

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



April 15, 2022

Advice Letter 6503-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Joint Investor Owned Utility Proposed Modifications to Electric Rule 21 to Incorporate an Expedited Dispute Resolution Process Pursuant to Resolution ALJ-347 and Assembly Bill 2861.

Dear Mr. Jacobson:

Advice Letter 6503-E-A is effective as of April 14, 2022.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pete Skala".

Pete Skala
Interim Deputy Executive Director for Energy and Climate Policy/
Interim Director, Energy Division, CPUC

March 24, 2022

Advice 6503-E-A

(Pacific Gas and Electric Company ID U 39 E)

Advice 3958-E-A

(San Diego Gas & Electric Company ID U 902 E)

Advice 4723-E-A

(Southern California Edison Company ID U 338 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Joint Investor Owned Utility Proposed Modifications to Electric Rule 21 to Incorporate an Expedited Dispute Resolution Process Pursuant to Resolution ALJ-347 and Assembly Bill 2861

Purpose

The purpose of this advice letter (“AL”) is to propose model shared language for updating Section K (“Dispute Resolution Process”) for Electric Rule 21 and the associated complaint template for Pacific Gas and Electric Company’s (“PG&E”), Southern California Edison Company (“SCE”) and San Diego Gas & Electric Company (“SDG&E”), (collectively, the “Investor-Owned Utilities” or “IOUs”) pursuant to the expedited dispute resolution process laid out in Resolution ALJ-347¹ (“Resolution”) based on Assembly Bill (AB) 2861.²

The Resolution establishes an expedited dispute resolution process that will issue binding determinations to electric distribution grid interconnection disputes based on the recommendation of a technical panel within 60 days of the Commission receiving the Application regarding a particular dispute.

Per March 16th email guidance from Energy Division, this Tier 2 advice letter replaces AL 6503-E/AL3958-E/AL 4723-E in its entirety and incorporates the changes described below in Background Section *March 15, 2022 Energy Division Guidance* below.

¹ Resolution [ALJ-347](#), Adopts an Expedited Interconnection Dispute Resolution Process as Authorized by Assembly Bill 2861 date October 12, 2017, Issued 10/17/2017.

² [AB 2861](#) “An act to add Section 769.5 to the Public Utilities Code, relating to electricity”

Background

Assembly Bill 2861

AB 2861 (Stats. 2016, Ch. 672), signed into law in September 2016, authorizes the California Public Utilities Commission (“CPUC” or “Commission”) to establish an expedited dispute resolution (“EDR”) process.

The EDR process will allow the CPUC to issue binding determinations to electric distribution grid interconnection disputes based on the recommendations of a technical panel.

As summarized in the Resolution, AB 2861 directs the CPUC to:

- Establish an eight-member technical advisory panel, consisting of four members from utilities and four non-utility members. Of the eight-member panel, four panel members will be assigned to review each dispute brought before the Commission and make a recommendation within 30 days to the Executive Director, who then will have 30 days to review the recommendation and prepare an Order resolving the dispute;
- Allow for any interested party to request a review of the Order within ten days, which would require a Resolution on the matter for a vote of the Commission; and
- Appoint a qualified electrical systems engineer with substantial interconnection expertise to advise the director of the Energy Division, and provide adequate staff to assist in resolving interconnection disputes.

Resolution ALJ-347

On May 30, 2017, the CPUC’s Energy Division issued its *Staff Concept Paper for an Expedited Interconnection Dispute Resolution Process* (Exhibit C to the Resolution). Energy Division subsequently prepared a revised proposal, dated September 5, 2017, and titled, “*Staff Proposal for an Expedited Interconnection Dispute Resolution Process*” (which is included as Exhibit B to the Resolution). This was made available for comments from parties. Additionally, comments were incorporated into the September 5, 2017 Staff Proposal, and it was retitled “*Expedited Interconnection Dispute Resolution Process FINAL*” and made Exhibit A³ to the Resolution ALJ-347, that was voted out October 12, 2017.

