

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6294E
As of February 14, 2022

Subject: Pacific Gas and Electric Company Request to Suspend its Green Tariff Shared Renewables Program Due to Market Malfunction

Division Assigned: Energy

Date Filed: 08-13-2021

Date to Calendar: 08-18-2021

Authorizing Documents: None

Disposition:	Withdrawn
Effective Date:	None

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

August 13, 2021

Advice 6294-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas and Electric Company Request to Suspend its Green Tariff Shared Renewables Program Due to Market Malfunction

Purpose

Consistent with Ordering Paragraph 14 of Decision (D.)15-01-051, Pacific Gas and Electric Company (PG&E) requests conditional approval to suspend its Green Tariff Shared Renewables (GTSR) program, effective January 1, 2022, for participants whose load results in the program's enrollment capacity exceeding the Green Tariff Option (referred to herein as "Solar Choice") dedicated resource capacity. Suspension would result in the unenrollment of such participants on January 1, 2022, and their subsequent placement on the Solar Choice waitlist on a first-come, first-serve basis according to their initial enrollment date.

If the California Public Utilities Commission (Commission) approves PG&E's request to temporarily supply its GTSR program with existing resources as articulated in its recent Petition for Modification (PFM)¹ by October 21, 2021, PG&E would not have a need to suspend its GTSR program as described herein. Temporary supply with existing resources remains PG&E's preferred approach.

Background*Initial Program Implementation*

The Commission approved the GTSR program in D.15-01-051 on February 2, 2015, to enact the provisions set forth in Senate Bill 43. For the initial resource procurement, D.15-01-051 required the investor-owned utilities to begin advance procurement for the program under the sixth Renewable Auction Mechanism (RAM 6). The joint RAM 6/Solar Choice solicitation was launched July 7, 2015. PG&E procured 52.75 megawatts (MW) in this initial solicitation as advance procurement for its Solar Choice program and the

¹ *Emergency Petition for Modification of Decision 15-01-051 of Pacific Gas and Electric Company*, filed April 30, 2021.

Commission approved Advice Letter 4780-E on February 21, 2016, for the initial Solar Choice contracts.

D.15-01-051 also included an initial sunset date for the program of January 1, 2019. PG&E submitted Advice Letter 3920-G/5206-E on December 22, 2017, to extend the program beyond its sunset date. On September 26, 2019, the Commission adopted Resolution E-5028, retroactively approving PG&E's request to extend its program beyond the sunset date and denying Southern California Edison Company's (SCE) proposal to terminate its GTSR program.

Recent Increases in Program Enrollment

Between its 2016 procurement of the initial 52.75 MW of dedicated resource capacity for the program and December 2020, PG&E's Solar Choice program had significant volumes of excess supply capacity – never less than approximately 16 MW or approximately 31%. In addition to having excess supply, PG&E had not procured dedicated resources after Q4 2017 because D.15-01-051 directed the IOUs *not to procure* “unless the IOU's GTSR program has been re-authorized or extended beyond its January 1, 2019 sunset date.”² Excess capacity at that time – Q4 2017 – totaled over 30 MW or approximately 57%, and PG&E could not reasonably know if the program would continue beyond 2019. GTSR ultimately was not extended by the Commission until September 2019, meaning that PG&E was prohibited from procuring additional capacity for nearly two years, from Q1 2018 until Q4 2019.

Even if PG&E had been allowed to procure in 2018 or 2019, program data would not have supported the solicitation of additional resources. After initial program growth, enrollments decreased from nearly 7,000 customers in May 2018 to just over 2,000 customers in May 2019 primarily due to Community Choice Aggregator expansion. PG&E was able to mitigate somewhat the impact to enrolled program capacity by adjusting its marketing, but enrollment capacity remained well below dedicated resources – peaking at 36 MW at the end of 2019 and then remaining below this peak until December of 2020.³

On January 1, 2021, the GTSR program's annual rate change allowed many customers to enroll in Solar Choice at a modest discount, and this became a key driver for the rapid increase in subscription levels. Residential customer enrollment grew at an accelerating pace throughout the first quarter of 2021 while large customers with many accounts began enrolling immediately at the start of the year. The result was that program capacity

