

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6243E
As of September 10, 2021

Subject: Advice Letter Explaining How Pacific Gas and Electric Company Implemented the Notification-only Process Pursuant to Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraph 1g

Division Assigned: Energy

Date Filed: 07-06-2021

Date to Calendar: 07-09-2021

Authorizing Documents: D2106002

Disposition:	Accepted
Effective Date:	07-06-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

July 6, 2021

Advice 6243-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Advice Letter Explaining How Pacific Gas and Electric Company Implemented the Notification-only Process Pursuant to Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraph 1g

Purpose

The purpose of this Tier 1 advice letter is to explain how Pacific Gas and Electric Company (PG&E) implemented Notification-only, pursuant to the California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-06-002¹ Ordering Paragraph (OP) 1.g. and D. 19-03-013².

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.³

As stated by the CPUC, the primary objective of this proceeding is to streamline the interconnection application process⁴.

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

² [D. 19-03-013](#) - *Decision Adopting Proposals from March 15, 2018 Working Group One Report* -Date of Issuance 4/5/2019, see pages 2 and 29

³ 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.)

⁴ 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.⁵

This advice letter addresses issues pertaining to Working Group 4 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 F⁶, 11⁷ and 13⁸. This advice letter pertains to portions of Issue 11 not addressed in earlier working groups 2 and 3, and so relegated to WG4⁹, .

Working Group 1

Working Group One and the Smart Inverter Working Group began meeting on October 16, 2017. Working Group One filed a Working Group One Final Report on March 15, 2018. This advice letter pertains to a proposal first raised in Working Group and discussed in the Working Group One Report¹⁰. A notification-only process was included.

Working Group 4

Working Group Four ("WG 4") began meeting February 12, 2020 and subsequently held twelve meetings to address the issues identified. On August 13, 2020, the final

⁵ 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]

⁶ Issue F is related to accounting for the ability of DERMS and aggregator commands to address flexibility

⁷ Issue 11 is related to the adoption of a modified notification-only approach for non-export systems

⁸ Issue 13 is related to distribution upgrade cost sharing among developers.

⁹ D. 21-06-002 p3

¹⁰ [Working Group One Report](#) see page 61 on "no notification" in Use Case 4 in the Working Group Proposals Addressing Modifications to Existing Facilities.

Working Group Four Report¹¹ (“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. D. 21-06-022 Ordering Paragraphs one through 6 address the notification-only process. This advice letter takes steps to explain its earlier notification-only process.

This Advice Letter

Pursuant to D. 21-06-002, OP 1 requires:

1. A notification-only interconnection application approach, based on the proposal from Tesla, attached as Appendix A, is adopted as modified herein:

(a) A two-year pilot of the approach shall be conducted, beginning 45 days from the issuance of this decision;

(b) Eligible projects: shall total less than or equal to an aggregate of 30 kilovolt-amps (kVA) and may consist of one of the following options:

i) one new non-export energy storage system,

ii) one new non-export system with energy storage system and solar, or

iii) one new energy storage system plus any existing generation systems where the combined system is non-export;

shall be limited to 10 non-export projects for each developer at any one circuit; shall use a Underwriter Laboratories (UL)-certified Power Control System with an Open Loop response time of two seconds or less and set to a non-export mode;

shall be limited to 120 Volt or 240 Volt services that use a self-contained meter;

shall not be located on or within a quarter mile distance from any networked secondary portion of the utility’s grid;

shall be operated in a manner that does not increase a customer’s peak load;

¹¹ [Working Group Four Report](#)

shall use inverters pre-approved by the utility;

shall be installed such that when connected to a single phase-transformer with 120/240 Volts secondary voltage the aggregated gross output is balanced as practicable between the two phases of the 240 Volt service; and

shall only be installed by eligible developers, as described below.

- (c) *Eligible developers must have successfully deployed at least 20 non-export projects that meet the eligibility criteria for the notification-only process using the current interconnection application process; must file an attestation with the utility stating:*
- i) they understand where the networked secondary portion of the utility's grid is located and*
 - ii) the developer will not use the notification-only process for projects deployed on the networked secondary portions of the utility's grid or located within a quarter mile distance from any networked secondary portion of the utility's grid.*
- (d) *Developers and customers shall submit the following documentation as part of the Notification Package to the utility no later than 15 business days after the project system passes final permit inspection:*
- i) Interconnection Application Form;*
 - ii) Certificate of Insurance from the customer;*
 - iii) Authority Having Jurisdiction Electrical Release;*
 - iv) Developer Attestation that a system deployed on a 240 volt service is deployed across the entire 240 volt service;*
 - v) Developer Attestation that if the system is found to be noncompliant, developer will work with the utility and customer to bring system into compliance and will pursue reinstatement of Permission To Operate through the standard Interconnection Application process;*
 - vi) Developer and Customer Attestations that the system meets each of the eligibility criteria described above; and vii) Developer and Customer Attestations they each recognize and understand the auditing element described below.*
- (e) *Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company (Utilities) shall issue documentation of Permissions To Operate to qualifying projects upon receipt of the Notification*

