

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



January 24, 2022

**Advice Letter 6233-E, 6233-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: Notification of the Location on PG&E's Website for Information on Where to Find Developer Instructions Regarding How to Request Eligibility for Participating in the Notification-Only Approach Pilot Pursuant.**

Dear Mr. Jacobson:

Advice Letter 6233-E, 6233-E-A is effective as of June 21, 2021.

Sincerely

A handwritten signature in black ink, appearing to read "SB".

Simon Baker  
Interim Deputy Executive Director for Energy and Climate Policy/ Interim Director,  
Energy Division  
California Public Utilities Commission

August 3, 2021

**Advice 6233-E-A**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Notification of the Location on PG&E's Website for Information on Where to Find Developer Instructions Regarding How to Request Eligibility for Participating in the Notification-Only Approach Pilot Pursuant to the Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraph 2**

**Purpose**

The purpose of this supplemental advice letter is to provide notice of where on PG&E's website interested developers will find instructions regarding how to request eligibility for participating in the Notification-Only Approach pilot, pursuant to the California Public Utilities Commission ("CPUC", "Commission") Decision ("D.") 21-06-002<sup>1</sup> Ordering Paragraph ("OP") 2. This supplement replaces Advice Letter (AL) 6233-E in its entirety.

**Background****Rulemaking 17-07-007**

On July 13, 2017, the CPUC 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.<sup>2</sup>

As stated by the CPUC, the primary objective of this proceeding is to streamline the interconnection application process.<sup>3</sup>

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<sup>1</sup> [D. 21-06-002](#) - *Decision Addressing Remaining Phase I Issues* - Date of Issuance 6/4/2021

<sup>2</sup> 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. ([R. 17-07-007](#) at p2.)

<sup>3</sup> D. 21-06-002 p2

**Assigned Commissioner Ruling Scoping Memo**

On October 2, 2017, the CPUC issued *Scoping Memo of Assigned Commissioner and Administrative Law Judge* (Scoping Memo) which established the initial scope, phases, and schedule of the proceeding. The resolution of the various technical issues of the proceeding would be proposed and discussed at a series of working groups.<sup>4</sup>

This advice letter addresses issues pertaining to Working Group 4 (“WG4”) and other remaining Phase 1 issues.

**Amended Scoping Memo**

Part way through, R.17-07-007 on November 16, 2018 *Assigned Commissioner’s Amended Scoping Memo and Joint Administrative Law Judge Ruling* (Amended Scoping Memo) revised the scope and schedule in response to the *Motion of the California Solar & Storage Association to Update the Scope for the Proceeding and the Joint Motion of Southern California Edison Company, San Diego Gas & Electric Company and Pacific Gas and Electric Company to Revise Certain Deadlines*. With respect to WG4, the Amended Scoping Memo made the following modifications related to Issues F<sup>5</sup>, 11<sup>6</sup> and 13.<sup>7</sup> This advice letter pertains to portions of Issue 11 not addressed in earlier working groups 2 and 3, and so relegated to WG4.<sup>8</sup>

**Working Group 4**

WG4 began meeting February 12, 2020 and subsequently held twelve meetings to address the issues identified. On August 13, 2020, the final Working Group Four Report<sup>9</sup> (“WG4 Report”) was filed. The Administrative Law Judge held a workshop on October 16, 2020, to ask clarifying questions.

**D. 21-06-002**

Based largely on the WG4 Report, on June 4, 2021, D. 21-06-002 was prepared and issued. D. 21-06-002 considers proposals recommended to resolve each of WG4’s assigned issues as well as two other issues that were not included in Working Group Four. One of those other issues, Issue 11, involved the use of a notification-only approach for non-exporting storage projects notifications in lieu of an interconnection application. This advice letter takes steps to implement a notification-only pilot phase.

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<sup>4</sup> 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]

<sup>5</sup> Issue F is related to accounting for the ability of DERMS and aggregator commands to address flexibility

<sup>6</sup> Issue 11 is related to the adoption of a modified notification-only approach for non-export systems

<sup>7</sup> Issue 13 is related to distribution upgrade cost sharing among developers.

<sup>8</sup> D. 21-06-002 p3

<sup>9</sup> [Working Group Four Report](#)

**AL 6233-E**

PG&E timely submitted AL 6233-E pursuant to D. 21-06-002 OP2 on June 21, 2021.

**AL Response**

Subsequently on July 12, 2021, Tesla, LLC, submitted a response<sup>10</sup> on AL 6233-E, seeking clarification on two issues: (i) that developers utilizing the notification-only process may deploy and energize a qualifying system immediately upon submitting the notification to the utility, (ii) assurance that the websites PG&E noted in AL 6233-E providing the location on PG&E's website for information on where to find developer instructions regarding how to request eligibility.

Additionally, Tesla asked that "...as the utilities put together this resource [the secondary network map], Tesla encourages them to ensure that those boundaries include the quarter mile buffer the CPUC approved under the Decision as well." This requirement to include a buffer, while supported in the decision,<sup>11</sup> is beyond what D. 21-06-002 and OP 2 specifically required of the utilities.

