

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



July 6, 2020

Advice Letter 5791-E/5791-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Modifications to PG&E's Electric Rule 21 Tariff to Support PG&E's
Customer Resiliency Support Program (CRoSP)**

Dear Mr. Jacobson:

Advice Letter 5791-E/5791-E-A is approved as of May 28, 2020, per resolution E-5079
Ordering Paragraphs.

Sincerely,

A handwritten signature in cursive script that reads 'Edward Randolph'.

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

April 15, 2020

Advice 5791-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Modifications to PG&E's Electric Rule 21 Tariff to Support PG&E's Customer Resiliency Support Program (CRoSP)

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this supplemental advice letter to clarify and supplement Advice Letter (AL) 5791-E. AL 5791-E was submitted on March 24, 2020 proposing revisions to Electric Rule 21 - *Generating Facility Interconnections* (Rule 21). The affected tariff sheet is listed on the enclosed Attachment A. As described below, this proposed change modifies project queuing requirements in Rule 21, Section E.5.c. to help prioritize and streamline interconnection applications to deliver resiliency services at key sites and locations.

Background

The California Public Utilities Commission (CPUC or Commission) initiated Rulemaking (R.) 19-09-009¹ on September 12, 2019 pursuant to Senate Bill 1339². One of the goals in R. 19-09-009 is to “examine whether to launch pilot microgrid programs to benefit communities most likely to be affected by public safety power shutoffs.”³

Subsequently on December 20, 2019, the Commission issued a scoping memo⁴ that divided the proceeding into three tracks. “Track 1 of the proceeding encompasses the

¹ Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies.

² Senate Bill (SB) 1339 (Stern, 2018). SB 1339 requires the Commission, in consultation with the California Energy Commission, and the California Independent System Operator Corporation, by December 1, 2020, to take a number of specific actions to facilitate the commercialization of microgrids for distribution customers of large electrical corporations. These actions include developing standards, protocols, guidelines, methods, rates, and tariffs that serve to support and reduce barriers to microgrid deployment while prioritizing system, public, and worker safety, and avoiding shifting costs between ratepayers.

³ R. 19-09-009 page 2.

⁴ Assigned Commissioner's [Scoping Memo And Ruling For Track 1](#).

Commission's goal of deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of putting some microgrid and other resiliency strategies in place by Spring or Summer 2020, if not sooner."

On January 21, 2020, the assigned Administrative Law Judge (ALJ) issued another Ruling⁵ regarding Track 1, which "seeks comment from interested parties on the attached Energy Division staff proposal titled, "Short-Term Actions to Accelerate the Deployment of Microgrids and Related Resiliency Solutions" (Staff Proposal). Comments were prepared and filed by stakeholder parties. Specifically, the Staff Proposal includes a proposal that would accelerate interconnections for key locations, customers, and/or facilities by requiring the IOUs to develop new rules to allow eligible projects to move ahead of other projects in the queue (often referred to as "queue jumping").⁶

In order to meet the Track 1 goals, PG&E developed processes to expedite interconnection of generation projects as described below in order to be in place by early Summer 2020. PG&E's program is called the Customer Resiliency Support Program (CReSP).

Under CReSP, PG&E is requesting that certain project types (i.e., Momentary Parallel Operation⁷ Applicants of any size, and Non-Export Applicants 30 kilowatts (kW) or less⁸) be exempt from the queue

⁵ The January 21, 2020 [Administrative Law Judge's Ruling Requesting Comments On Track 1 Microgrid And Resiliency Strategies Staff Proposal](#) with included Attachment A - *Short-Term Actions to Accelerate the Deployment of Microgrids and Related Resiliency Solutions*

⁶ *Id.*, pages 9 and 13.

⁷ Rule 21 Section C – Definitions – *Momentary Parallel Operation*: *The Interconnection of a Generating Facility to the Distribution and Transmission System for one second (60 cycles) or less.* (see Sheet 27). It is typically used to provide uninterrupted power to a customer load as the load transitions from utility interconnected, from when their generating facility starts up and is interconnected in *parallel momentarily* with the utility until it goes into "grid forming mode" when both load and generation are disconnected from the utility. It contrasts with a "break before make" interconnection, where during such a transition there is a momentary interruption of power to the load, and when the generating facility starts after the load is disconnected and hence the generating facility is never truly utility-interconnected and subject to Rule 21.

Momentary Parallel Operation is further discussed in Rule 21 Sections F.5.b, H.1.b & e, Hh.1.b & e.

