

March 26, 2021

Advice 6134-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Clarification to Electric Schedule NEM2VMSH to Preserve a Pathway for Affordable Housing Projects**Purpose**

Pacific Gas and Electric Company (PG&E) requests approval of a clarification to Electric Schedule NEM2VMSH – *Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s)* tariff that preserves a pathway for eligible affordable housing projects to enroll in the NEM2VMSH tariff.

Background

New construction affordable housing projects were previously able to enroll in the NEM2VMSH tariff through receipt of incentives from the New Solar Home Partnership (NSHP) program.¹ The NSHP program closed in 2018, which means that the current language could be read such that projects might no longer qualify for NEM2VMSH because projects are unable to receive NSHP incentives. Similarly, the Multifamily Affordable Solar Housing (MASH) program will close on December 31, 2021, and -- absent the clarifications herein -- future projects unable to receive MASH incentives might not qualify for NEM2VMSH. The proposed clarifications to the NEM2VMSH tariff contained in this Advice Letter are designed to ensure that the tariff continues to be used despite the closures of NSHP and MASH programs.

NEM2VMSH Eligibility

The current language in the NEM2VMSH tariff provides three ways to qualify:²

- a) By receiving incentives through the MASH program;
- b) By receiving incentives through the NSHP program;
- c) By receiving incentives through the Low-Income Weatherization Program (LIWP).

¹ PG&E Electric Schedule NEM2VMSH, sheet 1.

² PG&E Electric Schedule NEM2VMSH, sheet 1.

As mentioned above, because the NSHP program closed in 2018, the current language in the tariff suggests that pathway to qualify for NEM2VMSH is closed. Similarly, the MASH program has already closed to new applications and the program ends on December 31, 2021; therefore, a clarification for MASH is also warranted.

NEM2VMSH is a unique tariff in that it allows a project to aggregate the generation of multiple generators for re-allocation to benefiting accounts located at multiple service delivery points, as stated in provision (d) of the tariff.³ This ability was added to the predecessor NEMVMASH tariff specifically to address a requirement commonly found in funding sources for low-income projects: that residential unit accounts receive solar energy credits in proportion to the relative size of each unit, consistent with the manner in which affordable housing rents are established. The current language in the NEM2VMSH tariff does not include qualification (a) within provision (d), which may suggest MASH projects are unable to allocate solar energy credits to accounts located at multiple service delivery points so as to fully utilize their solar generator(s). PG&E proposes to remove provision (d) and clarify that all eligible NEM2VMSH qualified projects have the ability to serve accounts located at multiple service delivery points, as stated in footnote 1 of the redlined version of the tariff.

Alignment with Other Utilities

The corresponding tariffs to NEM2VMSH for Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) are Schedules MASH-VNM-ST⁴ and VNM-A-ST,⁵ respectively. Within these tariffs, SCE and SDG&E do not associate the eligibility criteria with the receipt of incentives from the MASH or NSHP programs, but simply state that a qualified customer is one who is “qualified to participate” within those programs. This does not present the same issue with the now closed NSHP program experienced by PG&E. The proposed clarifications to PG&E’s NEM2VMSH tariff more closely align with the other utilities’ tariffs.

Pathway for Future Affordable Housing Projects

Affordable housing projects that are unable to receive incentives for installing solar from the closed programs need clarification in the tariff to continue to allow tenant benefiting accounts to receive allocations in proportion to the relative size of the units.

PG&E thus proposes clarifying eligibility in the NEM2VMSH tariff from buildings that “received incentives under” to buildings that “are or would have been qualified for” MASH,

³ PG&E Electric Schedule NEM2VMSH, Provision (d), Sheet 1.

⁴ Southern California Edison MASH-VNM-ST Electric Schedule, <https://sites.energycenter.org/sites/default/files/docs/nav/programs/smp/MASH-VNM-ST.pdf> (Accessed March 8, 2021).

⁵ San Diego Gas and Electric VNM-A-ST Electric Schedule, https://www.sdge.com/sites/default/files/elec_elec-scheds_vnm-a-st.pdf (Accessed March 8, 2021).

NSHP, or LIWP programs. If a building participates in the Solar on Multifamily Affordable Housing (SOMAH) program and also qualifies for the MASH program, the building must enroll in the NEM2VSOM tariff. This would provide consistency between the NEM2VMSH and NEM2VSOM tariffs.

Tariff Revisions

PG&E proposes the following clarifications to the NEM2VMSH tariff. A redlined version of the tariff is attached to this filing.

