

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6141E
As of December 14, 2022

Subject: Modification of Electric Rule 21 for Qualifying Non-export and Limited Export Inverters to Use a Time-of-Year Maximum Monthly Export Value Settings Pursuant to Decision 20-09-035 Ordering Paragraphs 51 and 15

Division Assigned: Energy

Date Filed: 03-30-2021

Date to Calendar: 04-02-2021

Authorizing Documents: D2009035

| | |
|------------------------|-------------------|
| Disposition: | Signed |
| Effective Date: | 12-01-2022 |

Resolution Required: Yes

Resolution Number: E-5230

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

March 30, 2021

Advice 6141-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Modification of Electric Rule 21 for Qualifying Non-export and Limited Export Inverters to Use a Time-of-Year Maximum Monthly Export Value Settings Pursuant to Decision 20-09-035 Ordering Paragraphs 51 and 15

Purpose

The purpose of this advice letter is to make changes to Pacific Gas and Electric Company's (PG&E's) Rule 21 tariffs pursuant to the California Public Utilities Commission ("CPUC" or "Commission" Decision (D.) 20-09-035¹ with regard to:

- (i) (Ordering Paragraph ("OP") 51) to allow an inverter approved for non-export and limited export to be set using different maximum monthly export value settings at different times of the year, when meeting the qualifications for either Rule 21 Working Group 3 Proposal A-B 1 or A-B 2; and
- (ii) (OP 15) to resolve **Issue 9** by modify the Rule 21 Interconnection Application Process to allow a distributed energy resources customer to include a Limited Generation Profile with their application, require the customer to enable generation profile limiting functionality, and allow Utilities opportunity to alter the profile if safety and reliability concerns warrant it.

OP 51 allows that, "The discussions and Tier 3 Advice Letter required in this ordering paragraph may be combined with those required in **Ordering Paragraph 15.**"

¹ [Decision 20-09-035](#) - Date of Issuance 9/30/2020 - *Decision Adopting Recommendations from Working Groups Two, Three, and Subgroup*

Background

Rulemaking 17-07-007

On July 13, 2017, The Commission adopted Order Instituting Rulemaking (R.) 17-07-007 to consider refinements to Electric Tariff Rule 21 of Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) (jointly, "Utilities") regarding the interconnection of distributed energy resources.²

ACR Scoping Memo

On October 2, 2017, the Commission issued Scoping Memo of Assigned Commissioner and Administrative Law Judge (Scoping Memo) set forth the scope and schedule of the proceeding. It established the working group process, whereby resolution of the technical issues of the proceeding would be proposed by Working Groups One through Six. In addition, four issues were assigned to the Smart Inverter Working Group, including issues 5 and 6.³

Working Group 2

On February 14, 2018, a Ruling directed that Working Group Two would begin on March 15, 2018 and required that it subsequently file its recommendations report on September 15, 2018. The Ruling also reassigned Issue 6 to Working Group Two.

On August 15, 2018, the Administrative Law Judge issued a Ruling allowing additional time for Working Group Two to resolve issues, including sub-issues encountered, and delaying the filing of the recommendations report to October 31, 2018.

On October 31, 2018, the Working Group 2 final report was issued.⁴

On November 7, 2018, the Administrative Law Judge facilitated a workshop to discuss the recommendations provided in the Working Group 2 Final Report.

On December 7, 2018, in response to the November 7, 2018, workshop on the Working Group Two Report, and parties were directed to respond to questions on the report.

² The Rule 21 tariff describes the interconnection, operating, and metering requirements for certain generating and storage facilities seeking to connect to the electric distribution system. Rule 21 provides customers access to the electric grid to install generating or storage facilities while protecting the safety and reliability of the distribution and transmission systems at the local and system levels. (See R.17-07-007 at p2.)