⁸ PG&E continues to use the same 30 kilowatt limit it used when it created Form 79-1199 - *Agreement and Authorization Non-Export Stand-alone Energy Storage of 30 Kilowatts or Less* - in the March 29, 2019 [AL 5513-E](#) in Section C.

As noted in AL 5513-E, Form 79-1199 was in turn based on Form 79-1193 - *Agreement and Customer Authorization Net Energy Metering Interconnection for Solar and/or Wind Electric Generating Facilities of 30 Kilowatts or Less Paired with Energy Storage of 10 Kilowatts or Less* – which was created in AL [5140-E](#) in Section 11 to support the NEM successor program.

assignment requirement⁹ to facilitate interconnection cycle time improvements for all customer types. PG&E proposes that these project types will remain exempt from the queue assignment requirement for the entirety of the project lifecycle. PG&E believes this proposed tariff change will help accelerate resiliency focused interconnection projects for key sites and locations, as well as all other customer types, that may be impacted by PSPS activations as specified in the Rulings: *“In each of the above issues, the Commission will be considering, but not be limited to, the following elements for key sites and locations:*

- (1) customers with access and functional needs;*
- (2) medical baseline customers;*
- (3) police stations;*
- (4) fire stations;*
- (5) schools (e.g., educational facilities);*
- (6) water and waste water facilities;*
- (7) community centers;*
- (8) senior centers; and*
- (9) disadvantaged and hard to reach communities.*

Form 79-1193 borrowed from Form 79-1151A. - *Net Energy Metering Interconnection for Solar And/or Wind Electric Generating Facilities Of 30 Kilowatts Or Less Agreement and Customer Authorization* and which ultimately has its roots in the 2007 [AL 3068-E](#) that changed the division of its NEM interconnections from greater or less than 10 kw into those 30 kw or less and justified this based on the understanding that *“ninety-six (96) percent – of its NEM interconnections are under 30kW. PG&E believes most of its customers could benefit from a simpler interconnection process and that simplification can be accomplished with no reduction in system safety or reliability”*

⁹ Per [Rulemaking \(R.\)11-09-011](#) and [D.12-09-018](#) page 4, which cites to the R. 11-09-011 June 20, 2012 [Assigned Commissioner’s Scoping Memo and Ruling](#) which for phase 1 in section 4 - *Scope of Issues* – identified as the third item: *Evaluate and determine appropriate processes for establishing distribution-level interconnection queues (serial or cluster)*. Pages 23-24 of D.12-09-018 note, *“In addition, the rulemaking and the scoping memo confirm that this proceeding seeks to “evaluate and determine appropriate processes for establishing distribution-level interconnection queues (serial or cluster).”⁵⁹ Participants in the workshops identified this concern as the absence of a queue management system for exporting generating facilities.⁶⁰ The presently effective Rule 21 establishes a first-come, first-served approach to interconnection processing but does not explain how to implement this approach for exporting generating facilities that require detailed study and may or may not be electrically interdependent with each other, and/or the transmission system. The Revised Rule 21 remedies these flaws through the introduction of several steps. **First, the Revised Rule 21 establishes a first-ever public queue for non-net energy metering applicants, and sets out rules under which all non-net energy metering applicants may obtain a queue position.**⁶¹ An applicant’s queue position relative to those further ahead in the queue determines the timing of interconnection studies and the applicant’s share of triggered upgrades. ...”* (Emphasis added.)

As specified in Rule 21, Section E.5 provided below, PG&E is required to deem each interconnection application complete and valid when all required project items have been received. This includes the Applicant curing any application deficiencies identified by PG&E and submittal of the correct Interconnection Request fee payment.

"Any Applicant for Interconnection to Distribution Provider's Distribution or Transmission System must submit a complete and valid Interconnection Request. An Interconnection Request will be considered complete and valid when all items required for an Interconnection Request have been received by Distribution Provider and deemed valid by Distribution Provider."

Currently, all non-NEM Applicants and NEM-2 Applicants with Generating Facilities over 1MW are assigned a queue position once the application has been deemed complete and valid. In accordance with Section E.5.c provided below, PG&E assigns queue positions to relevant applications on a weekly basis depending on the date and time that the application was received and the date that any application deficiencies were cured.

"Distribution Provider shall assign a queue position to all non-Net Energy Metering Applicants and NEM-2 Applicants with Generating Facilities size above 1 MW (except as provided in Section D.13.e). If there were no deficiencies in the Interconnection Request, the queue position will be based on the date Distribution Provider received the Interconnection Request. If there were deficiencies in the Interconnection Request, the queue position will be based on the date Distribution Provider determines an Interconnection Request to be complete and valid."

