

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 5942E**  
**As of October 9, 2020**

Subject: Modifications to Schedule NEM2V to Adopt a Specific New Property Definition Per  
Decision 20-08-002

Division Assigned: Energy

Date Filed: 09-10-2020

Date to Calendar: 09-14-2020

Authorizing Documents: D2008002

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>10-10-2020</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Annie Ho

(415) 973-8794

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**

September 10, 2020

**Advice 5942-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Modifications to Schedule NEM2V to Adopt a Specific New “Property” Definition Per Decision 20-08-002, Ordering Paragraph 3**

**Purpose**

Pacific Gas and Electric Company (PG&E) submits this advice letter to adopt a new definition of “Property” in Schedule NEM2V Virtual Net Energy Metering pursuant to Decision (D.) 20-08-002 Ordering Paragraph (OP) 3. This advice letter is being submitted concurrently with a joint advice letter from PG&E, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (Collectively, Joint Utilities) to propose a “common function” definition requirement to their respective Virtual Net Metering Successor Tariffs per Decision (D.) 20-08-002, Ordering Paragraph (OP) 5.

**Background**

On February 13, 2009, PG&E submitted Advice Letter (AL) 3422-E, & -A<sup>1</sup> pursuant to D. 08-10-036<sup>2</sup> OP5 to create Rate Schedule NEMVNMA. D. 08-10-002 at the same time created the Multifamily Affordable Solar Housing Program incentive program. AL 3422-E included a limitation that NEMVNMA buildings must be served from one Customer Service Delivery Point, as defined in Rule 16<sup>3</sup>.

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- <sup>1</sup> [AL 3422-E](#), [AL 3422-E-A](#) - *Establishment of Schedule NEMVNMA – Virtual Net Energy Metering (VNM) Service for Individually Metered Residential Units and Owners with Housing Receiving Incentives from the Multifamily Affordable Solar Housing (MASH) Program or the New Solar Homes Partnership Program (NSHP) Affordable Housing*– Effective June 8, 2009
- <sup>2</sup> [D. 08-10-036](#) *Decision Establishing Multifamily Affordable Solar Housing Program Within The California Solar Initiative* – Issued October 20, 2008.
- <sup>3</sup> *SERVICE DELIVERY POINT: Where PG&E's Service Facilities are connected to either Applicant's conductors or other service termination facility designated and approved by PG&E* – See Electric Rule 16, sheet 21.

In 2011, D. 11-07-031<sup>4</sup> OP 1 led to PG&E submitting AL 3890-E<sup>5</sup> to remove a program sunset date and change the Rate Schedule name from NEMVNMA to NEMVMASH, as it is currently known.

Also, D. 11-07-031 OP 2 led to PG&E to submitting AL 3902-E. -A, -B, -C<sup>6</sup> to effectively spinoff from NEMVMASH a new general market virtual net energy metering Rate Schedule NEMV “*served by a single service delivery point.*”<sup>7</sup>

In 2016, with PG&E’s legislated net energy metering enrollment cap approaching, D. 16-01-044<sup>8</sup> laid out the requirements for the net energy metering successor tariffs including what are now known as Rate Schedules “NEM2, NEM2V, NEM2VMASH. ALs 4802-E, -A, -B, & -C<sup>9</sup> were submitted and approved creating the successor tariffs. Notably, D. 16-01-044 required for NEM2V’s Applicability that:

*“...the [Virtual Net Energy Metering (VNM)] tariff should be expanded to allow multiple **service delivery points at a single site** under the tariff. This has been allowed under the MASH VNM tariff since the adoption of D.11-07-031, and has been used successfully by participants, without administrative problems.”<sup>10</sup>*  
[emphasis added]

In PG&E’s supplemental filing AL 4802-E-A on May 16, 2016, it amended its NEM2V applicability to incorporate and align with SCE’s proposed “property” definition:

*“A Property is defined as: A cluster of multi-tenant and multi-meter buildings, facilities or structures that are under the control of a single Owner or Operator built to serve a common function, such as a housing complex or a multi-tenant complex, on an integral parcel of land undivided, unless the division is a street, highway, or similar public thoroughfare, which is permissible provided no other unrelated Single Enterprises (defined as a separate business or other individual activity carried on by a customer but does not apply to associations or*

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<sup>4</sup> [D. 11-07-031](#) California Solar Initiative Phase One Modification – Issued July 20, 2011.

