

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 17, 2021

PG&amp;E Advice Letter 5878-E

Eric Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177  
Facsimile: (415) 973-3582  
E-mail: PGETariffs@pge.com

**Subject: Staff Disposition of PG&E's AL 5878-E--Inspection Process for PG&E's Rule 21  
Interconnection Application Process, Pursuant to Decision 20-06-017**

Dear Mr. Jacobson:

Pacific Gas and Electric Company (PG&E) submitted Advice Letter (AL) 5878-E, pursuant to Ordering Paragraph 2 of Decision (D.) 20-06-017. PG&E has explained it has met the requirements set forth in D.20-06-017 by illustrating specific technical criteria used by PG&E to determine where field inspections are necessary for grid safety and reliability. PG&E's AL 5878-E is approved with an effective date of August 15, 2020.

Attachment 1 contains a detailed discussion of the AL, the protest, replies and staff's determination that the AL is compliant with Ordering Paragraph (OP) 2 and Section 4.1.3 of D.20-06-017.

Please contact Jose Aliaga-Caro of the Energy Division staff at [jc5@cpuc.ca.gov](mailto:jc5@cpuc.ca.gov) if you have any questions.

Sincerely,

Handwritten signature of Edward Randolph, followed by the word "FOR" in capital letters.

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy  
California Public Utilities Commission

cc: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com); [Justin.Regnier@cpuc.ca.gov](mailto:Justin.Regnier@cpuc.ca.gov); [jc5@cpuc.ca.gov](mailto:jc5@cpuc.ca.gov);  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov); [gmorris@emf.net](mailto:gmorris@emf.net); Service Lists R.14-07-002, R.17-07-007, and  
R.19-09-009.

**Appendix: Background and Disposition for  
PG&E's AL 5878-E**

***Background***

D.20-06-017—Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions—issued on June 11, 2020 in the Rulemaking (R.) 19-09-009,<sup>1</sup> adopts short term actions to accelerate microgrid development and resiliency solutions. OP 2 states:

Pacific Gas and Electric Company(PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision that demonstrates their compliance with Section 4.1.3 of this decision by: (a) providing specific technical criteria used to determine where field inspections are necessary for grid safety and reliability; and (b) in cases where an inspection is deemed necessary, the process by which utilities will accept videos, photos, and virtual inspection, along with attestations of authenticity and accuracy from the contractor. We direct the utilities to adopt these approaches to the extent possible while assuring that safety and reliability are not compromised. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 2.

In Section 4.1.3 of D.20-06-017 the Commission adopts Proposal 2 Option 1 and Option 3. Proposal 2 “identifies methods to increase the simplicity and transparency of the process that utilities use to inspect and sign-off on a project to reduce delays arising from utility site inspections.”<sup>2</sup> Option 1:

require[s] the IOUs publish the specific technical criteria they use to determine where field inspections are necessary for the safety and reliability of the grid...and Option 3, in cases where an inspection is necessary, require the IOUs to consider accepting photos or videos, along with attestations of their accuracy, from the contractor rather than requiring an in-person inspection.<sup>3</sup>

The Commission also notes the utilities’ reservations regarding virtual inspections—“SCE [argues] that the utilities should not be required in all instances to accept photos, technical information and other information in lieu of a field inspection.”<sup>4</sup> The Commission agreed and clarified that the aim of this endeavor “is to enhance transparency of technical information that may help developers construct their projects to minimize the need for field inspections while still promoting and ensuring the safety and reliability of the grid.”<sup>5</sup>

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<sup>1</sup> Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies.

<sup>2</sup> D.20-06-017 at 28.

<sup>3</sup> *Ibid.*

<sup>4</sup> D.20-06-017 at 29.

<sup>5</sup> *Ibid.*

PG&E's AL 5878-E was submitted on July 16, 2020 to respond to this requirement.<sup>6</sup> In its AL, PG&E provides information on when field inspections are necessary and explains why at this time it will not be proceeding with accepting a virtual inspection in lieu of an in-person field inspection. Per the requirements of OP 2, PG&E:

- Provides technical criteria used to determine where field inspections are necessary:
  - PG&E provides a table listing scenarios where field inspections are required (approximate 4% of interconnection requests):
    - For generating facilities that employ protective relays, Automatic Transfer Switches, or unapproved power control systems
    - Inverter-based technology where an AC Disconnect is required
    - Projects that include variance requests or deviations
  - PG&E provides a table listing projects where it does not require field inspections (approximate 96% of interconnection requests):
    - Interconnection of simple inverter-based generators
- Discusses the process (if any) by which it will accept videos, photos, and virtual inspection:
  - PG&E believes that a virtual inspection process for the approximate 4% of interconnection requests that require field inspections would compromise safety and reliability at this time.
    - PG&E requires a field inspection for inverter-based projects when a required AC Disconnect is installed
      - Historic data shows that 15% of these inverter-based projects fail field inspection for various Greenbook violations.
      - PG&E has found that all these failures would compromise safety and reliability and were identified due to the in-person field inspection
  - PG&E schedules and completes field inspections in 5.65 calendar days, on average
  - PG&E states that it will continue to monitor failure rates and commit to implementing a virtual inspection process when safety and reliability are not at risk.