³ *Exhibit A* is included with Resolution ALJ-347 titled “Expedited Interconnection Dispute Resolution Process FINAL” and is not to be confused with *Attachment A* which is a part of Exhibit A and is titled “CPUC Staff Proposal for an “Interconnection Discussion Forum”

Specifically, the Resolution ordered that:

1. “The Expedited Interconnection Dispute Resolution Process set forth in Exhibit A is adopted.
2. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company must file Tier 2 advice letters to implement the changes to Tariff Rule 21 set forth in Exhibit A within 60 days of the effective date of this ALJ resolution.
3. As part of the Tier 2 advice letter required in ordering paragraph 2, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company must include a draft template for applicants for the expedited process as described in Exhibit A at 9.
4. Energy Division shall evaluate the performance of the Expedited Interconnection Dispute Resolution Process consistent with the evaluation framework described in Exhibit A, Section 3.
5. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company must support the Interconnection Discussion Forum through the in-person attendance of at least one engineering representative from each utility at every quarterly meeting.
6. The Executive Director shall take all necessary steps to provide resources to ensure that the Expedited Interconnection Dispute Resolution Process adopted today may begin accepting applications no later than eight months from the effective date of this ALJ resolution.”

Additionally, the Resolution notes that:

“To be eligible for the Expedited Process, an applicant must demonstrate they have made prior attempts to informally resolve the dispute with the utility using one of the following two procedures:

1. Bilateral negotiations as set forth in Section K.2.a of Rule 21.
2. Expedited bilateral negotiations tracking the steps of Section K.2.a but with the following shortened deadline requirements: upon the applicant notifying the utility of the dispute, the utility shall have 10 business days to prepare its response instead of 21 calendar days, and 15

business days to meet to attempt to resolve the dispute instead of 45 calendar days.”

2018 IOU Advice Letters – Submittal and Withdrawal

Pursuant to Ordering Paragraph 2 of the Resolution, the Resolution was “duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on October 12, 2017,” making that its effective date. Sixty days following that date, i.e., Monday, December 11, 2017, the IOUs each submitted their respective advice letters:

- PG&E submitted Advice Letter 5196-E
- SCE submitted Advice Letter 3714-E
- SDG&E submitted Advice Letter 3160-E

However, around mid-May, 2018,⁴ each IOU based on guidance received asked the CPUC to withdraw their respective advice letters. This withdrawal was acknowledged for each IOU by Edward Randolph Director, Energy Division in a letter to each IOU dated around mid-June, 2018.⁵

Resubmit Joint IOU Advice Letter in 2022

In early 2022, the IOUs were asked to resubmit their modifications to Rule 21 and the Expedited Dispute Resolution Template Form. The IOUs noted minor differences in the Rule 21 language they had submitted in their 2018 advice letters. To facilitate the alignment of the IOUs’ language, the IOUs worked together to resolve their language differences, and now propose in this **Tier 2** advice letter to submit the Rule 21 modifications and dispute template as model language. If this advice letter is approved, each IOU would then submit shortly thereafter a follow-up Tier 1 advice letter incorporating the approved Rule 21 language into their respective Rule 21 tariff and work with the CPUC to make the final dispute template available.

Exhibit A⁶ originally provided for an original implementation time schedule:

- Interconnection Dispute Resolution Panel Assembled* March 31, 2018
- Expedited Process Launched (accepting applications) March 31, 2018

Joint AL 6503-E / AL 3958-E / AL 4723-E was submitted February 18, 2022 by PG&E.

⁴ The date varies slightly for each IOU.

⁵ See each IOU’s posted advice letter on their website, which includes a copy of these withdrawal acknowledgement letters from the CPUC.

⁶ Resolution ALJ-347 Exhibit A, Table 1 on pages 5 and 6.

However, given the change in timetable from the CPUC, the IOUs would request that their final Tier 1 advice letter should only become effective once the Energy Division has finalized the Expedited Dispute Resolution implementation.