- Clarifications to the Applicability section
 - Removal of the phrase “received incentives under” and replacing it with “are or would have been qualified for” for qualifications (a), (b), and (c).
 - Addition of footnote “If an existing building participates in the Solar on Multifamily Affordable Housing (SOMAH) program and also qualifies for the MASH program, then the customers must enroll such building in the NEM2VSOM tariff.”
 - Removal of the phrase “until all funds available for the incentives have been allocated.”
 - Removal of the sentence “Once all the available MASH funds have been allocated, Schedule NEM2VMSH will be closed to new customers.”
 - Addition of footnote “Customers may elect to serve Accounts located at multiple Customer Service Delivery Points within their “Eligible Low Income Development” so as to fully utilize their solar generator(s) also sited within their “Eligible Low Income Development.”
 - Removal of provision (d).
- Minor typographical corrections

For your convenience, redline versions of the tariff revisions are included as Attachment 2.

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 April 15, 2021, 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 should also 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 advice submittal become effective on regular notice, April, 26, 2021⁶, which is 31 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

The 30-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.⁶



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) #: 6134-E

Tier Designation: 2

Subject of AL: Clarification to Electric Schedule NEM2VMSH to Preserve a Pathway for Affordable Housing Projects

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 #:

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: 4/26/21

No. of tariff sheets: 5

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 NEM2VMSH

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
49312-E	ELECTRIC SCHEDULE NEM2VMSH VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S) Sheet 1	44518-E
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ELECTRIC SCHEDULE NEM2VMSH

Sheet 1

VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

- APPLICABILITY: This virtual net energy-metering schedule is applicable to Customers, who operate (a) solar generator(s) in parallel with PG&E's electric system, all on the same Premises¹ for: (T)
(T)
- a. an existing building or buildings are or would have been qualified for PG&E's California Solar Initiative (CSI) Multifamily Affordable Solar Housing (MASH) Program,² or (T)
 - b. new, "Affordable Housing" consisting of one or more buildings that are or would have been qualified for the New Solar Homes Partnership (NSHP) Program in PG&E's service territory, or (T)
(T)
 - c. an existing building or buildings that are or would have been qualified for the State of California's Low-Income Weatherization Program (LIWP) Program, (T)
- (D)
|
|
|
(D)

Customers on this Schedule NEM2VMSH will be covered under the Special Condition titled *NEM2 Grandfathering Provisions*, in Schedule NEM2. Customers meeting those conditions are referred to as "NEM2VMSH Transition Eligible Customers".

¹ Customers may elect to serve Accounts located at multiple Customer Service Delivery Points within their "Eligible Low Income Development" so as to fully utilize their solar generator(s) also sited within their "Eligible Low Income Development." (N)
|
|
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|
|
(N)

² If an existing building participates in the Solar on Multifamily Affordable Housing (SOMAH) program and also qualifies for the MASH program, then the customers must enroll such building in the NEM2VSOM tariff.

(Continued)



ELECTRIC SCHEDULE NEM2VMSH

Sheet 2

VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

APPLICABILITY: (Cont'd.) An "Eligible Low Income Development" is defined as all of the real property and apparatus employed in a single low income housing enterprise 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 and part of the same single low income housing enterprise, and all under the same ownership.

Each of the three options a. through c. above is referred to in this tariff as a "Eligible Low Income Facility."

Certain incremental billing and metering costs set forth in this schedule that are related to net energy metering are applicable to Electric Service Providers (ESPs) and Community Choice Aggregators (CCA's) serving a Customer with a Load Account (as defined below in the Applicability, Account Types section).

This service is not applicable to a Direct Access (DA) Customer with a Load Account, where the Customer's ESP does not offer a net energy metering tariff. In addition, if the Customer participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide virtual net energy metering for multifamily affordable housing to the Customer.

NEM2VMSH is available to Customers with an Eligible Low Income Facility that provide PG&E with:

- a. a completed NEM2VMSH application and interconnection agreement as described in Special Condition 3, including all supporting documents and required payments; AND
- b. evidence of the final inspection clearance from the governmental authority having jurisdiction over the Solar Generating Facility;

(D)
|
|
|
(D)

Generator Size – Size the generator(s) to produce no more than the energy requirements of all eligible account types of the past year for existing housing and estimated requirements of new housing. Specific size limit details will be determined by the relevant incentive program (MASH, NSHP, or LIWP) handbooks. These generator size limits apply to all Eligible Low Income Developments whether they receive MASH, NSHP, or LIWP incentives or not.

