PAs ALs' are compliant with D.19-09-027 OP 7. In Attachment 2, this disposition letter provides an eligibility matrix to help clarify the SGIP equity resiliency eligibility rules for non-residential customers. Staff requests that the SGIP PAs post this eligibility matrix on the statewide SGIP website available at [www.selfgenca.com](http://www.selfgenca.com).

Please contact Asal Esfahani of the Energy Division at [ae3@cpuc.ca.gov](mailto:ae3@cpuc.ca.gov) if you have any questions.

Sincerely,



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

cc: Steve Campbell, Project Manager, GRID Alternatives  
Mr. Jason Coolman  
Alex Morris, Executive Director, California Energy Storage Alliance  
Scott Murtishaw, Senior Advisor, California Solar & Storage Association

Andy Schwartz, Managing Policy Advisor, Tesla, Inc.

## **Attachment 1 Staff Technical Review and Disposition**

### **Background**

The CPUC adopted Decision (D.)19-09-027 (“Equity Resiliency Decision”) on September 12, 2019. This decision established a new Equity Resiliency budget, ordered new incentive levels and eligibility rules for participants, and made a number of other modifications to the SGIP. OP 2 of the Equity Resiliency Decision directed that the modifications to the program adopted in the decision be effective April 1, 2020.

OP 7(a) of the Equity Resiliency Decision directed the SGIP PAs to submit, within 90 days of the issuance of the decision, a joint Tier 2 advice letter (AL) proposing modifications to the SGIP Handbook to implement the changes adopted in that decision. OP 7(b), (d), and (e) describe additional items to be included in the Tier 2 AL, namely budget allocations for accumulated unused funds that reflect modifications adopted in the decision, recommendations on how to apply benchmarking processes or similar tools to SGIP, and a customized equity budget marketing, education, and outreach (ME&O) plan developed in consultation with disability rights advocates and other stakeholders.

On December 5, 2019, the PAs, in accordance with Rule 16.6 of the CPUC Rules of Practice and Procedure submitted a request for an extension of time to comply with D.19-09-027 OP 7 subsections (a), (b), (d), and (e). Specifically, the PAs requested permission to bifurcate the compliance filing into two separate advice letters. They proposed to file a Tier 2 AL as ordered within 90 days of issuance of D.19-09-027, on December 17, 2019, that would address the requirements necessary for an early opening of the equity resiliency budget for small residential customers. The PAs also requested permission to file a separate Tier 2 AL 60 days later, on February 18, 2020, that would cover all remaining requirements for other customer classes. The PAs asserted that the second AL would include a comprehensive statewide ME&O plan.

On December 17, 2019, the CPUC Executive Director granted the PAs’ request for a 60-day extension to file a Tier 2 AL that addresses all other requirements of OP 7 subsections (a), (b), (d), and (e).

### **Protests, Response, and Replies to the Initial AL Filing**

#### *GHG Requirements for Multifamily Projects*

The California Solar & Storage Association (CALSSA) protested the Joint SGIP PAs’ ALs stating that the PAs did not address their concern raised in response to a previous SGIP AL filing to establish the new Greenhouse Gas (GHG) rules pursuant to D.19-08-001. Specifically, CALSSA requests further clarification as to how the new GHG rules should be applied to multifamily storage projects.<sup>1</sup> D.19-08-001 provides two sets of rules, one for residential and another for non-residential customers, and, therefore, CALSSA’s protest argues that the PAs have yet to propose instructions for which set of rules apply to multifamily storage projects, which typically serve a combination of residential (tenant) and non-residential loads (common area).

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<sup>1</sup> CALSSA protest of SCE AL 4118-E et al. filed December 17, 2019.

