

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6003E
As of December 17, 2020

Subject: Request for Approval to Not Issue Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunities

Division Assigned: Energy

Date Filed: 11-16-2020

Date to Calendar: 11-18-2020

Authorizing Documents: D1802004

Disposition:	Accepted
Effective Date:	12-16-2020

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

November 16, 2020

Advice 6003-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Request for Approval to Not Issue Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunities

Purpose

Pursuant to Ordering Paragraphs (OP) 2.w and 2.x of Decision (D.) 18-02-004 as well as the May 7, 2019 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework Process (May 2019 ALJ Ruling) and the May 11, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework—Filing And Process Requirements (May 2020 ALJ Ruling)¹ in Rulemaking (R.) 14-08-013, Pacific Gas and Electric Company (PG&E) submits this Tier 2 advice letter requesting the California Public Utilities Commission's (Commission's or CPUC's) approval to not issue competitive solicitations to procure distributed energy resources (DER) solutions for identified electric distribution deferral opportunities as described below.

1. Background

On August 14, 2014, the Commission instituted 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

¹ May 11, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework—Filing and Process Requirements, Attachment A, pp. 89-98. Attachment A was subsequently revised on June 12, 2020

to inform the Commission and stakeholders, which ultimately led to several decisions in R.14-08-013.

In February 2018 the Commission issued 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, the May 2019 ALJ Ruling modified the Distribution Investment Deferral Framework (DIDF). One notable modification was the new August submission date for both the GNA and DDOR reports.

There were two improvement rulings modifying the DIDF process by Administrative Law Judge (ALJ) Mason in 2020. The April 13, 2020 Administrative Law Judge's Ruling Modifying the Distribution Investment Deferral Framework Process (April 2020 ALJ Ruling) updated the Independent Professional Engineer (IPE) scope of work for the DIDF process and provided the 2020-2021 DIDF cycle schedule. The May 2020 ALJ Ruling further modifies the DIDF process and filings requirements by focusing on the comments and reforms related to aspects of the DIDF.

PG&E jointly filed its third GNA and DDOR on August 17, 2020 and provided it to its Distribution Planning Advisory Group (DPAG). Also, as required by D.18-02-004, PG&E initiated DPAG meetings by September 16, 2020 to receive advisory input on candidate distribution deferral opportunities that should be issued for competitive solicitation and retained an IPE to attend the meetings and prepare a DPAG Report.

This advice letter is submitted in compliance with Reform 40 in Attachment A of the May 2020 ALJ Ruling.

2. Overview of the Distribution Investment Deferral Framework Process

Pursuant to the DIDF as specified in D.18-02-004, the May 2019 ALJ Ruling, and the May 2020 ALJ Ruling, PG&E has completed the following:

- August 17, 2020: Submitted PG&E's 2020 GNA Report
- August 17, 2020: Submitted PG&E's 2020 DDOR
- September 16, 2020: Hosted PG&E's DPAG Meeting #1 via Webinar
- October 12, 2020: Hosted PG&E's DPAG Follow up meeting via Webinar
- November 13, 2020: Submitted Supplement to PG&E's 2020 DDOR

This advice letter requests approval of the non-solicitation of the distribution deferral opportunities that were a result of the DPAG's advisory input on the DDOR.

3. Proposal to Not Solicit Candidate DER Distribution Deferral Projects

PG&E is requesting approval to not solicit DER distribution deferral projects for the following Tier 2 and Tier 3 candidate distribution deferral opportunities. PG&E does not recommend pursuing competitive solicitations of DER for these projects currently due to their low likelihood of achieving a successful outcome. Moreover, focusing developer efforts on the Tier 1 projects only may improve their probability of success. A Tier 2 ranking indicates that we have identified some red flags with the candidate deferral opportunity and not recommended for solicitation. A Tier 3 ranking indicates that there are multiple major red flags with the candidate deferral opportunity and not recommended for solicitation. PG&E plans to proceed with the traditional wires planned investment for the projects below.

