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

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<tr>
<td>Effective Date:</td>
<td>12-11-2020</td>
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</tbody>
</table>

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
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Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 Interconnections\(^1\) 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)

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iii. Multiple Tariff (NEM2-MT); and

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:
   o PG&E’s Integration Capacity Analysis (ICA) map shows whether the proposed location has hosting capacity constraints that may require additional project investments.\(^3\)
   o 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.\(^4\)
   o PG&E Interconnection queue which provides a list of resources by substation seeking interconnection.\(^5\)
   o 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.

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

Phase 1: Develop the Community Microgrid Plan  
Estimated Time to Complete: 3-4 months

Phase 2: Application and Agreement Processes  
Estimated Time to Complete: 12-14 months

Phase 3: Construction, Commissioning, and Operation  
Estimated Time to Complete: 6-12 months

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

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

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](http://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 resiliency 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**
  o Technical process flows for designing a microgrid, with a focus on the interconnection and service planning aspects.
  o 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)

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<thead>
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<th>Pacific Gas and Electric Company (ID U39 E)</th>
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<tbody>
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<td>HEAT</td>
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</tr>
<tr>
<td>Contact Person:</td>
<td>Annie Ho</td>
</tr>
<tr>
<td>Phone #:</td>
<td>(415) 973-8794</td>
</tr>
<tr>
<td>E-mail:</td>
<td><a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
</tr>
<tr>
<td>E-mail Disposition Notice to:</td>
<td><a href="mailto:AMHP@pge.com">AMHP@pge.com</a></td>
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**EXPLANATION OF UTILITY TYPE**

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

**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 proposed: 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:

<table>
<thead>
<tr>
<th>CPUC, Energy Division</th>
</tr>
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<tbody>
<tr>
<td>Attention: Tariff Unit</td>
</tr>
<tr>
<td>505 Van Ness Avenue</td>
</tr>
<tr>
<td>San Francisco, CA 94102</td>
</tr>
<tr>
<td>Email: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a></td>
</tr>
</tbody>
</table>

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

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