

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 5, 2021

**Advice Letter 6283-E**

Sidney Bob Dietz II  
Director, Regulatory Relations  
C/O Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mailcode B13U  
San Francisco, CA 94177

**SUBJECT:** PG&E Advice Letter 6283-E: Modifications to the Community Microgrid Enablement Tariff (CMET) Pursuant to Resolution E-5127

Dear Mr. Dietz:

This disposition letter approves PG&E Advice Letter 6283-E effective October 5, 2021.

**Background**

Decision (D.) 20-06-017 Ordering Paragraphs (OP) 16 and 17 approved the Pacific Gas and Electric Company (PG&E) Community Microgrid Enablement Program (CMEP) from 2020-2022 for use in all areas prone to outage events and subjected it to program evaluation. The Commission adopted with modification PG&E's implementation plan for the CMEP and its pro forma Community Microgrid Enablement Tariff (CMET) for use on an experimental basis via Resolution E-5127, effective March 18, 2021. In the same Resolution, the Commission authorized PG&E to file Tier 2 Advice Letters on its own motion, or at the direction of the Commission, to modify the CMET.

On August 5, 2021, PG&E filed PG&E Advice Letter (AL) 6283-E to request Commission approval to modify the Community Microgrid Enablement Tariff. This Tier 2 AL proposes to modify the tariff in three aspects: 1) Modify eligibility criteria to allow microgrids involving two customers or two customer premises to take service and broaden the eligibility to enable projects that do not involve the location or critical facility criteria; 2) Eliminate the requirement for a letter of interest from local government, tribes, or community choice aggregator (CCA); and 3) Clarify that the class of customers that receive electric distribution service within the microgrid project boundaries are retail distribution customers, while providing that PG&E may justify an exception to this provision by submitting a justification via Tier 1 Advice Letter.

PG&E states that it seeks CMET modifications based on PG&E experience gained through engaging with more than three dozen communities and developers to consult on potential resilience projects. Accordingly, PG&E claims it now believes that the current CMET eligibility criteria would unnecessarily limit the potential for the tariff to enable a significantly broader category of community-proposed resilience projects. Consequently, PG&E proposes to remove certain CMET eligibility criteria thereby broadening where community microgrids can operate. However, PG&E would maintain criteria for the CMEP program and

associated cost offsets. PG&E argues that adopting these modifications would provide increased certainty to a cohort of existing and potential community microgrid projects regarding a pathway towards operating these projects.

### **Summary of Request**

PG&E requests Commission review and disposition of its proposed tariff modifications which would: a) Modify section 3.1 to remove the restriction to critical facilities and one other customer; b) Modify section 3.2 to lift restrictions to the location of community microgrids and c) Eliminate the Section 3.4 requirement to provide a letter of support from local and tribal governments, or CCA.

### **Protests**

Protests were due on August 25, 2021. Marin Clean Energy (MCE) filed a timely protest on August 25, 2021.

MCE objects to PG&E's proposed modification that would remove the requirement for a letter of support from local and tribal governments or CCAs. MCE asserts that PG&E is seeking relief which would be contrary to the principles of D.20-06-017. They state that using the Advice Letter process is inappropriate for changing a community microgrid tariff. MCE argues that the Commission should reject the modification because it would fundamentally redefine the purpose of the CMET, which is not an independent, free-standing tariff. MCE asserts that CMET is the tariff component of the CMEP approved by the Commission in D.20-06-017. MCE claims that the referenced Decision makes clear that CMEP is required to include technical support and guidance from local and tribal governments and CCAs.

In the PG&E reply dated September 1, 2021, PG&E disagrees with the MCE Protest. PG&E responds that the Commission expressly authorized PG&E to propose changes to the CMEP and/or CMET on PG&E's own motion via a Tier 2 advice letter in Ordering Paragraph 7 of Resolution 5127-E. Accordingly, PG&E claims that the Commission's approval of the Advice Letter would be consistent with GO 96-B, General Rule 5.1, which states: "The primary use of the advice letter process is to review a utility's request to change its tariffs in a manner previously authorized by statute or Commission order . . . or to get Commission authorization to deviate from its tariffs." Additionally, PG&E argues that GO 96-B, General Rule 5.1 clearly allows this advice letter submittal where it states: "A utility may also request relief by means of an advice letter where the utility: (1) has been authorized . . . by other Commission order, to seek the requested relief by means of an advice letter." PG&E concludes that the substantive concerns raised by MCE do not create a procedural bar to using the advice letter process to consider those changes. PG&E states that the Commission granted PG&E the ability to use an advice letter process to propose such changes.

### **Discussion**

Commission staff has reviewed the proposed tariff modifications, the MCE Protest, and PG&E's reply to the MCE Protest. Staff's evaluation criteria considered whether the MCE protest should be dispositioned under General Order 96-B, General Rule 7.6.1 based on one of the following: protest to the advice letter (1) is not made on proper grounds as set forth in General Rule 7.4.2, (2) may be rejected on a technical basis as discussed in this rule, or (3) is clearly erroneous. Staff concludes that the MCE Protest was not made on proper grounds as set forth in General Rule 7.4.2 and is clearly erroneous because Commission Resolution E-5127 effective March 18, 2021, granted PG&E authority to modify the Community Microgrid Enablement Tariff using a Tier 2 advice letter.