Tier 2 Candidate Deferral Opportunities

- Dunnigan Bank 1 (1.6MW)
- Beresford 401 Cut-Over (1.5MW)
- Brentwood 2111 Line Work (0.9MW)
- Hollister 2106 Line Work (5MW)
- Rocklin 1104 and Rocklin 1101 (0.2MW)
- Caruthers 1104 Regulator (0.7MW)
- Morgan Hill 2103 (6.6MW)
- Storey 1103 (3.2MW)
- Vasona 1109 (3.9MW)
- Peabody 2106 Outlet [REDACTED]
- Stelling 1105 (4.6MW)
- Mountain View Bank 1 (5.7MW)

Tier 3 Candidate Deferral Opportunities

- San Luis Obispo 1106 [REDACTED]
- Woodland 1105 Outlet (1.3 MW)
- Lockeford Bank 1 (14.8 MW)
- Semitropic 1112 Line Work (8.1 MW)
- California 1103 & California 1111 [REDACTED]
- Wolfe 1111 & Wolfe 1112 (44.1 MW)
- FMC 1102 (6.7 MW)
- Rincon Bank 1 (8.0 MW)
- Spence Bank 2 ([REDACTED])

Cancelled Candidate Deferral Opportunities

- Belle Haven Bank 4 – as described in Section 4.1.3

The following information is provided on the candidate distribution deferral opportunities:

- Summary of the prioritization metrics for each candidate deferral opportunity – Attachment A
- Summary of reasons for each candidate deferral opportunity – see Section 4.1.2

4. Prioritization Metrics

In D.18-02-004, three metrics were adopted to characterize and help prioritize projects on the Candidate Deferral Opportunities shortlist. These metrics are: (a) Cost-Effectiveness, (b) Forecast Certainty, and (c) Market Assessment. Each IOU is to apply these metrics using its own approach provided the metrics support the deferral of any project that can be cost-effectively deferred by DERs.

PG&E has evaluated each of these metrics qualitatively, grouping the Candidate Deferral Opportunities into tiers based on their relative rankings. These qualitative rankings are based on quantitative data as well as engineering judgement by utility distribution planners where noted.

For ease of summarizing prioritization metric results, PG&E has developed a 4-tier system, where each tier represents PG&E's proposed priority ranking of those candidate deferral projects likelihood of success for DER sourcing. The following table (Table 1) summarizes PG&E's proposed 4-tier system.

Table 1: PG&E's 4-Tier Prioritization System

Tier	Color Designation	Definition
1		Relatively High Ranking
2		Relatively Moderate Ranking
3		Relatively Low Ranking
4 ²		Already Sourced Elsewhere

All ranking of projects is relative. For example, a higher tiered project does not indicate that the project will be cost-effective, have a certain forecast, or have a robust market.³ It only indicates the ranking of the candidate deferral opportunity relative to other candidate deferral opportunities.

PG&E's preliminary prioritization and ranking of candidate deferral opportunities were published in PG&E's 2020 DDOR. The prioritization metrics and tiering were then thoroughly discussed and updated throughout the DPAG process. The prioritization metrics for each candidate deferral opportunity are included in Attachment A.

² No Candidate Deferral Opportunities were under Tier 4.

³ For example, green candidate deferral opportunities are expected to be more cost-effective than red candidate deferral opportunities, but it does not indicate the candidate deferral opportunity will receive conforming and cost-effective bids. Similarly, all the opportunities have some degree of forecast uncertainty.

4.1 Candidate Deferral Opportunities

Table 2 summarizes the tiering of PG&E's 2020 final candidate deferrals, including the targeted in-service need date and minimum grid capacity needed (i.e., deficiency).

