

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



August 17, 2021

Advice Letter 6174-E, 6174-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Request for Prescribed Accommodation and Allowed Deferrals associated with the Emergency Load.

Dear Mr. Jacobson:

Advice Letter 6174-E, 6174-E-A is effective as of April 26, 2021.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

July 7, 2021

Advice 6174-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Request for Prescribed Accommodation and Allowed
Deferrals associated with the Emergency Load Reduction Pilot**

Purpose

PG&E submits this supplemental advice letter to Advice Letter (AL) 6174-E to enable the export functionality and associated counting in support of the Emergency Load Reduction Pilot (ELRP). Specifically, PG&E proposes to enable the export of energy by A.3 (Distributed Energy Resources) and A.4 (Virtual Power Plants) participants¹ along with the counting of export energy in ILR Incremental Load Reduction (ILR).² This supplemental advice letter supplements original AL 6174-E.

PG&E's original AL-6174-E requested the export functionality was to be deferred until May 1, 2022; this supplemental AL proposes implementation during the summer of 2021.

Separately, and unrelated to the export function, PG&E continues to request as originally submitted in AL-6174-E: 1) an accommodation for the ELRP baseline to have only one option for the ten-day selection and one option for the day-of adjustment,³ and 2) deferral of the effective date of excluding grid outages from an ELRP baseline⁴ to a date no later than May 1, 2022.

¹ D.21-03-056, Attachment 1 at p. 6 and 7.

² D.21-03-056, Attachment 1 at p. 10.

³ D.21-03-056, Attachment 1 at p. 11.

⁴ D.21-03-056, Attachment 1 at p. 11.

Background

In compliance with Decision (D.) 21-03-056, PG&E filed its request for accommodation and deferrals associated with the implementation of the ELRP.⁵ The accommodations and deferrals requested by the original Advice Letter pertained *only* to PG&E's terms and conditions for Group A participants in ELRP, which were jointly filed by Southern California Edison (SCE) on behalf of the three utilities.⁶

The specific accommodation and deferrals that PG&E sought in AL-6174-E are summarized below:

Baseline Accommodation

The basis for the one baseline option is that the use of a "similar" versus "calendar" days provides a better generally accepted methodology as more suitable comparable set of days could be identified. Furthermore, the application of an upward-only adjustment (+40%) instead of both up or down (+/-40%) would potentially preclude penalizing ELRP participants through a downward adjustment.

Deferral for Excluding Grid Outages

Due to the need for the development of reporting tools to incorporate the exclusion of grid outages (PSPS and non-PSPS) into the ELRP baseline, deferral of this requirement is appropriate. However, if PG&E can incorporate the exclusion of grid outages sooner than May 1, 2022, then it will do so.

Discussion

Based on comments submitted by CESA⁷, which advocated for an accelerated implementation by January 2022, along with direct engagement with the CPUC, PG&E is filing this supplemental advice letter proposing to enable some level of energy exports on a provisional basis for Group A participants during the summer of 2021. Specifically, PG&E will enable export of energy no later than August 31, 2021. PG&E is committed to keeping Energy Division apprised of the status, obstacles, and assistance required in achieving this goal. Such export activity will most likely be phased with A.3⁸ potentially occurring prior to A.4, due to the differentiated complexities between the two sub-

⁵ Attachment 1 to the Decision provides for a number of prescribed allowances and deferrals associated with the implementation of the ELRP. These allowances and deferrals were in certain cases available to all three utilities and in other cases only to a specific utility.

⁶ SCE Advice Letter 4478-E; SDG&E Advice Letter 3744-E; PG&E Advice Letter 6173-E jointly submitted April 26, 2021.

⁷ CESA filed a response dated May 17, 2021 addressing deferral requests by both PG&E and SCE (Advice Letter 4482-E). Subsequently, PG&E filed a reply dated May 24, 2021.

⁸ PG&E is offering the export function for Sub-group A.1 (direct), which would be rolled-out concurrently with A.3.

options.⁹ In the interim, PG&E proposes that parties who are interested in utilizing A.3 and A.4 provide notice to Olivine, PG&E's administrator for the ELRP, by emailing Olivine (pge-elrp@olivineinc.com). Concurrently, PG&E is reaching out to parties that it believes may have an interest in utilizing the export function.

Phase 1, Preliminary Interest: Effective immediately, potential customers interested in enrollment in the ELRP through either the A.3 or A.4 subgroup will be able to show non-binding, preliminary interest in participation by emailing Olivine (pge-elrp@olivineinc.com). No verification of eligibility is conducted at the time preliminary interest is shown. The full eligibility and validation steps will be implemented as part of Phase 2.

Phase 2, Eligibility Validation & Enrollment: PG&E will develop and implement an eligibility validation and enrollment process for A.3 and A.4. Considerations for this process will include, but are not limited to, review and potential modifications of its Rule 21 Interconnection Agreement, development of appropriate baselines, and an assessment of potential safety and reliability implications. Customers who expressed preliminary interests in Phase 1, in addition to new customers, will formally commence eligibility validation and enrollment into the ELRP by no later than August 31, 2021.

Protests

Pursuant to CPUC General Order 96-B, Section 7.5.1, PG&E hereby requests the protest period be waived.

Effective Date

PG&E requests that this Tier 1 advice submittal become effective concurrent with original AL 6174-E, which is April 26, 2021.

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 list for R.20-11-003. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

⁹ A-4 may require supporting agreements to be developed and could involve a large number of sites, which could involve a significant effort in validations associated with Rule 21 interconnection agreements.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments

cc: Service List R.20-11-003
Jin Noh, CESA



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) #: 6174-E-A

Tier Designation: 1

Subject of AL: Supplemental: Request for Prescribed Accommodation and Allowed Deferrals associated with the Emergency Load Reduction Pilot

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.21-03-056

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: N/A

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: Sidney Bob Dietz II, 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