

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 5881E
As of December 10, 2020

Subject: Implementation Plan for Resiliency Project Engagement Guide in Compliance with D.20-06-017

Division Assigned: Energy

Date Filed: 07-17-2020

Date to Calendar: 07-22-2020

Authorizing Documents: D2006017

Disposition:	Accepted
Effective Date:	12-11-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

July 17, 2020

Advice 5881-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Implementation Plan for Resiliency Project Engagement Guide in Compliance with D.20-06-017

I. Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this Tier 2 Advice Letter (“AL”) in compliance with the California Public Utilities Commission (“CPUC” or “Commission”) Decision (“D.”) 20-06-017 (“Decision”) Ordering Paragraph (“OP”) 9. The AL demonstrates PG&E’s compliance with Section 4.3.3.1 to show how it plans to develop a guide to help local and tribal governments navigate PG&E’s interconnection and other, relevant processes, for deploying a resiliency project.

II. 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 information sharing with local and tribal governments. This Advice Letter addresses the requirements included in Ordering Paragraph 9 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, showing how they plan to develop a resiliency project engagement guide consistent with Section 4.3.3.1 of this decision. This Advice Letter shall include, at minimum:

- a) Mockup showing how data will be presented (flow chart, list, etc.);*
- b) List of what data will be in the guides, including but not limited to:
 - i. listing of the types of resiliency projects;*
 - ii. draft flowcharts for the above project types including project/interconnection milestones and timelines;*
 - iii. lists of data required by utilities from local and tribal governments at each step in the process; and*
 - iv. lists of engagement best practices.**
- c) Plans for how the guides will be made available to the public; and*
- d) How the guides will be kept current with new modifications; and*
- e) Timeline for release of guides in compliance with this Decision.*

PG&E submits this Tier 2 Advice Letter in compliance with Ordering Paragraph 9 of D.20-06-017.

III. Description of Plans to Develop the Community Resilience Guide

PG&E has a strong desire to assist local governments, Community Choice Aggregators (CCAs), and tribal governments to better prepare for emergencies, including wildfires, and PSPS outages by improving the tools and resources required for communities to make informed decisions about resilience project development. These resilience solutions can range widely from complex multi-customer in-front-of-the meter microgrids to individual customer back-up systems. PG&E understands the importance of community partnership and engagement in co-creating community resilience projects. PG&E wants to encourage and be a catalyst for these projects and will continue to partner with local and tribal governments to reduce complexity and iterate on the right balance of programs, resources, and tools.

The combination of PG&E's grid knowledge and data with community input on the areas of greatest need and impact presents an efficient and logical path forward. This collaboration can lead to project success, despite many challenges that may be encountered in undertaking complex projects. It will be critical to find grid locations where community benefits are significant while grid upgrade and asset costs are modest. Private funding in partnership with CCA and utility programs will also be important.

PG&E plans to create a web-based Community Resilience Guide (Guide) to provide critical information in one, central location, with the objective of encouraging partnerships by providing access to linked resources. This Community Resilience Guide will centralize

existing tools and resources such as those for Wholesale Distribution Interconnections¹ and Energy Storage Charging for Rule 21 Generator Interconnections,² while housing general technical guidance on our interconnection and service planning processes along with other related guidance. This will meet the requirement given by the Commission in D.20-06-017 to develop a Resiliency Project Engagement Guide.

The Community Resilience Guide will focus on the community facing aspects such as available incentives, financing resources and tools to inform community resilience planning, while also providing technical guidance on addressing project scoping, pre-application design guidance, microgrid design/development best practices, and provide clear direction on how communities can engage with PG&E and navigate the interconnection and development cycle. Additional details of the contents of the Guide are provided below. The Guide will be applicable to all multi-customer microgrids, as well as certain types of single-customer microgrid configurations, and it will be a particularly valuable companion for PG&E's new Community Microgrid Enablement Program (CMEP).

IV. Implementation Plan for the Guide

For purposes of presenting the material required by D.20-06-017 in a logical manner, PG&E is providing first a summary of the information to be included in the Guide, followed by draft depictions of the type of information to be provided. The advice letter then presents information on how the Guide will be made public, how it will be updated, and presents a timeline for implementation.