- 1. Commission Resolution E-5127, Ordering Paragraph 7, granted authority for PG&E to seek modifications to the CMEP, including the CMET, through a subsequent Tier 2 advice letter on its own motion or in response to direction from the Commission.**

Regarding MCE objections to using the advice letter process to address policy issues, Staff notes that the Commission granted PG&E authority to submit Tier 2 advice letters to propose changes to the CMET/CMET.

7) PG&E may seek modifications to the CMET, including the Community Microgrid Enablement Tariff, through a subsequent Tier 2 Advice Letter on its own motion or in response to direction from the Commission.<sup>1</sup>

Commission staff finds the MCE objection to be without merit.

- 2. Commission guiding principles have included providing operational flexibility to enable the microgrid program to move forward. The letters of support (City of Oakland, Blossom Street Association, California Energy Commission and the California Institute for Energy and Environment) advocate that there are community microgrids in the development phase, which would be well-served by broadening the CMET, to enable taking service prior to a final decision in R.19-09-009, Track 4.**

A front-of-the-meter (FOM) microgrid tariff is under consideration in Track 4 of R.19-09-009. However, the Commission acknowledged in D.20-06-017 and in Resolution E-5127 that the CMET and its associated tariff were experimental in nature, and that operational flexibility was warranted to adapt the program and its associated tariff with experience. Since the CMET will be closed to new applicants as of December 31, 2022, and a Track 4 decision is not anticipated prior to Fall 2022, a gap exists in the promulgated tariffs during which new microgrid project proposals cannot be submitted.

- 3. D.21-06-027 did not mandate PG&E to secure a letter of support for a microgrid.**

MCE's claims the letter of support "is a fundamental part of the purpose and requirements of CMET and CMET." MCE articulates, "Eliminating Section 3.4 is contrary to the Commission's intent in approving CMET and CMET in D.20-06-017 and Resolution E-5125, respectively, and as such is a matter inappropriate for resolution through an Advice Letter under Sections 5.1 and 5.2 General Order ("GO") 96-B."<sup>2</sup>

However, D.20-06-017 did not mandate a letter of community interest for microgrid projects. Instead, in D.20-06-017, PG&E was directed to meet and confer with stakeholders to solicit input from local and tribal governments as well as CCAs to refine the CMET's scope, eligibility, and fund matching applicability.<sup>3</sup> PG&E Electric Schedule E-CMET, "Community Microgrid Enablement Tariff," provides CMET Eligibility Criteria in Section 3, paragraph 4:

"4. Community Interest: The CMET Applicant must provide to PG&E a written letter from i) any local government or Tribe, as applicable, with jurisdiction over the area within the proposed Microgrid Boundary, or ii) Community Choice Aggregator that provides service within the proposed Microgrid Boundary to document an expression of interest in the CMET Project as part of the Application."

Furthermore, the requirement for a letter of community interest is retained for the microgrid projects pursued within the CMET which would involve ratepayer-funded costs offsets.<sup>4</sup> MCE argues that "This Decision makes clear that CMET is required to include technical support and guidance from local and tribal

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<sup>1</sup> Resolution E-5127, Ordering Paragraph 7.

<sup>2</sup> MCE Protest to PG&E Advice Letter 6283-E dated August 25, 2021, at page 2.

<sup>3</sup> Decision D.20-06-017, issued 06/17/2020, Ordering Paragraph 17, at page 131.

<sup>4</sup> The requirement for the letter of interest is within the Resiliency Planning Guide: [Resiliency Planning Guide \(pge.com\)](#). It is also found within the [Community Microgrid -Request for Technical Consultation \(pge.com\)](#)

governments and CCAs.”<sup>5</sup> However, this is a mischaracterization of the Decision. The Commission did not require CMEP to include technical support and guidance from local and tribal governments and CCAs. The dicta at page 70 of the Decision states that PG&E is to offer utility technical support to local and tribal governments. And the Decision expanded the scope whereby PG&E would offer technical support for behind-the-meter microgrids to those entities. It is clear in the dicta at page 70 that the Commission states the technical support is offered to the local and tribal governments as well as CCAs to assist those entities in designing and engineering behind the meter microgrids. <sup>6</sup>

Consequently, Commission Staff finds that the MCE Protest is erroneous.

**4. The document referenced by MCE involving its board adopted principles is not legally binding on a community microgrid project sponsored by a residential neighborhood.**

In MCE’s Protest, MCE seeks to impose its organizational criteria upon community microgrid projects.

“In MCE’s case, retaining the Section 3.4 letter requirement will preserve a crucial mechanism that helps to ensure that prospective microgrids are developed in accordance with these Principles and the needs and values that underly them.”<sup>7</sup>

Public Utility Code Section 366.2 defines the CCA role in generation procurement and does not support the role imagined by MCE here.

“(5) A community choice aggregator shall be solely responsible for all generation procurement activities on behalf of the community choice aggregator's customers, except where other generation procurement arrangements are expressly authorized by statute.”