Momentary Parallel Operation project types, as defined in Rule 21, are specifically designed to provide resiliency and do not require system upgrades. Similarly, Non-Export Applicants 30 kW or less, when designed for resiliency, very rarely require system upgrades. Therefore, these project types have little to no impact on other queued project types but will benefit from the cycle time reduction resulting from this tariff change. Cost responsibility by Generating Facility Type is identified in Rule 21 Section E.4.f, Table E.2 and E.3, and will not be affected by this tariff change.

By exempting Momentary Parallel Operation Applicants of any size, and Non-Export Applicants 30 kW or less from the queue assignment requirement, PG&E expects that these project types will experience an overall cycle time reduction of roughly two weeks. To ensure PG&E captures all such customers in the affected areas, the changes to Rule 21 are not specific to any particular customer type. PG&E recommends that this tariff change remain in effect for three years, through 2022, whereupon PG&E and the CPUC will review the tariff change to determine if it is providing the intended benefit and should remain or be eliminated.

Tariff Revisions

- 1.) Modify Section E.5.c. (Sheet 68) to eliminate Queue Position requirement for Momentary Parallel Operation, of any size, as well as Non-Export Applicants 30kW and less. This supplement removes the phrase “within a PSPS impacted area” from the Rule 21 changes added in AL 5791-E marked in purple below:

E. INTERCONNECTION REQUEST SUBMISSION PROCESS (Cont’d.)

5. INTERCONNECTION REQUEST VALIDATION AND ASSIGNMENT OF QUEUE POSITION (Cont’d.)

c. Assignment of Queue Position

Distribution Provider shall assign a queue position to all ~~non-Net Energy Metering Applicants and~~ NEM-2 Applicants with Generating Facilities sized above 1 MW (except as provided in Section D.13.e) ~~and all non-Net Energy Metering Applicants. Applicants within a PSPS impacted area applying for Momentary Parallel Operation of any size, or Non-Export Applicants with Gross Nameplate Capacity of 30 kW or less, will not be assigned a queue position by the Distribution Provider.~~

...

Distribution Provider shall maintain a single queue for all ~~non-Net Energy Metering and >1-MW NEM-2 (except for as provided in Section D.13.e)~~ Interconnection Requests ~~requiring a Queue Position and~~ governed by this Rule with a Point of Interconnection on Distribution Provider’s Distribution System.

Protests

Pursuant to General Order 96-B, Section 7.5.1 - *Additional Information; Supplements* – PG&E requests that this supplemental advice letter not automatically continue or reopen the protest period or delay the effective date of the advice letter.

Effective Date

PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

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.07-07-007 and R.09-09-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address

PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List R.17-07-007
Service List R.19-09-009

Attachments:

Public Attachment A – Clean version of updated Rule 21 Tariff

Public Attachment B – Redline of Rule 21 Tariff Revisions



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 U39E)

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) #: 5791-E-A

Tier Designation: 3

Subject of AL: Supplemental: Modifications to PG&E's Electric Rule 21 Tariff to Support PG&E's Customer Resiliency Support Program (CReSP)

Keywords (choose from CPUC listing): Compliance, Rule 21

AL Type: Monthly Quarterly Annual One-Time Other:

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

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:

No. of tariff sheets: 3

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: See Attachment A

Service affected and changes proposed¹: N/A

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

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
505 Van Ness Avenue
San Francisco, CA 94102
Email: 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
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
46398-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 68	42365-E
46399-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46333-E
46400-E	ELECTRIC TABLE OF CONTENTS Sheet 20	46386-E



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 68

E. INTERCONNECTION REQUEST SUBMISSION PROCESS (Cont'd.)

5. INTERCONNECTION REQUEST VALIDATION AND ASSIGNMENT OF QUEUE POSITION (Cont'd.)

c. Assignment of Queue Position

Distribution Provider shall assign a queue position to all NEM-2 Applicants with Generating Facilities sized above 1 MW (except as provided in Section D.13.e) and all non-Net Energy Metering Applicants. Applicants applying for Momentary Parallel Operation of any size, or Non-Export Applicants with Gross Nameplate Capacity of 30 kW or less, will not be assigned a queue position by the Distribution Provider. If there were no deficiencies in the Interconnection Request, the queue position will be based on the date Distribution Provider received the Interconnection Request. If there were deficiencies in the Interconnection Request, the queue position will be based on the date Distribution Provider determines an Interconnection Request to be complete and valid. Should Distribution Provider not meet any deadline for providing the first (Section E.5.b.i) or second written notification (Section E.5.b.ii) to Applicant regarding the Interconnection Request, Applicant's queue position shall be set on the final day of the period in which Distribution Provider was obligated to provide such written notification, provided, however, that Applicant meets deadlines as set out above to submit any additional information required for a valid Interconnection Request following such written notification under Section E.5.b.i or E.5.b.ii, and that Distribution Provider determines that the Interconnection Request is valid.