Table 2: PG&E's 2020 DDOR Candidate Deferral Opportunities Prioritization Metrics

Tier	Candidate Deferral ⁴	In-Service Date	Deficiency (MW) ⁵
1	Willow Pass Bank 1	2023	5.3
	San Miguel Bank 2	2023	5.0
	Calistoga Bank 1	2023	4.2
	Ripon 1705	2024	3.7
	Blackwell Bank 1	2023	
	Zamora 1108	2023	1.1
	Greenbrae Bank 2	2023	
2	Dunnigan Bank 1	2024	1.6
	Beresford 401 Cut-Over	2023	1.5
	Brentwood 2111 Line Work	2023	0.9
	Hollister 2106 Line Work	2023	5.0
	Rocklin 1104 and Rocklin 1101	2025	0.2
	Caruthers 1104 Regulator	2023	0.7
	Morgan Hill 2103	2023	6.6
	Storey 1103	2023	3.2
	Vasona 1109	2023	3.9
	Peabody 2106 Outlet	2024	
	Stelling 1105	2023	4.6
	Mountain View Bank 1	2023	5.7
	San Luis Obispo 1106	2023	
3	Woodland 1105 Outlet	2025	1.3
	Lockeford Bank 1	2024	14.8
	Semitropic 1112 Line Work	2024	8.1
	California Ave 1103 & California Ave 1111 Line Work	2023	
	Wolfe 1111 & Wolfe 1112	2023	44.1
	FMC 1102	2023	6.7
	Rincon Bank 1	2023	8.0
	Spence Bank 2	2023	

⁴ Belle Haven Bank 4 candidate deferral project was cancelled due to a large load application after GNA/DDOR publication and the planned investment no longer exists. Distribution planning will need to identify new Planned Investment(s) to meet the need in the area

⁵ Banks and feeders with peak loads listed as "CUSTOMER CONFIDENTIAL" or "CC" or Grey Shaded were redacted due to their peak loads violating the 15-15 customer privacy rule. A 15-15 violation occurs if the load is comprised of less than 15 customers or a single customer contributes to more than 15% of the loading value.

PG&E has identified 28 Candidate Deferral Opportunities totaling approximately 165 megawatts (MW), which are further categorized and prioritized into the following three tiers:

- Tier 1: Identified seven Candidate Deferral Opportunities totaling approximately 25 MW. Tier 1 Candidate Deferral Opportunities are relatively more likely to be deferrable.
- Tier 2: Identified twelve Candidate Deferral Opportunities totaling approximately 35 MW. Tier 2 Candidate Deferral Opportunities have identified some red flags that indicate they are unlikely to be successfully deferred now. PG&E recommends not pursuing these Candidate Deferral Opportunities, but to closely monitor status and project conditions and re-evaluate for a future date.
- Tier 3: Identified nine Candidate Deferral Opportunities totaling approximately 105 MW. Tier 3 Candidate Deferral Opportunities have multiple major red flags that have been identified and indicate it is not likely a DER deferral solution can successfully be sourced.

4.1.1. Tier 1 Candidate Deferral Opportunities

PG&E's recommendation is to pursue competitive solicitations for the Tier 1 Candidate Deferral Opportunities and details are provided in a separate advice letter requesting approval to pursue competitive solicitations for 2021 DDF RFO in Advice Letter 6002-E.

4.1.2. Tier 2 and Tier 3 Candidate Deferral Opportunities

PG&E does not recommend pursuing competitive solicitations for Tier 2 and Tier 3 candidate deferral opportunities currently.

Tier 2 Candidate Deferral Opportunities:

Tier 2 Candidate Deferral Opportunities have some red flags that indicate they are unlikely to be successfully deferred now. PG&E recommends not pursuing these Candidate Deferral Opportunities, but to closely monitor status and project conditions and re-evaluate for a future date. Summary of reasons for each of the candidates are described below:

- *Dunnigan Bank 1* – Two grid needs, one grid need located on Dunnigan Bank 1 and the other located on Arbuckle Bank 2. The planned investment consists of replacing Dunnigan Bank 1 with 4-5.25/7.00 MVA with an expected in-service date of April 1, 2024. Dunnigan Bank 1 is 79 years old and well beyond the average age of failure of this type of bank which is 68 years. PG&E included two applications for EV chargers in its analysis for the 2020 GNA and DDOR. Multiple other EV developers have

expressed interest in load applications in the area. Deferring the Planned Investment potentially delays the ability to interconnect future EV fast charging applications in the area. Given the forecast uncertainty associated with EV fast charging applications in the area, the planned investment is not recommended for solicitation. There is also a high likelihood of the bank failure due to the age and condition during the deferral period and hence not recommended for solicitation at this time.

- *Beresford 401 Cut-Over* – Two grid needs, one grid need located on Beresford Bank 1 and the other located on San Mateo Bank 4. The planned investment consists of a cut over 4kV to 12kV: Beresford 401 to Bay Meadows 1107 with an expected in-service date of April 1, 2023. Beresford 401 Cut-Over has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Brentwood 2111 Line Work* – One grid need located on Brentwood 2111 feeder. The planned investment consists of Brentwood 2111 Line Work for Transfer with an expected in-service date of March 31, 2023. Brentwood 2111 Line Work has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Hollister 2106 Line Work* – One grid need located on Hollister Bank 3. The planned investment consists of offloading Hollister Bank 3 with reconductoring Hollister 2106 to Hollister 2101 with an expected in-service date of April 1, 2023. Hollister 2106 Line Work has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Rocklin 1104 and Rocklin 1101* – One grid need located on Rocklin Bank 2. The planned investment consists of rearranging feeder outlets at Rocklin to off-load Bank 2 with an expected in-service date of May 1, 2025. Rocklin 1104 and Rocklin 1101 has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Caruthers 1104 Regulator* – One grid need located on Caruthers 1104 feeder. The planned investment consists of installation of regulator for Caruthers 1104 transfer with an expected in-service date of April 1, 2023. Caruthers 1104 Regulator has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Morgan Hill 2103* - Two grid needs, one grid need located on Morgan Hill Bank 1 and the other located on Morgan Hill Bank 2. The planned investment consists of

installation of new circuit on Morgan Bank 1 with an expected in-service date of April 1, 2023. Morgan Hill 2103 has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.

- *Storey 1103* - Three grid needs, one grid need located on Storey Bank 2, and the other two needs located on Storey 1104 and Storey 1109 feeders. The planned investment consists of installation of new circuit on Storey Bank 1 with an expected in-service date of April 1, 2023. Storey 1103 has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Vasona 1109* - Three grid needs located on Saratoga1109, Saratoga 1120 and Saratoga 1104 feeders. The planned investment consists of installation of new Vasona 1109 feeder from Bank 2 to off-load Saratoga 1104 with an expected in-service date of April 1, 2023. Vasona 1109 has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Peabody 2106 Outlet* - One grid need located on Peabody 2106 feeder. The planned investment consists of replacing the 1000AL outlet on Peabody 2106 with a 1100AL (2 way) with an in-service date of April 1, 2024. Peabody 2106 Outlet has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Stelling 1105* - Three grid needs, one grid need located on Loyola 1102, Stelling 1110 and Stelling 1111 feeders. The planned investment consists of reconductoring and extending Stelling 1105 with an in-service date of June 30, 2023. Stelling 1105 has a red flag under the cost-effectiveness prioritization metrics and thus is not recommended for solicitation.
- *Mountain View Bank 1* – One grid need located on Mountain View Bank 1. The planned investment consists of replacing existing Mountain View Bank 1 with a 45MW Bank with an in-service date of April 1, 2023. There is a high possibility of new load growth in the area and DER is unlikely to successfully defer the planned investment. PG&E anticipates there may be multiple EV Charging station loads (~3MW each) in the area. PG&E included two applications for EV chargers in its analysis for the 2020 GNA and DDOR. Multiple other EV developers have expressed interest in load applications in the area. Deferring the Planned Investment potentially delays the ability to interconnect future EV fast charging applications in the area. Given the forecast uncertainty associated with EV fast charging applications in the area, the planned investment is not recommended for solicitation.