² D. 15-01-051 directed the IOUs not “to start new solicitations after January 31, 2018, unless the IOU's GTSR Program has been re-authorized or extended” beyond its January 1, 2019 sunset date p.33

³ Capacity calculated using PG&E's “Alternate Capacity Calculation Methodology” as described in its 2021 GTSR Quarterly Reports.

grew to 58 MW by the end of January, 135 MW by the end of February, and 215 MW by the end of March.⁴

GTSR Rate Dynamics

Solar Choice rates are updated annually through the Energy Resource Recovery Account (ERRA) Forecast Proceeding. The complex nature of GTSR ratemaking, which has been intertwined with Power Charge Indifference Adjustment (PCIA) and generation ratemaking overhauls in recent years, has limited PG&E's ability to accurately forecast when newly enrolling customers and existing participants might experience a net credit rather than a net premium in their Solar Choice rate, compared to their otherwise applicable tariffed rate.

More specifically, regulatory and market uncertainty associated with these two key rate components – the PCIA and the class average generation rate – has increased rate volatility for program participants and added to the challenge of predicting the near-term trend in the GTSR rate results. Delays in implementation of changes to these rate components beyond January 1 in 2019 and 2020 compounded this uncertainty.

The GTSR program's rate design is intended to capture incremental costs applicable to program participants and ensure costs are not shifted to non-participating customers; However, the drawback of the GTSR rate design is that it is difficult to forecast rate trends which, in turn, inform expectations of future enrollment and hence procurement needs. In short, PG&E was not able to forecast future rates or enrollment trends – variables which also impact each other – with sufficient confidence to justify procurement in advance and in time to meet its current demand.

Emergency Petition for Modification

In response to rapid Solar Choice enrollments in Q1 2021, PG&E filed an Emergency PFM of D.15-01-051 on April 30, 2021, to request the Commission reinstate the use of an interim pool of existing renewable resources to avoid an unanticipated interruption in services to retail customers of its Solar Choice program under PG&E Electric Schedule E-GT.

PG&E's PFM sought to modify D.15-01-051 to allow IOUs to use excess existing renewable resources previously procured separately from its Solar Choice Program on a temporary basis to form a temporary resource pool to meet the needs of the unanticipated significant increase in Solar Choice customer enrollments until new procurement to acquire additional Solar Choice resources is completed and those resources commence operation.

⁴ Quarterly Green Tariff Shared Renewables Program Progress Report of Pacific Gas and Electric Company (U 39 E) for Activities Occurring April-June 2021, Appendix – 3.

Precedent for Ongoing Interim Resource Utilization

Other load-serving entities in California, namely San Diego Gas & Electric (SDG&E) and the Sacramento Municipal Utility District (SMUD), both address community solar supply-demand imbalance through the use of interim pools of existing resources.

As documented in SDG&E's 2018 Annual GTSR Program Progress Report, SDG&E used existing RPS resources to manage an 860% increase in Green Tariff Option enrollment which occurred in Q1 2018, when enrollments increased from 4.4 MW to 42.8 MW.⁵ As SDG&E notes in its report:

"In January 2018, the cost of customer participation in the GT component transitioned from a net cost increase to a slight credit for residential customers, as well as for medium and large business customers. When this transition occurred, SDG&E saw a rapid increase in GT applications from business customers. By March 2018, SDG&E had fully allocated the share of unrestricted capacity available for the GT component and introduced a waitlist for business customers."⁶

This scenario is identical to the one PG&E experienced at the beginning of 2021. In both its 2018 and 2020 annual reports, SDG&E indicates that it "will serve any GT demand in excess of the generation capacity of its dedicated GT project(s) with generation from its Interim Pool until (an) additional dedicated GT project(s) can be brought online to serve this demand," which is the permission PG&E has sought in its PFM.⁷

In 2018, SDG&E transferred 86,383 MWh from its existing RPS resources to GTSR participants.⁸ Its 2020 annual report shows that it has continued to rely on its RPS resources, transferring 90,960 MWh to GTSR program participants in that program year.⁹ SDG&E does note that participants will be served exclusively by dedicated resources when they are brought online, but because this has not yet occurred it is still utilizing RPS interim resources to serve participant demand.¹⁰