### *Storage System Sizing Rules for Equity Resiliency Projects*

In the Joint SGIP PAs' ALs, the PAs argued that they were not able to implement a D.20-01-021 order that directed them to revise existing storage system sizing restrictions for resiliency projects because currently there is no such rule that limits storage systems to the inverter size.<sup>2,3</sup>

In protests filed by CALSSA, CESA, Tesla, and Mr. Jason Coolman on March 9, 2020, the protesters request the PAs revise the SGIP Handbook to be in alignment with what the protesters argue is the intent of D.20-01-021- ensuring Equity Resiliency budget customers can meet their onsite needs by removing the sizing limit based on historical peak demand. CALSSA and Tesla argue that regardless of its wording on inverter size, the decision gave the PAs latitude to propose revisions to existing sizing rules to ensure systems receive the appropriate level of incentives to provide adequate customer resiliency benefits.<sup>4</sup> All parties in protest cite the directive in D.20-01-021 OP 30 that Equity Resiliency projects and projects receiving the incentive adder (resiliency projects) should receive full incentives when, in order to meet peak load, systems must be sized above peak load due to the modularity of component sizes.<sup>5</sup>

CALSSA's protest suggests the sizing limit to the customer peak load should be eliminated altogether for those customers who install storage projects with backup capability. Similarly, CESA's protest recommends removing the current storage system limitations to expand resiliency benefits to all customer classes, regardless of whether they qualify for the Equity Resiliency incentive or the resiliency adder.

### *CESA's Recommendations for Clarifying Customer Eligibility and Identification Rules*

In their March 9, 2020 protest, CESA includes recommendations for improving clarity of the proposed SGIP Handbook's eligibility language and documentation requirements. First, CESA suggests that instead of referencing CPUC decisions to establish customer eligibility criteria, the proposed SGIP Handbook should include the actual table and lists from the decisions. Second, CESA protests the lack of detail on how certain class of SGIP equity project applicants must demonstrate that the Host Customer serve customers that are at least 50 percent members disadvantaged communities (DACs) or low-income communities. CESA requests that the proposed SGIP Handbook provide specific documentation requirements to ease applicants' burden of proof in this regard.

### *Marketing, Education and Outreach (ME&O) Plan*

GRID's March 9, 2020 protest focuses on the PAs' proposed statewide ME&O plan. GRID expresses concern that the PAs' ME&O Plan deprioritizes Equity Budget (low-income) customers by leaving this customer class out of the Plan's primary and secondary residential target markets, which are explicitly geared toward Medical Baseline and other medically vulnerable populations. GRID recommends the PAs identify specific Community-Based Organizations (CBOs), Community Choice Aggregators (CCAs), and affinity groups that the PAs will work with to effectively provide outreach to potential equity and equity resiliency customers. GRID also recommend that the PAs partner with low-income solar program administrators to strategically reach "a large portion of

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<sup>2</sup> Joint SGIP PAs ALs at 6.

<sup>3</sup> Per Section 5.2.4 of the current SGIP Handbook (March 2, 2020), the size of storage system rated 10 kW or above is limited to the Host Customer's previous 12-month annual peak demand (kW) at 46-47.

<sup>4</sup> CALSSA protest of Joint SGIP PAs ALs at 6 citing D.20-01-021 at 73.

<sup>5</sup> D.20-01-021 OP 30 at 106.

qualified customers with existing or pipeline solar.”<sup>6</sup> Finally, GRID recommends that the PAs’ forthcoming territory-specific ME&O plans include specific budgetary line items for funding partnerships with CBOs.

CESA’s protest includes a recommendation for the PAs to collaborate with “key storage vendors” to develop marketing materials to educate potential customers about the benefits of energy storage.

*CALSSA Suggested Revisions to the Text in Section 4.1.1.3 of the Proposed SGIP Handbook*

CALSSA’s protest includes suggested revisions to the proposed SGIP Handbook’s Section 4.1.1.3 to provide improved clarification on Equity Resiliency Budget eligibility rules for non-residential customers.

*CESA’s “Other Issues”*

CESA raises a number of issues, which they characterize as “not the direct subject of [their] protest”.<sup>7</sup> These concerns, including islanding requirements for longer-duration batteries and the new incentive step-down by duration scheme for general market storage systems, are not related to the precise directives in D.19-09-027 and will not be addressed in this disposition.

*Program Administrators’ (PAs’) Reply*

On March 16, 2020, PG&E, on behalf of the SGIP PAs, filed a reply to the protests.

The PAs agree with CALSSA that clarification is needed regarding how SGIP GHG rules apply to multifamily storage projects, and, in particular, those that serve both residential and non-residential loads. The PAs propose to address this issue in a supplemental advice letter.