³ The Smart Inverter Working Group (SIWG) grew out of a collaboration between the Commission and the California Energy Commission in early 2013. The collaboration identified the development of advanced inverter functionality as an important strategy to mitigate the impact of high penetrations of distributed energy resources. [as explained in footnote 2 in D. 20-09-035]

⁴ Working Group Two Final [Report](#) filed jointly by the Utilities.

On February 1, 2019, responses to the questions, along with comments on the Working Group Report, were filed by the various parties

On February 22, 2019, replies were filed by the various parties.

Amended Scoping Memo and Working Group 3

On November 16, 2018, a Scoping Memo and Ruling (Amended Scoping Memo) delayed the start of Working Group Three until December 1, 2018 and required Working Group Three to file its recommendations report on June 14, 2019. The Amended Scoping Memo also decreased the number of working groups and redistributed issues across two working groups and the Interconnection Discussion Forum⁵ such that Working Group Three was assigned issues 12, 15, 16, 20, 22, 23, 24, 27 28, and New Issues A and B.

On June 13, 2019, the Working Group Three Final Report⁶ was issued followed by a workshop.

A November 27, 2019 Ruling directed parties to respond to questions on the Working Group Three Report.

On January 13, 2020, the various parties filed responses to the questions contained in the November 27, 2019, ruling, along with comments to the Working Group Three Report.

On January 27, 2020, various parties filed replies to the responses and Working Group Three Report comments

On January 13, 2020, various parties filed replies to the comments on the V2G AC subgroup report.

Decision 20-09-035

On August 20, 2020, a proposed decision was issued on Working Groups Two and Three. On September 9, 2020 comments were received. On September 22, 2020, replies were received. Decision 20-09-035 was issued on September

Subsequently, on January 21, 2021, the Commission issued D. 21-02-027⁷ making corrections to D. 20-09-035. The corrections do not pertain directly to this advice letter.

⁵ In Resolution Administrative Law Judge-347, the Commission established the Interconnection Discussion Forum (formerly known as the Rule 21 Working Group) as a venue to encourage discussion and collaboration between the Utilities and developers. [as explained in footnote 3 in D. 20-09-035]

⁶ Working Group Three Final [Report](#) filed by SDG&E

⁷ [D.21-01-027](#) *Order Correcting Errors In Decision 20-09-035*

Pending Advice Letters in R. 17-07-007

Working Group One Advice letters filed ⁸ and Resolution E-5035 now requires and updated Advice Letters be submitted to incorporate changes Rule 21 by April 8th.

On October 30th, 2020, PG&E submitted AL 5988-E⁹, a Tier 1 AL 30 days after the issuance of D. 20-09-035, as ordered by that decision. That advice letter was protested and has been suspended.

On November 30th, 2020, PG&E submitted AL 6014-E¹⁰, a Tier 2 AL 60 days after the issuance of D. 20-09-035, as ordered by that decision. That advice letter was protested.

On January 28th, 2021, PG&E submitted AL 5915-E¹¹ regarding OPs 5, 6, 8, and 11, 120 days after the issuance of D. 20-09-035, as ordered by that decision. That advice letter was protested.

Also, on January 28th, 2021, PG&E submitted AL 6058-E¹² regarding OP 15 and 16, which relates to this Advice Letter. That advice letter was protested.

Finally, on February 22, 2021, PG&E submitted AL 6093-E¹³ regarding modifications to Rule 21 Pursuant to Resolution E-5000 OP 6, 7, and 8 for IEEE 1547.1 Standards. That advice letter was protested.

⁸ [AL 5553-E](#) *Modification to Rule 21 Pursuant to the Working Group 1 D. 19-03-013.* The Rule 21 changes in AL 5553-E is still pending approval. Two other Advice letters (AL 5583-E, and AL 5584-E) were also submitted for Working Group 1 but they did not directly impact Rule 21.

