

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 16, 2023

Advice Letter 6364-E, 6364-E-A, and 6364-E-B

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Proposed Suspension of the Capacity Reservation Component of the Standby Charge for Eligible Microgrid Distributed Technologies Pursuant to Decision 21-07-011

Dear Mr. Dietz:

This disposition letter approves Pacific Gas and Electric Company (PG&E) Advice Letter 6364-E, Advice Letter Supplement 6364-E-A, and Advice Letter Supplement 6364-E-B, effective June 16, 2023. The approved tariff changes to the Standby Service Rate Schedules addressed herein shall be effective 45 days prospectively after receipt of this approved disposition letter that addressed the original and supplemental advice letters.

Attachment 1 contains a discussion of PG&E's Advice Letters, California Clean DG Coalition's Response to the Advice Letters, and staff's determination to approve the Advice Letters.

Please contact Energy Division staff Rosanne Ratkiewich at Rosanne.Ratkiewich@cpuc.ca.gov if you have any questions.

Sincerely,

Handwritten signature of Leuwam Tesfai in black ink, followed by the text "FOR".

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

Cc:

Simon Baker, Director, Office of Distributed Energy Resources, Natural Gas, and Retail Energy Rates; simon.baker@cpuc.ca.gov
Matthew Coldwell, Program Manager, Energy Division; matthew.coldwell@cpuc.ca.gov
Jason Ortego, Program and Project Supervisor, Energy Division; jason.ortego@cpuc.ca.gov
Rosanne Ratkiewich, Senior Analyst, Energy Division; Rosanne.ratkiewich@cpuc.ca.gov
Kimberley Loo, PG&E; KELM@pge.com
Lisa Wan, PG&E; Lisa.Wan@PGE.com
PG&E Tariffs, PGETariffs@pge.com
Ann Trowbridge for California Clean DG Coalition; atrowbridge@daycartermurphy.com
Energy Division Tariff Unit, EDTariffUnit@cpuc.ca.gov
Service List of R.19-09-009

Attachment 1

Background

This letter approves the disposition of PG&E Advice Letter (AL) 6364-E and PG&E Advice Letter Supplements 6364-E-A and 6364-E-B, effective June 16, 2023. Energy Division grants PG&E an extension of 45 days after this effective date to accomplish implementation.

PG&E timely filed AL 6364-E on October 13, 2021. PG&E requests modifications to its applicable electric standby rate schedules and forms to comply with Decision (D).21-07-011, Ordering Paragraph (OP) 2. Specifically, D.21-07-011 suspended the capacity reservation component of utility standby charges for eligible microgrids that meet California Air Resources Board (CARB) air pollution standards for generation. The Decision limits suspension of the capacity reservation component of the standby charge to specific eligibility and microgrid performance requirements.

The California Clean DG Coalition (CCDC) filed a response to PG&E AL 6364-E on November 2, 2021. CCDC asserts that the wording in PG&E's advice letter is potentially ambiguous with respect to compliance timing. CCDC states that it could be interpreted as requiring customers to recertify compliance with emissions standards semiannually in addition to recertifying compliance with the performance standard, which is inconsistent with D.21-07-011.¹

CCDC requested changes to the PG&E AL to make it consistent with the Decision and the Southern California Edison (SCE) AL. The minor revision would involve changing the word "variability" to "performance" in two places on Sheet 19.

PG&E and SDG&E provided a reply dated November 9, 2021, to the CCDC response of November 2, 2021.² PG&E and SDG&E assert that their ALs conform to the language in OP 2 of D.21-07-011. For instance, they state that OP 2 requires that "the microgrid's generation and storage resources meet the following performance standards" and then identifies two sub-bullet categories, variability and emissions, along with all the semi-annual recertification requirements.

In their reply, PG&E and SDG&E acknowledged that there appears to be a discrepancy between certain language in the dicta and the adopted OP.³ They argued that the question hinges upon whether emissions are merely an eligibility requirement at application, or also an ongoing performance requirement.

Accordingly, PG&E and SDG&E stated that they were working with the CPUC's Energy Division to review the decision and determine the appropriate action. The two utilities indicated that they would submit supplemental ALs to clarify that customers will not be required to semiannually recertify compliance with emissions standards and address the concerns raised by CCDC.⁴

Staff notes that the PG&E AL requested to delay implementation for Standby Reservation Capacity Charge suspension by 120 days after Commission disposition of PG&E AL 6364-E. PG&E states this delay is necessary to develop new internal processes and procedures and modify existing accounting and or billing system procedures. Staff disagrees with the length of this extension request and Staff denies this request because D.21-07-011 did not allow such a delay. Furthermore, more than 636 days have elapsed since D.21-07-011 was issued,

¹ Response of California Clean DG Coalition to Pacific Gas and Electric Company Advice Letter 6364-E dated November 2, 2021, at page 2.

² Reply To Responses On SDG&E Advice Letter 3876-E And PG&E Advice Letter 6364-E Proposing Modifications To Electric Standby Rate Schedules And Forms Pursuant To Decision 21-07-11, dated November 9, 2021.

