

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6394E
As of December 2, 2021

Subject: Implementation of NEM-enrolled customers to the NEM Successor tariff pursuant to Decision (D.) 14-03-041

Division Assigned: Energy

Date Filed: 11-05-2021

Date to Calendar: 11-10-2021

Authorizing Documents: D1403041

Disposition:	Accepted
Effective Date:	12-05-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



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

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November 5, 2021

Advice 6394-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Implementation of NEM-enrolled customers to the NEM Successor tariff pursuant to Decision (D.) 14-03-041

Purpose

Pacific Gas & Electric Company (PG&E) requests approval to implement transitions for a limited number of Net Energy Metering (NEM) Transition Eligible Customers after the expiration of their designated NEM Transition Period that is defined in the PG&E Tariff “Electric Schedule NEM”.

PG&E recently completed building an automated solution to transition NEM-enrolled customers to the applicable NEM successor tariff¹. Due to delay in implementing this automated process, there are NEM Transition Eligible Customers whose transitions were not completed on their appropriate transition date. PG&E will initiate transitions for these customers starting at the end of November 2021 once the automated solution is fully operationalized. Additionally, PG&E is proposing that the transition for each NEM Transition eligible customer occurs on the customer’s first True-Up date after the IT automated solution is operational.

Background

Decision (D.) 14-03-041 — pursuant to Public Utilities Code Section 2827.1(b)(6) — established the timing and rules for the Investor-Owned Utilities to transition customers enrolled on the original Net Energy Metering Tariffs (NEM) to the applicable NEM successor tariff. D.14-03-041 defined that customers enrolled on NEM may remain on the Tariff for up to 20 years from the original date of Permission to Operate (PTO), their legacy “NEM Transition Period”. After a customer’s NEM Transition Period ends, the customer will be transitioned to the applicable NEM successor tariff.

¹ The current applicable NEM successor tariff is PG&E’s “Electric Schedule NEM2”. The CPUC is currently considering an additional successor tariff through the “Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision D.16-01-044, and to Address Other Issues Related to Net Energy Metering” (R.20-08-020)

Per Sheet 2 of the NEM Tariff, the date on which NEM Transition Eligible Customers should be transitioned to the current applicable NEM successor tariff is defined as:

NEM Transition Eligible Customers, NEMV Transition Eligible Customers and NEMVMASH Transition Eligible Customers (as defined in this tariff, the NEMV tariff and NEMVMASH tariff, respectively) may remain on this tariff from (i) the date of the issuance of the original "permission to operate" (PTO) letter until (ii) the date of the customer's first Energy True Up in the twenty first (21st) year

In 2019 PG&E piloted a process to manually transition a limited group of NEM Transition Eligible Customers (who installed and interconnected their systems before the year 2000) to their appropriate NEM successor tariff.

Challenges with the manual process, and recognition of the need to prepare for significantly higher volumes of NEM Transition Eligible Customers in coming years (see Figure 1), made clear the need for an automated, consistent, and more cost-effective solution for transitioning NEM Transition Eligible Customers to the applicable NEM successor tariff. The automated IT solution will eliminate manual work and ensure customers are transitioned at the correct time with appropriate notifications.

As part of the development of the automated solution, PG&E has established the dates by which NEM Transition Eligible customers' 20-year enrollment period on the NEM Tariff expires. This process was complicated by varying systems and approaches to collecting PTO dates over the past 25 years of customer interconnection and enrollment on NEM in PG&E's service area. During this process, PG&E has identified a group of NEM Transition Eligible customers whose transition has been delayed, and we anticipate delaying the transition of an additional group of customers until the automated solution is operational. We anticipate initiating transitions by the end of November 2021. The expected total number of impacted customers who will have had their transition delayed is approximately 140 customers, which represent 0.05% of the total NEM1-enrolled customers (279,276 total customers) (see Tables 1 and 2).²

PG&E believes this group of customers should have their transitions deferred until their next true-up date. We want to avoid "forced" true-ups before customers have completed their normal annual true-up cycle so that customers will not lose credits they may be able to apply to future NEM charges. We also want to ensure that customers receive notifications through the automated solution which will send customers 90, 60, and 30 days letters about their pending transition to the applicable NEM successor tariff. Additional channels for notifications will include account notification updates online, and information for customers who call PG&E to manage their bill. PG&E believes this is a better operational and customer experience approach that will allow for a consistent transition process for remaining NEM Transition Eligible Customers.

² In this submittal, we will sometimes refer to customers taking service on PG&E's Electric Schedule NEM as "NEM1" customers for greater clarity.