⁹ [AL 5988-E](#) *Advice Letter Modifying Electric Rule 21 Pursuant to Decision 20-09-035 for Working Group 2 and 3 (due 30 days from Issuance)*

¹⁰ [AL 6014-E](#) *Advice Letter Modifying Electric Rule 21 Pursuant to Decision 20-09-035 for Working Group 2 and 3 (due 60 days from Issuance)*

¹¹ [AL 5915-E](#) *Subject: Advice Letter Modifying Electric Rule 21 Pursuant to Decision 20-09035 for Working Group 2 and 3 (due 120 Days from Issuance) for Ordering Paragraphs 5, 6, 8 and 11.*

¹² [AL 6058-E](#) *Advice Letter Modifying Electric Rule 21 Pursuant to Decision 20-09035 for Working Group 2 and 3 Ordering Paragraphs 15 and 16 (due 120 Days from Issuance)*

¹³ [AL 6093-E](#) *Modifications to Electric Rule 21 Pursuant to Resolution E-5000 Ordering Paragraphs 6, 7, and 8 for IEEE 1547.1 Standards*

Overview

Op 51 requires.

*A modified **Proposal A-B 3** is adopted but shall not be implemented until nine months after technical specifications standards, and a certification scheme for a **Limited Generation Profile** have been approved by the standards approving bodies.*

Within 90 days of such approval, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall submit a Tier 2 Advice Letter seeking to modify their Rule 21 tariffs to allow an inverter approved for non-export and limited export to be set using different maximum export value settings at different times of the year, when meeting the qualifications for either Proposal A-B 1 or A-B 2.

Within 90 days of the issuance of this decision, Utilities shall commence discussions with the Smart Inverter Working Group focused on implementing the proposal.

Within six months of issuance of this decision, Utilities shall submit a Tier 3 Advice Letter providing recommendations (as applicable) regarding the standard review, certification requirements, and interconnection processes necessary for implementation of the proposal.

*The discussions and Tier 3 Advice Letter required in this ordering paragraph may be combined with those required in **Ordering Paragraph 15**.*

[Formatting added for clarity; red text pertains directly to this advice letter]

Proposal A-B 3¹⁴

Proposal A-B 3 is dependent upon the adoption of A-B 1¹⁵ and/or A-B 2¹⁶.

*This proposal would **allow an inverter approved for non-export and limited-export to be set using different maximum export value settings***

¹⁴ D. 20-09-035 see Section 5.9.5. Issue A-B, which is also where footnote and 15 and 15 language below is excepted. P. 163

¹⁵ Proposal A-B 1 requires Rule 21 to be modified to specifically allow the use of a power control system for non-export and limited export interconnection applications and establishes five specifications that generating facilities must meet to be treated as non-export or limited export.

¹⁶ Proposal A-B 2 is also a consensus proposal addressing a project in interconnection review with inadvertent export. First, like Proposal A-B 1, this proposal would update Rule 21 language to allow the use of a power control system for non-export and limited-export applications. Further, Proposal A-B 2 would require that, to be treated as inadvertent export, a generating facility must meet all six of the following specifications.

at different times of the year and at the discretion of the utility until a future scheduling standard is released.

Proposal A-B 3 would require the inverter to meet the qualifications for non-export or limited-export under Proposal A-B 1 or A-B 2.

...

CALSSA maintains that Smart Inverter Phase II Function 8 will allow power control systems to have different maximum export values at different times of the year. Distributed energy resources are required to have this advanced functionality, as of June 2020. SCE contends this proposal cannot be adopted until standards to test control systems have been adopted.

Further, SCE also argues that the UL CRD must be updated to include the temporal testing procedures for which work has not commenced.³⁵⁰ SCE surmises this proposal is premature. However, SCE submits that nine months after these specifications and standards have been approved, Utilities could adopt tools, forms, and technical evaluation methods in order to make this various scheduling capability available for use.³⁵¹

SDG&E and PG&E agrees that the proposal is premature but would consider the proposal once the standards and specifications are in place.³⁵²

Footnote references for this section refer to pages in the Working Group Three Report

³⁴⁹ Id. at 135.