³ SDG&E PGE Reply To Responses On SDG&E Advice Letter 3876-E And PG&E Advice Letter 6364-E Proposing Modifications To Electric Standby Rate Schedules And Forms Pursuant To Decision 21-07-011 dated November 9, 2021 at page 2.

⁴ SDG&E PGE Reply To Responses On SDG&E Advice Letter 3876-E And PG&E Advice Letter 6364-E Proposing Modifications To Electric Standby Rate Schedules And Forms Pursuant To Decision 21-07-011 dated November 9, 2021 at page 2.

and more than 546 days have already elapsed since the advice letter filing, providing more than adequate time to prepare.

With the exception of the implementation time and the emissions recertification issues, Staff found the proposed actions by SDG&E and PG&E as stated in their November 9, 2021 reply were reasonable, subject to additional discussion between Energy Division and the utilities regarding semi-annual certification. Staff disagreed in part with the utilities' understanding of D.21-07-011 and directed the utilities each to provide a Supplement to the Advice Letter.⁵

Staff requested PG&E to include the following information in its Supplement to PG&E AL 6364-E:

- a) In lieu of the requested 120 days, allow 45 days after the Commission approval for utility implementation.
- b) Define “performance standards” and “emissions standards” using a similar approach as SCE did in SCE AL 4612-E.
- c) Provide by compliance filing to the Energy Division compliance filing electronic mailbox, the annual emissions report received by the customer, under the applicable terms/conditions of the applicable local air district permit.
- d) Add conditions that in the event the annual emissions report shows that customer facilities are not in compliance with the emissions standards required by the local air district permit, suspend the rate schedule, allowing time for the customer to reapply.

Staff further clarified information necessary for the Supplement to the Advice Letter on July 12, 2022, and on December 1, 2022. Staff directed the utilities to provide by periodic compliance filing to the CPUC Energy Division electronic mailbox the following: (1) initial validation of emissions and performance as a baseline, and (2) recurring validation of emissions standards and performance standards (low variability). Staff stated that for administrative ease and consistency, the compliance filings can be submitted based on the schedule that the IOUs proposed.

Staff further clarified the definition and applicability of “bench test” data regarding its use *prior* to commercial operation and that actual real time operating performance data is used *after* commercial operations whether for performance standards or emissions standards validation. Staff provided examples of three optional ways that customers could demonstrate whether the resource continues to meet the emissions standards adopted by the State Air Resources Board on an annual basis. Staff requested the utilities to transmit their respective Supplemental Advice Letters by January 20, 2023.

PG&E transmitted its Supplemental Advice Letter 6364-E-A on January 20, 2023.⁶ In this supplemental filing, PG&E provides the following additional information:

- Change to 45 days in lieu of the requested 120 days, after the Commission approval, for utility implementation.
- Add a definition of “performance standards” and “emissions standards” using a similar approach as PG&E stated in PG&E AL 6364-E.⁷
- Provide by compliance filing to the Energy Division compliance filing electronic mailbox, the annual emissions report received by the customer, under the applicable terms/conditions of the applicable local air district permit.

⁵ Emails dated May 27, 2022; and July 12, 2022; from Joyce Steingass to Danielle Weizman, SDG&E and to Lisa Wan, PG&E.

⁶ PG&E Supplemental Advice Letter 6364-E-A, “Supplemental: Proposed Modifications Suspending the Capacity Reservation Component For Eligible Microgrid Distributed Technologies - Electric Standby Rate Schedules and Forms Pursuant to Decision 21-07-011” dated January 20, 2023.

⁷ Joyce Steingass confirmed the purpose of this statement with PG&E was to conform PG&E's approach with the approach utilized by SCE in AL 4612-E, on February 7, 2023.

- Add conditions that in the event the annual emissions report shows that customer facilities are not in compliance with the emissions standards required by the local air district permit, PG&E will suspend the rate schedule, allowing time for the customer to reapply.

Energy Division staff directed PG&E to transmit Substitute Sheets to adopt consistent language with the other utilities implementing D.21-07-011. Specifically, Staff instructed PG&E to allow the customer to demonstrate compliance with the emissions standards by transmitting a customer attestation “subject to penalty of perjury” and to conform the definition of capacity reservation amount with OP 2 and the other utilities.⁸

PG&E submitted PG&E Supplemental Advice Letter 6364-E-B dated March 16, 2023. Supplemental Advice Letter 6364-E-B seeks to modify the definition of “capacity reservation amount” to conform to OP 2 of D.21-07-011 and to modify the customer’s attestation to state “under penalty of perjury”. PG&E states that this supplement does not change the substance of ALs 6364-E and 6364-E-A except as provided therein.⁹

Staff Analysis

Commission Staff has reviewed PG&E Advice Letter 6364-E, the CCDC Response to the PG&E AL 6364-E, PG&E Response to the CCDC Response; PG&E supplemental Advice Letter 6364-E-A; and second supplemental AL 6364-E-B. Staff verified the utility materials for compliance with OP 2 of D.21-07-011.