In their reply, the SGIP PAs consider the protests regarding revising the system sizing limitations on resiliency projects and agree that the decision’s intention was to allow system size to exceed a customer’s 12-month annual peak demand, but only if modular component sizes make this necessary.

The PAs disagree with recommendations from CALSSA and CESA that all sizing restrictions should be eliminated and assert that this would entail “unreasonable expansion of the decision, which if adopted could impact other program operational requirements, such as the ability to meet cycling requirements.”<sup>8</sup> The PAs cite D.20-01-021 to signal the CPUC’s strong preference that “SGIP sizing restrictions continue to apply to all projects as do related restrictions adopted in D.19-09-027.”<sup>9</sup>

In response to GRID’s concerns that their proposed statewide ME&O plan focuses too narrowly on medical baseline customers and excludes low-income customers, the PAs clarify that low-income customers will not be excluded from any ME&O activities, but each PA will identify tailored strategies for targeting low-income customers in their respective territory-specific plans. The PAs go on to state their willingness to consider GRID’s remaining recommendations regarding forming appropriate partnerships that provide customer outreach in their territory-specific plans.

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<sup>6</sup> GRID Response to Joint SGIP PAs ALs at 5.

<sup>7</sup> CESA Protest of Joist SGIP PAs ALs at 6.

<sup>8</sup> PAs Reply to Protests to Joint SGIP PAs AL at 4.

<sup>9</sup> D.20-01-021 at 80.

The PAs state that they will incorporate CALSSA’s recommended edits to Section 4.1.1.3 of the proposed Handbook in their supplemental advice letter.

### **Supplemental Filing**

On March 20, 2020, PG&E, on behalf of the SGIP PAs filed a supplemental advice letter to the Joint SGIP PAs’ ALs.

The supplemental AL addresses two issues raised in the protests discussed above.

In their reply discussed above, the PAs acknowledged that CALSSA appropriately requested further clarification on the GHG and Equity Budget rules for multifamily projects. While the SGIP PAs committed to addressing this issue in their supplemental filing, the supplemental AL’s cover letter states that the SGIP PA’s require additional time to consult with industry stakeholders to come up with comprehensive program rules with specific consideration for multifamily energy storage. The PAs committed to submitting their proposal on this topic in the forthcoming SB 700 Implementation Advice Letter due April 15, 2020.

The supplemental filing proposes additional revisions to the SGIP Handbook to clearly implement the order in D.19-09-027 to allow resiliency projects to size their systems above the allotted 12-month peak demand in instances where modular storage components limit the size of the system.

### **Disposition**

Staff finds that the Joint SGIP PAs’ ALs adequately address issues raised by parties in protest of the initial AL filing. While D.20-01-021 lifted the sizing limit for resiliency projects, the decision was explicit in its determination that “resiliency projects may receive full incentives for a system that is sized above peak load *if this is necessary due to modular component sizes to accommodate the customer’s peak load,*” (emphasis added) and that the incentive can be paid only when the applicant provides proof of this need.<sup>10</sup> Therefore, the PAs’ proposed revisions to Handbook Section 5.2.4 are in compliance with the directive in D.20-01-021.

Staff agrees with the PAs that GRID’s comments and recommendations regarding targeting strategies for targeting low-income populations are more appropriate for consideration in the forthcoming territory-specific ME&O plans. In addition, staff appreciates the PAs’ commitment to submitting territory-specific ME&O plans “in the coming weeks” as stated in the Joint SGIP PAs’ ALs.<sup>11</sup> PG&E has already submitted an ME&O plan specific to their customer region in AL 4219-G/5765-E on February 20, 2020, therefore staff recommends the remaining PAs to submit their respective plans via Tier 2 Advice Letter within 45 days of the effective date of this disposition.

Staff further appreciates the PAs’ commitment to submitting a proposal for the specific treatment of multifamily energy storage projects under the new GHG and Equity Resiliency Budget rules, and look forward to reviewing the proposal in the forthcoming SB 700 Implementation Advice Letter due April 15, 2020.

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<sup>10</sup> D.20-01-021 at 72.

<sup>11</sup> Joint SGIP PAs ALs at 9.

Staff notes that, while the PAs indicated they would accept CALSSA's recommended edits to Section 4.1.1.3, the supplemental filing to the Joint SGIP PAs' ALs did not include these revisions. Staff recommends the PAs include these edits when finalizing the SGIP Handbook in accordance with this disposition.