### ***Protest by Green Power Institute, and Reply by PG&E***

Green Power Institute (GPI) submitted a protest to PG&E's AL on August 6, 2020. Protests were due on August 5, 2020; therefore, this protest was filed late. Energy Division informed PG&E that GPI's late protest was accepted, and per GO 96-B, Section 7.4.4, PG&E had five business days to reply.

GPI argues that PG&E provides insufficient information to conclude that virtual inspections can never be used to provide safe and reliable interconnection, and does not comply with OP 2 of D.20-06-017. GPI states that SCE is able to accept remote inspections for some interconnection scenarios and states "PG&E should be required to provide a more detailed explanation of why SCE is able to remotely verify certain interconnections without compromising safety and reliability, while PG&E cannot."<sup>7</sup> GPI argues that PG&E's statistic:

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<sup>6</sup> SCE's AL 4257-E and SDG&E's AL 3573-E were also submitted to respond to this requirement. The ALs have been approved and are therefore not discussed.

<sup>7</sup> GPI Protest at 3.

that field inspections of facilities generating more than 30 kW with a disconnect switch fail inspections 15% of the time...alone is not enough to justify PG&E's failure to allow any remote inspections. If photo-based verification can be done safely and reliably for SCE, then PG&E needs to offer a more detailed explanation as to why it cannot do the same. Specifically, PG&E should provide additional information on why 15% of projects are failing field inspections. Without knowing why the inspections are failing, there is no way to understand whether these failures could be detected as effectively through the submission of photographs or videos. Similarly, PG&E also must explain what a field inspector sees that could not be depicted in a photograph or video.<sup>8</sup>

PG&E filed a timely reply to GPI on August 17, 2020.

In its reply to GPI, PG&E notes that the scope of the field inspection involves a small number of inspections (under 5% of PG&E interconnection projects), and that PG&E has had a good track record for inspection timelines. PG&E explains that based on 2019 data, 689 out of 4,545 field inspections failed due to abnormal field conditions; the main issues for failure were related to lockable AC disconnects (such as the disconnect installed not matching the equipment noted in the Single Line Diagram), and abnormal conditions (such as having no access to metering facilities or electrical equipment mounted within the restricted area of a gas meter). PG&E also discusses its performance on meeting timelines: on average, in 2019 PG&E completed NEM inspections in 5.65 calendar days and 99.1% were completed within 10 calendar days. In reply to GPI's comparison to SCE, PG&E notes that each utility has different types of interconnections. PG&E also notes it is not set up to complete virtual inspections at this time—PG&E does not have a department, or processes, to complete this and establishing one would require effort and cost.

PG&E explains why field inspections are necessary, and argues that in its experience:

- Contractors do not always provide good visual evidence of installations;
- There are issues with validating any visual evidence that is provided--verifying the photos are authentic, and confirming the safety clearance distances conform with standards, are typical challenges with visual media.
- Many items observed during a field inspection cannot be depicted in a photograph or video, such as:
  - if the installed equipment operates as expected;
  - if there is 24/7 access to the metering facilities, including access from the public roadway;
  - if PG&E's metering security seals have not been removed or tampered with;
  - whether no customer equipment has been placed inside PG&E sealed metering sections; and
  - whether the lockable disconnect installed is the correct model number reflected on the application.

## ***Disposition***

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<sup>8</sup> *Ibid.*

Energy Division Staff (Staff) has reviewed D.20-06-017, PG&E's AL 5878-E, GPI's protest, and PG&E's reply and finds that the AL is in compliance with Section 4.1.3 and OP 2 of D.20-06-017.

OP 2 ordered PG&E to: (1) provide specific technical criteria used to determine where field inspections are necessary for grid safety and reliability; and (2) in cases where an inspection is deemed necessary, the process by which it will accept videos, photos, and virtual inspection. Staff finds PG&E has adequately described the projects for which it will continue to require field inspections and substantiated the reasons for doing so. PG&E has provided scenarios where field inspections are required and has stated why they are necessary for certain projects.