Tier 3 Candidate Deferral Opportunities:

PG&E does not recommend pursuing competitive solicitations for Tier 3 candidate deferral opportunities. The Tier 3 projects have multiple major red flags that have been identified and indicate that it is unlikely a DER deferral solution can successfully be sourced. Two of these have real-time requirements⁶ which are unlikely to be successfully sourced. The others are Capacity projects with day ahead dispatch and not recommended for solicitation due to multiple red flags.

- *San Luis Obispo 1106* – As indicated in PG&E's 2nd DPAG follow up webinar,⁷ PG&E has identified that Foothill Bank 1 is at its end of life. To extend its lifespan in the interim, there are plans to de-rate Foothill Bank 1 to be operated below 80% of its rated capacity. PG&E has therefore updated its distribution planning to reflect the de-rate and have recalculated the DER Service Requirements. Based on this recalculation of the prioritization metrics, as shown in Table 2 of Attachment A of Advice Letter 6002-E,⁸ San Luis Obispo is now a Tier 3 opportunity and PG&E is thus not recommending this project for solicitation based on red flags in Market Assessment (Number of Calls) and Cost Effectiveness (LNBA \$/MWh-yr).
- Woodland 1105 Outlet
- Lockeford Bank 1
- Semitropic 1112 Line Work
- California 1103 & California 1111
- Wolfe 1111 & Wolfe 1112
- FMC 1102⁹
- Rincon Bank 1
- Spence Bank 2

4.1.3. Cancelled Candidate Deferral Opportunities

- *Belle Haven Bank 4* – The initial Deferral Opportunity One as included in PG&E's DDOR addressed one grid need, located on Belle Haven Bank 3, with the planned investment of replacing the existing Belle Haven Bank 4 with a 30 MVA Bank and had

⁶ Lockeford Bank 1 is a resiliency project with islanding requirements, and FMC 1102 is a reliability project.

⁷ Distribution Planning Advisory Group (DPAG) follow up webinar on 10-12-2020.

⁸ Advice Letter 6002-E, *Request for Approval to Issue Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunities*, filed November 16, 2020.

⁹ PG&E's notice to cancel solicitations for distributed energy resource procurement for the distribution deferral opportunity at FMC 1102 (AL 5956) was accepted effective 10-23-2020.

an expected in-service date of June 1, 2023. Due to a large (~45MW) load application that was received after the publication of PG&E's 2020 GNA and DDOR, PG&E needs to re-assess its plans for the area. Therefore, the Belle Haven Bank 4 Planned Investment no longer exists at this time. Instead, PG&E's Distribution planning will need to identify new Planned Investment(s) to meet the need in the area. In order to ensure these new Planned Investment(s) are assessed under the DIDF and considered for DER deferral, PG&E will assess each new Planned Investment as follows:

- If these newly identified Planned Investment(s) have an In-Service Date of:
 - Prior to 2023 – Planned Investment will be screened out via the timing screen.
 - 2023 – Planned Investment will be evaluated using the Prioritization Metrics as described in PG&E's 2020 DDOR. If Tier 1, PG&E will file a Tier 2 Advice Letter requesting authorization to solicit DERs to defer the investment.
 - After 2023 – Planned Investment will be assessed in PG&E's 2021 DDOR.

5. Commission Action Requested

Pursuant to D.18-02-004, PG&E requests approval from the Commission to not solicit CSF RFO to procure DERs for thirteen Tier 2 and nine Tier 3 candidate distribution deferral sites.