## Attachment 2: SGIP Equity Resiliency Eligibility Matrix – Non-Residential Customers

Criteria:	Pathways for eligibility:	Description:	Additional Guidance:
1.	a) In HFTD Tier 2 or 3; or,	Located in a High Fire Threat District (HFTD) Tier 2 or Tier 3. Process initiated in D.17-01-009 and modified by D.17-06-024. <sup>12</sup>	Maps available here: <a href="https://www.cpuc.ca.gov/general.aspx?id=6442454972">https://www.cpuc.ca.gov/general.aspx?id=6442454972</a>
	b) Have experienced ≥ 2 PSPS events;	Customers whose electricity was shut off during two or more discrete Public Safety Power Shutoff (PSPS) events prior to the date of application for SGIP incentives. <sup>13</sup>	List of circuits with two or more PSPS events posted on SGIP portal. To be updated 30 days after new PSPS event. <sup>14</sup>
<b><u>AND:</u></b>			
2.	Is a critical facility or critical infrastructure provider. <sup>15</sup>	Police stations; fire stations; emergency response providers with the addition of tribal government providers; emergency operations centers; 911 call centers (also referred to as Public Safety Answering Points); medical facilities including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities; public and private gas, electric, water, wastewater or flood control facilities; jails and prisons; locations designated by the IOUs to provide assistance during PSPS events; cooling centers designated by state, local or tribal governments; homeless shelters supported by federal, state, local, or tribal governments; grocery stores, corner stores, markets and supermarkets that have average annual gross receipts of \$15 million or less as calculated at the single location applying for SGIP incentives over the last three tax years; independent living centers; and food banks.	
<b><u>AND:</u></b>			
3.	a) Provides critical services or infrastructure to one or more communities in a Tier 3 or Tier 2 HFTD or a community with customers whose electricity was shut off during 2 or more discrete PSPS events, <b>AND</b> b) at least one of those communities is eligible for the equity budget.	Equity budget eligible community refers here to a disadvantaged community or low-income census tract as defined in D.17-10-004 or California Indian Country as defined in D.19-09-027.	

<sup>12</sup> D.19-09-027 at 20.

<sup>13</sup> D.20-01-021 at OP 19.

<sup>14</sup> Id. at 43.

<sup>15</sup> D.19-09-027 and D.19-12-065 at 4-7.

## Definitions

California Indian Country – Per D.19-09-027 all California Indian Country is defined as Disadvantaged Communities (see definition below) for purposes of the SGIP equity budget.<sup>16</sup>

Disadvantaged Community (DAC) – Under the SGIP Equity Budget, a disadvantaged community is defined as any census tract that ranks in the statewide top 25% most affected census tracts in the most current version of the environmental health screening tool, CalEnviroScreen, plus census tracts that score within the highest 5% of CalEnviroScreen’s pollution burden but do not receive an overall CalEnviroScreen score.<sup>17</sup>

Low-Income Community - For the purpose of the SGIP Equity Budget, a low-income community pursuant to section 39713(d)(2) of the Health and Safety Code. “Low-income communities” are census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 50093.<sup>18</sup>

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<sup>16</sup> D.19-09-027 at 11.

<sup>17</sup> D.17-10-004 at 30.

<sup>18</sup> Ibid.

March 20, 2020

**Advice 4218-G-A/5764-E-A**

(Pacific Gas and Electric Company U 39 M)

**Advice 4167-E-A**

(Southern California Edison Company U 338 E)

**Advice 5589-G-A**

(Southern California Gas Company U 904 G)

**Advice 109-E-A**

(Center for Sustainable Energy<sup>®</sup>)

Public Utilities Commission of the State of California

**Subject: Supplemental Advice Letter of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Center For Sustainable Energy (CSE) and Southern California Gas Company (SoCalGas), collectively the Joint Program Administrators (PAs), to address topics raised in protests filed March 9, 2020, to the Joint PA Advice Letter, “Proposed Revisions to the Self-Generation Incentive Program Handbook to Further Incorporate Requirements Pursuant to Decision 19-09-027,” submitted by the Joint PAs on February 18, 2020.**

On behalf of the Joint PAs, PG&E hereby submits this Supplemental Advice Letter to the Joint PA Advice Letter titled, *Proposed Revisions to the Self-Generation Incentive Program Handbook to further Incorporate Requirements Pursuant to Decision (D.) 19-09-027*, submitted on February 18, 2020. In their March 16, 2020 reply, the Joint PAs agreed to submit this Supplemental Advice Letter at a later date to incorporate further revisions as discussed in their reply. This Supplemental Advice Letter supplements the original Joint PA Advice Letter but does not replace it in its entirety.