Energy Division Guidance

Based on Energy Division guidance, the IOUs are proposing the changes to Attachment A, Clean Model Rule 21 Language. Changes to Attachment A are shown in Blue in Attachment B, Redline Model Rule 21 Language. Of note that that we removed a one-sentence, proposed addition to Rule 21 Section K that gives both the IOU and the disputant the ability to withdraw the dispute from the Expedited Process simply by requesting that the dispute be considered as a formal Complaint.

Also, the former “Draft Request Form Template” was replaced by the attached “EIDR_IntakeForm_Final.pdf” as Attachment C. This attachment aligns with the processes that we have established since 2017 to facilitate the Expedited Process.

Tariff Revisions

Pursuant to Ordering Paragraph 2 of the Resolution, the IOUs include the proposed clean model Rule 21 language as **Attachment A**. Redline changes to the proposed model Rule 21 language is included as **Attachment B**.

Pursuant to Ordering Paragraph 3 of the Resolution, the IOUs include the “EIDR_IntakeForm_Final.pdf” as **Attachment C**.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 13, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to the IOUs via E-mail at the addresses shown below on the same date it is electronically delivered to the Commission:

For PG&E: Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

For SDG&E: Greg Anderson
Regulatory Tariff Manager
E-mails: GAnderson@sdge.com; and
SDGETariffs@sdge.com

For SCE: Shinjini C. Menon
Managing Director, State Regulatory Operations
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Email: Karyn.Gansecki@sce.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 and 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 letter become effective on the date the CPUC completes its implementation of the expedited dispute process.

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 lists for R.20-08-020 (NEM3), and R.17-07-007 (Rule 21). 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/>.



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: 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) #: 6503-E-A, et al.

Tier Designation: 2

Subject of AL: Supplemental: Joint Investor-Owned Utility Proposed Modifications to Electric Rule 21 to Incorporate an Expedited Dispute Resolution Process Pursuant to Resolution ALJ-347 and Assembly Bill 2861

Keywords (choose from CPUC listing): Compliance, Rule 21

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution ALJ-347

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: PGE 5196-E, SDGE 3160-E, SCE 3714-E

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: 0

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

March 24, 2022

Attachment A

Clean Model Rule 21 Language

ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

C. DEFINITIONS (Cont'd.)

...

Expedited Interconnection Dispute Resolution Panel Process (“Expedited Process”): A process authorized by AB 2861 in which the CPUC’s Executive Director issues binding determinations on interconnection disputes within 60 days of receiving the dispute. Determinations are made based on the recommendations of the Interconnection Dispute Resolution Panel, pursuant to Resolution ALJ-347. See Section K.

ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

F. REVIEW PROCESS FOR INTERCONNECTION REQUESTS (Cont'd.)

1. OVERVIEW OF THE INTERCONNECTION REVIEW PROCESS (Cont'd.)

d. Compliance with Timelines (Cont'd.)

- (i) Contact the ombudsman designated by Distribution Provider;
- (ii) If the Distribution Provider ombudsman [EACH IOU TO INSERT THEIR OMBUDSMAN EMAIL ADDRESS] is unable to resolve the dispute within ten (10) Business Days, Applicant may either:
 - a) Contact the Consumer Affairs Branch (CAB) at the Commission.
 - b) Upon mutual agreement with Distribution Provider, make a written request for mediation to the Alternative Dispute Resolution (ADR) Coordinator in the Commission's Administrative Law Judge (ALJ) Division. The request may be made by electronic mail to adr_program@cpuc.ca.gov, and shall state "Rule 21" in the subject line. The request shall contain the relevant facts of the timeline dispute. A copy of the request shall be sent to the Distribution Provider ombudsman. Provided that resources are available, the mediator assigned shall schedule a mediation with Applicant and Distribution Provider within ten (10) Business Days of receiving the request.
 - c) Initiate dispute resolution processes in accordance with Section K.

At any time, Applicant may file a formal complaint before the Commission pursuant to California PUC Section 1702 and Article 4 of the Commission's Rules of Practice and Procedure.

ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

K. DISPUTE RESOLUTION PROCESS

In addition to the informal procedures for timeline-related disputes set out in Section F.1.d, the following procedures will apply for disputes arising from this Rule:

1. SCOPE

The Commission shall have initial jurisdiction to interpret, add, delete or modify any provision of this Rule or of any agreements entered into between Distribution Provider and Applicant or Producer to implement this tariff ("Implementing Agreements") and to resolve disputes regarding Distribution Provider's performance of its obligations under Commission-jurisdictional tariffs, the applicable agreements, and requirements related to the interconnection of Applicant's or Producer's Generating Facility or Interconnection Facilities pursuant to this Rule.

2. INFORMAL DISPUTE RESOLUTION PROCEDURES

Any dispute arising between Distribution Provider and Producer (individually referred to in Section K as "Party" and collectively "the Parties") regarding Distribution Provider's or Producer's performance of its obligations under its tariffs, the Implementing Agreements, and requirements related to the interconnection of Producer's Facilities pursuant to this Rule shall be resolved according to the following procedures:

a. Informal Dispute Resolution

To initiate Informal Dispute Resolution, the aggrieved Party may submit a written notice ("notice") to the other party pursuant to either Section K.2.a.(i) (Bilateral Negotiations) or K.2.a.(ii) (Expedited Bilateral Negotiations).

This notice shall:

- specify whether the aggrieved Party is invoking the Informal Dispute Resolution procedures pursuant to either Section K.2.a.(i) (Bilateral Negotiations) or K.2.a.(ii) (Expedited Bilateral Negotiations);
- state the specific dispute and the relief sought; and
- contain all relevant known facts pertaining to the dispute.

The notice shall be sent to the Party's email address and physical address set forth in the Generator Interconnection Agreement or Interconnection Request, if there is no Generator Interconnection Agreement. A copy of the notice shall also be sent to the Energy Division, Office of the Director, at the Commission and Rule21.Disputes@cpuc.ca.gov

The receiving party shall acknowledge the notice within five (5) calendar days of its receipt.

ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

(i) Bilateral Negotiations

- 1) The receiving Party shall acknowledge the notice within five Calendar Days of its receipt.
- 2) Each Party must designate a representative with the authority to make decisions for its respective Party to review the dispute within seven (7) Calendar Days of receiving Party's receipt of the notice.
- 3) The Distribution Provider shall provide the aggrieved Party with all relevant regulatory and/or technical details and analysis regarding any Distribution Provider interconnection requirements under dispute within twenty-one (21) Calendar Days of receiving Party's receipt of the notice.
- 4) Within forty-five (45) Calendar Days of the date of the notice, the Parties' authorized representatives will be required to meet and confer to try to resolve the dispute. Parties are expected to operate in good faith and use best efforts to resolve the dispute.
- 5) Parties may by mutual agreement extend any deadline identified in this section.

(ii) Expedited Bilateral Negotiations

- 1) The receiving Party shall acknowledge the notice within five (5) Calendar Days of its receipt.
- 2) Each Party must designate a representative with the authority to make decisions for its respective Party to review the dispute within seven (7) Calendar Days of receiving Party's receipt of the notice.
- 3) Distribution Provider shall provide the aggrieved Party with all relevant regulatory and/or technical details and analysis regarding any Distribution Provider interconnection requirements under dispute within ten (10) Business Days of receiving Party's receipt of the notice.
- 4) Within fifteen (15) Business Days of the date of the notice, the Parties' authorized representatives will be required to meet and confer to try to resolve the dispute. Parties are expected to operate in good faith and use best efforts to resolve the dispute.
- 5) Parties may by mutual agreement extend any deadline identified in this section.

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GENERATING FACILITY INTERCONNECTIONS

- b. If a resolution of a dispute raised as part of section K.2.a is not reached in forty-five (45) Calendar Days from the date of the notice, either
- 1) a Party may request to continue negotiations for an additional forty-five (45) Calendar Days; or
 - 2) the Parties may by mutual agreement make a written request for mediation to the ADR Coordinator in the Commission's ALJ Division.