In the PG&E Reply to the MCE Protest, PG&E states:

“MCE’s protest raises a fundamental jurisdictional issue. Specifically, MCE’s protest appears to assert that MCE can control or assert veto authority over the use or operation of the distribution system. If MCE’s support is required to use the CMET tariff in all cases, then this effectively gives MCE control over whether or not the islanding of the distribution system can occur in its service area and what resources can interconnect to that system. This view is inconsistent with the limited statutory authority of CCAs and their role as load-serving entities for their customers.”<sup>8</sup>

Commission staff agrees and finds it reasonable to reject the MCE Protest on the grounds that it is erroneous.

Some community driven projects may not seek ratepayer-funded CMEP cost offsets and may not directly involve local government, tribal government, or a CCA. The Oakland EcoBlock project is one example. It was funded by the California Energy Commission’s Electric Program Investment Charge (EPIC). The Oakland EcoBlock project is an arrangement that allows a section of the distribution feeder to safely island in the event of a grid outage, using only solar PV generation from multiple rooftops. The program is designed to develop “innovative and replicable approaches for accelerating the deployment of Advanced Energy Communities,” aimed at advancing California’s policy goals in the areas of climate and resilience while also

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<sup>5</sup> MCE Protest to PG&E Advice Letter 6283-E dated August 25, 2021, at page 1.

<sup>6</sup> D.20-06-017 at p. 70. “Second, we approve PG&E to expand the scope of its CMEP proposal to include technical support and guidance for local and tribal governments as well as CCAs to design and engineer behind-the-meter microgrids, in preparation for the upcoming 2020 fire season and beyond. Community microgrids can be complex to develop and interconnect. The technical support and guidance for local and tribal governments and CCAs is essential for collaborative success.”

<sup>7</sup> MCE Protest to PG&E Advice Letter 6283-E dated August 25, 2021, at page 2.

<sup>8</sup> Pacific Gas and Electric Company’s Reply to the Protest from Marin Clean Energy to Advice 6283-E – Modifications to the Community Microgrid Enablement Tariff Pursuant to Resolution E-5127, dated September 1, 2021, at page 3.

promoting equity.<sup>9</sup> Approving the CMET modifications requested by PG&E would facilitate the project by enabling the microgrid electrical installation to proceed. The Oakland EcoBlock project would not meet the eligibility criteria of either the CMEP nor the CMET, in their current form.

The Commission's Decision in Track 1, D-20-06-017, was specifically targeted for adopting solutions to accelerate interconnection of resiliency projects in advance of the forthcoming wildfire seasons. The CMEP was approved for a limited term from 2020 to 2022 subject to program evaluation.<sup>10</sup> Hence the program and its tariff are experimental in nature and opportunities exist for the program to be evaluated and revised in a formal Commission proceeding based on experience and lessons learned.

The Commission acknowledged that the PG&E CMEP is a nascent program with an experimental tariff for a limited duration commencing from the effective date of this Resolution through December 31, 2022. The experimental program aims to provide resilience for critical facilities and vulnerable communities. As such, the Commission used as a guiding principle that providing PG&E operational flexibility was warranted to enable the program to move forward. This approach is reasonable while setting follow-up expectations for PG&E to report back with additional information or analysis as the program gains experience and lessons learned.

PG&E's original proposal for CMEP in R.19-09-009 received broad support. The Commission provisionally approved the program in D.20-06-017 subject to PG&E describing additional program and implementation details via the Advice Letter process. The Commission subsequently approved the modified PG&E program in Resolution E-5127 and granted PG&E authority to transmit additional advice letters to modify the program or the tariff. Commission staff draws attention to GO 96-B, General Rule 7.4.2 which states, "A protest may not rely on policy objections to an advice letter where the relief requested in the advice letter follows rules or directions established by statute or Commission order applicable to the utility."

Therefore, Commission staff finds that the MCE Protest should be rejected because it does not raise an appropriate ground for protest under General Order 96-B section 7.4.2.

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<sup>9</sup> PG&E Advice Letter 6283-E, dated August 5, 2021, at Attachment 4.

<sup>10</sup> D.20-06-017, Ordering Paragraph 16.

## Disposition

Commission staff finds that it is reasonable to accept the modifications to the Community Microgrid Enablement Tariff.

This disposition letter is effective on October 5, 2021.

Sincerely,

 FOR

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division

Cc:

David Peffer, ([peffer@braunlegal.com](mailto:peffer@braunlegal.com))  
Simon Baker, ([Simon.Baker@cpuc.ca.gov](mailto:Simon.Baker@cpuc.ca.gov))  
Forest Kaser, ([Forest.Kaser@cpuc.ca.gov](mailto:Forest.Kaser@cpuc.ca.gov))  
Joyce Steingass, ([Joyce.Steingass@cpuc.ca.gov](mailto:Joyce.Steingass@cpuc.ca.gov))  
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Igor Grinberg, ([Igor.Grinberg@pge.com](mailto:Igor.Grinberg@pge.com))  
Annie Ho, ([AMHP@pge.com](mailto:AMHP@pge.com))  
R.19-09-009 Service List  
PG&E Tariffs, ([PGETariffs@pge.com](mailto:PGETariffs@pge.com))  
Energy Division Tariff Unit, ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov))

August 5, 2021

**Advice 6283-E**

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

**Subject:      Modifications to the Community Microgrid Enablement Tariff (CMET)  
Pursuant to Resolution E-5127**

**I. Purpose**

Pursuant to Ordering Paragraph (OP) 7 of Resolution E-5127, Pacific Gas and Electric Company (PG&E) hereby seeks modifications to the Community Microgrid Enablement Tariff (CMET) to distinguish eligibility for the CMET from eligibility for the Community Microgrid Enablement Program (CMEP). PG&E seeks to do this by removing certain CMET eligibility restrictions.