Package Utilities shall review the Notification Package for completeness and accuracy and identify projects that inadvertently did not follow the requirements of the Notification-Only Approach pilot or are ineligible for the Notification-Only Approach pilot within 15 business days of receipt of the Notification Package at which point Utilities shall notify developers of any missing requirements. Developers will work with Utilities within five business days after notification to fix any issues. Utilities may suspend Permission To Operate if developer does not cure outstanding issues within the five business days or if there are safety and reliability issues identified.

- (f) *The Audit element described in the attached Tesla Proposal is adopted but revised such that up to 20 percent of projects in the notification approach may be audited at the utility's discretion. Audits are restricted to review of generating facility equipment, control modes, and equipment settings for compliance with the eligibility requirements. Developers shall respond to an audit request within 20 business days. A violation of the established criteria will cause removal of the developer's name from the eligibility list until the developer:*
- i) has successfully deployed an incremental 40 projects that meet the eligibility criteria using the standard interconnection application process and*
 - ii) explained to the utility how the developer intends to prevent future violations. A utility may audit any other projects deployed through the notification-only process by a developer found in violation.*

Any projects found noncompliant will automatically have the Permission To Operate revoked and the developer will be required to request a new Permission To Operate through the current Interconnection application process.

- (g) No later than 30 days from the issuance of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company shall each file a Tier 1 Advice Letter explaining how they implemented the Notification-only approach, as required in Decision 19-03-013.**

[emphasis added]

This Tier 1 advice letter is being submitted pursuant to D. 21-06-002 OP 1.g.

Implementation Of The Notification-Only Approach

For Decision 19-03-013, PG&E currently allows for like-for-like equipment replacements through the use of Form [79-1211 Generating Facility Material Modification Notification Worksheet](#)

PG&E includes notes about the process for equipment modification on its standard NEM portal NEMS and other ACE-IT application portals:

- Starting Thursday June 29 2021, Advice letter [AL 6155-E](#) was filed to create the new Pacific Gas and Electric Company's (PG&E's) [Electric Form 79-1211 - Generation Facility Material Modification Worksheet](#) in accordance with Resolution E-5035 Ordering Paragraphs (OP) 4,5, and 9 as related to [Advice Letter 5583-E](#). The form was introduced to propose a notification-only interim standard form template for Type II modifications to existing generating facilities. Below are the qualifying factors for the notification-only changes:
 - Replacing inverters with "Like-for-Like" where Generating Facility output will not exceed the inverter nameplate capacity listed in the current and effective Interconnection Agreement (IA) and the operating mode is not being adjusted
 - Replacing inverters with an inverter type that increases the inverter nameplate capacity BUT certified power controls limit the real power output to the inverter capacity and is within 110% of the original nameplate listed in the current and effective IA.
 - Adding storage capacity to a Generating Facility with an existing storage device WITHOUT changing the inverter

** Like-for-Like definition: For inverters, Like-for-Like means certified, same nameplate or smaller, same fault current or smaller. For solar panels, Like-for-Like means certified, same GEC-AC rating of the system or smaller. For batteries, Like-for-Like means same or less kWh & kW rating, and same operating profile. For transformers, Like-for-Like means same connection type, same or smaller impedance and capacity*

All other changes to existing systems are required to submit a new interconnection application.

Basically, PG&E provide links to a Form 79-1211 a customer can fill out, with specific instructions. They will send it in per the instruction on the form.

For 2020, PG&E has so far only processed a very limited number of requests if any yet, for equipment replacements projects seeking inverter replacements, but the process has only recently been approved¹².

PG&E will be using a manual process with the Form 79-1211, until such time as it can automate it fully in its application portals.

As consistent with proposed automation processing development enhancements and related cost recovery discussions slated for Phase 2 of Rulemaking 17-07-007, PG&E anticipates additional discussions on any required additional enhancements beyond the current process as appropriate.

¹² See Tier 1 [AL 6155-E-A](#) and [AL 6154-E-A](#) submitted June 28, 2021 pursuant to Resolution E-5035 as well as feedback from the CPUC.

Protests

*****Due to the COVID-19 pandemic, 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 July 26, 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:

Sidney Bob Dietz II
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).



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) #: 6243-E

Tier Designation: 1

Subject of AL: Advice Letter Explaining How Pacific Gas and Electric Company Implemented the Notification-only Process Pursuant to Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraph 1g

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: 7/6/21

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