

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6451E
As of July 7, 2022

Subject: PG&E's Tier 3 Advice Letter to Establish its Borrowed Green Tariff Shared Renewables (GTSR) Pool of Projects to Serve GTSR Customers on a Temporary Basis

Division Assigned: Energy

Date Filed: 12-30-2021

Date to Calendar: 12-31-2021

Authorizing Documents: D2112036

Disposition:

Signed

Effective Date:

06-29-2022

Resolution Required: Yes

Resolution Number: E-5218

Commission Meeting Date: None

CPUC Contact Information:

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AL Certificate Contact Information:

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415-973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

December 30, 2021

Advice 6451-E

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

Subject: PG&E's Tier 3 Advice Letter to Establish its Borrowed Green Tariff Shared Renewables (GTSR) Pool of Projects to Serve GTSR Customers on a Temporary Basis

Purpose

Pursuant to Ordering Paragraph 2 in Decision (D.) 21-12-036 (Decision), Pacific Gas & Electric Company (PG&E) hereby submits this Tier 3 advice letter seeking California Public Utilities Commission (Commission) approval to establish its borrowed GTSR pool of projects to serve GTSR customers on a temporary basis until PG&E replaces the borrowed GTSR pool with additional new renewable resources.

Background

Senate Bill 43 enacted the Green Tariff Shared Renewables (GTSR) program to be administered by the three large electrical utilities. D.15-01-051 authorized the implementation of Senate Bill 43, which included the implementation of both the Green Tariff program and the Enhanced Community Renewables program that aim to expand access to renewable energy resources to all customers. The GTSR program has a cap of 600 megawatts (MW) shared amongst the three large electrical utilities with PG&E's share capped at 272 MW.

In 2021, PG&E experienced a surge of customer enrollments in its Green Tariff program (more commonly referred to as PG&E's Solar Choice program), due in large part to updated program rates yielding a discount for many customer classes. The amount of load participating in the GTSR program increased from 35 MW in December 2020 to approximately 230 MW by April 2021, with much of this load attributable to larger non-residential customers. This enrollment exceeds the current 52.75 MW of dedicated resource capacity in PG&E's GTSR program.

In response to this shortfall in GTSR program supply and demand, PG&E submitted an Emergency Petition for Modification on April 30, 2021, requesting Commission authority to use existing Renewables Portfolio Standard (RPS) resources in PG&E's portfolio to supply customers in PG&E's Solar Choice program until new dedicated renewable

resources become available to serve demand in the program. On December 16, 2021, the Commission issued its Decision granting PG&E's request to temporarily use its existing RPS resources towards the GTSR program and imposed an obligation for PG&E to track those resources and bring online new dedicated renewable resources in an expedited timeframe.¹ In addition, PG&E was directed to cease enrolling new GTSR customers until it has first brought new renewable resources online.²

Pursuant to Ordering Paragraph 2 in the Decision, PG&E is required to submit a Tier 3 advice letter within 15 days of the effective date of the Decision to establish its borrowed GTSR pool of projects to serve GTSR customers on a temporary basis. The Decision provides a list of 19 projects identified by Energy Division, which have a combined capacity of 163 MW and are representative of the eligible projects in PG&E's RPS portfolio that meet GTSR program size and location requirements.³ Moreover, the identification of these 19 projects in the Decision is intended to help ensure PG&E does not "cherry-pick" high or low-priced projects and maintain non-participant customer indifference.

Discussion

PG&E evaluated its needs to serve the projected demand of its Solar Choice program for the years 2021 through 2024. PG&E took into consideration expected energy generation from its existing dedicated Solar Choice resources as well as projected generation from the 19 required projects listed in Table 1 of the Decision. PG&E also considered the impacts of the December 2021 supplemental GTSR rate testimony in the 2021 Energy Resource Recovery Account (ERRA) Forecast proceeding which yields a return to a premium rate for most rate classes.