Staff finds that the CCDC Response to PG&E AL 6364-E was timely filed in accordance with General Order 96-B. Staff clarified and approved the language regarding the definitions for the performance standards. Staff finds that the issue raised by CCDC regarding ambiguity about recertification of emissions standards has been resolved with the PG&E changes. The issue regarding requirements to meet the Low Variability Microgrid Performance Standards was resolved, where it states that customers can demonstrate compliance with actual real-time operating performance data documenting that the customer’s operation of the Low Variability Microgrid continues to comply with the performance standards and semiannually thereafter.¹⁰

Staff reviewed the Supplemental Advice Letters 6364-E-A and 6364-E-B. The purpose of Staff’s review was to verify that PG&E fully implemented the Staff’s advice regarding implementation of OP 2, particularly regarding the approach used for demonstrating compliance with the emissions criteria. Staff verifies that PG&E added the appropriate subsections to Schedule S Special Condition 16 and Schedule SB Special Condition 15 to implement the eligibility requirements for treatment as a low variability microgrid standby customer. Staff verifies that the performance standards and emissions standards were addressed according to staff’s guidance. Staff verifies that PG&E incorporated into Form No. 79-1219, Schedule S at Sheet 24, Schedule SB at Sheet 21, the appropriate definition for “capacity reservation amount” that is fully aligned with D.21-07-011, as follows:

“The utility shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, the utility should consider the documentation provided by the customer to satisfy the performance criteria required by this decision.”¹¹

Staff verifies that PG&E implemented the changes to enable the customer attestation to be provided “under penalty of perjury” in Form No. 79-1219, Schedule S at Sheet 23, and Schedule SB at Sheet 20. Staff disagrees with the utility request for an additional 120 days implementation time in its October 13, 2021 advice letter and

⁸ Email of Joyce Steingass to Lisa Wan dated February 22, 2023.

⁹ Advice 6364-E-B, “Second Supplemental: Proposed Modifications Suspending the Capacity Reservation Component For Eligible Microgrid Distributed Technologies - Electric Standby Rate Schedules and Forms Pursuant to Decision 21-07-011”; dated March 16, 2023.

¹⁰ PG&E Schedule S, “Standby Service” submitted Jan 20, 2023; at Sheet 22. PG&E Schedule SB, “Standby Service” submitted January 20, 2023, at sheet 19.

¹¹ D.21-07-011 issued July 16, 2021; at page 47.

denies this request because D.21-07-011 did not allow such a delay. Furthermore, more than 636 days have elapsed since D.21-07-011 was issued, and more than 546 days have already elapsed since the advice letter filing, providing more than adequate time to prepare. In lieu of the requested 120 days, staff agrees to allow 45 days after the effective date of this disposition letter to accomplish implementation.

Staff approves PG&E Advice Letter 6364-E, Supplemental Advice Letter 6364-E-A, and Supplemental Advice Letter 6364-E-B effective June 16, 2023. Staff grants PG&E 45 days after this effective date to accomplish implementation.

March 16, 2023

Advice 6364-E-B

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Second Supplemental: Proposed Modifications Suspending the Capacity Reservation Component For Eligible Microgrid Distributed Technologies - Electric Standby Rate Schedules and Forms Pursuant to Decision 21-07-011

Purpose

Pursuant to Ordering Paragraph (“OP”) 2 of Decision (“D.”) 21-07-011 (“Decision”) and requests from the California Public Utilities Commission’s (Commission or CPUC) Energy Division staff, Pacific Gas and Electric Company (“PG&E”) hereby submits additional modifications to its applicable electric standby rate schedules and companion agreements. The revised tariff sheets are listed on Attachment 1 and are attached hereto. The purpose of this advice letter is to supplement, in part, PG&E’s Advice Letters (“AL”) 6364-E and 6364-E-A.

PG&E’s AL 6364-E-B seeks to modify PG&E’s Standby tariff, Schedule S and SB and Form 79-1219 - Low Variability Microgrid Standby Customers Provision Service, to fully align with the Commission’s order in Decision 21-07-011 Ordering Paragraph 2.

The modifications are:

1. Revise the definition of capacity reservation amount to state: “PG&E shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, PG&E will consider the documentation provided by the customer to satisfy the performance criteria required by this Special Condition.”
2. Include in the customer’s attestation to state “under penalty of perjury”.

This supplemental advice letter does not change the substance of ALs 6364-E and 6364-E-A except as provided herein.

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 February 9, 2021, the Assigned Commissioner issued an Amended Scoping Memo and Ruling for Track 3 of the proceeding. The Amended Scoping Memo and Ruling focused on whether to waive or reduce standby service charges in exchange for the value that microgrids may offer. Parties were directed to file opening and reply comments to a series of questions that were included as an attachment to the Amended Scoping Memo and Ruling.

On July 15, 2021, the Commission adopted D.21-07-011, which suspends the CRC of utility standby charges for eligible microgrids that meet California Air Resources Board (“CARB”) air pollution standards for distributed generation, among other requirements. Specifically, D.21-07-011 provides that the suspension of the CRC of the standby charge is limited to specific eligibility and microgrid performance requirements.