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|
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Distribution Provider shall maintain a single queue for all Interconnection Requests requiring a Queue Position and governed by this Rule with a Point of Interconnection on Distribution Provider's Distribution System. For Interconnection Requests that are studied under the Distribution Group Study Process, the effective queue position for all Interconnection Requests in a Distribution Study Group will be derived on the last day of the Distribution Group Study window for that Distribution Study Group. For Interconnection Requests that are studied under the Transmission Cluster Study Process, the queue position will be the applicable cluster's queue position.

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(Continued)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page.....		46399-E	(T)
Rate Schedules.....	46334,46335,46269,45403,46270,46266,43935,44177-E		
Preliminary Statements.....	45406,44687,42856*,46219,41723,40591,44724,46131-E		
Rules.....	45270,43023, 46400-E		(T)
Maps, Contracts and Deviations.....	37960-E		
Sample Forms....	40925*,37631,45743,41573*, 37632,41152*,41153,37769,44035,40671,37169-E		

(Continued)

Advice 5791-E-A
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

April 15, 2020



ELECTRIC TABLE OF CONTENTS

Sheet 20

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rules (Cont'd)		
Rule 21	Generating Facility Interconnections..... 42298,42299,42300,42301,42302,42303,42304,42305,42306,42307,42308,42309,42310,42311,42312,42313,42314,42315,42316,42317,42318,42319,42320,42321,42322,42323,42324,42325,42326,42327,42328,42329,42330,42331,42332,42333,42334,42335,42336,42337,42338,42339,42340,42341,42342,42343,42344,42345,42346,42347,42348,42349,42350,42351,42352,42353,42354,42355,42356,42357,42358,42359,42360,42361,42362,42363,42364, 46398 ,42366,42367,42368,42369,42370,42371,42372,42373,42374,42375,42376,42377,42378,42379,42380,42381,42382,42383,42384,42385,42386,42387,42388,42389,42390,42391,42392,42393,42394,42395,42396,42397,42398,42399,42400,42401,42402,42403,42404,42405,42406,42407,42408,42409,42410,42411,42412,42413,42414,42415,42416,42417,42418,42419,42420,42421,42422,42423,42424,42425,42426,42427,42428,42429,42430,42431,42432,42433,42434,42435,42436,42437,42438,42439,42440,42441,42442,42443,42444,42445,42446,42447,42448,42449,42450,42451,42452,42453,42454,42455,42456,42457,42458,42459,42460,42461,42462,42463,42464,42465,42466,42467,42468,42469,42470,42471,42472,42473,42474,42475,42476,42477,42478,42479,42480,42481,42482,42483,42484,42485,42486,42487,42488,42489,42490,42491,42492,43700,43701,43702,43703,43704,46381,43706,42500,46382,44783,44784,46383,43709,46384,43711,43712,43713,42510,42511,42512,42513,42514,42515,42516,42517,42518,42519,42520,42521,42522,42523,42524,42525,42526,42527,42528,42529,42530,42531,42532,42533,42534,42535,42536,42537,42538,42539,42540,42541,42542,42543,42544,42545,42546,42547,42548,42549,42550,42551,42552,42553,42554,42555,43945,42557,43946,42294-E	(T)
Rule 22	Direct Access Service 33491,29165,29166,29167,29168,29169,29170,29171,14896,30872,30873,32758,32992,32993,32994,32995,30879,30880,30881,30882,30883,30884,30885,30886,30887,30888,30889,30890,30891,30892,30893,30894,30895,43002,30897,30898,30899,30900,30901,30902,30903,30904,30905,30906,30907,30908,30910,30911,30912,30913,30914,30915,33492,30493,30494,30495,30496,30497,30498,30923,30924,30925,30926,33499,33500,33501,33502,33503-E	
Rule 22.1	Direct Access Service Switching Exemption Rules..... 44759,32404,44760,44761,44762,44763,44764,44765,44766,44767,44768,44769,44770,44771,44772,44773,44774-E	
Rule 23	Standby Service..... 25527*,25528*,32810,25530*,25531*25532*,25533*,25534*,30933,29202,25537*,25538*,29471,25540*,25541*,25542*,25543*,25544*,29472,27268,30934,30935,30936,30937,30938,30939,35427,30941,30942,30943,30944,30945,30946,30947,30948,30949,30950,30951,30952,43003,43004,30955,30956,30957,30958,32811,30960,30961,30962-E	
Rule 23.2	Community Choice Aggregation Open Season25575,25576,25577,27270,27271-E	
Rule 24	Direct Participation Demand Response 33694,36693,35814,35856,36694,36695,33818,36696,35820,36697,36698,35823,36699,35825,36700,36701,35828,35829,35830,35831,35832,35833,35834,35835,35836,35837,36702,35839,35840,36703-E	
Rule 25	Release Of Customer Data To Third Parties34333,34334,34335,34336,34337-E	
Rule 27	Privacy and Security Protections for Energy Usage Data 32189,32190,32191,32192,32193,32194,32195,32196,32197,32198,32199,32200,32201,32202,32203,32204,32205-E	
Rule 27.1	Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data34311,34312,34313,34314,34315-E	
Rule 28	Mobilehome Park Utility Upgrade Program..... 41093,34628,34629,34630,34631,34632,35416,35417-E	