The 19 projects listed by the Commission in Table 1 represent the most recent solar contracts to come online in PG&E's RPS portfolio that also meet the size and location requirements of the Green Tariff program. Utilizing the most recent solar contracts to come online will best ensure ratepayer indifference as these are the resources in PG&E's RPS portfolio which most closely match the GTSR eligible dedicated resources that would have otherwise been procured. Utilizing the most recent solar contracts to come online is also consistent with the ratepayer indifference method outlined in D.15-01-051 for the composition of the interim GTSR resource pool.⁴

PG&E agrees with the Commission that this "starting point" of RPS projects for the borrowed GTSR pool does not "cherry-pick" high or low-priced projects that could have long-term adverse impacts on either GTSR or non-GTSR customers.

¹ Decision, p. 7.

² *Id.*

³ Decision, p. 28.

⁴ D.15-01-051, pp. 39-43.

To ensure that the borrowed GTSR pool has enough energy to serve program demand through 2024, PG&E proposes adding Shafter Solar to the 19 projects identified by the Decision. Shafter Solar is the next most recent solar project to come online that meets the GTSR program requirements. This selection fits the methodology described above that provides for the most recent solar contracts in PG&E's portfolio.

Shafter Solar is a 19.98 MW solar project. Given that the Decision sets a maximum size of 176.15 MW for the borrowed GTSR pool, PG&E will only propose to add 13.15 MW of Shafter Solar to the borrowed GTSR pool. Adding Shafter Solar to fill in the borrowed GTSR pool up to the cap will also minimize the need for further regulatory approvals should demand remain at current levels.

Therefore, pursuant to Ordering Paragraph 2 of the Decision, PG&E identifies the following RPS resources it wishes to use as the borrowed GTSR pool to meet its projected GTSR load:

Proposed Projects for Borrowed GTSR Pool: Project Name	Actual Contract Operating Date	Capacity (MW)	Expected Generation (MWh)
Shafter Solar – RAM 3	6/3/15	13.15	34,599
Bakersfield 111	7/8/15	1.4	1,960
Fresno Cogeneration - Fresno Solar South	10/20/15	1.5	2,100
Fresno Cogeneration - Fresno Solar West	10/20/15	1.5	2,100
Columbia Solar Energy - RAM 2	10/21/15	19	40,600
Greenlight - Sirius Solar Project	10/22/15	0.999	1,399
Morelos del Sol - RAM 3	12/2/15	15	32,630
Woodmere Solar Farm - RAM 4	12/23/15	15	29,998*
ImMODO- Lemoore 1	2/1/16	1.5	2,100
Greenlight - Peacock Solar Project	2/3/16	0.999	1,399
Pristine Sun- 2192 Ramirez	2/11/16	0.5	700
Greenlight - Castor Solar Project	4/7/16	1.5	2,100

CED Corcoran Solar 3, LLC - PV 3	12/1/16	20	49,230
CED Oro Loma Solar Project A - RAM 5	1/26/17	10	25,910
Avenal Solar Project A - RAM 5	1/26/17	7.9	19,710
CED Oro Loma Solar Project B - RAM 5	1/26/17	10	25,910
Avenal Solar Project B - RAM 5	1/26/17	7.9	19,710
Westside Solar, LLC - PV 3	3/13/17	20	55,250
Aspiration Solar G LLC - PV 3	9/26/17	9	23,280
Summer Wheat (FKA San Joaquin 1A - RAM 6)	10/11/18	19.24	29,998*

* Woodmere Solar Farm and Summer Wheat will have part of their output supporting the DAC interim pool.

Additional Considerations

As noted above, the December 2021 supplemental GTSR rate testimony presented in the 2021 ERRR Forecast proceeding yielded a premium rate for most rate classes, including the E-19 rate class that accounts for most of the 2021 new enrollees in the program. At present, PG&E is unsure what magnitude of impact this rate change will have on enrollments in the program.

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 **January 19, 2022**, 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

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).

VI. Effective Date:

PG&E requests that this Tier 3 advice letter submittal become effective upon Commission approval.

VII. Notice:

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list **and the parties on the service list for A.12-01-008, A.12-04-020, and A.14-01-007**. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: A.12-01-008, A.12-04-020, and A.14-01-007



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (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) #: 6451-E

Tier Designation: 3

Subject of AL: PG&E's Tier 3 Advice Letter to Establish its Borrowed Green Tariff Shared Renewables (GTSR) Pool of Projects to Serve GTSR Customers on a Temporary Basis

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.21-12-036

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:

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
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
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