**II. Background**

The Commission initiated Rulemaking (“R.”) 19-09-009 to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018).

On December 20, 2019 the assigned Commissioner’s Scoping Memo and Ruling was issued, adopting a scope and schedule for Track 1 of the proceeding. Track 1 addressed deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of establishing key microgrid and resiliency strategies as soon as possible. Subsequently, on January 21, 2020, PG&E filed a Track 1 Proposal Addressing Immediate Resiliency Strategies for Outages. As part of that proposal, PG&E sought approval for a Community Microgrid Enablement Program (“CMEP”) to provide incremental technical and financial support on a prioritized basis for community requested microgrids for PSPS mitigation purposes.

On June 11, 2020, the Commission adopted Decision (D.) 20-06-017, which approves PG&E’s CMEP subject to certain requirements and directed that PG&E file a Tier 2 Advice Letter containing CMEP implementation details.<sup>1</sup> PG&E filed Advice Letter 5918-E on

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<sup>1</sup> D.20-06-017, Ordering Paragraph 17.

August 17, 2020 in conformance with that Decision, and included a pro forma CMET as Appendix 4 to that filing.

On March 18, 2021 the Commission issued Resolution E-5127, which adopted with modification PG&E's implementation plan for the CMEP, and approved PG&E's pro forma CMET "for use on an experimental basis".<sup>2</sup> Ordering Paragraph (OP) 7 of the Resolution provides that "PG&E may seek modifications to the CMEP, including the Community Microgrid Enablement Tariff, through a subsequent Tier 2 Advice Letter on its own motion or in response to direction from the Commission." This Advice Letter seeks such modification to the CMET.

### **III. Reason for Requested Tariff Modifications**

Since launching the CMEP in April 2021, there has been early and broad interest in the concept of community microgrids as a tool to increase resilience. PG&E has engaged with over three dozen communities and project developers to explore potential resilience solutions. As with all CMEP engagements, the conversations begin with a Resilience Solution Evaluation, intended to help the Applicant determine what type of resilience solution will best meet their needs: a front-of-the meter multi-customer microgrid; a behind-the-meter solution; or some other grid resilience solution. For those Applicants wishing to pursue a front-of-the meter, multi-customer microgrid, PG&E's Resilience Coordinator will help them assess their eligibility for the CMET.

Through these initial engagements, PG&E has observed that a number of projects are prevented from being eligible to operate as a community microgrid because they do not meet the critical facility and location requirements of the CMET. For example, projects located in population centers which lie outside Tier 2 or 3 High Fire Threat Districts, or which serve a community segment that does not include a critical facility, do not currently meet the CMET eligibility requirements. Those eligibility criteria were put in place to ensure that the distribution customer funding of community microgrids – via the CMEP cost offsets for distribution upgrades to enable the safe islanding of a community microgrid - were directed to those areas with the greatest resilience needs. The CMET does not provide ratepayer funding and, therefore, does not require similar restrictions.

PG&E proposes modifying the eligibility criteria, described in Section 3.1, to require the CMET Project to serve at least "two customers or customer premises connected by PG&E's distribution infrastructure". Defining the eligibility criteria as "two customer premises" rather than "two customers" exclusively will support circumstances where a

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<sup>2</sup> Resolution E-5127, Ordering Paragraph 2. See also *id.*, p. 7 ("While the Commission grants conditional approval of the CMET using the proposed tariff language as a starting point, it will be important to remain open to change so this experimental tariff evolves with experience. There may be a legitimate concern if the CMET is overly restrictive or inappropriately limiting participation in a contract or agreement.")



single municipality, school district, institution, or other civic body owning multiple premises can still qualify under the CMET.

PG&E is also proposing to clarify that the class of customers (“CMET Customers”) that receive PG&E distribution service within the CMET Project Microgrid Boundary is generally limited to PG&E *retail* distribution customers. However, because optimal community microgrid boundaries are driven by grid topology, PG&E is proposing to allow, where it is in the best interest of PG&E retail distribution customers, the CMET to be used even where there are some electrical loads within a particular community microgrid boundary that are not served by PG&E retail distribution facilities. For instance, PG&E may consider supporting a community microgrid project that includes a single critical wholesale distribution customer located midway along a distribution segment so long as it represents a small or moderate fraction of the total load. In such a case, it would likely be infeasible to modify the existing grid topology in order to exclude that single customer from the proposed microgrid, and the spirit of the tariff, which is to enable customer-proposed microgrids, may be more fully carried out by making an exception for that single customer. PG&E’s proposed revision to the CMET would have PG&E submit a notice of and justification for this determination through a Tier 1 Advice Letter.