³⁵⁰ Id. at 136-137.

³⁵¹ Ibid.

³⁵² Id. at 137.

[Formatting added; red text pertains directly to this advice letter]

Op 15 requires¹⁷

*The counter proposal from Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) to resolve **Issue 9** is adopted with modification.*

¹⁷ Issue 9 is; *What conditions of operations should the Commission adopt in interconnection applications and agreements to allow distributed energy resources to perform within existing hosting capacity constraints and avoid triggering upgrades?* See pp 8 and 51 of D. 20-09-35.

Within 90 days of the issuance of this decision, Utilities shall commence discussions with the Smart Inverter Working Group focused on implementing the proposal.

Within six months of issuance of this decision, Utilities shall submit a Tier 3 Advice Letter providing recommendations (as applicable) regarding the standard review, certification requirements, and interconnection processes necessary for implementation of the proposal.

*Within 60 days of adoption of a certification scheme for the **Limited Generation Profile**, Utilities shall modify the Rule 21 Interconnection Application Process to allow a distributed energy resources customer to include a Limited Generation Profile with their application, require the customer to enable generation profile limiting functionality, and allow Utilities opportunity to alter the profile if safety and reliability concerns warrant it. Retroactive alterations to generation profiles shall not reduce generation to below a pre-defined static level, i.e., the lowest Integrated Capacity Analysis – Static Grid typical profile value identified at the time of the Interconnection Application.*

As part of the proposal, Utilities shall: i) allow customers to utilize a smart inverter's ability to increase its output on a monthly basis; and ii) use a 10 percent buffer, which shall be revisited.

No later than 18 months after the implementation of this proposal, Utilities shall submit a Tier 3 Advice Letter providing data obtained from Proposals 8b and 8c, adopted below, assessing the effectiveness of the use of the Integration Capacity Analysis values within the interconnection process and addressing whether the Commission should continue use of the 10 percent buffer or adjust it, based on the data.

[Formatting added; red text pertains directly to this advice letter]

Discussion

OPs 15 and 51 required that Utilities discuss them SIWG meeting within 90 days of the issuance of the Decision. The Utilities discussed the two OPs at the following SIWG meetings:

| | SIWG dates when OPs 15 & 51 discussed |
|---|--|
| 1 | December 17, 2020 |
| 2 | January 7, 2021 |
| 3 | February 4, 2021 |
| 4 | February 16, 2021 |
| 5 | March 4, 2021 |

As indicated in the table below, due to the high degree of similarity between OPs 15 and 51 the Utilities proposed at the SIWG that the two OPs be implemented together as one and the proposal was accepted.

| | OP 15 | OP 51 |
|---|--|-----------------------|
| | == SIMILARITIES == | |
| Generating Facilities export levels | Both allow variance during the year | |
| Certification scheme | Both rely on approved certification standard | |
| Use of Smart Inverters | Both require | |
| SIWG engagement | Both require | |
| | == DIFFERENCES == | |
| Working Group 3 basis | Issue 9 | Issue A-B #3 |
| Timing for updates to Rule 21 once certification standards are approved | Update within 60 days | Update within 90 days |
| Implementation timeline once certification standards are approved | No timeline provided | 9 months |

The SIWG included discussions that focused on

- standard review,
- certification requirements, and
- the interconnection process modifications

necessary for implementation of the proposal as required by Ordering Paragraphs 15 and 51.

On the December 17, 20 SIWG, IOUs presented a draft process flow that outlined the requirements for:

1. Customer Pre-application Research
2. Interconnection Request
3. Technical review process
4. Interconnection Agreement and PTO
5. Operational Verification Requirements

Refinement and discussion of the draft process flow continued until the final SIWG meeting on March 4, 2021.