Tariff Revisions

The filing 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 filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 7, 2020, which 21 days¹⁰ after the date of this submittal. Protests must be submitted to:

¹⁰ The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

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, December 16, 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

Attachment A – Candidate DER Distribution Deferral Prioritization Metrics (Confidential)

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) #: 6003-E

Tier Designation: 2

Subject of AL: Request for Approval to Not Issue Competitive Solicitations for Distributed Energy Resource (DER)
Procurement for Electric Distribution Deferral Opportunities

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.18-02-004

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: See Confidentiality Declaration
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: Quinn Nakayama, (415-973-3732, QJN1@pge.com

Resolution required? ☐ Yes ☒ No

Requested effective date: 12/16/20

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
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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

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Quinn Nakayama, am the Director of Integrated Grid Planning & Innovation at Pacific Gas and Electric Company (“PG&E”), a California corporation. Fong Wan, the Senior Vice President of Energy Policy and Procurement at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): R.14-08-013

3. Title and description of document(s): Advice Letter 6003-E; Advice Letter 6003-E
Attachement A

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents are marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart.

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	Grey-shaded information in Advice Letter 6003-E; Advice Letter 6003-E Attachment A
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)</p>	
<input type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code § 1060; D.11-01-036)</p>	
<input type="checkbox"/>	<p>Corporate financial records</p> <p>(Protected under Govt. Code §§ 6254(k), 6254.15)</p>	

☐

Third-Party information subject to non-disclosure or confidentiality agreements or obligations

(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

☐

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a))

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 16th day of November, 2020 at San Francisco, California.

/s/

Quinn Nakayama
Director, Integrated Grid Planning &
Innovation
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY

Attachment A

Candidate DER Distribution Deferral Prioritization Metrics

(Public Version)

Attachment A - Candidate DER Distribution Deferral Prioritization Metrics

Table 1: Candidate Distribution Deferral Prioritization Metrics

Tier	Candidate Deferral ¹	In-Service Date	Deficiency (MW) ²	Cost Effectiveness	Forecast Certainty	Market Assessment
1	Willow Pass Bank 1	2023	5.3			
	San Miguel Bank 2	2023	5.0			
	Calistoga Bank 1	2023	4.2			
	Ripon 1705	2024	3.7			
	Blackwell Bank 1	2023	CC			
	Zamora 1108	2023	1.1			
	Greenbrae Bank 2	2023	CC			
2	Dunnigan Bank 1	2024	1.6			
	Beresford 401 Cut-Over	2023	1.5			
	Brentwood 2111 Line Work	2023	0.9			
	Hollister 2106 Line Work	2023	5.0			
	Rocklin 1104 and Rocklin 1101	2025	0.2			
	Caruthers 1104 Regulator	2023	0.7			
	Morgan Hill 2103	2023	6.6			
	Storey 1103	2023	3.2			
	Vasona 1109	2023	3.9			
	Peabody 2106 Outlet	2024	CC			
	Stelling 1105	2023	4.6			
	Mountain View Bank 1	2023	5.7			
	San Luis Obispo 1106	2023	CC			
3	Woodland 1105 Outlet	2025	1.3			
	Lockeford Bank 1	2024	14.8			
	Semitropic 1112 Line Work	2024	8.1			
	California Ave 1103 & California Ave 1111 Line Work	2023	CC			
	Wolfe 1111 & Wolfe 1112	2023	44.1			
	FMC 1102	2023	6.7			
	Rincon Bank 1	2023	8.0			
	Spence Bank 2	2023	CC			

¹ Belle Haven Bank 4 candidate deferral project was cancelled due to a large load application after GNA/DDOR publication and the planned investment no longer exists. Distribution planning will need to identify new Planned Investment(s) to meet the need in the area

² Banks and feeders with peak loads listed as "CUSTOMER CONFIDENTIAL" or "CC" were redacted due to their peak loads violating the 15-15 customer privacy rule. A 15-15 violation occurs if the load is comprised of less than 15 customers or a single customer contributes to more than 15% of the loading value