A. Summary of Information to Be Included in the Guide

The Guide will enhance customer-facing microgrid implementation information through three key offerings:

- 1) Improved pages on PG&E's website with comprehensive information on behind-the-meter (BTM) and community microgrid implementations, including process, rate and incentive availability, key project design considerations, and other key pieces of information;
 - PG&E's Guide will include information on distributed generation planning for both Rule 21, BTM and FERC Front-of-the-Meter microgrid interconnections. These interconnections can include:
 - i. Net Energy Metering with Paired Storage (NEM-PS)
 - ii. Net Energy Metering for Fuel Cells (NEMFC)

¹ https://www.pge.com/en_US/for-our-business-partners/interconnection-renewables/energy-transmission-and-storage/wholesale-generator-interconnection/wholesale-distribution-fast-track-interconnection-process.page

² https://www.pge.com/pge_global/common/pdfs/for-our-business-partners/interconnection-renewables/GuidetoEnergyStorageChargingIssues.pdf

- iii. Multiple Tariff (NEM2-MT); and
 - iv. Wholesale Distribution Tariff (WDT).
- 2) A technical resource section to help local and tribal governments navigate PG&E's interconnection and other relevant processes for deploying a community microgrid project; and
- 3) Publicly available tools for communities to assess initial project viability and appropriately site microgrids in areas of critical need. A few tools identified include:
 - PG&E's Integration Capacity Analysis (ICA) map shows whether the proposed location has hosting capacity constraints that may require additional project investments.³
 - CAISO's Interconnection Study and Reports showing the available deliverability at the substation level and the CAISO annual Transmission Plan which can identify locations with limited capacity and the types of delivery network upgrades that could be triggered by an interconnection request.⁴
 - PG&E Interconnection queue which provides a list of resources by substation seeking interconnection.⁵
 - Development or licensing of software tools to support customers with initial project development phases are also under consideration.

As part of the website pages described in offering (1), above, PG&E will highlight a series of engagement and engineering best practices during each project step. *These best practices will largely be informed by lessons learned from PG&E's previous and current microgrid work including projects such as: Blue Lake Rancheria and the Redwood Coast Airport Microgrid. Categories of these best practices may include:* utilizing existing PG&E design standards, effective project sequencing, cost reductions by modeling projects on pre-approved single-line diagrams and control architectures, and *how/when to engage with PG&E during the intake and application process.*

B. Mock-Up Showing How Data Will Be Presented in Guide

Figures 1 and 2 below provide a draft flow chart of the application and interconnection process for community microgrid projects. This draft flow chart will be annotated with timelines, data requirements, and estimated costs to help communities navigate the application process and development cycle. Each step will be further expanded in narrative form describing key milestones and best practices.

³ https://www.pge.com/en_US/for-our-business-partners/distribution-resource-planning/distribution-resource-planning-data-portal.page

⁴

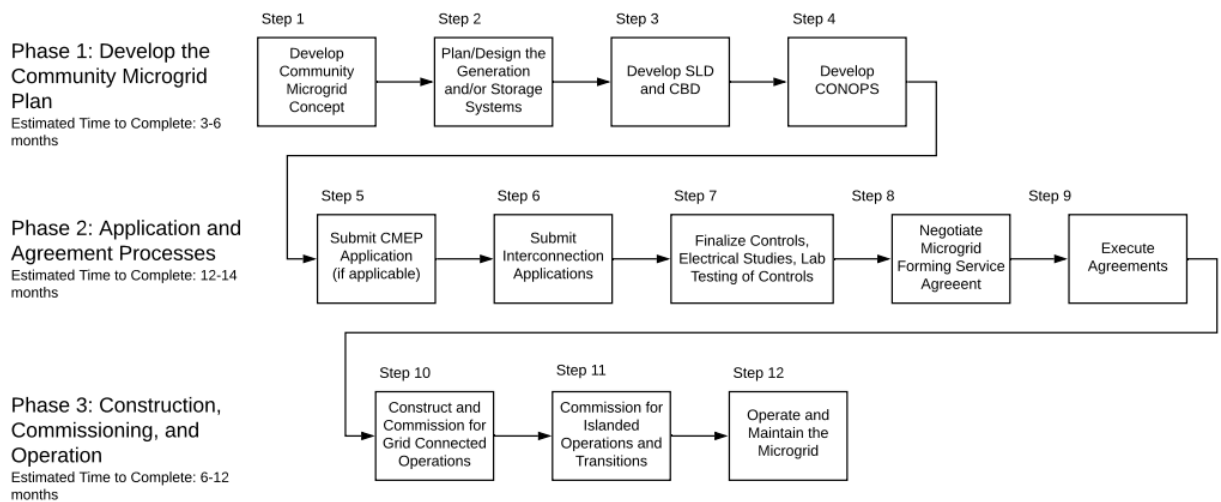
<http://www.caiso.com/planning/Pages/GeneratorInterconnection/InterconnectionStudy/Default.aspx>

⁵ https://www.pge.com/pge_global/common/word_xls/for-our-business-partners/interconnection-renewables/energy-transmission-and-storage/wholesale-generator-interconnection/PublicQueueInterconnection.xls

Additionally, the technical resource section will list the data required from microgrid applicants at each milestone identified in Figures 1 and 2. This list will include structured data such as aggregated load profiles, generation sources and sizing, meter numbers, protection devices and equipment model numbers, required monitoring points, single line drawings, site plans, and a Concept of Operations narrative.