The key difference between SDG&E's rapid enrollment increase in 2018 and the one PG&E experienced in 2021 is that PG&E had sufficient dedicated resources online prior to the spike such that it was not relying on an interim pool when the increase occurred. Thus, if SDG&E experienced another enrollment spike in 2021, they would be able to use

⁵ Annual GTSR Program Progress Report of San Diego Gas & Electric Company (U 902 E) for Activities Occurring in 2018, p.4

⁶ Ibid. p.3-4

⁷ Ibid. page 5; Annual GTSR Program Progress Report of San Diego Gas & Electric Company (U 902 E) for Activities Occurring in 2020, p.5

⁸ Annual GTSR Program Progress Report of San Diego Gas & Electric Company (U 902 E) for Activities Occurring in 2018, p.6

⁹ Annual GTSR Program Progress Report of San Diego Gas & Electric Company (U 902 E) for Activities Occurring in 2020, p.6

¹⁰ Ibid. p.5

existing resources to serve program demand. PG&E is not able to follow suit due to the simple fact that it stopped relying on interim resources prior to 2021.

SMUD's Neighborhood SolarShares Program also has the ability to use existing resources to supply program participants while dedicated resources are being brought online. While the California Energy Commission's (CEC) Title 24 Alternative Compliance Option shares project size and other requirements with GTSR, it granted SMUD the ability to use interim resources on an ongoing basis when it approved its program in 2020.¹¹ Moreover, in its 2022 draft Code update, it expressly includes interim resource permissibility in its requirements for additionality:

"Other renewable resources may be used when participating buildings are permitted before the renewable resources developed for the program start operating or after they cease operating. During these times, other renewable resources may be used to meet the requirements of Section 10-115(a)4 for each participating building."¹²

These examples both create clear precedent for and attest to the practicality of PG&E's request to use existing resources on a temporary basis to serve GTSR participant demand.

Request for Program Suspension

In D.15-01-051 approving the GTSR program for California IOUs pursuant to Senate Bill 43 (2013), the Commission stated that:

"...under certain unique circumstances, such as risk of ratepayer exposure to excessive costs due to market manipulation or market malfunction, it may be necessary to authorize a rapid suspension of the GTSR Program. Therefore, should any of the three utilities determine that suspension is necessary to protect ratepayers, they must do so by Tier 2 Advice Letter. The Advice Letter must clearly

¹¹ As documented in this CEC press release, (<https://www.energy.ca.gov/news/2020-02/california-energy-commission-approves-first-community-solar-proposal-under-2019>), SMUD's Neighborhood SolarShares Program was approved by the CEC on February 20, 2020. CEC press release: <https://www.energy.ca.gov/news/2020-02/california-energy-commission-approves-first-community-solar-proposal-under-2019>, SMUD's Neighborhood SolarShares Program was approved by the CEC on February 20, 2020. SMUD's approved revised application noted that interim resources "*will remain available to serve a portion of program demand if development timeframes unfold so that new resources and [procured resource] are insufficient at any point in time.*" (p. 10) (<https://efiling.energy.ca.gov/GetDocument.aspx?tn=231588&DocumentContentId=63405>)

¹² Revised Express Terms, 2022 Energy Code, Title 24 Parts 1 and 6, (p.48) (<https://efiling.energy.ca.gov/GetDocument.aspx?tn=238848>)

set forth why such early suspension is necessary to protect ratepayers and the utility's proposal for resolving the issue."¹³

This text was further supported by Finding of Fact 46 and Ordering Paragraph 14 which grant the IOUs the ability to suspend their GTSR programs to protect customers from market manipulation or malfunction. While current conditions may differ from the market malfunction contemplated in 2015, PG&E's program faces unusual circumstances that are similar to those that the Commission recognized would require program suspension: Solar Choice is encountering an imbalance of supply and demand due to program design constraints and latency in the market's ability to supply the program. This supply-demand imbalance, if unaddressed, would likely result in adjustments to the ERRA balancing account that could adversely impact both participating and non-participating customers.

The constraints of D.15-01-051 – in particular, PG&E's inability to quickly and unilaterally suspend enrollments, the prohibition on soliciting dedicated resources in 2018 and 2019, and insufficient enrollment levels or rate forecast certainty to justify advance procurement – force PG&E into a position of needing to procure resources immediately that can provide supply in 2021. However, the market cannot and could not have delivered resources on this timeline.