Discussion

Due to the complexity of designing an automated, and replicable, billing solution for NEM Transition Eligible Customers, including designs to update the solution for potential future successor tariff(s), PG&E's transitioning of a limited group of NEM Transition Eligible Customers has been delayed. PG&E has identified the total number of customers who were eligible for transition that we anticipate will not transition before the automated solution is released by the end of November 2021. Table 1 below summarizes the number of customers who were not transitioned, grouped by the year that their NEM Transition Period eligibility expired. In total, approximately 140 customers will experience delayed transitions.

Table 1. Number of NEM Transition Eligible Customers not Transitioned by Year

Year	NEM Transition Eligible Customers	Total NEM1 Enrolled
2018	2	279,276
2019	34	
2020	55	
2021	~49*	
Total	140	

**Forecasted Total (Jan 2021 – Nov 2021)*

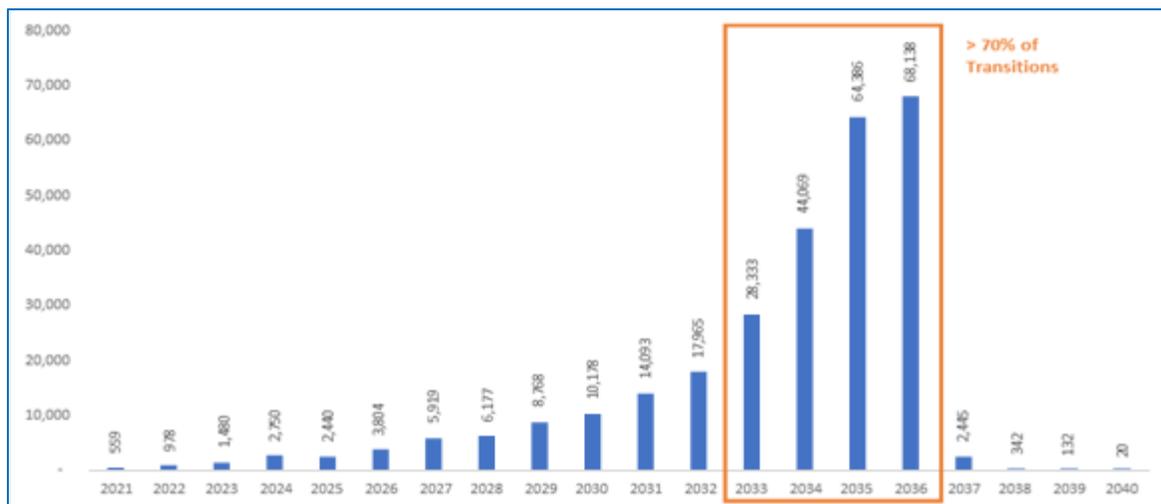
Table 2 summarizes the percent of total NEM Eligible Customers who should have, but have not yet, transitioned in the years 2018 through October 2021.

Table 2. Percent of NEM Transition Eligible Customers not Transitioned by Year

Year	% of Total NEM1 Enrolled Customers
2018	0.0007%
2019	0.0121%
2020	0.0197%
2021	0.0175%
Total	0.0500%

Figure 1 below shows the number of NEM Transition Eligible Customers whose 20-year NEM enrollment expires each year over the next 20 years. The chart illustrates the need to establish an automated solution as the number of NEM Transition Eligible Customers goes from dozens in recent years to hundreds, thousands, and then tens of thousands of customers per year.

Figure 1. Number of Customer Service Points with Expiring 20-year NEM1 Enrollment by Year.



PG&E wants to have the automated solution implemented and operational before the expected ramp up, and year-to-year increase, of transitions.

Process Proposal

For the NEM Transition Eligible Customers whose transitions have not been executed, PG&E is proposing to transition each customer on their first true-up date after the IT automated solution is operational. This will ensure:

1. No “forced” true-ups are performed
2. Customers receive all notifications and alerts regarding the transition
3. No manual efforts to transition the customer (which have a greater potential for error)
4. All remaining NEM Transition Eligible Customers will experience the same transition process

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 November 29, 2021, which is 24 days³ after the date of this submittal. Protests must be submitted to:

³ The 20-day protest period concludes on a holiday, therefore, PG&E is moving this date to the following business day.

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

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

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 advice submittal become effective on regular notice, December 5, 2021 which is 30 calendar days after the date of submittal.

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. 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.



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) #: 6394-E

Tier Designation: 2

Subject of AL: Implementation of NEM-enrolled customers to the NEM Successor tariff pursuant to Decision (D.) 14-03-041

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.14-03-041

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: 12/5/21

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Sidney Bob Dietz II, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

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

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology

Intertie

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