Finally, PG&E proposes to remove Section 3.4 of the CMET which requires applicants to provide PG&E with a letter of interest from a local government, Tribe, or Community Choice Aggregator. This letter is intended to validate that the multi-customer microgrid project will serve the community’s broad interests from the perspective of those serving the community. However, in broadening the tariff’s eligibility to include projects which do not primarily or directly support public health and safety facilities, it may be difficult or infeasible for the developer or sponsor to obtain such a letter.

Community Microgrids are a novel and useful tool to improve community resilience. CMET is the only available mechanism by which communities can deploy community microgrids utilizing PG&E’s distribution infrastructure. Through its discussions with customers and community representatives, PG&E now recognizes that the current CMET eligibility criteria unnecessarily limits the potential for the tariff to enable a significantly broader category of community-proposed resilience projects. Recognizing this, PG&E proposes to remove certain eligibility criteria in the CMET – to broaden where community microgrids can operate – while maintaining those criteria for the CMEP program and associated cost offsets. Adopting these modifications will provide a cohort of existing and potential community microgrid projects increased certainty regarding a pathway to operating these projects.<sup>3</sup> Without that certainty it is difficult to justify the near-term investments of time and resources necessary to design and develop these potential projects.

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<sup>3</sup> See attached letters of support in reference to an example of a near-term potential community microgrid project that has the potential to benefit from the changes to CMET requested in this Advice Letter.

PG&E further believes these modifications are in the public interest and consistent with SB 1339. By making the community microgrid development pathway more broadly available, PG&E and California will gain essential experience and learnings regarding developing and, potentially, operating<sup>4</sup> these projects.

#### **IV. Tariff Changes**

PG&E proposes the following modifications to the E-CMET:

- Section 3.1  
Community Microgrid: The CMET Project, ~~consistent with the framework for the CMEP approved in CPUC D.20-06-017,~~ must meet the needs of at least ~~one Critical Facility and at least one-two~~ customers or two customer premises connected by PG&E's distribution infrastructure within the Microgrid Boundary. All customers within the Microgrid Boundary of the CMET Project must be PG&E retail distribution customers; provided that, where PG&E determines in its sole discretion that inclusion of electrical loads or customers which do not take PG&E retail distribution service in a CMET Project will benefit PG&E retail distribution customers, PG&E may agree to the inclusion of such loads and/or customers and will submit a notice of and justification for this determination through a Tier 1 Advice Letter.
- Section 3.2  
Location: The CMET project must be located in an area served, entirely or in part, by PG&E retail distribution service. ~~either in a Tier 2 or Tier 3 High Fire Threat District (HFTD), in an area that has been impacted by a Public Safety Power Shutoff (PSPS) event in the past, or is in an Outage Prone Area. CMET Projects located in areas that have been excluded from all reasonably anticipated potential future PSPS events due to other PSPS mitigation activities will not be eligible, regardless of whether they have previously experienced a PSPS event.~~
- Section 3.4  
~~Community Interest: The CMET Applicant must provide to PG&E a written letter from i) any local government or Tribe, as applicable, with jurisdiction over the area within the proposed Microgrid Boundary, or ii) Community Choice Aggregator that provides service within the proposed Microgrid Boundary to document an expression of interest in the CMET Project as part of the Application.~~

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<sup>4</sup> The community microgrid development process reveals increasingly precise information regarding project costs, technical viability and operational complexity. Thus, it is expected that not all projects that enter into the design and development phase will reach commercial operations.

**V. Letters of Support**

Letters of support for this CMET modification from the Mayor's Office of the City of Oakland, and the Oakland EcoBlock project are hereby attached to this Advice Letter.

**VI. 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](mailto:EDTariffUnit@cpuc.ca.gov) and [PGETariffs@pge.com](mailto: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 August 25, 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, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: [EDTariffUnit@cpuc.ca.gov](mailto: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](mailto: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).

**VII. Effective Date**

PG&E requests that this Tier 2 Advice Letter become effective on regular notice, September 4, 2021, which is 30 calendar days after the date of submittal.

**VIII. 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 R.19-09-009. 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

cc: Service List R.19-09-009



# 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) #: 6283-E

Tier Designation: 2

Subject of AL: Modifications to the Community Microgrid Enablement Tariff (CMET) Pursuant to Resolution E-5127

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 #: E-5127

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: 9/4/21

No. of tariff sheets: 4

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: Electric Schedule E-CMET

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:

Clear Form

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
50808-E	ELECTRIC SCHEDULE E-CMET COMMUNITY MICROGRID ENABLEMENT TARIFF Sheet 1	49632-E
50809-E	ELECTRIC SCHEDULE E-CMET COMMUNITY MICROGRID ENABLEMENT TARIFF Sheet 2	49633-E
50810-E	ELECTRIC TABLE OF CONTENTS Sheet 1	50806-E
50811-E	ELECTRIC TABLE OF CONTENTS Sheet 7	50800-E



**ELECTRIC SCHEDULE E-CMET**  
**COMMUNITY MICROGRID ENABLEMENT TARIFF**

Sheet 1

1. **APPLICABILITY:** The Community Microgrid Enablement Tariff (CMET) schedule (Schedule CMET or this Schedule) implements, in part, on an experimental basis the Community Microgrid Enablement Program (CMEP) pursuant to Public Utilities Commission (CPUC) Decision (D.) D.20-06-017 and CPUC Resolution E-5127. This CMET governs the eligibility, engineering studies, development, and island and transitional operation of Community Microgrids, as defined herein, under the CMEP. As an experimental tariff associated with a limited CMEP, this Schedule is available, on a first-come, first-served basis, to applicants (CMET Applicants) who (i) meet the CMET Eligibility Criteria in Section C, and (ii) submit a complete CMET Application (Application). This Schedule will close to CMET Applicants on the date set forth in Section D, below. Capitalized terms specific to this tariff are defined in section N below.