In AL 6364-E-A, PG&E provides the following additional information:

- Change to 45 days in lieu of the requested 120 days, after the Commission approval, for utility implementation.
- Add a definition of “performance standards” and “emissions standards” using a similar approach as PG&E stated in PG&E AL 6364-E.
- Provide by compliance filing to the Energy Division compliance filing electronic mailbox, the annual emissions report received from the customer, under the applicable terms/conditions of the applicable local air district permit.
- Add conditions that in the event the annual emissions report shows that customer facilities are not in compliance with the emissions standards required by the local air district permit, suspend the rate schedule, allowing time to reapply.

On July 12, 2022, PG&E received further clarification that the investor-owned utilities (“IOUs”) should provide by periodic compliance filing to the CPUC Energy Division electronic mailbox the following: (1) initial validation of emissions and performance as a baseline, and (2) recurring validation of emissions standards and performance standards (low variability). The Energy Division stated that for administrative ease and consistency, the compliance filings can be submitted based on the schedule that the IOUs proposed.¹

¹ The performance standard certification will be submitted by the Microgrid customers on January 31 and July 31 of every year. Accordingly, the IOUs proposed to submit the performance standard certification received the following month. As for the emission standard report, the IOUs proposed to submit the emissions standard report received from the Microgrid customers on January 31 annually.

Tariff Revisions

Pursuant to the Energy Division's request to supplement AL 6364-E, PG&E proposes the following additional modifications to its tariffs.

Implementation Timeline

In lieu of the originally requested 120 days, PG&E requests a shortened period of 45 days after the Commission approval.

Revision to Special Condition in Schedules S and SB

PG&E proposes to add the following subsection (f) to Schedule S Special Condition 16 and Schedule SB Special Condition 15 - Documentation required for Customer to demonstrate eligibility for treatment as a Low Variability Microgrid Standby Customer.

For demonstrating ongoing compliance with the first emissions criteria and Form 79-1219, the customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:

1. the annual emissions report the customer transmits to the customer's local air district;
2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment; or
3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.

Electric Form 79-285

PG&E does not propose additional changes to Form 79-285 - Special Agreement for Electrical Standby Service.

Electric Form 79-1219

PG&E proposes to add the following in the new application, *Form 79-1219 – Low Variability Microgrid Standby Customer Application for Standby Waiver Per Special Condition 16 of Schedule S and Special Condition 15 of Schedule SB.*

2. Semi-annual and Annual Performance Standard Certification

For demonstrating compliance with the Microgrid performance criteria, PG&E will accept either: (1) independently verified, reputable third-party bench test data over a shorter time period that when extrapolated would meet the performance standards adopted in CPUC Decision 21-07-011; or (2) actual, real-time operating performance data from substantially similar equipment demonstrating that it meets the performance standards adopted by D.21-07-011. Additionally, PG&E will accept actual real-time operating performance data documenting that the Low Variability Microgrid Standby Customer's operation of the Microgrid continues to comply with the Microgrid performance standard semi-annually thereafter. Customers designated as Low Variability Microgrid Standby Customers will need to submit the semi-annual third-party certification by January 31 and July 31 each year for the period July-December and January-June, respectively. The performance standards certification or report received from a Low Variability Microgrid Standby Customer will be submitted by PG&E to the CPUC's Energy Division via compliance filing (i.e., Energy Division electronic mailbox) semiannually by February 28 and August 31. Failure to maintain semi-annual certification of the microgrid performance standards shall result in immediate termination from the Capacity Reservation Charge (CRC) suspension. A Customer terminated as being a Low Variability Microgrid Standby Customer due to failure to submit proper recertification documentation in a timely manner will be eligible to re-apply for suspension of the CRC no earlier than one year from termination by PG&E.

2. Emissions Certification

For demonstrating ongoing compliance with the first emissions criteria the customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:

1. the annual emissions report the customer transmits to the customer's local air district;
2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment; or
3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.

Tier Designation

Pursuant to OP 2 of D.21-07-011, this supplemental advice letter is submitted with a Tier 2 designation.

Protests

Pursuant to GO 96-B, General Rule 7.5.1., PG&E request to maintain the original protest and comment period designated in Advice Letter 6364-E-A and not reopen the protest period.

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 2 of D.21 07-011, this advice letter is submitted with a Tier 2 designation. Advice 6364-E requests that it become effective on November 21, 2021, 30 calendar days after the date submitted. Because Advice 6364-E has been suspended beyond that date, PG&E requests that the tariff modifications made in Advice 6364-E and 6364-E-A be effective upon approval of the advice letter.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for 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

Attachments:

Attachment 1: Clean Tariffs

Attachment 2: Redline Tariff Revisions

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 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) #: 6364-E-B

Tier Designation: 2

Subject of AL: Second Supplemental: Modifications to Electric Standby Rate Schedules and Forms Pursuant to Decision 21-07-011

Keywords (choose from CPUC listing): Compliance, Standby Service

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-07-011

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:

No. of tariff sheets: 10

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. |
|-------------------------|---|---------------------------------------|
| 55752-E | Electric Sample Form No. 79-1219 Low Variability Microgrid Standby Customer Application for Standby Waiver Per Special Condition 16 of Schedule S and Special Condition 15 of Schedule SB Sheet 1 | |
| 55753-E | ELECTRIC SCHEDULE S STANDBY SERVICE Sheet 23 | |
| 55754-E | ELECTRIC SCHEDULE S STANDBY SERVICE Sheet 24 | |
| 55755-E | ELECTRIC SCHEDULE SB STANDBY SERVICE Sheet 20 | |
| 55756-E | ELECTRIC SCHEDULE SB STANDBY SERVICE Sheet 21 | |
| 55757-E | ELECTRIC TABLE OF CONTENTS Sheet 1 | 55722-E |
| 55758-E | ELECTRIC TABLE OF CONTENTS Sheet 6 | 55697-E |
| 55759-E | ELECTRIC TABLE OF CONTENTS Sheet 30 | 52256-E |
| 55760-E | ELECTRIC TABLE OF CONTENTS Sheet 31 | 53592-E |
| 55761-E | ELECTRIC TABLE OF CONTENTS Sheet 32 | 53128-E |



Electric Sample Form No. 79-1219

Sheet 1

Low Variability Microgrid Standby Customer Application for Standby Waiver Per Special Condition 16 of
Schedule S and Special Condition 15 of Schedule SB

**Please Refer to Attached
Sample Form**

(Continued)

Advice 6364-E-B
Decision D.21-07-011

Issued by
Meredith Allen
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

March 16, 2023



LOW VARIABILITY MICROGRID STANDBY CUSTOMER APPLICATION FOR STANDBY WAIVER PER SPECIAL CONDITION 16 OF SCHEDULE S AND SPECIAL CONDITION 15 OF SCHEDULE SB

Microgrid Customer Name¹: _____

Service Address:

Street: _____

City/Zip Code: _____

PG&E project ID: _____ and/or

PG&E electric service account #: _____

Microgrid Customer operates a microgrid interconnected under Rule 21 and under one of PG&E's retail tariffs with generation and storage resources that meet the following performance standards, including resources that use natural gas as a fuel, and meets the following operating and emissions criteria:

Operating Criteria:

1. Microgrid has a Capacity Factor² of greater than 85 percent or Self-Supply Factor³ greater than 85 percent and;
2. Availability of the microgrid is greater than 95 percent where Availability is defined as the number of annual hours a resource is able to produce electricity divided by the total hours in a year.

Note: For demonstrating compliance with this **operating criteria**, PG&E accepts credible, publicly available independently verified third-party initial bench test data or actual real-time operational performance data from substantially similar equipment at the time of interconnection application and independent, third-party certification of performance data documenting that the microgrid customers operation of the project continues to comply with the performance standard semi-annually thereafter.

Does the resource comply with BOTH criteria above? Yes _____; No _____. Please attach evidence of compliance.

If 'No' then not qualified for Reservation Capacity suspension.

¹ Low Variability Microgrid Standby Customer definition and eligibility requirements are described in California Public Utilities Commission Decision (D.)D.21-07-011.

² Capacity Factor is defined as the ratio of energy actually produced by a generating unit to the maximum amount of energy it could produce over the course of a year.

³ Self-Supply Factor is defined as the ratio of electricity actually produced by the Customer's Microgrid to the total amount of electricity consumed at the Customer's site, regardless of source, over the course of a year.

† Information collected on this application is handled in accordance with PG&E's Privacy Policy.
The Privacy Policy is available at pge.com/privacy.

LOW VARIABILITY MICROGRID STANDBY CUSTOMER APPLICATION FOR STANDBY WAIVER PER SPECIAL CONDITION 16 OF SCHEDULE S AND SPECIAL CONDITION 15 OF SCHEDULE SB

Emissions Criteria:

1. Each non-Renewable Resource⁴ within a microgrid shall individually comply with the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation, regardless of if the resource is required to obtain certification, pursuant to the California Air Resources Board (CARB) distributed generation program;

Does the resource comply? Yes _____; No _____. Please attach evidence of compliance⁵.

If 'No' then not qualified for Reservation Capacity suspension.

2. Each non-Renewable Resource within a microgrid shall have the technical capacity to operate using at least one renewable fuel, such as, but not limited to, renewable natural gas, biogas, and green hydrogen by at the time of application for the suspension.

Does resource operate using at least one renewable fuel? Yes _____; No _____. Please attach evidence of compliance⁶. If 'No' see below.