PG&E, however, did not discuss the process by which it will accept videos, photos, and virtual inspection. D.20-06-017 did not order the utilities to implement virtual inspections but rather only directed the utilities to "consider accepting photos or videos." Additionally, D.20-06-017 does not discuss any cost recovery mechanism with regards to Proposal 2. As noted earlier, in Section 4.1.3, the Commission considered the IOUs' reservations regarding virtual inspections and clarified that the aim of this endeavor is to enhance transparency of technical information to help developers construct their projects to minimize the need for field inspections while still promoting and ensuring the safety and reliability of the grid. Additionally, OP 2 directed the utilities to "adopt these approaches to the extent possible while assuring that safety and reliability are not compromised." Therefore, Staff concludes that PG&E has explained why at this time it will not, due to safety and reliability concerns, be proceeding with accepting a virtual inspection in lieu of an in-person field inspections for a small percentage of projects seeking interconnection.

D.20-06-017, OP 4 orders the utilities to report, in a compliance filing due February 15, 2021, the results of the required actions the utilities have taken.<sup>9</sup> In this report,<sup>10</sup> PG&E supplies statistics for July 2020 through December 2020 as follows:

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<sup>9</sup> OP 4 of D.20-06-017 states:

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit compliance filing on February 15, 2021 in this proceeding and to Energy Division at [energydivisioncentralfiles@cpuc.ca.gov](mailto:energydivisioncentralfiles@cpuc.ca.gov), that describes the results of the required actions described under Section 4.1.3. The utilities are ordered to discuss, with Energy Division, what specific information is necessary before filing the compliance filing. Nevertheless, items that must be reported in this compliance filing shall include: (a) description of the number of projects that utilized the interconnection proposals adopted in this decision; (b) the success in meeting Rule 21 interconnection timeliness; (c) if any project experienced a delay, the utility shall provide an explanation about why the project was delayed; and (d) the utilities shall track the number and type of projects that use the template-based interconnection process adopted in Interconnection Proposal 1.

<sup>10</sup> *Pacific Gas and Electric Company (U 39 E) Compliance Filing Regarding Microgrid Interconnection* at 5. Filed on February 16, 2021 in R.19-09-009.

Work Type	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total
<b>Projects auto-passed</b>	<b>4916</b>	<b>4956</b>	<b>5507</b>	<b>5547</b>	<b>5125</b>	<b>5351</b>	<b>31402</b>
<b>Field inspections completed within 10 days</b>	347	281	292	366	315	384	<b>1985</b>
<b>Field inspections not completed within 10 days</b>	2	3	2	2	10	15	<b>34</b>
<b>Total field inspections completed</b>	349	284	294	368	325	399	<b>2019</b>
<b>Total projects</b>	5265	5240	5801	5915	5450	5750	<b>33421</b>
<b>Percent of total projects requiring field inspection</b>	6.63%	5.42%	5.07%	6.22%	5.96%	6.94%	<b>6.04%</b>
<b>Percent of field inspections completed within 10 days</b>	99.43%	98.94%	99.32%	99.46%	96.92%	96.24%	<b>98.32%</b>

In all instances the total number of projects requiring field inspection for July 2020 through December 2020 ranges from 5.07 to 6.63 percent, which is in the same order of magnitude as the 4 to 5 percent reported in PG&E’s AL which was submitted on July 16, 2020. This is a small percentage of projects seeking interconnection that require field inspections.

In its protest, GPI argues (1) that PG&E should provide information on why 15% of projects are failing field inspections; and (2) PG&E supply an explanation on what field inspections show that cannot be depicted through virtual inspections. Staff finds that in reply to GPI’s protest, PG&E has addressed GPI’s requests. PG&E has explained that less than 5% of its interconnection projects require inspections, and out of that percentage, 15% are failing field inspections. PG&E has addressed GPI’s request to provide additional information on why 15% of projects are failing field inspections—the main issues for failure were related to lockable AC disconnects (such as the disconnect installed not matching the equipment noted in the Single Line Diagram), and abnormal conditions (such having no access to metering facilities or electrical equipment mounted within the restricted area of a gas meter). Similarly, in its reply, PG&E has explained what a field inspector sees that could not be depicted in a photograph or video.

GPI also notes that SCE is able to accept remote inspections for some interconnection scenarios and argues that “PG&E should be required to provide a more detailed explanation of why SCE is able to remotely verify certain interconnections without compromising safety and reliability, while PG&E cannot.”<sup>11</sup> Staff finds that such comparison was not required in D.20-06-017 and therefore is out of scope.