2. **TERRITORY:** This schedule applies throughout PG&E's electric service area.

3. **CMET ELIGIBILITY CRITERIA:** A CMET Applicant must meet all of the eligibility criteria outlined below (CMET Eligibility Criteria):

1. **Community Microgrid:** The CMET Project must meet the needs of at least one Critical Facility and at least two customers premises connected by PG&E's distribution infrastructure within the Microgrid Boundary. All customers within the Microgrid Boundary of the CMET Project must be PG&E retail distribution customers; provided that, where PG&E determines in its sole discretion that inclusion of electrical loads or customers which do not take PG&E retail distribution service in a CMET Project will benefit PG&E retail distribution customers, PG&E may agree to the inclusion of such loads and/or customers and will submit a notice of and justification for this determination through a Tier 1 Advice Letter. (T)
2. **Location:** The CMET project must be located in an area served, entirely or in part, by PG&E retail distribution service. (T)

(Continued)





**ELECTRIC SCHEDULE E-CMET**  
**COMMUNITY MICROGRID ENABLEMENT TARIFF**

Sheet 2

**3. CMET  
ELIGIBILITY  
CRITERIA  
(Cont'd.)**

3. Community Microgrid Parameters: The CMET Project must include interconnected exporting energy producing resources (Project Resources) that do not exceed 20MW in aggregate within a clearly defined Microgrid in PG&E's Distribution System with a single Microgrid Islanding Point; the CMET Project must act as a single, controllable entity; the CMET Project must be able to connect to, disconnect from, and run in parallel with larger portions of the electrical grid; and the CMET Project must be capable of maintaining electrical supply and service quality when isolated to connected customers during larger grid disturbances. Project Resources must be interconnected to PG&E's Distribution System pursuant to PG&E's Wholesale Distribution Tariff (WDT) and/or Electric Rule 21 as applicable.

(D)  
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(D)

4. Pre-Application Report: The CMET Applicant must complete a Community Microgrid Pre-Application Report (CM Pre-Application Report) and consultation with PG&E prior to submitting a CMET Application.
5. Applicant Experience: The CMET Applicant must provide to PG&E an attestation that at least one current member of its development team has: (a) completed the development of at least one microgrid project of similar technology and capacity; or (b) begun construction of at least one other project of similar technology and capacity. The CMET Applicant must identify the entity(ies), if not the Applicant, that will be responsible for development of the CMET Project and the entity that will be the CMET Aggregator responsible for coordinated operation with PG&E pursuant to Rule 24 and an executed CMET Microgrid Operating Agreement ("CMET MOA" or "MOA").

(T)  
  
(T)

(Continued)



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Sheet 1

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Advice 6283-E  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

August 5, 2021  
E-5127



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## **Attachment 2**

### **Redline Tariffs**



**ELECTRIC SCHEDULE E-CMET**  
**COMMUNITY MICROGRID ENABLEMENT TARIFF**

Sheet 1

(N)

(N)

1. **APPLICABILITY:** The Community Microgrid Enablement Tariff (CMET) schedule (Schedule CMET or this Schedule) implements, in part, on an experimental basis the Community Microgrid Enablement Program (CMEP) pursuant to Public Utilities Commission (CPUC) Decision (D.) D.20-06-017 and CPUC Resolution E-5127. This CMET governs the eligibility, engineering studies, development, and island and transitional operation of Community Microgrids, as defined herein, under the CMEP. As an experimental tariff associated with a limited CMEP, this Schedule is available, on a first-come, first-served basis, to applicants (CMET Applicants) who (i) meet the CMET Eligibility Criteria in Section C, and (ii) submit a complete CMET Application (Application). This Schedule will close to CMET Applicants on the date set forth in Section D, below. Capitalized terms specific to this tariff are defined in section N below.

2. **TERRITORY:** This schedule applies throughout PG&E's electric service area.

3. **CMET ELIGIBILITY CRITERIA:** A CMET Applicant must meet all of the eligibility criteria outlined below (CMET Eligibility Criteria):

1. **Community Microgrid:** The CMET Project, ~~consistent with the framework for the CMEP approved in CPUC D.20-06-017,~~ must meet the needs of at least ~~one Critical Facility and at least one additional two~~ two customers ~~or two customer premises connected by PG&E's distribution infrastructure within the Microgrid Boundary. All customers within the Microgrid Boundary of the CMET Project must be PG&E retail distribution customers; provided that, where PG&E determines in its sole discretion that inclusion of electrical loads or customers which do not take PG&E retail distribution service in a CMET Project will benefit PG&E retail distribution customers, PG&E may agree to the inclusion of such loads and/or customers and will submit a notice of and justification for this determination through a Tier 1 Advice Letter.~~
2. **Location:** The CMET project must be located in an area served, entirely or in part, by PG&E retail distribution service, either in a Tier 2 or Tier 3 High Fire Threat District (HFTD), in an area that has been impacted by a Public Safety Power Shutoff (PSPS) event in the past, or is in an Outage Prone Area. CMET Projects located in areas that have been excluded from all reasonably anticipated potential future PSPS events due to other PSPS mitigation activities will not be eligible, regardless of whether they have previously experienced a PSPS event.