Figure 1. Navigating the Community Microgrid Process

Navigating the Community Microgrid Process

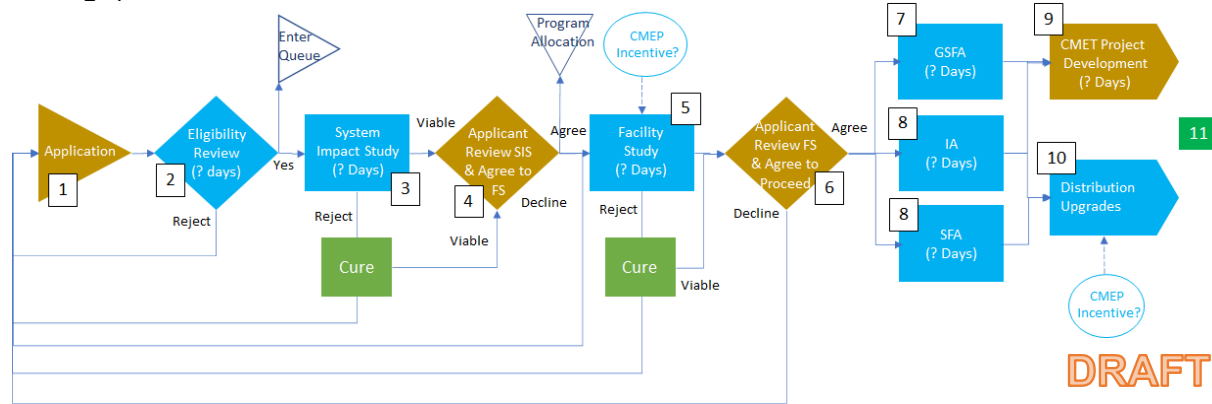


Abbreviations:

SLD- Single Line Diagram
CBD- Communication Block Diagram
CONOPS- Concept of Operations Document
CMEP- Community Microgrid Enablement Program

DRAFT

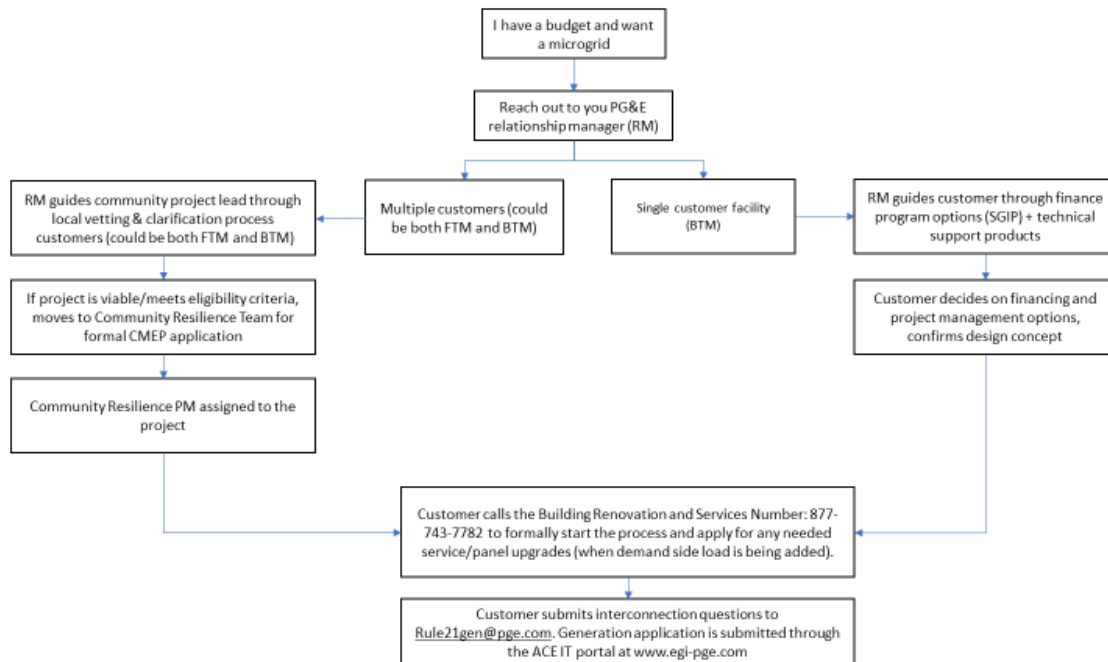
Figure 2. Subset of Figure 1 showing Steps 5 through 9 in detail. (draft and subject to change)



