

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

April 26, 2021

Advice 6174-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

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

Purpose

In compliance with Decision (D.) 21-03-056, PG&E hereby submits its request for accommodation and deferrals associated with the implementation of the Emergency Load Reduction Pilot (ELRP).¹ The accommodations and deferrals requested by this Advice Letter pertains *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.² The issues described in this Advice Letter are limited to PG&E as each utility has the option to separately request relief from the Commission via a Tier 1 Advice Submittal.

Background

The specific accommodation and deferrals that PG&E seeks in this Advice Letter are summarized below:

Prescribed Accommodation

- An IOU may choose to implement the ELRP baseline with only one option for the ten-day selection or one option for the DO [Day-Of] adjustment by submitting a Tier 1 AL.³

¹ 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.

² SCE Advice Letter 4478-E; SDG&E Advice Letter 3744-E; PG&E Advice Letter 6173-E jointly submitted April 26, 2021.

³ D.21-03-056, Attachment 1 at p. 11.

Deferral for Exports

- Under the Group A section, it states that “An IOU may elect to defer the effective date of counting of export energy in ILR [Incremental Load Reduction]...to a date no later than May 1, 2022, by filing a Tier 1 AL.”⁴
- More specific export deferrals are provided for A.3 (Distributed Energy Resources) and A.4 (Virtual Power Plants) through the filing of a Tier 1 Advice Letter to defer until May 1, 2022.⁵

Deferral for Excluding Grid Outages

- The decision provides for the ability “to defer the effective date of excluding grid outages from an ELRP baseline to a date no later than May 1, 2022 by filing a Tier 1 AL.”⁶ Exclude effective date of grid outages (p. 11)

Discussion

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 of Exports

PG&E requests deferral in order to implement the framework to enable export of resources under Group A. This includes but is not limited to review and potential modifications of its Rule 21 interconnection agreement, development of appropriate baselines, and assessment of safety and reliability. Moreover, PG&E would like to work with entities that plan to utilize A.3 and A.4 in order to determine capabilities and suitable approaches for utilization of the export function. The request for deferral is predicated on the potential that an earlier than May 1, 2022 roll-out may be possible, but PG&E is unable to determine that at this point in time.

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.

⁴ D.21-03-056, Attachment 1 at p. 10.

⁵ D.21-03-056, Attachment 1 at p. 6 and 7.

⁶ D.21-03-056, Attachment 1 at p. 11.

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 May 17, 2021, which is 21 days⁷ 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

⁷ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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 1 advice submittal become effective upon date of submittal, 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/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.20-11-003



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

Tier Designation: 1

Subject of AL: 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: 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