Process

The processes outlined below were an outcome of the discussion and refinements of the interconnection, approval, and performance evaluation process

In more details PG&E's process will be:

1. Customer Preparation Phase:

- a. In this phase, customers who intend to use this operational method are to download the ICA¹⁸ profiles from Utility ICA maps (when ICA values are available) for the three-phase electrical node that will be used for the interconnection request.

Customers will download a CSV¹⁹ file (containing ICA values) from the PG&E ICA map.

- b. Customer should examine and conform the downloaded data to inform applicant of the minimum monthly ICA-SG values from the ICA-SG profile.
- c. Customer should determine monthly export values to not exceed 90% of the monthly minimum ICA-SG values as determined in (b).
- d. Customer shall select a certified control system that can control the export limit to not exceed the values determined in (c).
- e. Customer shall capture the name of the Distribution Feeder (circuit) name, the three-phase electrical node identifier (CSV Line Section²⁰), and the date of when the data extraction took place. This information will be needed when the customer submits the Interconnection Request.

In summary, customers will then use the ICA data to come up with their generation LGP and provide monthly generation output values with their applications, similar to what is shown below:

¹⁸ ICA is Integrated Capacity Analysis – See [AL 6014-E](#) Issue 5. Ordering Paragraph 12 – Screen N Thermal Overload p13. This section proposes definitions related to the ICA profiles in Rule 21 *Section C, Definitions*. AL 6014-E was protested. The Utilities are working together to develop consistent language and working with stakeholders to address any concerns.

¹⁹ Comma-separated variable file.

²⁰ See ICA map & user-guide to understand how the term *CSV Line Section* is used.

User Guide:

<https://www.pge.com/eimp/?appname=GISMapping&resume=%2Fas%2FB7VUa%2Fresume%2Fas%2Fauthorization.ping&spentity=null>

ICA Map:

<https://www.pge.com/eimp/?appname=GISMapping&resume=%2Fas%2FuKhws%2Fresume%2Fas%2Fauthorization.ping&spentity=null>

| Limited Generation Profile Values | |
|--|-------------------------|
| Month | kW |
| January | 2100 |
| February | 1900 |
| March | 2400 |
| April | 1300 |
| May | 2100 |
| June | 1800 |
| July | 2300 |
| August | 1300 |
| September | 2100 |
| October | 1800 |
| November | 2100 |
| December | 1800 |
| | |
| Project Nameplate (kW) | 3000 |
| | |
| Distribution Circuit Name | Circuit Name |
| CSV Line Section | CSV Line Section |
| Date of ICA Profile Extraction | Date |

2. Interconnection Request Phase:

- a. Customer is to provide the information that is typical and general to all interconnection requests.
- b. Customer is to provide the Limited Generation Values as determined in 1.c and the information for 1.e within PG&E's Customer Connect Interconnection application portal.
 - i. Currently, the Customer Connect interconnection application portal is not able to accept this information. The tool will need to undergo significant updates to be able to accept and process this new information
- c. Customer to provide information on their certified control systems within PG&E's Customer Connect interconnection application portal.
 - i. The UL²¹ PCS²² standard for this type of application has not been approved and thus no control systems have provided certification information yet. When certification information becomes available, PG&E will maintain a list of approved UL PCS that customers can select from during the application process.

²¹ Underwriters Laboratories, a nationally recognized testing laboratory.

²² PCS are Power Control Systems

3. Technical Evaluation Phase:

- a. PG&E will apply all the applicable Initial Review Screens (A-L) based on the Nameplate capacity.
- b. Queue assignments will be based on Nameplate Capacity.
- c. PG&E will verify that it has the most updated ICA value corresponding to the customer provided three phase electrical node (CSV Line Section) from 1.e.
- d. PG&E will evaluate most updated ICA-SG profile and determine if the requested export values are at or below 90% of each month minimum ICA-SG value for each of the 12 months.
 - i. If the export request for each of the 12 months is at or below the 90% of each month's minimum ICA-SG value, then the project can continue with its evaluation.
 - ii. If all Initial review screens (A-L) are met including 3.d.i (all requested values are below 90% of each month's ICA values). Then the project would pass Fast Track.
 - iii. If the export request for one or more of the 12 months is not at or below the 90% of the specific month's minimum ICA-SG value, then PG&E will inform the customer and will allow **5 Business Days (BD)** for the customer to update their proposed limited generation profile such that all monthly values are at or below 90% ICA-SG profile values.
 - iv. If customer does not respond within **5 BD** of the notification, PG&E will then proceed to evaluate the project using full nameplate without monthly limits.
 - v. It should be noted that additional tools may be necessary to complete this profile evaluation efficiently and accurately.