If "No" then Microgrid Customer must commit at the time of this application to convert to and exclusively use renewable fuels, as reasonably feasible and practicable, by December 31, 2030. Additionally, Microgrid customer must submit the following information to the PG&E on their progress to transitioning to renewable fuels:

- a) status of renewable fuel use by percentage at the time of the report and
- b) activities under way for procurement of renewable fuels for all use by the microgrid by December 31, 2030. **Customer must submit this report to PG&E by January 1, 2025.**

3. Semi-annual and Annual Performance Standard Certification

For demonstrating compliance with the Microgrid performance criteria, PG&E will accept either: (1) independently verified, reputable third-party bench test data over a shorter time period that when extrapolated would meet the performance standards adopted in CPUC Decision 21-07-011; or (2) actual, real-time operating performance data from substantially similar equipment demonstrating that it meets the performance standards adopted by D.21-

⁴ Non-Renewable Resources are defined as a resource that is not renewable pursuant to the latest version of the California Energy Commission's (CEC's) Renewables Portfolio Standard (RPS) Eligibility Guidebook and the Overall Program Guidebook.

⁵ Evidence of compliance is an independently verified, reputable third-party bench test data meeting the first emissions criteria stated above or certification from CARB.

⁶ Evidence of compliance is the manufacturer's credible documentation of the ability of the equipment to operate using one or more renewable fuels while meeting all applicable performance standards.



LOW VARIABILITY MICROGRID STANDBY CUSTOMER APPLICATION FOR STANDBY WAIVER PER SPECIAL CONDITION 16 OF SCHEDULE S AND SPECIAL CONDITION 15 OF SCHEDULE SB

07-011. Additionally, PG&E will accept actual real-time operating performance data documenting that the Low Variability Microgrid Standby Customer's operation of the Microgrid continues to comply with the Microgrid performance standard semi-annually thereafter. Customers designated as Low Variability Microgrid Standby Customers will need to submit the semi-annual third-party certification by January 31 and July 31 each year for the period July-December and January-June, respectively. The performance standards certification or report received from a Low Variability Microgrid Standby Customer will be submitted by PG&E to the CPUC's Energy Division via compliance filing (i.e., Energy Division electronic mailbox) semiannually by February 28 and August 31. Failure to maintain semi-annual certification of the microgrid performance standards shall result in immediate termination from the Capacity Reservation Charge (CRC) suspension. A Customer terminated as being a Low Variability Microgrid Standby Customer due to failure to submit proper recertification documentation in a timely manner will be eligible to re-apply for suspension of the CRC no earlier than one year from termination by PG&E.

4. Emissions Certification

For demonstrating ongoing compliance with the first emissions criteria [on p. 45 of **D.21-07-011** stated in both Special Condition 16 in Schedule S and Special Condition 15 in Schedule SB], the customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:

1. the annual emissions report the customer transmits to the customer's local air district;
2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment; or
3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.



LOW VARIABILITY MICROGRID STANDBY CUSTOMER APPLICATION FOR STANDBY WAIVER PER SPECIAL CONDITION 16 OF SCHEDULE S AND SPECIAL CONDITION 15 OF SCHEDULE SB

Demand Assurance Amount

Billing: For any month in which the Low Variability Microgrid Standby Customer's maximum created demand is below the Capacity Reservation Amount (kW), defined below, the Low Variability Microgrid Standby Customer will pay no Standby Reservation Capacity Charge. For any month in which the customer's maximum created demand exceeds the Capacity Reservation Amount, the microgrid customer will pay a Demand Assurance Amount which is defined as two times the Standby Reservation Capacity Charge.

Capacity Reservation Amount for this special condition: PG&E shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, PG&E will consider the documentation provided by the customer to satisfy the performance criteria required by this Special Condition.

Microgrid Customer agrees to the conditions set forth in this application.

Signed: _____

Name: _____

Title: _____

Date: _____



**ELECTRIC SCHEDULE S
STANDBY SERVICE**

Sheet 23

SPECIAL
CONDITIONS:
(Cont'd.)

16. LOW VARIABILITY MICROGRID STANDBY CUSTOMER ELIGIBILITY
(Cont'd)

(N)

Documentation required for Customer to demonstrate eligibility for treatment as a Low Variability Microgrid Standby Customer, consistent with the following (Cont'd):

- a. The customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:
 - 1. the annual emissions report the customer transmits to the customer's local air district;
 - 2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment; or
 - 3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.

Failure to maintain semi-annual certification of the microgrid performance standards to PG&E shall result in immediate termination from the standby charge suspension.

(N)

(Continued)

Advice 6364-E-B
Decision D.21-07-011

Issued by
Meredith Allen
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

March 16, 2023



**ELECTRIC SCHEDULE S
STANDBY SERVICE**

Sheet 24

SPECIAL
CONDITIONS:
(Cont'd.)

16. LOW VARIABILITY MICROGRID STANDBY CUSTOMER ELIGIBILITY
(Cont'd)

(N)

Agreement: Customers participating in this provision must sign PG&E's Special Agreement for Electrical Standby Service (Form 79-285).

Verification: Information provided by the customer is subject to verification by PG&E. Refusal or failure of a customer to provide eligibility information upon request by PG&E in the form of written approval or certification by PG&E shall delay the provisions of service under Special Condition 15.

Billing: For any month in which the microgrid customer's maximum created demand is below the Capacity Reservation Amount (kW), defined below, the microgrid customer will pay no Standby Reservation Capacity Charge. For any month in which the customer's maximum created demand exceeds the Capacity Reservation Amount, the microgrid customer will pay a Demand Assurance Amount defined as two times the Standby Reservation Capacity Charge.

