

February 22, 2021

Advice 6098-E

(Pacific Gas and Electric Company ID U 39 E)

Advice 3700-E

(San Diego Gas & Electric Company U 902 E)

Advice 4424-E

(Southern California Edison Company U 338 E)

Public Utilities Commission of the State of California

Subject: Joint Utility Workshop Plan to Solicit Input on Program Elements for the Microgrid Incentive Program

I. Purpose

Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (“SDG&E”) (collectively, “the Joint IOUs”) hereby submit this Tier 1 Advice Letter (“AL”) in compliance with the California Public Utilities Commission (“CPUC” or “Commission”) Decision (“D.”) 21-01-018 (“Decision”) Ordering Paragraph (“OP”) 5.

II. Background

The Commission initiated Rulemaking (“R.”) 19-09-009 to develop a policy framework to facilitate the commercialization of microgrids and related resiliency strategies, and to implement Senate Bill (“SB”) 1339 (Stern, 2018).

In Track 1 of the proceeding, the Commission adopted D.20-06-017 to accelerate microgrid deployment and related resiliency solutions, including solutions to accelerate interconnection of resiliency projects in advance of the 2020 wildfire season; modernizing existing tariffs to maximize resiliency benefits; solutions to promote collaborative engagement between the utilities and local and tribal governments; and approving an array of resiliency proposals set forth by PG&E and SDG&E.

On January 21, 2021, the Commission adopted the Decision in Track 2 of this proceeding, which approves, among other proposals, the development and implementation of a new microgrid incentive program to fund clean energy microgrids to support the critical needs of vulnerable populations impacted by grid outages. The Decision requires the Joint IOUs

to collaborate with interested stakeholders via workshops and meetings to refine program design and implementation details. Additionally, the Decision requires the Joint IOUs to coordinate with Energy Division when establishing the workshops.

The Joint IOUs have conferred with Energy Division staff on the proposed workshop plan. The discussions with Energy Division staff have informed the workshop objectives and plan below.

This advice letter details the Joint IOUs' proposed workshop plan to solicit input on program elements for the Microgrid Incentive Program ("MIP") adopted in the Decision, including the number of meetings to be held and topics to be covered at each meeting. In addition, the advice letter describes the Joint IOUs' proposed stakeholder outreach plan for participation at the workshops. The plan is designed to encourage broad participation in the workshops to obtain a diverse range of views on various program elements to form a full program implementation plan.¹

III. Workshop Objectives & Key Features

The Joint IOUs have developed the Workshop Plan ("Plan") to solicit input on the program elements necessary for developing a full program implementation plan. Through a series of focused workshops, the Plan seeks to gather information that the Joint IOUs will need to design a program that meets the Commission's intent, while supporting the deployment of multi-property microgrids in disadvantaged and vulnerable communities.

The Plan features four workshops, each ranging from 2.5 hours to 4 hours. The Joint IOUs recognize that the current plan involves a significant time commitment from stakeholders. Designing a novel microgrid incentive program involves numerous impactful decisions, and the Joint IOUs aim to provide sufficient space for the level of stakeholder input that such decisions demand. The Joint IOUs understand that some stakeholders will not be able to attend all four sessions or may not be interested in all topics. Thus, the Plan has sought to group topics such that they lead to cohesive discussions and also provide some opportunity for stakeholders to prioritize attendance.

The Joint IOUs propose a format that focuses on stakeholder engagement and participation, seeking stakeholder input through robust dialogue, written comments, or stakeholder presentations. Stakeholders are encouraged to collaborate and offer joint proposals that may help identify program elements supporting program implementation.

¹ The Decision's OP 6, corrected in D.21-02-002, requires the Joint IOUs to file an implementation plan within 120 days upon approval of this advice letter.