DRAFT

Figure 3 below shows a draft flowchart depicting how to engage with the utility depending on the type of resiliency project being planned, such as whether it is an in-front-meter or a BTM project.

Figure 3. Draft Customer Engagement Flowchart



DRAFT

C. Plan for Making Guide Available to the Public

PG&E will make the guide accessible to local and tribal governments, as well as CCAs and the public, on PG&E's website at **pge.com/resilience**. The information will be presented through webpage text, a PDF, and a resource library with links to internal and external resources. The following provides an outline to demonstrate how the Guide will be presented on the website:

- Landing page and introduction to how PG&E and communities can partner to provide resilience solutions.
- This page will offer three tabs to choose from:
 1. Agency/Stakeholder Resilience Resources (for government/community leaders)
 2. Non-Residential Resilience Resources (for business leaders)
 3. Residential Resilience Resources (for individual or community residences)

Each of the three tabs will have two sections:

- Incentives and Financing
 - PG&E financial resources and non-PG&E resources like CCA programs and tax incentives

- Tools and Information
 - Technical process flows for designing a microgrid, with a focus on the interconnection and service planning aspects.
 - Data available to local government leaders to inform their resilience planning and potential microgrid locations.

PG&E also plans to introduce local and tribal governments and other community partners to the Guide at the quarterly regional de-energization working group meetings required by D.20-05-051 and the semi-annual resiliency planning meetings required by D.20-06-017.

D. Updates to the Guide

The Guide will be developed and managed by the PG&E team developing the CMEP. Updates to the Guide will be made as the team receives stakeholder feedback and develops new tools and processes across various organizations (e.g., Electric Generation Interconnection (Rule 21) process changes). PG&E will review the Guide at least once annually to identify any areas that may need to be updated, until such time the Commission no longer deems the Guide necessary.

In addition, PG&E will describe key updates to the Guide at the semi-annual resiliency planning meetings required by D.20-06-017.

E. Workplan Schedule

The Guide will be made publicly available by the fourth (4th) quarter of 2020. Below is a draft workplan schedule for the guide:

- August 2020 – PG&E finalizes workflows described in Figures 1-3
- October 2020 – PG&E Information Technology (IT) department publishes material in testing environment.
- October 2020 – PG&E in coordination with Schatz Energy Research Institute develops first draft of the technical resource section for internal circulation and comments.
- Q4 2020 – The Guide webpage goes live including the technical resource section, which will also be available as a PDF download.

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 6, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th 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).

V. Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 9 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 16, 2020 which is 30 calendar days after the date of submittal.

VI. 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 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.19-09-009

Attachments



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) #: 5881-E

Tier Designation: 2

Subject of AL: Implementation Plan for Resiliency Project Engagement Guide in Compliance with D.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: 8/16/20

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 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:

Clear Form

**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.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Engineers and Scientists of California	
Anderson & Poole		
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
	Kelly Group	Spark Energy
Cameron-Daniel, P.C.	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Keyes & Fox LLP	Sunshine Design
Cenergy Power	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity		TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Chevron Pipeline and Power	Los Angeles County Integrated	TransCanada
City of Palo Alto	Waste Management Task Force	Troutman Sanders LLP
	MRW & Associates	Utility Cost Management
City of San Jose	Manatt Phelps Phillips	Utility Power Solutions
Clean Power Research	Marin Energy Authority	Water and Energy Consulting Wellhead
Coast Economic Consulting	McKenzie & Associates	Electric Company
Commercial Energy		Western Manufactured Housing
Crossborder Energy	Modesto Irrigation District	Communities Association (WMA)
Crown Road Energy, LLC	NLine Energy, Inc.	Yep Energy
Davis Wright Tremaine LLP	NRG Solar	
Day Carter Murphy		
Dept of General Services	Office of Ratepayer Advocates	
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	
	Peninsula Clean Energy	