This malfunction forces either the use of interim resources as requested in PG&E's PFM or a rebalancing of program supply and demand via suspension of the program enrollments as requested here. To date, the Commission has not acted on the Emergency Petition. If PG&E is unable to utilize interim resources, suspension of the GTSR program will be necessary to both protect customers and minimize disruption for program participants.

PG&E's Proposal to Resolve the Issue

PG&E's outstanding PFM proposes to resolve GTSR supply-demand imbalance by using interim pool resources on a temporary basis. This remains PG&E's preferred approach.

Absent PFM approval, the proposal PG&E puts forward in this Advice Letter would resolve the issue through a rebalancing of supply and demand effective January 1, 2022. Specifically, PG&E requests conditional approval to suspend the program to any new enrollments and for customers whose previous enrollments caused demand to exceed dedicated resource capacity. The latter group would be unenrolled on a last-in, first-out basis, so that PG&E would be able to balance dedicated resource supply and demand. Customers that subscribed to the program would be unenrolled from the optional rate scheduled E-GT and returned to their otherwise applicable tariff (OAT). PG&E would exempt from unenrollment only residential CARE customers currently experiencing a discount relative to their OAT. PG&E currently estimates that between eight and nine thousand service agreements would be impacted, of which roughly 60 percent are business customers and 40 percent are residential customers.

¹³ D. 15-01-051, (p.83)

This change would take effect on January 1, 2022, and impacted customers would be notified at least 45 days in advance. Unenrolled participants would be placed on a waitlist and given priority treatment given their prior enrollment in the Program. If and when program capacity is available for waitlisted customers to enroll, either due to interim pool resources or an increase in dedicated resource capacity, they would be notified and given the option to re-enroll in the program.

Billed Revenues from Oversubscribed Enrollment

PG&E's Green Tariff Shared Renewables Balancing Account (GTSRBA) currently has more billed revenues from customers than renewable resource costs due to the increase in Solar Choice enrollment and lack of authority to supplement the resource supply with interim pool resources. The net result is an overcollection in the GTSRBA.

If its PFM is approved, PG&E would transfer interim pool resource costs to the GTSRBA which would bring the balance in line with billed revenues. However, if PG&E's PFM is not approved and this Advice Letter is instead approved, PG&E will credit the accumulated solar generation and other program charge revenues from unenrolled participants to ERRA and credit PCIA revenues to the Portfolio Allocation Balancing Account (PABA).

Program Supply-Demand Imbalance Estimation

As of the date of this filing, PG&E expects to have approximately 173 GWh of supply from dedicated resources compared to roughly 520 GWh of participant usage for program year 2021.¹⁴ Any difference between unenrolled participants' billed revenues and otherwise applicable tariff revenues may result in unrecovered costs given most of the newly enrolled customers are receiving a discount relative to their OAT. PG&E estimates an undercollection attributable to these customers of approximately \$2.4 million for program year 2021.

Tariff Changes

If this Advice Letter is approved PG&E will modify language in its Electric Schedule E-GT for the Green Tariff Program to exempt unenrolled customers from the 12-month ineligibility period because their unenrollment from the program was involuntary.

The 'Enrollment Term' section of the E-GT tariff it states that when a customer's participation in the program is terminated or canceled "[t]he customer is then ineligible to

¹⁴ The dedicated resource estimate includes recorded deliveries through July and an August – December forecast plus reversal of dedicated resource deliveries that were recorded to ERRA but will be transferred back to the Green Tariff Shared Renewables Balancing Account to support the program. The forecast subscribed enrollment is based on PG&E's forecast values presented in its 2022 ERRA Forecast.

participate in the Green Tariff Program for a period of 12 months from the date of the change." PG&E will modify that language to allow earlier enrollment in the program if a customer's unenrollment was involuntary. The amended tariff shall state:

"Cancellation of the customer's participation in the Green Tariff Program will become effective as of the customer's last closed bill period. The customer is then ineligible to participate in the Green Tariff Program for a period of 12 months from the date of the change, unless unenrollment from the program was involuntary."