<sup>5</sup> [AL 3890-E](#) - Modifications to Schedule NEMVNMA Pursuant to D.11-07-031, Ordering Paragraph 1 – Effective September 14, 2011.

<sup>6</sup> [AL 3902-E](#), [AL 3902-E-A](#), [AL 3902-E-B](#), [AL 3902-E-C](#) Schedule NEMV Pursuant to Decision (D.) 11-07-031, Ordering Paragraph 2- AL 3902-E-C is effective June 4, 2012 and replaces the prior ALs in the series.

<sup>7</sup> D 11-07-031, OP2, page 65

<sup>8</sup> [D. 16-01-044](#) - Decision Adopting Successor To Net Energy Metering Tariff – Issue February 5, 2016.

<sup>9</sup> [AL-4802-E](#), [AL 4802-E-A](#), [AL 4802-E-B](#), [AL 4802-E-C](#) Implementation of Net Energy Metering Successor Tariff Rate Schedules and Various Filed Forms, and Modifying of Electric Rule 21- effective “when the NEM Cap in PG&E’s service territory is reached,” per Resolution E-4792 Ordering Paragraphs; See footnote 11.

<sup>10</sup> D. 16-01-044, Section 2.14.5, page 99

*combinations of customers) break up the otherwise integral parcel and cluster of multi-tenant and multi-meter buildings, facilities or structures.”*

Resolution E-4792<sup>11</sup> approved AL 4802-E, -A, -B, and -C adopting the property definition above, which then went into effective upon PG&E reaching its NEM cap as was noticed in AL 4980-E.<sup>12</sup>

On November 20, 2019, CALSSA<sup>13</sup> filed a petition for modification<sup>14</sup> (PFM) D.16-01-044, requesting the Commission in its words to “*resolve ambiguity in the way that eligible properties are defined for purposes of participation in...VNEM.*”

On August 11, 2020, D. 20-08-002<sup>15</sup> was issued, addressing CALSSA’s PFM. There it ruled in Section 2 that CALSSA’s PFM failed to justify its late submission, pursuant to Rule 16.4(d). However, Section 3 concludes that Non-MASH Virtual Net Energy Metering Eligibility (i.e. NEM2V) should be the same as for MASH Virtual Net Energy Metering (NEM2VMASH). Per the Decision:

*The Commission’s intent is apparent from D.16-01-044, which adopted the CALSEIA (now CALSSA) proposal without modification: to make VNEM eligibility requirements for non-MASH multifamily and multitenant customers the same as for affordable housing tenants. **Specifically, customers or accounts behind multiple service delivery points and on multiple contiguous parcels (whether tax /assessor or legal) may take service on a VNEM tariff, and thereby receive credits from the same eligible renewable generating facility, provided those customers or accounts are part of the same multitenant or multi-meter facility (as specified in each electric IOU’s VNEM tariff) .***<sup>16</sup>

Consequently, D. 20-08-002 OP 3 requires:

*Within 30 days after the issue date of this decision, Pacific Gas and Electric Company shall submit a Tier 2 advice letter proposing revisions to its NEM2V tariff to make effective the following definition of “Property”: Property: All of the*

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<sup>11</sup> Resolution [E-4792](#). Adoption of PG&E’s, SCE’s and SDG&E’s Net Energy Metering (NEM) successor tariffs as directed by Decision 16-01-044. Issued June 24, 2016.

<sup>12</sup> [AL 4980-E](#) - Advice Filing Regarding Net Energy Metering (NEM) Successor, E-DCG and Electric Rule 21 Tariffs Effective Dates – Being a Tier 1 AL, it was effective upon submission on December 16, 2016.

<sup>13</sup> On February 8, 2018, the California Solar Energy Industries Association filed a notice of name change to California Solar & Storage Association.

<sup>14</sup> Petition for Modification of the California Solar & Storage Association Regarding Clarification of Virtual Net Energy Metering Eligibility Requirements, filed November 20, 2019 (Petition), at 1.

<sup>15</sup> [D. 20-08-007](#) Decision Modifying Decision 16-01-044 Regarding Virtual Net Energy Metering Eligibility Requirements - Date of Issuance 8/11/20

<sup>16</sup> D. 20-08-007, Page 9.

*real property and apparatus employed in a single multi-tenant or multi-meter facility on contiguous parcels of land. These parcels may be divided by a dedicated street, highway or public thoroughfare or railway, so long as they are otherwise contiguous, part of the same single multitenant or multi-meter facility, and all under the same ownership.*<sup>17</sup>

As noted above, a Joint IOU Tier 2 Advice Letter 5945-E, is being submitted concurrently with this AL pursuant to OP 5, to propose a “common function” definition requirement to their respective Virtual Net Metering Successor Tariffs.

PG&E submits this Tier 2 Advice Letter in accordance with OP3 today September 10, 2020, in a timely fashion, 30 days after the issuance of D. 20-08-002 (on August 11, 2020).

### **Tariff Revisions**

This advice letter modifies the definition of Property in Electric Schedule NEM2V to be:

Property: All of the real property and apparatus employed in a single multi-tenant or multi-meter facility on contiguous parcels of land. These parcels may be divided by a dedicated street, highway or public thoroughfare or railway, so long as they are otherwise contiguous, part of the same single multitenant or multi-meter facility, and all under the same ownership.

### **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\*\*\***

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than September 30, 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

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<sup>17</sup> This definition had been included by SDG&E in its virtual net energy metering tariff. OP4 requires SCE to adopt the same language, so all three IOUs definition align.

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 3 of D. 20-08-002, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, October 10, 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 lists for R. 14-07-002 (NEM) and R.07-07-007 (Rule 21). 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/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

cc: Service List R.17-07-007  
Service List R.14-07-002





# 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) #: 5942-E

Tier Designation: 2

Subject of AL: Modifications to Schedule NEM2V to Adopt a Specific New Property Definition Per Decision 20-08-002  
Ordering Paragraph 3

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.20-08-002

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: 10/10/20

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: Electric Schedule NEM2V

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  
Facsimile (xxx) xxx-xxxx: (415)973-3582  
Email: [PGETariffs@pge.com](mailto: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

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
47343-E*	ELECTRIC SCHEDULE NEM2V VIRTUAL NET ENERGY METERING SERVICE Sheet 2	44514-E
47344-E*	ELECTRIC TABLE OF CONTENTS Sheet 1	46962-E
47345-E*	ELECTRIC TABLE OF CONTENTS Sheet 7	47199-E



**ELECTRIC SCHEDULE NEM2V**  
**VIRTUAL NET ENERGY METERING SERVICE**

Sheet 2

APPLICABILITY: (Cont'd.) Property: All of the real property and apparatus employed in a single multi-tenant or multi-meter facility on contiguous parcels of land. These parcels may be divided by a dedicated street, highway or public thoroughfare or railway, so long as they are otherwise contiguous, part of the same single multi-tenant or multi-meter facility, and all under the same ownership. (T)  
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Customers on this Schedule NEM2V will be covered under the Special Condition titled, *NEM2 Grandfathering Provisions*, in Schedule NEM2. Customers meeting those conditions are referred to as "NEM2V Transition Eligible Customers".

The exports from the Generator Account are allocated to the Benefitting Accounts as described in the Special Condition 3 below.

The Generator Account and the Benefitting Accounts will be referred to collectively in this tariff as a "NEM2V Arrangement."