(T)

(Continued)



ELECTRIC SCHEDULE NEM2VMSH
VIRTUAL NET ENERGY METERING FOR MULTIFAMILY
AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

Sheet 3

APPLICABILITY: **Network Grid Limitations** – Portions of San Francisco and Oakland, where PG&E has a network grid, have generation export limitations. Customers seeking generator interconnections in San Francisco and Oakland must contact PG&E before beginning any work.

(Cont'd.)

Account Types – Three types of Accounts in an Eligible Low Income Facility are covered by this tariff:

- a. Generator Account – the Account(s) where the solar photovoltaic generation (Solar Generating Facilities³) are interconnected and for which the Eligible Low Income Facility owner or a party they designate (“Owner”), is the PG&E Customer. The Generator Account must have no load other than that required by the Solar Generating Facility itself and must not be included as part of a Common Area Account.
- b. Common Area Account – each load-only Account for a common area, if any, and for which the Owner is the PG&E Customer.
- c. Residential Unit Account – each load-only account for a residential unit located in the Eligible Low Income Facility, and for which an occupant is the PG&E Customer.

Any Account that includes load, except one that includes only Solar Generating Facility load or as otherwise provided in NEM2VMSH, is referred to as a “Load Account”. All accounts must take service on a time of use (TOU) rate schedule.^{4,5}

The Generator Account(s), the Common Area Accounts(s) and the Residential Accounts will be referred to collectively in this tariff as a “NEM2VMSH Arrangement.”

Customers may continue to take service on this tariff for up to 20 years from the date of the original interconnection of their Renewable Electrical Generation Facility subject to Commission jurisdiction if the NEM2VMSH Arrangement is not terminated. As provided in D.14-03-41, any customer that switches from the NEMVMSH tariff may remain on this tariff for 20 years from the original year of the interconnection of their Solar Generating Facility.

³ Consistent with Decision (D.) 14-05-033, as modified by D.16-01-044. NEM paired storage may be interconnected under this tariff, subject to the metering and sizing requirements specified in D.14-05-33. For Solar Generating Facilities with storage (NEM2VMSH Storage), please see Special Condition 5.

⁴ Customers on Schedules such as ET, ES, and ESR, which have no available corresponding TOU Rate, are not required to switch to TOU rates, unless and until such a rate becomes available.

⁵ Customers, including those at Residential Unit Accounts, switching from Schedule NEMVMASH to this NEM2VMSH are required to take any applicable TOU rate, beginning at the time the customer switched to the NEM2VMSH successor tariff, pursuant to D.14-03-041 and D.16-01-033. Any account not found to be on a TOU rate will automatically be defaulted to the specified TOU rate defined in the “Rate” section below.

(T)

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Advice 6134-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

March 26, 2021



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Attachment 2

Redline Tariffs



ELECTRIC SCHEDULE NEM2VMSH
VIRTUAL NET ENERGY METERING FOR MULTIFAMILY
AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

Sheet 1

APPLICABILITY: This virtual net energy-metering schedule is applicable to Customers, who operate (a) solar generator(s) in parallel with PG&E's electric system, all on the same Premises¹ ~~(or meeting the requirements in d.)~~ for:

- a. an existing building or buildings that ~~received incentives under~~ are or would have been qualified for PG&E's California Solar Initiative (CSI) Multifamily Affordable Solar Housing (MASH) Program,² or
- b. new, "Affordable Housing" consisting of one or more buildings that ~~received incentives under~~ are or would have been qualified for the New Solar Homes Partnership (NSHP) Program in PG&E's service territory, or
- c. an existing building or buildings that ~~received incentives for solar generator(s) under~~ are or would have been qualified for the State of California's Low-Income Weatherization Program (LIWP) Program,
- ~~d. Customers that meet the requirements of provisions "b" or "c" above except for the single Customer Service Delivery Point restriction may alternatively elect to serve Accounts located at multiple Customer Service Delivery Points within their "Eligible Low Income Development" so as to fully utilize their solar generator(s) also sited within their "Eligible Low Income Development."~~

Customers on this Schedule NEM2VMSH will be covered under the Special Condition titled *NEM2 Grandfathering Provisions*, in Schedule NEM2. Customers meeting those conditions are referred to as "NEM2VMSH Transition Eligible Customers".

(T)
(T)
(N)
(N)

¹ Customers may elect to serve Accounts located at multiple Customer Service Delivery Points within their "Eligible Low Income Development" so as to fully utilize their solar generator(s) also sited within their "Eligible Low Income Development."