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 **September 2, 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



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 (U 39 E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 6294-E

Tier Designation: 2

Subject of AL: Pacific Gas and Electric Company Request to Suspend its Green Tariff Shared Renewables Program Due to Market Malfunction

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 #:

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: N/A

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: 8/12/21

No. of tariff sheets: 3

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: See attachment 1

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:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
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51188-E	ELECTRIC TABLE OF CONTENTS Sheet 1	50646-E
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**ELECTRIC SCHEDULE E-GT
GREEN TARIFF PROGRAM**

Sheet 5

ENROLLMENT PROVISIONS:

Customers may elect to purchase 50% or 100% of their energy usage under this schedule.

Customers may elect to change their enrollment level once in a 12 month period (e.g. changing from 50% to 100% and vice versa). Once the GTSR program cap is reached, existing customers may change their enrollment level down only (from 100% to 50%).

The enrollment level for a single service agreement may not exceed the equivalent of 2 MW of load per year. This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.¹

A single customer cannot elect an enrollment level that results in the equivalent amount of load served under this schedule to exceed 20% of any single calendar year's total available cumulative nameplate rated generating capacity under the GTSR Program.²

45 MW of capacity is reserved for residential customer participation in the GTSR program, and 20 MW is reserved for the City of Davis. PG&E reserves the right to stop offering additional subscriptions under this schedule to non-residential customers if non-residential customer participation in the GTSR program reached the equivalent of 207 MW.

ENROLLMENT TERM:

The customer will be placed on the Green Tariff program option on the first day of the next Billing Cycle where the Billing Cycle start date occurs at least five business days after the date of the customer's request. A customer request that is received within five business days of the customer's next Billing Cycle may result in the customer being placed on the Green Tariff Program in the following Billing Cycle.

There is no minimum service length under this schedule. There is also no termination fee associated with terminating participation in this program. Cancellation of the customer's participation in the Green Tariff Program will become effective as of the customer's last closed bill period. The customer is then ineligible to participate in the Green Tariff Program for a period of 12 months from the date of the change, unless unenrollment from the program was involuntary.

(T)
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¹ PU Code 2833(h)
² PU Code 2833 (i)

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Advice 6294-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

August 13, 2021
September 12, 2021



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Advice 6294-E
August 13, 2021

Attachment 2

Redline Tariffs



**ELECTRIC SCHEDULE E-GT
GREEN TARIFF PROGRAM**

Sheet 5

ENROLLMENT PROVISIONS:

Customers may elect to purchase 50% or 100% of their energy usage under this schedule.

Customers may elect to change their enrollment level once in a 12 month period (e.g. changing from 50% to 100% and vice versa). Once the GTSR program cap is reached, existing customers may change their enrollment level down only (from 100% to 50%).

The enrollment level for a single service agreement may not exceed the equivalent of 2 MW of load per year. This limitation does not apply to a federal, state, or local government, school or school district, county office of education, the California Community Colleges, the California State University, or the University of California.¹

A single customer cannot elect an enrollment level that results in the equivalent amount of load served under this schedule to exceed 20% of any single calendar year's total available cumulative nameplate rated generating capacity under the GTSR Program.²

45 MW of capacity is reserved for residential customer participation in the GTSR program, and 20 MW is reserved for the City of Davis. PG&E reserves the right to stop offering additional subscriptions under this schedule to non-residential customers if non-residential customer participation in the GTSR program reached the equivalent of 207 MW.

ENROLLMENT TERM:

The customer will be placed on the Green Tariff program option on the first day of the next Billing Cycle where the Billing Cycle start date occurs at least five business days after the date of the customer's request. A customer request that is received within five business days of the customer's next Billing Cycle may result in the customer being placed on the Green Tariff Program in the following Billing Cycle.

There is no minimum service length under this schedule. There is also no termination fee associated with terminating participation in this program. Cancellation of the customer's participation in the Green Tariff Program will become effective as of the customer's last closed bill period. The customer is then ineligible to participate in the Green Tariff Program for a period of 12 months from the date of the change, unless unenrollment from the program was involuntary.

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¹ PU Code 2833(h)
² PU Code 2833 (i)

(Continued)

**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

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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