IV. Workshop Schedule and Topics

Session Name	Agenda Items & Description	Presenter
Workshop Approval	Workshop Approval – Joint IOU's receive approval of Workshop Plan Advice Letter and will begin communicating scheduled workshops	N/A
Laying the Foundation (Workshop #1) – <i>What should guide the development of the MIP? How do we most effectively engage communities and target the MIP?</i>	MIP Objectives and Goals (30 minutes) – Participants will be asked to provide input on the overarching objectives and goals of the MIP, including prioritization of those goals.	IOUs
	MIP Principles (40 minutes) – A set of MIP development principles will be presented and discussed. Establishing a transparent set of program development principles will help guide future workshop discussions and make them more efficient. The principles will also provide essential guidance on decisions related to MIP program design.	IOUs
	Engaging Communities (40 minutes) – A discussion on how best to engage with communities on the MIP. Particular emphasis will be given to how to reach and engage disadvantaged and vulnerable communities, including how to identify their resilience objectives.	Interested stakeholders
	Eligibility Criteria (40 minutes) – A discussion on what types of projects and communities should be eligible to participate in the MIP. The discussion will seek to refine and build upon the project, community and technology criteria set forth in the Track 2 Staff Proposal, as amended by the Track 2 Decision (D.21-01-018). This session will also explore the balance between the benefits of broad eligibility (e.g. engagement from diverse set of communities, greater diversity of project proposals, greater quantity of proposals) and the benefits of more restrictive eligibility (e.g., limiting overhead costs, limiting community impacts of investing in an unsuccessful proposal, expediting implementation).	Interested stakeholders
MIP Design (Workshop #2) – <i>How can the program be structured to optimally meet goals and objectives?</i>	Selecting the Program Model (120 minutes) – Given the novelty of community microgrids, is it an open questions as to how best to structure a program to cost-effectively incentivize community microgrids that are aligned with program objectives. This session will feature presentations from stakeholders on proposed design of program funding followed by Q&A focused solely on proposal clarification. The floor will then be opened for statements of support or opposition, in part or in whole, to the proposal.	Interested stakeholders
	Open Comments (30 minutes) – Parties are invited to comment on items they believe should be key priorities, constraints, and considerations in program design.	Open Discussion

Session Name	Agenda Items & Description	Presenter
<p>Proposal Submission & Evaluation (Workshop #3) – <i>What is the process for participation in the MIP? How are projects selected? How do we weed out infeasible projects that will tie up resources?</i></p>	<p>Project Sponsorship & Roles (40 minutes) – A discussion of what types of entities should be eligible to sponsor/submit a project. The questions to be examined may include: could a community submit a project concept without the support of a microgrid developer; can a microgrid developer submit a proposal without the support of the community; what are the pros and cons of each prior approach; what is the optimal way to connect the targeted communities with industry expertise?</p>	Interested Stakeholders
	<p>Application Process Considerations (40 minutes) – A discussion on the balance between ensuring that sufficient information is gathered through the application process while not placing undue burden on applicants. Key question: what steps can be taken to ensure the application process and incentive reservation triggers are equitable?</p>	Open Discussion
	<p>Initial Project Assessment (40 minutes) – How do we ensure that resources are directed towards projects with a realistic probability of completion? What are potential methods for determining whether proposed projects are technically feasible? Who should perform such an assessment?</p>	Interested Stakeholders
<p>Project Selection, Program Evaluation, and Promoting the Public Good (Workshop #4) – <i>How can project selection best maximize program benefits? How should the program and individual projects be evaluated? How can we ensure the projects deliver local benefits and deliver broader insights?</i></p>	<p>Scoring Methodology & Prioritization (40 minutes) – Which of the eligibility criteria should also serve as prioritization criteria? Are there additional attributes that should be considered for prioritization? How should projects be scored? Who should perform the scoring? How should results be validated? Should a project have to be cost-effective to be funded?</p>	Interested Stakeholders
	<p>Cost-effectiveness and Program Evaluation (90 minutes) – How should cost-effectiveness of the program be evaluated? What reporting requirements should there be for overall program performance? Who should perform these tasks?</p>	Interested Stakeholders
	<p>Project Performance and Evaluation Requirements (40 minutes) – How should performance of individual projects be evaluated? What performance requirements should be placed on projects? Who should evaluate the performance?</p>	Interested Stakeholders
	<p>Public Benefit Requirements (30 minutes) – Given that these projects will be funded to some extent through the entire utility customer base, what public good requirements should be placed upon them? For example, what data regarding project costs, performance, etc. should be made available to the CPUC, the Joint IOUs or the general public?</p>	Open Discussion

V. Scheduling Process

The workshops will commence upon Commission approval of this advice letter. Given that the workshops are an essential input for determining the program implementation details, the Joint IOUs propose that the workshops be held as soon as practical following approval of the Workshop Plan Advice Letter. Stakeholder feedback during the workshops will inform the Joint IOUs' implementation plan.