² If an existing building participates in the Solar on Multifamily Affordable Housing (SOMAH) program and also qualifies for the MASH program, then the customers must enroll such building in the NEM2VSOM tariff.

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ELECTRIC SCHEDULE NEM2VMSH
VIRTUAL NET ENERGY METERING FOR MULTIFAMILY
AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

Sheet 2

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Each of the three options a. through c. above is referred to in this tariff as a "Eligible Low Income Facility."

Certain incremental billing and metering costs set forth in this schedule that are related to net energy metering are applicable to Electric Service Providers (ESPs) and Community Choice Aggregators (CCA's) serving a Customer with a Load Account (as defined below in the Applicability, Account Types section).

This service is not applicable to a Direct Access (DA) Customer with a Load Account, where the Customer's ESP does not offer a net energy metering tariff. In addition, if the Customer participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide virtual net energy metering for multifamily affordable housing to the Customer.

NEM2VMSH is available to Customers with an Eligible Low Income Facility that provide PG&E with:

- a. a completed NEM2VMSH application and interconnection agreement as described in Special Condition 3, including all supporting documents and required payments; AND
- b. evidence of the final inspection clearance from the governmental authority having jurisdiction over the Solar Generating Facility;

~~until all funds available for the incentives have been allocated.~~

~~Once all the available MASH funds have been allocated, Schedule NEM2VMSH will be closed to new customers.~~ (T)

Generator Size – Size the generator(s) ~~to produce no larger more than for~~ the energy requirements of all eligible account types of the past year for existing housing and estimated requirements of new housing. Specific size limit details will be determined by the relevant incentive program (MASH-, NSHP, or LIWP) handbooks. These generator size limits apply to all Eligible Low Income Developments whether they receive MASH, NSHP, or LIWP incentives or not. (T)

(Continued)



ELECTRIC SCHEDULE NEM2VMSH
VIRTUAL NET ENERGY METERING FOR MULTIFAMILY
AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

Sheet 3

APPLICABILITY: **Network Grid Limitations** – Portions of San Francisco and Oakland, where PG&E has a network grid, have generation export limitations. Customers seeking generator interconnections in San Francisco and Oakland must contact PG&E before beginning any work.
(Cont'd.)

Account Types – Three types of Accounts in an Eligible Low Income Facility are covered by this tariff:

- a. Generator Account – the Account(s) where the solar photovoltaic generation (Solar Generating Facilities³) are interconnected and for which the Eligible Low Income Facility owner or a party they designate (“Owner”), is the PG&E Customer. The Generator Account must have no load other than that required by the Solar Generating Facility itself and must not be included as part of a Common Area Account.
- b. Common Area Account – each load-only Account for a common area, if any, and for which the Owner is the PG&E Customer.
- c. Residential Unit Account – each load-only account for a residential unit located in the Eligible Low Income Facility, and for which an occupant is the PG&E Customer.

Any Account that includes load, except one that includes only Solar Generating Facility load or as otherwise provided in NEM2VMSH, is referred to as a “Load Account”. All accounts must take service on a time of use (TOU) rate schedule.^{4,5} (T)

The Generator Account(s), the Common Area Accounts(s) and the Residential Accounts will be referred to collectively in this tariff as a “NEM2VMSH Arrangement.” (T)
(T)

Customers may continue to take service on this tariff for up to 20 years from the date of the original interconnection of their Renewable Electrical Generation Facility subject to Commission jurisdiction if the NEM2VMSH Arrangement is not terminated. As provided in D.14-03-41, any customer that switches from the NEMVMSH tariff may remain on this tariff for 20 years from the original year of the interconnection of their Solar Generating Facility.

³ Consistent with Decision (D.) 14-05-033, as modified by D.16-01-033. NEM paired storage may be interconnected under this tariff, subject to the meeting and sizing requirements specified in D.14-05-033. For ~~a~~ Solar Generating Facilities with storage (NEM2VMSH Storage), please see Special Condition 5.

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⁵ Customer, including those at Residential Unit Accounts, switching from Schedule NEMVMASH to this NEM2MSH are required to take any applicable TOU rate, beginning at the time the customer switched to the NEM2VMSH successor tariff, pursuant to D.14-03-041 and D.16-01-033. Any account not found to be on a TOU rate will automatically be defaulted to the specified TOU rate defined in the “Rate” section below.

(Continued)

**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