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<sup>11</sup> *Ibid.*

While some might argue that the goal of this efforts was to assure the option of remote inspections in all cases, this is not what the Decision required. As the Commission stated in D. 20-06-017, “SCE also argues that the utilities should not be required in all instances to accept photos, technical information and other information in lieu of a field inspection.<sup>12</sup> We agree.” This language cannot be conformed with the idea that the Decision required remote inspections in all cases. Staff therefore may not direct such an outcome through an advice letter process.<sup>12</sup> This disposition, however, should not be interpreted as an Energy Division conclusion that virtual inspections are an impossibility. PG&E is encouraged to further explore ways to overcome the safety and reliability concerns it listed through more research such as discovering how SCE employs virtual inspections for the limited instances it allows them.

For the foregoing reasons, Staff denies GPI’s protest, and concludes that PG&E has met the requirements set forth in D.20-06-017; therefore, PG&E’s AL 5878-E is approved.

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<sup>12</sup> General Order 96-B, General Rule 5.1 provides in part, “The primary use of the advice letter process is . . . to conform the tariffs to the requirements of a statute or Commission order . . .” Further, General Rule 5.2 provides, “a utility must file an application to seek approval of . . . an alteration of any . . . practice, or rule as to result in a new rate.” Here, because PG&E has expressed that it would have to set up new systems to provide remote inspections, which would presumably require resources the expenses for which would likely be passed on to customers, we may not direct such a change in practice via advice letter.



**Erik Jacobson**  
Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B13U  
P.O. Box 770000  
San Francisco, CA 94177

Fax : 415-973-3582

July 16, 2020

**Advice 5878-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Inspection Process for PG&E's Rule 21 Interconnection Application Process, Pursuant to Decision 20-06-017**

**Purpose**

Pacific Gas and Electric Company ("PG&E") hereby submits this Tier 2 Advice Letter ("AL") in compliance with California Public Utilities Commission ("CPUC" or "Commission") Decision ("D.") 20-06-017 ("Decision") Ordering Paragraph ("OP") 2. The AL demonstrates compliance with Section 4.1.3 by illustrating specific technical criteria used by PG&E to determine where field inspections are necessary for grid safety and reliability.

**Background**

The Commission initiated Rulemaking ("R.") 19-09-009 to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018).

On December 20, 2019 the assigned Commissioner's Scoping Memo and Ruling was issued, adopting a scope and schedule for Track 1 of the proceeding. Track 1 addressed deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of establishing key microgrid and resiliency strategies as soon as possible. Subsequently, on January 21, 2020, Administrative Law Judge Rizzo issued a Ruling with Energy Division staff's ("Staff's") proposal on short-term actions related to microgrids and other resiliency strategies that could be initiated in early 2020 to reduce the impact of public safety power shutoff ("PSPS") outages or other catastrophic events.

On June 11, 2020, the Commission adopted D.20-06-017, which approves certain Staff proposals for prioritizing and streamlining interconnection applications to deliver resiliency services at key sites and locations. This Advice Letter addresses the requirements included in Ordering Paragraph 2 of D.20-06-017, which requires:

*Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a **Tier 2 Advice Letter** within **30 days of the date of issuance of this decision** that demonstrates their **compliance with Section 4.1.3** of this decision by:*

*(a) providing specific technical criteria used to determine where field inspections are necessary for grid safety and reliability; and*

*(b) in cases where an inspection is deemed necessary, the process by which utilities will accept videos, photos, and virtual inspection, along with attestations of authenticity and accuracy from the contractor.*

*We direct the utilities to adopt these approaches to the extent possible while assuring that safety and reliability are not compromised.*

*In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 2. [emphasis added; reformatted to highlight key requirements]*

PG&E submits this Tier 2 Advice Letter in compliance with Ordering Paragraph 2 of D.20-06-017.

**Discussion**

In compliance with OP 2 and Section 4.1.3 of D.20-06-017, PG&E provides below specific information demonstrating when field inspections are necessary for grid safety and reliability and an explanation of why at this time will not be proceeding with accepting a remote inspection in lieu of an in-person field inspection.<sup>1</sup>

A. Specific Technical Criteria Used To Determine Where Field Inspections Are Necessary

<b>Requires Field Inspection (Approx. 4% of Interconnection Requests)</b>		
1	For generating facilities that employ protective relays, Automatic Transfer Switches (ATs), or unapproved power control systems.	Per PG&E Rule 21 Section L.5.a, generating facilities that require protective relays, ATs, or unapproved power control systems may require any of the following witnessed by an individual qualified in testing protective equipment

<sup>1</sup> The Decision notes that IOUs are not required to accept a virtual inspection in all instances where a field inspection is determined to be necessary. In adopting the proposal, the Decision’s aim is to “enhance transparency of technical information that may help developers construct their projects to minimize the need for field inspections while still promoting and ensuring the safety and reliability of the grid.” P. 29.