Given the compressed timeframe for completing program design, it is unlikely that the workshops will address or fully answer all of the many outstanding questions regarding design of the MIP. Having the workshops set early in the 120-day period will provide the Joint IOUs and parties time to continue to discuss key topics beyond the conclusion of the workshops, where necessary. Thus, the Joint IOUs recommend the workshops begin roughly three weeks following the approval of this advice letter and be held weekly until completion. The Joint IOUs will select specific workshop dates and communicate those dates through the channels described in Section VI within five business days of approval of this advice letter.

VI. Planned Stakeholder Outreach

Ensuring participation from a broad cross-section of stakeholders is valuable for constructive dialogue within the workshops and to inform the MIP design and implementation plan. Of particular importance is ensuring that the communities targeted by the MIP are invited and given opportunity to participate in the stakeholder workshops. This participation will guide the identification of specific resiliency needs and facilitate effective program design to meet the identified needs.

Within five business days of the approval of the this advice letter, the Joint IOUs will notice the service lists for R.19.09.009 (Microgrids and Resiliency Strategies Rulemaking) and R.18-12-005 (De-Energization Rulemaking) with the confirmed date, time, and other necessary information for the series of stakeholder meetings.

The Joint IOUs realize that many key stakeholders in targeted communities are not aware of or parties to this proceeding. Therefore, prior to and following approval of this advice letter, the Joint IOUs will reach out to key stakeholders to promote participation, including:

- The Commission's Disadvantaged Communities Advisory Group (DACAG);²
- Community Based Organizations ("CBOs"), using the lists each utility has developed for Public Safety Power Shutoffs ("PSPS") outreach;³
- Local and tribal governments through each of the Joint IOUs' dedicated staffing;⁴ and
- Sending workshop notifications through appropriate existing PSPS communication and outreach channels.

The Joint IOUs recognize the importance that CBOs hold in reaching historically under-represented communities and will invite a wide selection of CBOs to these workshops, including those that represent populations within the Access and Functional Needs community and environmental and social justice groups that focus on directly assisting disadvantaged communities.

Besides outreach with CBOs and stakeholder advocacy groups, the Joint IOUs intend to utilize their existing relationships with community members as part of their outreach efforts. The Joint IOUs' dedicated staffing have established direct relationships with community members to support collaborative partnerships, which can help the MIP meet communities' resiliency needs.

To the extent feasible and that scheduling allows for, the Joint IOUs intend to utilize established workshops, meetings, or other means of pre-arranged collaboration efforts to minimize time constraints on interested stakeholders. For example, the Joint IOUs have recurring meetings with various local and tribal governments, Office of Emergency Services, and public safety partners as part of PSPS preparation that could serve as a vehicle for outreach during the development of the MIP.

VII. Workshop Reporting

The Joint IOUs note that the Decision requires the Joint IOUs to include in the Implementation Plan a report describing "the public workshops that were convened, including but not limited to the number and type of participants, and their inputs in the discussions."⁵ Thus, the Joint IOUs will document stakeholder names and organizational affiliation to the extent possible. The Joint IOUs will summarize stakeholder input received during the workshops and include meeting summaries in the report.

² <https://www.energy.ca.gov/about/campaigns/equity-and-diversity/disadvantaged-communities-advisory-group>.

³ While these lists are not inclusive of all of the CBOs that the Joint IOUs regularly coordinate with, it is a group that represents a cross-section of the stakeholders the Joint IOUs are trying to reach. The Joint IOUs would also consider input on other CBOs stakeholders believe should be invited to participate.

⁴ See SDG&E AL 3571-E, SCE AL 4260-E, and PG&E AL 5918-E.

⁵ D.21-01-018, p. 70.

VIII. 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 March 15, 2020, which is 21 days⁶ 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:

For PG&E: 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

⁶ The 20-day protest period concludes on a weekend; therefore, PG&E is moving this date to the following business day.

For SCE: Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For SDG&E: Attn: Greg Anderson
Regulatory Tariff Manager
8330 Century Park Court, CP31F
San Diego, CA 92123-1548
E-Mail: GAnderson@sdge.com and SDGETariffs@sdge.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).

IX. Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 5 of D. 21-01-018, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is February 22, 2020.

X. 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 R.19-09-009 and R.18-12-005. 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.19-09-009 and R.18-12-005



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) #: 6098-E, et al.

Tier Designation: 1

Subject of AL: Joint Utility Workshop Plan to Solicit Input on Program Elements for the Microgrid Incentive Program

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.21-01-018

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: 2/22/21

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:

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
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

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
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
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
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy