

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 5956E
As of October 23, 2020

Subject: Notice to Cancel Competitive Solicitations for Distributed Energy Resource (DER)
Procurement for Electric Distribution Deferral Opportunity at FMC 1102

Division Assigned: Energy

Date Filed: 09-22-2020

Date to Calendar: 09-25-2020

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	10-23-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

September 22, 2020

Advice Letter 5956-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Notice to Cancel Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunity at FMC 1102

Purpose

Pacific Gas and Electric Company (PG&E) submits this Tier 2 advice letter requesting approval from the California Public Utilities Commission (Commission or CPUC) to cancel the competitive solicitation to procure distributed energy resources (DER) solutions for the electric distribution deferral opportunity at FMC 1102.

1. Background

On August 14, 2014, the Commission instituted Rulemaking (R.) 14-08-013 to establish policies, procedures, and rules to guide the California investor-owned utilities (IOUs) in developing their Distribution Resources Plan (DRP) proposals. This rulemaking also established new policies to evaluate the IOUs' existing and future electric distribution infrastructure and planning procedures with respect to incorporating DERs into the planning and operations of their electric distribution systems.

In July 2015, California IOUs each submitted their respective DRP proposals to the Commission. The Commission organized the review of the DRP filing content into three tracks: Track 1 – Tools and Methodologies, Track 2 – Field Demonstration Projects, and Track 3 – Policy Issues. Various DRP working group meetings and workshops were held to inform the Commission and stakeholders, which ultimately led to several decisions in R.14-08-013.

In February 2018 the Commission issued Decision (D.) 18-02-004 on Track 3 Policy Issues, sub-track 1 (Growth Scenarios) and sub-track 3 (Distribution Investment and Deferral Process). This decision directed the IOUs to file a Grid Needs Assessment (GNA) by June 1 of each year, and a Distribution Deferral Opportunity Report (DDOR) by September 1 of each year. Subsequently, on May 2019, assigned Administrative Law

Judge (ALJ) Mason issued a Ruling (May 2019 Ruling) modifying the Distribution Investment Deferral Framework (DIDF) process. One notable modification was the new August submission date for both the GNA and DDOR reports.

PG&E jointly filed its second annual GNA and DDOR on August 15, 2019. As required by D.18-02-004 and the May 2019 Ruling, PG&E initiated Distribution Planning Advisory Group (DPAG) meetings by September 20, 2019 to receive advisory input on candidate distribution deferral opportunities that should be issued for competitive solicitation.

On November 15, 2019, PG&E submitted Advice Letter (AL) 5688-E to request approval to competitively solicit for electric distribution deferral opportunities, including the FMC 1102 distribution deferral opportunity. On December 19, 2019, PG&E received disposition of AL 5688-E with approval to solicit for the requested deferral opportunity projects.

In accordance with the May 2019 Ruling, the purpose of this advice letter is to explain modifications for the approved FMC 1102 project. PG&E is submitting this advice letter to cancel the competitive solicitation for DER procurement to defer the candidate project FMC 1102. The explanation for this decision is detailed below in Section 3.

2. Overview of the Distribution Investment Deferral Framework Process

Pursuant to the DIDF as specified in D.18-02-004 and the May 2019 Ruling, PG&E:

- August 15, 2019 – Submitted PG&E's 2019 GNA Report and PG&E's 2019 DDOR
- September 19, 2019 – Hosted PG&E's DPAG Meeting #1
- October 7, 2019 – Hosted PG&E's DPAG Meeting #2 via Webinar
- November 15, 2019 – Republished PG&E's 2019 GNA Report and PG&E's 2019 DDOR
- November 15, 2019 – Filed AL 5688-E
- December 10, 2019 – Received disposition letter approving AL 5688-E
- March 12, 2020 – PG&E hosted DPAG meeting on updates to Calflax and FMC deferral opportunities via webinar.
- August 17, 2020 – Submitted PG&E's 2020 GNA Report and PG&E's 2020 DDOR

This advice letter requests approval to cancel the solicitation of candidate DER distribution deferral project FMC 1102.

3. Summary of Reasons

PG&E's decision to request approval to cancel the solicitation for the distribution deferral opportunity FMC 1102 is primarily due to FMC 1102 now being ranked as a Tier 3 Candidate Deferral Opportunity, as documented in PG&E's 2020 DDOR.¹ A Tier 3 ranking indicates that there are numerous red flags with the candidate deferral opportunity and not recommended for solicitation, based on the DIDF Prioritization Metrics shown in Section 4.

The change of FMC 1102 to a Tier 3 ranking is due to changes in the load forecast, primarily driven by a new large-load application for an electric vehicle (EV) charging station. The impact of the new load forecast is that the local area need is now 6.6 MW and the area has baseload (24/7) operational requirements due to the EV charging. The 24/7 need means it is extremely challenging to defer the traditional investment with DERs. Moreover, there is additional uncertainty in the forecast due to new interest from parties to add EV charging station loads, particularly fast charging stations.

4. Prioritization Metrics

In D.18-02-004, three metrics were adopted to characterize and help prioritize projects on the candidate deferral shortlist. These metrics are a) Cost-Effectiveness, b) Forecast Certainty, and c) Market Assessment.

As described in detail in PG&E's 2019 and 2020 DDOR,² PG&E has evaluated each of these metrics qualitatively, grouping the candidate deferral opportunities into tiers based on their relative rankings. The prioritization metrics incorporate lessons learned from prior solicitations. For example, candidate deferral opportunities that have baseload (24/7) operational requirements were given a relatively low ranking.

PG&E's preliminary prioritization and ranking of candidate deferral opportunities were published in PG&E's 2019 DDOR. The prioritization metrics and tiering were then thoroughly discussed and updated throughout the DPAG process. As documented in PG&E's 2020 DDOR, due to red flags being identified for the cost effectiveness, and market assessment prioritization metrics, the FMC 1102 candidate deferral opportunity has changed from Tier 2 to Tier 3, as shown in Table 2 below.

¹ PG&E's 2020 DDOR, published on August 17, 2020, Executive Summary, p. ii.

² PG&E's 2019 DDOR, published on November 15, 2019, Section 7.4

Table 2: Summary of Prioritization Metrics for the FMC 1102 candidate deferral opportunity

Prioritization Metrics Summary	2019 DDOR	2020 DDOR (Updated Forecast)
Cost Effectiveness		
Forecast Certainty		
Market Assessment		
Tier	2	3

5. Commission Action Requested

Pursuant to D.18-02-004, PG&E requests approval from the Commission to cancel the competitive solicitations to procure DER solutions for FMC 1102 project.

Tariff Revisions

The submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

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 October 12, 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).

Effective Date

PG&E requests that this Tier 2 compliance advice submittal become effective on regular notice, October 22, 2020, which is 30 calendar days after the date of submittal or, if necessary, the date of the Commission Resolution approving the advice letter.

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.14-08-013 and R.14-10-003. 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 Lists R.14-08-013 and R.14-10-003
Gabe Petlin – Energy Division
Robert Peterson – Energy Division



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5956-E

Tier Designation: 2

Subject of AL: Notice to Cancel Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunity at FMC 1102

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 10/22/20

No. of tariff sheets: 0

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: N/A

Service affected and changes proposed¹: N/A

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

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

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

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