Capacity Reservation Amount: PG&E shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, PG&E will consider the documentation provided by the customer to satisfy the performance criteria required by this Special Condition.

Metering: PG&E Metering employed to bill the microgrid account under the provisions of this Special Condition, Low Variability Microgrid Standby Customer, will be at a service point behind which the microgrid is formed.

Microgrid customer is required to provide, own, install and maintain all facilities necessary to accommodate any metering equipment specified by PG&E, including but not limited to net generation output metering (NGOM), and data monitoring equipment. Data from these meters shall provide, at a minimum, monthly values to validate calculations for the operating performance requirement of this schedule S.

(N)



**ELECTRIC SCHEDULE SB
STANDBY SERVICE**

Sheet 20

SPECIAL
CONDITIONS:
(Cont'd.)

15. LOW VARIABILITY MICROGRID STANDBY CUSTOMER (Cont'd)

(N)

Documentation required for Customer to demonstrate eligibility for treatment as a Low Variability Microgrid Standby Customer, consistent with the following (Cont'd):

- a. For demonstrating compliance with the third emissions criterion stated above, language stating the Customer's commitment for its microgrid to use renewable fuel by December 31, 2030, if reasonably practicable and feasible. Customer must submit a progress report to PG&E on their activities to meet this commitment by January 1, 2025.
- b. The customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:
 - 1. the annual emissions report the customer transmits to the customer's local air district;
 - 2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment; or
 - 3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.

Failure to maintain semi-annual certification of the microgrid performance standards to PG&E shall result in immediate termination from the standby charge suspension.

(N)

(Continued)

Advice 6364-E-B
Decision D.21-07-011

Issued by
Meredith Allen
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

March 16, 2023



**ELECTRIC SCHEDULE SB
STANDBY SERVICE**

Sheet 21

SPECIAL
CONDITIONS:
(Cont'd.)

15. LOW VARIABILITY MICROGRID STANDBY CUSTOMER (Cont'd)

(N)

Agreement: Customers participating in this provision must sign PG&E's Special Agreement for Electrical Standby Service (Form 79-285).

Verification: Information provided by the customer is subject to verification by PG&E. Refusal or failure of a customer to provide eligibility information upon request by PG&E in the form of written approval or certification by PG&E shall delay the provisions of service under Special Condition 15.

Billing: For any month in which the microgrid customer's maximum created demand is below the Capacity Reservation Amount (kW), defined below, the microgrid customer will pay no Standby Reservation Capacity Charge. For any month in which the customer's maximum created demand exceeds the Capacity Reservation Amount, the microgrid customer will pay a Demand Assurance Amount defined as two times the Standby Reservation Capacity Charge.

Capacity Reservation Amount: PG&E shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, PG&E will consider the documentation provided by the customer to satisfy the performance criteria required by this Special Condition.

Metering: PG&E Metering employed to bill the microgrid account under the provisions of this Special Condition, Low Variability Microgrid Standby Customer, will be at a service point behind which the microgrid is formed. Microgrid customer is required to provide, own, install and maintain all facilities necessary to accommodate any metering equipment specified by PG&E, including but not limited to, net generation output metering (NGOM), and data monitoring equipment. Data from these meters shall provide, at a minimum, monthly values to validate calculations for the operating performance requirement of this schedule SB.

Microgrid customer is required to provide, own, install and maintain all facilities necessary to accommodate any metering equipment specified by PG&E, including but not limited to, net generation output metering (NGOM), and data monitoring equipment. Data from these meters shall provide, at a minimum, monthly values to validate calculations for the operating performance requirement of this schedule SB.

(N)



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Advice 6364-E-B
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Issued by
Meredith Allen
Vice President, Regulatory Affairs

Submitted
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Resolution

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Attachment 2

Redline Tariff Revisions



**ELECTRIC SCHEDULE S
STANDBY SERVICE**

Sheet 20

SPECIAL
CONDITIONS:
(Cont'd.)

16. LOW VARIABILITY MICROGRID STANDBY CUSTOMER ELIGIBILITY
(Cont'd)

Documentation required for Customer to demonstrate eligibility for treatment as a Low Variability Microgrid Standby Customer, consistent with the following (Cont'd):

- f. The customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:
 - 1. the annual emissions report the customer transmits to the customer's local air district;
 - 2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment; or
 - 4.3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.

Failure to maintain semi-annual certification of the microgrid performance standards to PG&E shall result in immediate termination from the standby charge suspension.



**ELECTRIC SCHEDULE S
STANDBY SERVICE**

Sheet 20

SPECIAL
CONDITIONS:
(Cont'd.)

16. LOW VARIABILITY MICROGRID STANDBY CUSTOMER ELIGIBILITY
(Cont'd)

Agreement: Customers participating in this provision must sign PG&E's Special Agreement for Electrical Standby Service (Form 79-285).

Verification: Information provided by the customer is subject to verification by PG&E. Refusal or failure of a customer to provide eligibility information upon request by PG&E in the form of written approval or certification by PG&E shall delay the provisions of service under Special Condition 15.