(Continued)



**ELECTRIC SCHEDULE E-CMET**  
**COMMUNITY MICROGRID ENABLEMENT TARIFF**

Sheet 2

(N)

(N)

**3. CMET  
ELIGIBILITY  
CRITERIA  
(Cont'd.)**

3. Community Microgrid Parameters: The CMET Project must include interconnected exporting energy producing resources (Project Resources) that do not exceed 20MW in aggregate within a clearly defined Microgrid in PG&E's Distribution System with a single Microgrid Islanding Point; the CMET Project must act as a single, controllable entity; the CMET Project must be able to connect to, disconnect from, and run in parallel with larger portions of the electrical grid; and the CMET Project must be capable of maintaining electrical supply and service quality when isolated to connected customers during larger grid disturbances. Project Resources must be interconnected to PG&E's Distribution System pursuant to PG&E's Wholesale Distribution Tariff (WDT) and/or Electric Rule 21 as applicable.

~~4. Community Interest: The CMET Applicant must provide to PG&E a written letter from i) any local government or Tribe, as applicable, with jurisdiction over the area within the proposed Microgrid Boundary, or ii) Community Choice Aggregator that provides service within the proposed Microgrid Boundary to document an expression of interest in the CMET Project as part of the Application.~~

~~54.~~ Pre-Application Report: The CMET Applicant must complete a Community Microgrid Pre-Application Report (CM Pre-Application Report) and consultation with PG&E prior to submitting a CMET Application.

~~65.~~ Applicant Experience: The CMET Applicant must provide to PG&E an attestation that at least one current member of its development team has: (a) completed the development of at least one microgrid project of similar technology and capacity; or (b) begun construction of at least one other project of similar technology and capacity. The CMET Applicant must identify the entity(ies), if not the Applicant, that will be responsible for development of the CMET Project and the entity that will be the CMET Aggregator responsible for coordinated operation with PG&E pursuant to Rule 24 and an executed CMET Microgrid Operating Agreement ("CMET MOA" or "MOA").

(Continued)

Advice 6283-E  
August 5, 2021

## **Attachment 3**

**Letters of support - Mayor's Office of the City of Oakland**

# CITY OF OAKLAND



1 FRANK H. OGAWA PLAZA • 3<sup>RD</sup> FLOOR • OAKLAND, CALIFORNIA 94612

Office of the Mayor  
Libby Schaaf

(510) 238-3141  
FAX: (510) 238-4731

August 2, 2021

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

To Whom It May Concern:

On behalf of the City of Oakland (“City”), I am pleased to submit this letter in strong support of Pacific Gas & Electric’s (“PG&E”) Advice Letter to the CPUC requesting a modification of its Community Microgrid Enablement Tariff (CMET) to further develop the Oakland EcoBlock Project, which advances the City’s sustainability and resiliency goals as set forth in Oakland’s [2030 Equitable Climate Action Plan](#) and our [Resilient Oakland Playbook](#).


As you may know, the Oakland EcoBlock is a research project led by UC Berkeley, funded by the California Energy Commission, that aims to address urgent needs and policy priorities for California. As an urban neighborhood retrofit, the EcoBlock will demonstrate a block-level, 100% solar microgrid whose design starts with deep energy and water efficiency measures, and conversion of gas to electric end uses. It will include shared electric vehicle charging, and a new approach for coordinating these resources among neighbors. The idea is that by combining technologies, standardizing components and creating a neighborhood collective with the right legal and financing structure, investments like these can be made affordable for everyone. The City of Oakland has been an active partner through the design of the project, recruitment of the pilot block in the Fruitvale neighborhood, and navigation of policy, legal and permitting issues at the municipal level.

Given the City’s sustainability and resiliency goals rooted in equity, the City strongly supports PG&E’s proposed modification for CMET. Resilience in Oakland has a broader definition, which means tackling systemic, interdependent challenges, such as equitable access to quality education and jobs, housing security, community safety and vibrant infrastructure to better prepare us for shocks like power outages and stresses like climate change. To achieve this, we need to leverage our collective resources by fostering a culture of responsive and trustworthy government, data-driven decisions centered around residents’ needs and robust, smart infrastructure development. The CPUC’s timely



approval of PG&E's modification request will put us on this path to support our community's changing needs in a changing climate.

Sincerely,

A handwritten signature in black ink, appearing to read "Libby Schaaf". The signature is fluid and cursive, with the first name "Libby" written in a larger, more prominent script than the last name "Schaaf".