A Qualified Customer is either:

- 1) the Owner or Operator of the multi-tenant, multi-meter Eligible NEM2V Development with one or more separately metered accounts;
- 2) an entity authorized by the owner to install and/or operate the REGF on the Eligible NEM2V Development and who will be the IOU's customer of record for the REGF; or
- 3) a tenant/occupant<sup>5</sup> in the Eligible NEM2V Development with a separately metered account, which received credit from the REGF.

Qualified Customers may continue to take service on this tariff for up to 20 years from the date of the original interconnection of their REGF, subject to Commission jurisdiction if the NEM2V Arrangement is not terminated. As provided in D.14-03-041, any customer that switches to this NEM2V tariff from the NEMV tariff may remain on this NEM2V tariff for 20 years from the original year of the interconnection of their system.

<sup>5</sup> While this refers to a single metered tenant/occupant, "Multi-Meter Property" requires that there be two or more tenant/occupants, each with its own utility revenue meter participating in the NEM2V Arrangement, in addition to the (N) Generator Account meter.

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Sheet 1

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<i>Decision</i>	20-08-002	<b>Robert S. Kenney</b>	<i>Effective</i>	
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



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Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
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47344-E*	ELECTRIC TABLE OF CONTENTS Sheet 1	46962-E
47345-E*	ELECTRIC TABLE OF CONTENTS Sheet 7	47199-E

**ELECTRIC SCHEDULE NEM2V**  
**VIRTUAL NET ENERGY METERING SERVICE**

Sheet 2

APPLICABILITY:  
(Cont'd.)

Property: All of the real property and apparatus employed in a single multi-tenant or multi-meter facility on contiguous parcels of land. These parcels may be divided by a dedicated street, highway or public thoroughfare or railway, so long as they are otherwise contiguous, part of the same single multi-tenant or multi-meter facility, and all under the same ownership.

~~A Property is defined as: A cluster of multi-tenant and multi-meter buildings, facilities or structures that are under the control of a single Owner or Operator built to serve a common function, such as a housing complex or a multi-tenant complex, on an integral parcel of land undivided, unless the division is a street, highway, or similar public thoroughfare, which is permissible provided no other unrelated Single Enterprises (defined as a separate business or other individual activity carried on by a customer but does not apply to associations or combinations of customers) break up the otherwise integral parcel and cluster of multi-tenant and multi-meter buildings, facilities or structures.~~

(T)  
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(T)

Customers on this Schedule NEM2V will be covered under the Special Condition titled, *NEM2 Grandfathering Provisions*, in Schedule NEM2. Customers meeting those conditions are referred to as "NEM2V Transition Eligible Customers".

The exports from the Generator Account are allocated to the Benefitting Accounts as described in the Special Condition 3 below.

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- 2) an entity authorized by the owner to install and/or operate the REGF on the Eligible NEM2V Development and who will be the IOU's customer of record for the REGF; or
- 3) a tenant/occupant<sup>5</sup> in the Eligible NEM2V Development with a separately metered account, which received credit from the REGF.

Qualified Customers may continue to take service on this tariff for up to 20 years from the date of the original interconnection of their REGF, subject to Commission jurisdiction if the NEM2V Arrangement is not terminated. As provided in D.14-03-041, any customer that switches to this NEM2V tariff from the NEMV tariff may remain on this NEM2V tariff for 20 years from the original year of the interconnection of their system.

(Continued)

Advice 5568-E  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

June 21, 2019  
July 21, 2019



U 39     *San Francisco, California*

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**ELECTRIC SCHEDULE NEM2V**  
VIRTUAL NET ENERGY METERING SERVICE

Sheet 2

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<sup>5</sup> While this refers to a single metered tenant/occupant, "Multi-Meter Property" requires that there be two or more tenant/occupants, each with its own utility revenue meter participating in the NEM2V Arrangement, in addition to the (N) Generator Account meter.

(Continued)

**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	