Table 2: Detailed Candidate Distribution Deferral Prioritization Metrics

Candidate Deferral	Cost Effectiveness			Forecast Certainty			Market Assessment				
	Unit Cost of Traditional Mitigation (\$k)	Estimated LNBA (\$/kW-yr)	Estimated LNBA (\$/MWh-yr)	Forecasted Need (Year)	SCADA Available (Y/N)	Project Uncertainty Risk Score	Real Time (RA) or Day Ahead (DA)	Number of Grid Needs	Calls/Year	Hours/Call	Deficiency (%)
Hollister 2106 Line Work	\$500	\$5.35	\$20.75	2023	Y	14	DA	1	43	6	11%
Spence Bank 2	\$9,000	\$46.91	\$53.23	2020	Y	23	DA	4	CC	CC	CC
Wolfe 1111 & Wolfe 1112	\$8,600	\$21.36	\$2.89	2020	Y	14	DA	2	365	24	238%
Vasona 1109	\$1,650	\$46.20	\$13.12	2020	Y	14	DA	3	257	18	25%
Stelling 1105	\$3,756	\$43.51	\$35.45	2020	Y	18	DA	3	236	9	19%
Mountain View Bank 1	\$6,000	\$55.02	\$56.37	2020	Y	24	DA	1	122	8	19%
Brentwood 2111 Line Work	\$80	\$10.08	\$240.03	2023	Y	8	DA	1	21	2	4%
Willow Pass Bank 1	\$14,741	\$194.62	\$337.42	2020	Y	22	DA	2	101	6	17%
Caruthers 1104 Regulator	\$110	\$8.45	\$938.49	2023	Y	13	DA	1	9	1	6%
California Ave 1103 & California Ave 1111 Line Work	\$660	\$8.08	\$7.96	2023	Y	9	DA	4	CC	CC	CC
Semitropic 1112 Line Work	\$34	\$0.22	\$0	2024	Y	14	DA	1	168	6	33%
San Miguel Bank 2	\$9,700	\$138.09	\$151.04	2020	Y	15	DA	3	122	10	22%
San Luis Obispo 1106	\$3,130	\$60.00	\$11.00	2022	Y	14	DA	2	CC	CC	CC
Greenbrae Bank 2	\$6,000	\$114.67	\$52.84	2021	Y	18	DA	1	CC	CC	CC
Beresford 401 Cut-Over	\$1,000	\$35.83	\$64.13	2020	Y	6	DA	2	145	5	17%
Peabody 2106 Outlet	\$110	\$2.16	\$1.37	2022	Y	2	DA	1	CC	CC	CC
Dunnigan Bank 1	\$8,000	\$257.41	\$861.19	2020	Y	26	DA	2	91	5	11%
Woodland 1105 Outlet	\$125	\$5.11	\$13.90	2025	Y	6	DA	1	92	4	10%
Zamora 1108	\$1,200	\$61.21	\$97.15	2020	Y	14	DA	1	45	14	11%
FMC 1102	\$1,700	\$27.46	\$217.91	2020	Y	15	RT	1	9	14	31%
Morgan Hill 2103	\$2,100	\$34.27	\$73.03	2020	Y	17	DA	2	100	6	13%
Rocklin 1104 and Rocklin 1101	\$150	\$34.87	\$335.29	2021	Y	10	DA	1	52	2	2%
Rincon Bank 1	\$10,000	\$64.89	\$14.99	2020	Y	24	DA	2	340	20	29%
Ripon 1705	\$2,200	\$63.07	\$123.68	2023	Y	14	DA	1	102	5	22%
Storey 1103	\$2,200	\$37.40	\$89.35	2020	Y	12	DA	3	105	5	16%
Blackwell Bank 1	\$6,000	\$106.83	\$53.96	2020	Y	16	DA	1	CC	CC	CC
Calistoga Bank 1	\$7,340	\$91.61	\$126.51	2021	Y	16	DA	2	122	8	23%
Lockeford Bank 1	\$6,000	\$20.67	\$35.88	2021	Y	6	RT	1	12	48	50%

Confidential

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