Specifically, this Supplemental Advice Letter addresses two topics raised by stakeholders in their protests:

- Protest of Tesla to Self-Generation Incentive Program (SGIP) Handbook project sizing language found in Sections 5.2.4 and 5.4.1.

- Protest of the California Solar and Storage Association (CALSSA) regarding Multi-Family and Virtual Net Energy Metering (VNEM) issues.

## **Background**

On February 18, 2020, the Joint PAs submitted the Joint PA Advice Letter, *Proposed Revisions to the Self-Generation Incentive Program Handbook to Further Incorporate Requirements Pursuant to Decision 19-09-027*, that seeks to implement the modifications to the Handbook detailed above.

On March 9, 2020, one stakeholder submitted a Response to the Joint PA Advice Letter and four stakeholders submitted Protests to the Joint PA Advice Letter, two of which will be addressed in the discussion below.

On March 16, 2020, the SGIP PAs submitted their, “*Joint Reply of the Self-Generation Incentive Program’s Program Administrators to Protests of California Energy Storage Alliance, Tesla Inc, Solar Technologies, and California Solar & Storage Association and Response of GRID Alternatives to Joint Program Administrators’ Advice Letter re: Proposed Revisions to the Self-Generation Incentive Program Handbook to Further Incorporate Requirements Pursuant to Decision 19-09-027.*”

The March 16, 2020 Joint PA Reply also indicated that the Joint PAs would submit a Supplemental Advice letter addressing specific issues omitted from their February 18, 2020 and March 16, 2020 filings where the PAs agreed with suggested edits or recommendations in Protests.

Specifically, this Joint PA Supplemental Advice Letter addresses project sizing and Multifamily/Virtual Net Energy Metering (VNEM) – two key issues raised in the aforementioned Protests.

## **SGIP Energy Storage Project Sizing**

In the Joint Reply, the PAs agreed with Tesla’s protest which appropriately identified that D.19-09-027 sought to allow the size of a project to exceed a customer’s 12-month annual peak demand in instances where the modular nature of a storage system would limit the size of a system.<sup>1</sup>

As such, the PAs seek to revise Handbook Section 5.2.4, System Size Parameters, with red-text indicating revised language as follows:

*System size requirements are applicable for systems that are rated above 10 kW. Systems that are rated at 10 kW or less are exempt from the sizing requirements.*

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<sup>1</sup> Tesla Protest at 3.

*Energy storage projects that are not receiving equity budget resiliency incentives or receiving the resiliency adder, whether paired or stand-alone, may be sized up to the Host Customer's previous 12-month annual peak demand (kW). Energy storage systems that are receiving equity budget resiliency incentives or that are receiving the resiliency adder may be sized greater than the Host Customer's previous 12-month peak demand if this is necessary due to modular component sizes to accommodate the customer's peak load, and provided they demonstrate proof of this need before the incentives are paid. For new construction or projects with future load growth, projects can be sized up to future peak demand, but the load must be substantiated before the incentive can be paid.*

*HVAC-integrated S-TES systems must be sized no larger than the tonnage of their accompanying HVAC unit and cannot be integrated with HVAC units greater than 20 tons. Refrigeration TES systems must be sized no larger than the tonnage of their accompanying refrigeration system(s).*

Additionally, PAs seek to revise Handbook Section 5.4.1, Required Documentation for Reservation Request, item 3. The strikethrough language is to be replaced by the following language:

*~~Systems that have installed an inverter that causes the system to be oversized and cannot justify the size with adequate load documentation must provide documentation as proof that the oversized component was necessary for the project.~~ Resiliency projects requesting to receive incentives for a system that is sized above peak load necessary due to modular component sizes to accommodate the customer's peak load must demonstrate proof of this need.*

### **Multi-Family / VNEM Issues**

The protest submitted by CALSSA appropriately identified the need for further clarification on the treatment of multifamily projects for the equity resiliency budget.<sup>2</sup> The SGIP PAs agree with CALSSA that it is necessary to further clarify how to categorize these projects that serve both residential (i.e., tenant) and non-residential (i.e., common area) loads. Also, clarification is required to determine which projects would need to adhere to residential or non-residential GHG compliance rules.