(Continued)

Advice 5791-E-A
April 15, 2020

Attachment B

Redline of Rule 21 Tariff Revisions



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 68

E. INTERCONNECTION REQUEST SUBMISSION PROCESS (Cont'd.)

5. INTERCONNECTION REQUEST VALIDATION AND ASSIGNMENT OF QUEUE POSITION (Cont'd.)

c. Assignment of Queue Position

Distribution Provider shall assign a queue position to all ~~non-Net Energy Metering Applicants and~~ NEM-2 Applicants with Generating Facilities sized above 1 MW (except as provided in Section D.13.e) and all non-Net Energy Metering Applicants. Applicants applying for Momentary Parallel Operation of any size, or Non-Export Applicants with Gross Nameplate Capacity of 30 kW or less, will not be assigned a queue position by the Distribution Provider. If there were no deficiencies in the Interconnection Request, the queue position will be based on the date Distribution Provider received the Interconnection Request. If there were deficiencies in the Interconnection Request, the queue position will be based on the date Distribution Provider determines an Interconnection Request to be complete and valid. Should Distribution Provider not meet any deadline for providing the first (Section E.5.b.i) or second written notification (Section E.5.b.ii) to Applicant regarding the Interconnection Request, Applicant's queue position shall be set on the final day of the period in which Distribution Provider was obligated to provide such written notification, provided, however, that Applicant meets deadlines as set out above to submit any additional information required for a valid Interconnection Request following such written notification under Section E.5.b.i or E.5.b.ii, and that Distribution Provider determines that the Interconnection Request is valid.

Distribution Provider shall maintain a single queue for all ~~non-Net Energy Metering and >1 MW NEM-2 (except as provided in Section D.13.e)~~ Interconnection Requests requiring a Queue Position and governed by this Rule with a Point of Interconnection on Distribution Provider's Distribution System. For Interconnection Requests that are studied under the Distribution Group Study Process, the effective queue position for all Interconnection Requests in a Distribution Study Group will be derived on the last day of the Distribution Group Study window for that Distribution Study Group. For Interconnection Requests that are studied under the Transmission Cluster Study Process, the queue position will be the applicable cluster's queue position.

(Continued)

Advice	5187-E-A	Issued by	Date Filed	May 31, 2018
Decision	16-06-052	Robert S. Kenney	Effective	June 30, 2018
		Vice President, Regulatory Affairs	Resolution	

**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	
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Water Power and Sewer
California Energy Commission	ICF	Seattle City Light
California Public Utilities Commission	IGS Energy	Sempra Utilities
California State Association of Counties	International Power Technology	Southern California Edison Company
Calpine	Intestate Gas Services, Inc.	Southern California Gas Company
Cameron-Daniel, P.C.	Kelly Group	Spark Energy
Casner, Steve	Ken Bohn Consulting	Sun Light & Power
Cenergy Power	Keyes & Fox LLP	Sunshine Design
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Chevron Pipeline and Power	Los Angeles County Integrated	TerraVerde Renewable Partners
City of Palo Alto	Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	MRW & Associates	TransCanada
Clean Power Research	Manatt Phelps Phillips	Troutman Sanders LLP
Coast Economic Consulting	Marin Energy Authority	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Water and Energy Consulting Wellhead
Crown Road Energy, LLC	NLine Energy, Inc.	Electric Company
Davis Wright Tremaine LLP	NRG Solar	Western Manufactured Housing
Day Carter Murphy	Office of Ratepayer Advocates	Communities Association (WMA)
Dept of General Services	OnGrid Solar	Yep Energy
Don Pickett & Associates, Inc.	Pacific Gas and Electric Company	
Douglass & Liddell	Peninsula Clean Energy	