

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



June 28, 2021

Advice Letter 6193-E and 6193-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: Pacific Gas & Electric Company's Proposed Changes to the Technology-Neutral Pro-Forma Contract for IDER Standard Offer Contract Pilot and Prescreening Application for IDER Partnership Pilot.

Dear Mr. Jacobson:

Advice Letter 6193-E and 6193-E-A is effective as of June 12, 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



Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

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June 23, 2021

Advice 6193-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Pacific Gas & Electric Company's Proposed Changes to the Technology-Neutral Pro-Forma Contract for IDER Standard Offer Contract Pilot and Prescreening Application for IDER Partnership Pilot

Purpose

As requested by Energy Division (ED) Staff of the California Public Utilities Commission (Commission or CPUC), Pacific Gas and Electric Company (PG&E) submits this supplemental advice letter to its original Tier 2 Advice Letter 6193-E to provide clarifications to the experience requirement of PG&E's prescreening criteria for the Partnership Pilot Program in response to the California Energy Storage Alliance's response.

This supplemental advice letter supplements original Advice 6193-E.

Background

On February 12, 2021, the CPUC issued D.21-02-006 which adopts Energy Division's Staff Proposals with minor modifications and required the California Investor Owned Utilities (IOUs) to pilot two frameworks for procuring DERs to avoid or defer utility distribution investments. One of the pilots is called the Partnership Pilot which is a five-year DER distribution deferral tariff pilot which involves a tiered payment structure paid to aggregators of behind-the-meter (BTM) DERs who partner with the IOUs to dispatch the DERs to meet grid needs according to their contractual obligations. The second pilot is called the Standard Offer Contract (SOC) Pilot which is a three-year pilot based on the Technology Neutral Pro Forma (TNPF) contract and aimed at procuring in-front-of-the-meter DERs.

In D.21-02-006, the CPUC directs the IOUs to implement a prescreening process, ahead of the Partnership Pilot solicitation, in order to provide improvements to the solicitation process. The purpose of the prescreening process is to vet aggregators in terms of their experience, financial strength and commercial viability while maintaining technology neutrality and not inhibiting new market entrants. As required by D.21-02-006, on April

12th, the IOUs jointly hosted a workshop to detail the various components of the proposed prescreening application and solicit feedback from stakeholders.

D.21-02-006 also directs the IOUs to make modifications to the TNPF for use in the SOC Pilot. In compliance with the decision, the IOUs held a workshop on April 12th to present proposed changes to the TNPF and solicit feedback from stakeholders.

On May 13, 2021, Pacific Gas and Electric Company (PG&E) submitted Advice Letter 6193-E to comply with in compliance with Ordering Paragraph 7 and 13 of this decision.

CESA submitted a response to Advice Letter 6193-E on June 2, 2021. On June 9, 2021, Pacific Gas and Electric Company's filed a Reply to the Response from CESA to Advice Letter 6193-E.

Prescreening Criteria

In PG&E's advice letter, PG&E provided details as to what PG&E will include in the prescreening application for the Partnership Pilot, as was required by the CPUC. In CESA's response, they noted that PG&E's criterion for the demonstration of an Applicant's relevant experience is vague and requires additional clarity. In particular, CESA stated that PG&E's requirement that applicants attest that the applicant and/or member of the applicant's team has completed at least one project of the selected Distributed Energy Resource (DER) technology with a capacity of at least 1 megawatt (MW) is not clear as to what "project" means. CESA argued that a requirement of a single project would place undue burden on distributed energy resource (DER) providers and limit participation. CESA recommended this criterion be eliminated and instead focus only on DER technology-related experience or, at minimum, modify the existing "project" language for clarity.¹

PG&E finds value in having a certain threshold for experience and therefore will maintain the capacity requirement. PG&E clarifies that the developer experience criterion of 1 MW project capacity threshold is intended to include aggregated projects, in other words, the applicant can have one or several project at various locations that operate in aggregate up to at least 1 MW in capacity. For example, whether the applicant has ten 0.1 MW projects or four 0.25 MW projects or one 1 MW project, these would all meet the requirement as long as they connect together.

PG&E would like to reiterate that PG&E's prescreening criteria detailed in Advice Letter 6193-E, including the proposed developer experience criterion, is intended to be as inclusive as possible, while also ensuring Applicants can demonstrate a reasonable level of minimum experience to indicate an Applicant's future success in the program and a prudent use of any associated ratepayer dollars.

¹ Response of the California Energy Storage Alliance to Advice Letter 6193-E of Pacific Gas and Electric Company, pg.2-3.

The developer experience prescreening criterion of 1 MW project capacity threshold is clarified below (the revised language is highlighted with added or removed language italicized):

Prescreening Component	Evaluation Criteria	Reason
<p>Applicants will be required to attest that the Applicant and/or member of the Applicant’s team has completed at least one other project of the selected DER technology(ies) operating together with a total aggregated capacity of at least one megawatt (MW).</p> <p>Applicants will also need to fill out and attach a Developer Experience Form in order to provide evidence the Applicant and/or member of the Applicant’s team has completed at least one project of the selected DER(s).</p>	<p>Pass: Applicant provides affirmative attestation and demonstration that the Applicant and/or member of the Applicant’s team has successfully completed at least one project of the same technology as the selected DER(s) operating together with a total aggregated capacity of at least one MW.</p> <p>Applicants may pre-qualify for multiple technologies and will need to describe their experience for each technology they are applying for.</p> <p>In order to demonstrate minimum developer experience, the Developer Experience Form must explain how the Applicant and/or team member has had direct involvement in management and/or development of proposed project. Roles such as finance, sales, legal or counsel do not qualify as direct Applicant involvement and therefore do not satisfy this experience requirement.</p>	<p>This criterion is standard across PG&E procurement solicitations and provides evidence the Applicant can successfully develop a project.</p> <p>The criterion is in alignment with the CPUC’s directive to ascertain an Applicant’s experience and has taken into account workshop feedback to provide clarity as to what constitutes minimum required experience.</p> <p>Allowing one or more member(s) of the Applicant’s team to have relevant experience, as opposed to the company as a whole, will give new market entrants the opportunity to participate.</p>

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 2 advice submittal become effective concurrent with original Advice Letter 6193-E, which is June 12, 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.14-10-003 and R.14-08-013. 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/

Sidney Bob Dietz II
Director, Regulatory Relations

Attachments

cc: Service List R.14-10-003 and R.14-08-013
Gabe Petlin, CPUC Energy Division
Naseem Golestani, CPUC Energy Division
Robert Peterson, CPUC Energy Division
Keishaa Austin, CPUC Energy Division



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) #: 6193-E-A

Tier Designation: 2

Subject of AL: Supplemental: Pacific Gas & Electric Company's Proposed Changes to the Technology-Neutral Pro-Forma Contract for IDER Standard Offer Contract Pilot and Prescreening Application for IDER Partnership Pilot

Keywords (choose from CPUC listing): Contract

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-02-006

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: 6/12/21

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