

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6244E
As of August 20, 2021

Subject: Advice Letter Providing Auditing Details for the Notification-Only Non-export Storage Pilot Program Pursuant to the Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraphs 1 and 3

Division Assigned: Energy

Date Filed: 07-06-2021

Date to Calendar: 07-09-2021

Authorizing Documents: D2106002

Disposition:	Accepted
Effective Date:	08-05-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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 6244-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Advice Letter Providing Auditing Details for the Notification-Only Non-export Storage Pilot Program Pursuant to the Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraphs 1 and 3

Purpose

The purpose of this Tier 2 advice letter is to provide details for how audits will be implemented for the Notification-Only Non-export Storage Pilot Program, pursuant to the California Public Utilities Commission (“CPUC”, “Commission”) Decision (“D.”) 21-06-002¹ Ordering Paragraphs (“OP”) 1 and 3.

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.²

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

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

² 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.)

³ 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.⁴

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 F⁵, 11⁶ and 13.⁷ This advice letter pertains to portions of Issue 11 not addressed in earlier working groups 2 and 3, and so relegated to WG4.⁸

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 Working Group Four Report⁹ ("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

⁴ 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]

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

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

⁷ Issue 13 is related to distribution upgrade cost sharing among developers.

⁸ D. 21-06-002 p3

⁹ [Working Group Four Report](#)

application. This advice letter takes steps to implement a notification-only non-export storage interconnection pilot phase.

Advice Letter AL 6233-E

On June 21, 2021, PG&E submitted information only AL 6233-E.¹⁰ It provided details on the website location for regarding how to request eligibility for participating in the notification-only non-export storage pilot pursuant to D. 21-06-002 OP 2.

This Advice Letter

Pursuant to D. 21-06-002, OP 3 requires:

*3. No later than 30 days from the issuance of the decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company share submit a **Tier 2 Advice Letter proposing details on the audits** allowed as part of the Notification-Only Approach pilot adopted in Ordering Paragraph 1.*

[emphasis added]

This Tier 2 advice letter is being submitted pursuant to D. 21-06-002 OP 3. While OP 3 provides the basis for this advice letter, the requirements contained in this advice letter may be provided for in other ordering paragraphs and in the body of D. 21-06-002.

Audit

PG&E, working with the other utilities, has developed the following auditing plan.

1. Applying the 20 percent Requirement

For the notification-only non-export storage pilot, OP 1(f)¹¹ allows PG&E to audit up to 20% (percent) of pilot projects. PG&E is applying the 20% to each of a given

¹⁰ [AL 6233-E](#) - 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.

¹¹ D. 21-06-002, OP 1.f states: *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*

developer's pilot project interconnections performed in each calendar year commencing July 19, 2021¹² for a total of no more than 20% of the total number of all pilot projects (i.e., as permitted by the Decision PG&E will "round up" only for the total number of projects, not on a per developer basis). For example, PG&E could therefore audit up to 20% of notification-only projects submitted by each pre-approved developer between July 19, 2021 through July 18, 2022 and up to 20% of projects submitted between July 19, 2022 through July 18, 2023.

2. Selection of projects to be audited

PG&E intends to prioritize for auditing those projects that may have the greatest risk using the following guidelines:

- Priority 1: Newly, pre-approved¹³ developers,
- Priority 2: Existing pre-approved developers using new equipment. (PG&E will include several projects using the new equipment.)
- Priority 3: Other concerns, e.g., errors on the application form, ambiguous information on the customer record, or verification of PG&E site equipment.
- Priority 4: Finally, a random selection process.

3. Types of audits

Two types of audits will be used. (Both types of audits will count towards the 20% allowance.)

Office Audit – PG&E will have already reviewed the documents during the Notification-Only interconnection process review. PG&E will perform an audit to confirm results of the original document review.

Field and Office Audit - includes the same requirements as those in the Office Only audit, as well as field verification within the limits set forth in OP 1(f) of:

- a) generating facility equipment per provided single line diagram;

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.

¹² 45 days

¹³ Newly pre-approved developers are those that have been within the audit period and have been confirmed to satisfy the requirements of D. 21-06-002, OP 1.c.

- b) control modes to verify that Power Control Systems have been set with the correct mode;
- c) equipment settings in compliance with the non-export and safety requirements, such as those on inverter and power control system (PCS) settings;
- d) equipment installation meets all applicable safety standards (e.g. PG&E Greenbook Standards, Rule 21, etc.).

4. Audit Process

PG&E will inform the developer:

- that their project is to be audited;
- of the type of office to be performed (office, or office-and-field audit).
 - For an office-only audit, PG&E will:
 - request any additional technical information for the audit, which the customer must provide within 20 business days.
 - For an office-and-field, PG&E will:
 - request any additional technical information for the audit, which the customer must provide within 20 business days;
 - schedule a day and time for the field audit portion with the agreed upon customer's developer technical team; and
 - perform the actual field audit with the customer and their developer (may be after the 20 business days to provide the information).
- Results of audit
 - Project Fails Audit¹⁴
 - Should an audit reveal a violation(s) of the established criteria, the Pre-Approved Contractor will be removed from the pre-approved contractor list until it has successfully deployed an incremental 40 projects that meet the Notification-Only Process eligibility criteria using the standard interconnection process and

¹⁴ Pursuant to D. 21-06-002 OP 1.f

provide an explanation to PG&E detailing how it intends to prevent any future violations.

- If a Pre-Approved Contractor is not able to satisfy the eligibility requirements, it will lead to automatic revocation of PTO and require the Pre-Approved Contractor to re-apply for interconnection through the standard interconnection application process.
- PG&E is further authorized to audit any other projects installed by the contractor under the Notification-Only Process prior to its re-establishment of eligibility for the Notification-Only Process.
- In the event a Pre-Approved Contractor is removed from the Pre-Approved Contractor list a second time after the Pre-Approved Contractor has been reinstated, the Pre-Approved Contractor will be permanently removed from the Pre-Approved Contractor list and will not be allowed to use the Notification-Only Process for the remaining duration of the pilot. Moreover, any projects that are found to be out of compliance will automatically have PTO revoked and a new interconnection request must be submitted through the standard interconnection.

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.

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) #: 6244-E

Tier Designation: 2

Subject of AL: Advice Letter Providing Auditing Details for the Notification-Only Non-export Storage Pilot Program Pursuant to the Rulemaking 17-07-007 Phase 1, Working Group 4 Decision 21-06-002 Ordering Paragraphs 1 and 3

Keywords (choose from CPUC listing): Compliance, Rule 21

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: 8/5/21

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 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