The request may be submitted by electronic mail to adr_program@cpuc.ca.gov. Alternatively, both Parties by mutual agreement may request mediation from an outside third-party mediator with costs to be shared equally between the Parties.

- c. At any time, either Party may file a formal complaint before the Commission

3. EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS

The Expedited Interconnection Dispute Resolution process ("Expedited Process") may be used to resolve eligible disputes between the Distribution Provider and an Applicant according to the following procedures.

For a complete description of all Expedited Process rules and requirements, please refer to Resolution ALJ-347, Exhibit A "Expedited Interconnection Dispute Resolution Process FINAL". Information can also be found on the Commission's website at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/rule-21-interconnection/expedited-interconnection-dispute-resolution>. In the event of a conflict between the terms of this section and the terms of Resolution ALJ-347, the terms of Resolution ALJ-347 shall govern.

a. Eligibility

- i) An Applicant may apply for Expedited Process at any stage of the interconnection process if it can demonstrate that:
 - it has, in compliance with Section K.2 requirements, invoked the Section K.2.a Informal Dispute Resolution procedures and has been unable to resolve the dispute in accordance with Section K.2.a.¹
 - it has, in compliance with Section K.2 requirements, invoked the Section K.2.b Informal Dispute Resolution procedures and has been unable to resolve the dispute in accordance with Section K.2.b.¹
 - the subject matter of the dispute at issue concerns whether one or both parties' actions are compliant with established interconnection rules and/or are reasonable, cost efficient and necessarily required

ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

¹ The Commission's Energy Division has the discretion to grant waivers to this eligibility requirement when the Applicant and Distribution Provider have already engaged in a dispute resolution process equivalent to Section K.2.a or K.2.b, including equivalent duration and with equivalent opportunity for both parties to understand the facts of the dispute and prepare responses. The Applicant or Distribution Provider must make a request to the Energy Division to waive the requirement.

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under those rules to ensure safe and reliable interconnection.

- ii) The Energy Division has the authority to determine that a dispute is noteligible for this process in response to notice submitted in Section K.2.b.

b. Initiation of Expedited Process by Applicant

To request resolution of a dispute pursuant to the Expedited Process, the Applicant shall download a PDF application form from the CPUC Expedited Interconnection Dispute Resolution Webpage (<https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/rule-21-interconnection/expedited-interconnection-dispute-resolution>), complete the application, and email an electronically PDF application form to Rule21.disputes@cpuc.ca.gov.

- i) The Applicant shall include the following in the PDF application form:
- all relevant known facts pertaining to the dispute;
 - the specific dispute and the relief sought;
 - express notice by the Applicant that it is requesting resolution usingthe Commission’s Expedited Process;
 - a description of all efforts to date to resolve the dispute directly withthe Distribution Provider, including at minimum a showing that the Applicant meets the eligibility requirements described above; and
 - names of all Interconnection Dispute Resolution Panel memberswho may have a conflict of interest as defined in Public Utilities Code Section 769.5(b)(1).
- ii) The Applicant shall also attach to the PDF application form all materials that may aid in review of the dispute, including a copy of the Interconnection Request, any interconnection study performed for that Interconnection Request, and all correspondence between the Applicant and the Distribution Providerrelevant to the dispute. For treatment of confidential materials, please refer to Resolution ALJ-347 and the relevant notes on pages 1 and 3 of the PDF application form.
- iii) The Applicant shall serve this written notice on:
- Energy Division (Rule21.Disputes@cpuc.ca.gov);
 - the Distribution Provider’s email address set forth in the Generator Interconnection Agreement or Interconnection Request, if there is no Generator Interconnection Agreement;
 - the ombudsman designated by Distribution Provider; and
 - any other interested persons. “Interested persons” for the purposesof this section are defined as the applicant, utility, a person who hassubmitted comments on the recommendation of the Review Sub- Panel, or a person who has a demonstrable interest in the outcomeof the dispute and has written Energy Division requesting to be added to the distribution list for the dispute.

Please refer to Resolution ALJ-347 for more information and instructions for applying to the Commission for the Expedited Process.