Billing: For any month in which the microgrid customer's maximum created demand is below the Capacity Reservation Amount (kW), defined below, the microgrid customer will pay no Standby Reservation Capacity Charge. For any month in which the customer's maximum created demand exceeds the Capacity Reservation Amount, the microgrid customer will pay a Demand Assurance Amount defined as two times the Standby Reservation Capacity Charge.

Capacity Reservation Amount: PG&E shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, PG&E will consider the documentation provided by the customer to satisfy the performance criteria required by this Special Condition.

Metering: PG&E Metering employed to bill the microgrid account under the provisions of this Special Condition, Low Variability Microgrid Standby Customer, will be at a service point behind which the microgrid is formed.

Microgrid customer is required to provide, own, install and maintain all facilities necessary to accommodate any metering equipment specified by PG&E, including but not limited to net generation output metering (NGOM), and data monitoring equipment. Data from these meters shall provide, at a minimum, monthly values to validate calculations for the operating performance requirement of this schedule S.



**ELECTRIC SCHEDULE SB
STANDBY SERVICE**

Sheet 18

SPECIAL
CONDITIONS:
(Cont'd.)

15. LOW VARIABILITY MICROGRID STANDBY CUSTOMER (Cont'd)

Documentation required for Customer to demonstrate eligibility for treatment as a Low Variability Microgrid Standby Customer, consistent with the following (Cont'd):

- e. For demonstrating compliance with the third emissions criterion stated above, language stating the Customer's commitment for its microgrid to use renewable fuel by December 31, 2030, if reasonably practicable and feasible. Customer must submit a progress report to PG&E on their activities to meet this commitment by January 1, 2025.
- f. The customer shall annually, upon both application and renewal, provide the utilities with either: (a) certification from the CARB that the microgrid resource receiving a standby charge exemption continues to be certified, or has been re-certified, by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation; or (b) independently verified, reputable third-party bench test data demonstrating that the resource continues to meet the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification Code of Regulations, or any successor regulation ("CARB Emissions Standards"), regardless of if the resource is required to obtain certification. To satisfy (b), the customer may provide to the IOU:

 - 1. the annual emissions report the customer transmits to the customer's local air district;
 - 2. the same information requested of the customer by the Air Pollution Control Officer regarding emissions from the equipment;
or
 - 3. an attestation under penalty of perjury that the periodic emissions information they are providing is accurate.

Failure to maintain semi-annual certification of the microgrid performance standards to PG&E shall result in immediate termination from the standby charge suspension.

(Continued)



**ELECTRIC SCHEDULE SB
STANDBY SERVICE**

Sheet 18

SPECIAL
CONDITIONS:
(Cont'd.)

15. LOW VARIABILITY MICROGRID STANDBY CUSTOMER (Cont'd)

Agreement: Customers participating in this provision must sign PG&E's Special Agreement for Electrical Standby Service (Form 79-285).

Verification: Information provided by the customer is subject to verification by PG&E. Refusal or failure of a customer to provide eligibility information upon request by PG&E in the form of written approval or certification by PG&E shall delay the provisions of service under Special Condition 15.

Billing: For any month in which the microgrid customer's maximum created demand is below the Capacity Reservation Amount (kW), defined below, the microgrid customer will pay no Standby Reservation Capacity Charge. For any month in which the customer's maximum created demand exceeds the Capacity Reservation Amount, the microgrid customer will pay a Demand Assurance Amount defined as two times the Standby Reservation Capacity Charge.

Capacity Reservation Amount: PG&E shall set the capacity reservation amount at the maximum expected demand in excess of the demand regularly served by the utility based on the best available information. In determining the maximum expected demand, PG&E will consider the documentation provided by the customer to satisfy the performance criteria required by this Special Condition.

Metering: PG&E Metering employed to bill the microgrid account under the provisions of this Special Condition, Low Variability Microgrid Standby Customer, will be at a service point behind which the microgrid is formed. Microgrid customer is required to provide, own, install and maintain all facilities necessary to accommodate any metering equipment specified by PG&E, including but not limited to, net generation output metering (NGOM), and data monitoring equipment. Data from these meters shall provide, at a minimum, monthly values to validate calculations for the operating performance requirement of this schedule SB.

Microgrid customer is required to provide, own, install and maintain all facilities necessary to accommodate any metering equipment specified by PG&E, including but not limited to, net generation output metering (NGOM), and data monitoring equipment. Data from these meters shall provide, at a minimum, monthly values to validate calculations for the operating performance requirement of this schedule SB.

(Continued)

Advice 6603-E-A
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

May 31, 2022
June 1, 2022

**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.
Braun Blaising Smith Wynne, P.C.
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
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
Downey Brand LLP
Dish Wireless L.L.C.

East Bay Community Energy Ellison
Schneider & Harris LLP
Engineers and Scientists of California

GenOn Energy, Inc.
Green Power Institute
Hanna & Morton
ICF

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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
McClintock IP
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.

Resource Innovations

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
Stoel Rives LLP

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