Mayor Libby Schaaf  
City of Oakland

## **Attachment 4**

**Letters of support - Oakland EcoBlock**

July 13, 2021

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

To Whom It May Concern:

On behalf of the Oakland EcoBlock team, I am pleased to write in strong support of Pacific Gas & Electric's Advice Letter to the CPUC, requesting a modification of the Community Microgrid Enablement Tariff (CMET).

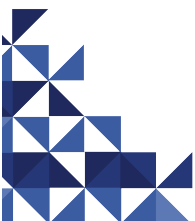
As you may be aware, the *Oakland EcoBlock: A Zero Net Energy, Low Water Use Retrofit Project* is funded by the California Energy Commission's Electric Program Investment Charge (EPIC) program on *Accelerating the Deployment of Advanced Energy Communities*, and led by the University of California, Berkeley. The program is designed to develop "innovating and replicable approaches for accelerating the deployment of Advanced Energy Communities," aimed at advancing California's policy goals in the areas of climate and resilience while also promoting equity.

In addition to deep efficiency improvements and electrification, the Oakland EcoBlock seeks to develop a 100% solar + storage islandable microgrid comprising 32 residential customers and one commercial customer on an urban block. This community approach will make clean and resilient technology accessible to customers who could not afford a stand-alone PV and battery system for their individual home or apartment.

After thorough discussions with PG&E, and in view of the current regulatory status regarding multi-customer microgrids, our project team and PG&E believe that the most sensible, cost-effective and scalable approach at this time is to implement this microgrid within the design and operating framework articulated in PG&E's Community Microgrid Enablement Tariff (CMET). We envision that the Oakland EcoBlock will exemplify an innovative arrangement that allows a section of the distribution feeder to safely island in the event of a grid outage, using only solar PV generation from multiple rooftops. PG&E will retain ownership and control of the distribution infrastructure (including switchgear), and the *Blossom Street Association* will own and be responsible for the operation of generation and storage assets, along with EV chargers and other highly controllable loads. While leaving intact existing customer accounts, the microgrid control infrastructure provides a technical basis for emergency islanded operation, as well as coordinating distributed resources in aggregate for grid benefits.

If proven effective, this approach could be rapidly scaled to other circuits to offer resilience at the community scale without relying on diesel generators. This will benefit the health and safety of Californians, advance our climate goals, and may point to the most cost-effective way to ensure survivability of emergencies in the face of climate change, extreme weather, and other threats to the electric grid.

The Oakland EcoBlock's participation in CMET will require some relaxation of eligibility criteria. Specifically, the Blossom Street location is not in an area presently designated as outage prone, or at high risk of fires and Public Safety Power Shutoffs (PSPS). Also, the requirement for including "critical infrastructure" would need to be relaxed. In the case of the Oakland EcoBlock, a corner grocery store will serve as a community gathering center where neighbors can go for general support, essential items, and charging electronic devices in an emergency.



More generally, though, just creating options for residents to safely shelter in place – and thereby reduce burden on emergency services – is well aligned with the original CMET vision.

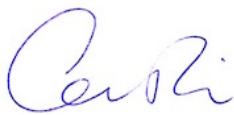
We strongly believe that this relaxation of eligibility criteria is the right choice in the public interest, not only for the Oakland EcoBlock project. Considering the urgency of the climate crisis and the unknown pace of acceleration of extreme weather in the years ahead, we have no time to lose.

If, as many experts believe, community microgrids are to play a crucial role in advancing California's policy goals, it is imperative that practical experience with diverse design and operating approaches be gained as quickly as possible. PG&E is to be commended for advancing a vision of a community microgrid approach with scaling potential that fits within their business model and general strategy. There may be other good approaches that should ultimately compete on their objective merits – but nobody knows yet what the best one is. California needs as many different innovative examples as possible, so that empirical learnings from pilot projects like the Oakland EcoBlock can be evaluated and inform future strategies.

For this reason, PG&E should be encouraged to work with diverse CMET candidates, rather than limiting the tariff to ideal situations. Building a community microgrid is hard. As far as we know, there are not large numbers of applicants waiting at the door. But we are quite certain that lessons learned from the Oakland EcoBlock, and perhaps other projects that don't quite fit the original CMET eligibility criteria, will carry over and inform projects that do. For example, microgrid experience in purely residential locations will also apply to locations with critical infrastructure, while allowing for more liberal experimentation with islanding procedures. Relaxing the eligibility requirements will accelerate our collective progress along the learning curve and thereby fully support the intent of the tariff, in the interest of all ratepayers.

In sum, we strongly support PG&E's proposed modification for CMET. Our team has immensely appreciated our collaborative process and the sincere efforts of PG&E staff to help make the Oakland EcoBlock project a success, despite innumerable hurdles. Beyond an innovative technological demonstration, we aspire to set an example for constructive cooperation – among block neighbors as well as businesses and institutions. The CPUC's timely approval of the modification request will be a very positive step for all.

Sincerely,



Alexandra von Meier

Director, Electric Grid Research, California Institute for Energy and Environment  
Adjunct Professor, Dept. of Electrical Engineering and Computer Science  
University of California, Berkeley

Principal Investigator, Oakland EcoBlock

<https://ecoblock.berkeley.edu>  
[vonmeier@berkeley.edu](mailto:vonmeier@berkeley.edu)

**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  
Semptra 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