**This Advice Letter**

Pursuant to D. 21-06-002, OP 2 requires:

*2. No later than 15 days following the issuance of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company (Utilities) shall each file a Tier 1 Advice Letter indicating where on the utility's website interested developers will find instructions regarding how to request eligibility for participating in the Notification-Only Approach pilot.*

*The eligibility request contents are limited to the following:*

- i) the developer's name and contact information.*
- ii) a list of no less than 20 non-export projects in the utility's service territory that received a Permission To Operate and how each project meets each of the eligibility criteria for the Notification-Only Approach pilot adopted in Ordering Paragraph 1; and*

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<sup>10</sup> Subject: Tesla, Inc.'s Response to Pacific Gas and Electric Advice Letter 6233-E, Southern California Edison Advice Letter 4526-E and San Diego Gas and Electric Advice Letter 3791-E – dated July 12, 2021. In its response, Tesla notes, "Tesla has reviewed these advice letter filings, and while we do not believe a protest is warranted, we have identified a couple of issues that we hope can be addressed via the disposition letter process."

<sup>11</sup> See D. 21-06-002 pp 17-18 and Finding of Fact 12: "A one quarter mile buffer from any networked secondary portion of a utility's grid is a reasonable safety precaution to ensure that projects are not inadvertently connected to a customer that is served from the networked secondary portion of a utility's grid."

- iii) the two attestations regarding the networked secondary portion of the grid, as described in this decision. Utilities shall respond to a developer request no later than 10 business days after receiving the request.*

This supplemental advice letter is being submitted pursuant to D. 21-06-002 OP 2, and addresses the issues raised in the response from Tesla.

### **Location of the Website**

PG&E proposes to place eligibility information for developers on the Notification-Only process for eligible non-export storage in two locations:

1. On PG&E's DG Program Webpage titled "Learn more about Interconnection and Renewables", subtitled "Find resources for your interconnection project"  
[https://www.pge.com/en\\_US/for-our-business-partners/interconnection-renewables/interconnections-renewables.page?WT.mc\\_id=Vanity\\_gen&ctx=large-business](https://www.pge.com/en_US/for-our-business-partners/interconnection-renewables/interconnections-renewables.page?WT.mc_id=Vanity_gen&ctx=large-business)

The link is proposed to be near the bottom of the page, above the Ombudsman info.

2. On PG&E's ACE-IT Interconnection Application Portal  
<https://www.egi-pge.com/legacy-home-ccsf/login>

The link is proposed to be located on the application portal page (for ACE-IT) to appear once applicant logs in and will be in a "drawer" where highlighted in the screenshot below.

## Screenshot:

Application Portal: ACE-IT

Welcome to the Rule 21 Online Application Web Portal for electric generators.

It's easy: Submit your application anytime. This portal will guide you through the process to ensure that all required information is provided for a complete application. After submittal, you will receive a confirmation message that contains your application number.

PG&E recommends preparing all generating facility information and materials before starting the application. If the Interconnection Request is missing information or documents, PG&E will accept the application, but will deem it incomplete and provide a written list of deficiencies to the designated representative identified in your request.

Questions concerning the Rule 21 application and interconnection process can be directed to the Electric Generation Interconnection Department at [rule21gen@pge.com](mailto:rule21gen@pge.com).

**Start New Application** ▶  
Start a new Rule 21 Generator Interconnection Application

**My Projects** ☑  
View your active projects

Please review the following information regarding the ACE-IT application process:

- 📄 Solar Percentage Factor
- 📄 Template Single Line Diagrams
- 📄 Resiliency Project Interconnection
- 📄 New Smart Inverter Requirement

June 22, 2020

To address the comments in Tesla response to the original AL 6233-E, for his supplemental advice letter, PG&E clarifies that:

- 1) Developers are immediately permitted to operate upon submission of the Notification-Only Package based their understanding of and compliance with the requirements with the requirements of the notification only pilot program. To be clear, they do not need to wait for the receipt of PG&E's permission to operate (PTO) letter.
- 2) PG&E provides assurances that its websites listed above will include links to the notification only website tool so they can identify if their application is on one of PG&E's secondary networks. PG&E will also by the fourth quarter of 2021 identify the quarter mile buffer zone around its secondary networks, as discussed in D. 21-06-002.

**Protests**

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

**Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 2 of D.21-06-002, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective concurrent with original Advice Letter 6233-E, which is June 21, 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 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/>.

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/S/

Sidney Bob Dietz II  
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) #: 6233-E-A

Tier Designation: 1

Subject of AL: Supplemental: Notification of the Location on PG&E's Website for Information on Where to Find Developer Instructions Regarding How to Request Eligibility for Participating in the Notification-Only Approach Pilot Pursuant to the Rulemaking 17-07-007 Phase 1, Working Group 4 D.21-06-002 OP 2

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.21-06-002

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: 6/21/21

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 proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss 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](mailto: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](mailto: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