		<p>and performed by the Applicant's third-party tester:</p> <ul style="list-style-type: none"> <li>• Over and under voltage;</li> <li>• Over and under frequency;</li> <li>• Anti-islanding function (if applicable);</li> <li>• Non-Exporting function (if applicable);</li> <li>• Inability to energize dead line;</li> <li>• Time delay on restart after Distribution Provider source is stable;</li> <li>• Distribution Provider system fault detection (if used);</li> <li>• Synchronizing controls (if applicable); and</li> <li>• Other Interconnection Protective Functions that may be required as part of the Generator Interconnection Agreement.</li> </ul>
2	<p>Certified inverter-based technology where an AC Disconnect is required.<sup>2</sup></p>	<p>In order to confirm the following:</p> <ul style="list-style-type: none"> <li>• Anti-islanding per PG&amp;E Rule 21 Section L.5.d.(2);</li> <li>• AC Disconnect located within 10 ft visible line of site of utility meter;</li> <li>• AC Disconnect is approved type as identified on single line diagram;</li> <li>• Signage is installed, when required; and</li> <li>• Equipment installation meets gas clearance requirements.</li> </ul>
3	<p>Projects that include variance requests or other interconnection deviations that inherently require a field inspection.</p>	<p>Field inspection is also required for projects that include the following:</p> <ul style="list-style-type: none"> <li>• Net Generation Output Meter (NGOM) installations;</li> <li>• Line side tap variance;</li> <li>• Meter replacement;</li> <li>• Smart Meter opt out;</li> </ul>

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<sup>2</sup> In PG&E's experience, generating facilities greater than 30 kW with a disconnect switch fail inspections about 15% of the time. The situations causing a failed inspection would be difficult to capture with photographs or videos. While PG&E has only very infrequently had to resort to the use of a disconnect switch, its use is contemplated in emergency situations where a quick disconnect is essential for safety. Where possible and time permits, PG&E will disconnect the service on utility side.

	<ul style="list-style-type: none"> <li>• Partial system Conditional Permission to Operate; and/or</li> <li>• Green Meter Adapter installations.</li> </ul>
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<b>Does Not Require Field Inspection (Approx. 96% of Interconnection Requests)</b>		
1	For the interconnection of simple inverter-based generators, such as solar PV or battery storage installations, when an AC disconnect is not required. <sup>3</sup>	Per PG&E's Greenbook, an AC disconnect is not required when all the following conditions are met: <ul style="list-style-type: none"> <li>• Self-contained socket-based meter panels;</li> <li>• Electrical panel rating of 320A or less (continuous current rating); and</li> <li>• Single phase service.</li> </ul>

**B. Current Safety Risks with Accepting Remote Inspections**

PG&E currently only requires field inspections in about 4% of interconnection requests and, for inverter-based projects where field inspection is only needed because a required AC Disconnect is installed, PG&E schedules and completes field inspections in 5.65 calendar days, on average. However, historic data shows that 15% of these inverter-based projects fail field inspection for various Greenbook violations. PG&E has found that all of these failures would compromise safety and reliability and were identified because of the in-person field inspection. With this in mind, PG&E believes that a virtual inspection process would compromise safety and reliability at this time. PG&E will continue to monitor failure rates and commit to implementing a virtual inspection process when safety and reliability are not at risk, and it would result in more timely and responsive inspections.

**Protests**

**\*\*\*Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com\*\*\***

Any party wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 5, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

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<sup>3</sup> As a PG&E noted in its comments, NEM solar PV and NEM Paired Storage represent approximately 95% of Rule 21 applications and 38.6% of Rule 21-interconnected installed megawatt (MW) capacity within PG&E's service territory over the last three years.

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-3582  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

### **Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 2 of D. 20-06-017, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, August 15, 2020 which is 30 calendar days after the date of submittal.

**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.17-07-007, R. 14-07-002 and R.19-09-009. 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.14-07-002  
Service List R.19-09-009



# 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 U39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Annie Ho  
 Phone #: (415) 973-8794  
 E-mail: PGETariffs@pge.com  
 E-mail Disposition Notice to: AMHP@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) #: 5878-E

Tier Designation: 2

Subject of AL: Inspection Process for PG&E's Rule 21 Interconnection Application Process, Pursuant to Decision 20-06-017

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 #: D.20-06-017

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: 8/15/20

No. of tariff sheets: N/A

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:

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  
Telephone (xxx) xxx-xxxx: (415)973-2093  
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Title:  
Utility Name:  
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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	
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	