4. Interconnection Agreement/PTO Phase:

- a. Execute Interconnection Agreements. The interconnection agreements should be updated to reflect the operational requirement including:
 - i. Update Interconnection Agreements to ensure that the Generating Facility control systems meet the approved operating specification.
 - ii. Update Interconnection Agreement to require prompt action by the customer if operating specifications are not followed and if not clarify that utility may take actions including termination of agreement if multiple instances of not operating according to the approved limits occur.
 - iii. Update Interconnection Agreement to require that the customer provide in a quarterly basis export performance data (profile export) on a quarterly basis to the utility.
- b. Perform field performance verification

- i. Customer shall provide written field verification procedure per Rule 21 Section L.5.a 10 BD prior to field verification.
 - ii. PG&E will review, discuss, and agree on the verification procedures
 - iii. PG&E and customer will agree on field verification date.
 - c. Permission to Operate (PTO) will be issued if field performance evaluation shows compliance with the approved limitations and once all the agreements and documentation (such as AHJ release) has been completed or provided.
5. Operation Performance Phase:
 - a. For system which have telemetry, PG&E will monitor the performance of the generating facility.
 - b. For systems which do not have telemetry, the customer must provide quarterly generation export data which can be used to determine if the generating facility is limiting its export to the approved limits.

Implementation Requirements

In order for qualifying customers to be able to use a Limited Generation (monthly) Profile (LGP) based on the published ICA SG profile (with 10% buffer), PG&E will require changes to

- SAP
 - EDGIS²³
 - PG&E interconnection application intake portal
- to implement.

In general, PG&E will need to make the following changes:

- Update the **Rule 21 application intake portal** to allow customers to provide their Limited Generation (monthly) Profile (LGP) with their application.
- Update **SAP** and **EDGIS** tools to allow them to store the LGP values.
- Update **SAP** to allow the IC to modify their LGP during **R21 study process** for cases where it is greater than 90% ICA SG.
- Need to record and track circuits (in **SAP / EDGIS**) that have LGP generation projects. This requires a change to **SAP / EDGIS**.
- Create a system to monitor circuits with LGP generation projects in case the profile needs to be adjusted in the future for safety and reliability reasons.
- Update the downloadable ICA CSV file to include additional columns (and relabel existing columns) or modify the user's guide to assist customers who intend to use an LGP.

²³ EDGIS is PG&E's geographic information system software.

- **Additional tools are necessary to perform technical evaluation.** While a small quantity of projects can be evaluated manually in the short term, a more sophisticated tool is necessary to extract data from the ICA data set, determine ICA-SG values and its corresponding 90% limit, and compare limits with requested these technical evaluations accurately and effectively.

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 19, 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 also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the

following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.3, and OP 15 and 51 of D.20-09-035, this advice letter is submitted with a Tier 3 designation. PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

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.11-09-011 and R.17-07-007. 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.11-09-011 and R.17-07-007



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) #: 6141-E

Tier Designation: 3

Subject of AL: Modification of Electric Rule 21 for Qualifying Non-export and Limited Export Inverters to Use a Time-of-Year Maximum Monthly Export Value Settings Pursuant to Decision 20-09-035 Ordering Paragraphs 51 and 15

Keywords (choose from CPUC listing): Compliance, Rule 21

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-09-035

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:

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