The PAs will continue to consult with industry stakeholders to better understand the potential configuration of these energy storage systems and will address GHG rules and classification of projects for multifamily energy storage interconnecting through a VNEM tariff in the forthcoming SB 700 Implementation Advice Letter to be submitted on April 15, 2020.

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<sup>2</sup> CALSSA Protest at 2.

### **Protests**

The SGIP PAs respectfully request that the Commission maintain the original protest period designated in Advice 4218-G/5764-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.

### **Effective Date**

The SGIP PAs request that this Tier 2 Advice Letter become effective on regular notice, March 19, 2020, which is the date requested in the Joint PA Advice Letter submitted on February 18, 2020.

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

/S/

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Erik Jacobson  
Director, Regulatory Relations

cc: Service List R.12-11-005



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39M)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4218-G-A/5764-E-A

Tier Designation: 2

Subject of AL: Supplemental Advice Letter of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Center For Sustainable Energy (CSE) and Southern California Gas Company (SoCalGas), collectively the Joint Program Administrators (PAs), to address topics raised in protests filed March 9, 2020

Keywords (choose from CPUC listing): Compliance, Self Generation

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-09-027

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:

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: 3/19/20

No. of tariff sheets: 0

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: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss 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  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Erik Jacobson, c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility Name: Pacific Gas and Electric Company  
Address: 77 Beale Street, Mail Code B13U  
City: San Francisco, CA 94177  
State: California Zip: 94177  
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Title:  
Utility Name:  
Address:  
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State: District of Columbia Zip:  
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**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	Redwood Coast Energy Authority
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
Alta Power Group, LLC	Energy Management Service	SCD Energy Solutions
Anderson & Poole	Engineers and Scientists of California	SCE
Atlas ReFuel	Evaluation + Strategy for Social	SDG&E and SoCalGas
BART	Innovation	SPURR
Barkovich & Yap, Inc.	GenOn Energy, Inc.	San Francisco Water Power and Sewer
P.C. CalCom Solar	Goodin, MacBride, Squeri, Schlotz &	Seattle City Light
California Cotton Ginners & Growers Assn	Ritchie	Sempra Utilities
California Energy Commission	Green Power Institute	Southern California Edison Company
California Public Utilities Commission	Hanna & Morton	Southern California Gas Company
California State Association of Counties	ICF	Spark Energy
Calpine	IGS Energy	Sun Light & Power
Cameron-Daniel, P.C.	International Power Technology	Sunshine Design
Casner, Steve	Intestate Gas Services, Inc.	Tecogen, Inc.
Cenergy Power	Kelly Group	TerraVerde Renewable Partners
Center for Biological Diversity	Ken Bohn Consulting	Tiger Natural Gas, Inc.
Chevron Pipeline and Power	Keyes & Fox LLP	TransCanada
City of Palo Alto	Leviton Manufacturing Co., Inc.	Troutman Sanders LLP
City of San Jose	Los Angeles County Integrated	Utility Cost Management
Clean Power Research	Waste Management Task Force	Utility Power Solutions
Coast Economic Consulting	MRW & Associates	Utility Specialists
Commercial Energy	Manatt Phelps Phillips	Water and Energy Consulting Wellhead
Crossborder Energy	Marin Energy Authority	Electric Company
Crown Road Energy, LLC	McKenzie & Associates	Western Manufactured Housing
Davis Wright Tremaine LLP	Modesto Irrigation District	Communities Association (WMA)
Day Carter Murphy	NLine Energy, Inc.	Yep Energy
Dept of General Services	NRG Solar	
Don Pickett & Associates, Inc.	Office of Ratepayer Advocates	
Douglass & Liddell	OnGrid Solar	
	Pacific Gas and Electric Company	
	Peninsula Clean Energy	