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GENERATING FACILITY INTERCONNECTIONS

c. Eligibility Verification

- i) The Energy Division will evaluate the submission of an Expedited Process written notice and notify the Applicant and the Distribution Provider of the dispute's eligibility within three (3) Business Days of receiving the request.
- ii) The Energy's Division's notice shall contain specific instructions regarding how the Expedited Process will be resolved. Please refer to Resolution ALJ-347 for more information.

d. Distribution Provider Response

- i) Upon receiving notice from the Energy Division of the dispute's eligibility for the Expedited Process, the Distribution Provider shall have five (5) Business Days to serve its response to the Sub-Panel (as defined in Resolution ALJ-347) assigned to the dispute, the Applicant, Energy Division and other interested persons in accordance with the procedures outlined in Resolution ALJ-347.
- ii) The Distribution Provider's response shall include:
 - the relevant known facts pertaining to the dispute, including the dispute's impact on safe and reliable grid operations;
 - its position on the dispute as presented by the Applicant;
 - a response to the relief requested by the Applicant; and
 - a description of the efforts to date to resolve the dispute directly with the Applicant.
- iii) The Distribution Provider shall also include in its response a copy of documentation in its possession that was not previously submitted in the Applicant's written notice that requested the Expedited Process that Distribution Provider believes may aid in review of the dispute, including the Applicant's Interconnection Request, any interconnection study performed for that Interconnection Request, and all correspondence between the Applicant and the Distribution Provider relevant to the dispute. For treatment of confidential materials, please refer to Resolution ALJ-347 and the relevant notes on pages 1 and 3 of the PDF application form

The Distribution Provider shall serve this written notice on:

- Energy Division (Rule21.Disputes@cpuc.ca.gov);
- the Applicant's email address set forth in Applicant's written notice requesting the Expedited Process; and
- any other interested persons in accordance with the procedures outlined in Resolution ALJ-347.

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GENERATING FACILITY INTERCONNECTIONS

K. DISPUTE RESOLUTION PROCESS (Cont'd.)

3. EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS
(Cont'd.)

e. Comments on Review Sub-Panel Recommendations

The Review Sub-panel will issue recommendations to the Executive Director of the Commission on how to resolve an Expedited Process's dispute.

Within five (5) Business Days of the issuance of the Review Sub-Panel's recommendations, Applicant, Distribution Provider, and any other interested persons may serve comments on those recommendations via Rule21.Disputes@cpuc.ca.gov.

The Applicant and Distribution Provider may serve a reply to any comments within three (3) Business Days of the last day for service of opening comments via Rule21.Disputes@cpuc.ca.gov.

Please refer to Resolution ALJ-347 and <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/rule-21-interconnection/expedited-interconnection-dispute-resolution> for more information regarding the service requirements.

f. Appealing the Executive Director's Order

Upon receipt of the Review Sub-Panel's recommendations, the Executive Director of the Commission will issue an order resolving the dispute within thirty (30) Calendar Days.

Within ten (10) Calendar Days of the issuance of the Executive Director's Order, the Applicant, Distribution Provider, or any interested person may appeal the Order and request Commission review. Such a request must set forth specifically the grounds on which the requester considers the Order to be unlawful or erroneous. Requests for review should be emailed to Rule21.Disputes@cpuc.ca.gov.

g. Withdrawal

At any time following Applicant's submission of a written notice under this Section, the Applicant may withdraw its notice. If the Applicant and Distribution Provider reach a settlement independent of the Commission, it is not necessary for the Commission to approve the settlement.

Notices of withdrawal should be sent to all interested parties and Rule21.Disputes@cpuc.ca.gov. Please refer to Resolution ALJ-347 for more information regarding the service requirements.

4. FORMAL COMPLAINT

At any time, either Party may file a formal complaint before the Commission pursuant to California PUC section 1702 and Article 4 of the Commission's Rules of Practice and Procedure.

March 24, 2022

Attachment B

Redline Model Rule 21 Language

ELECTRIC RULE NO. 21
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C. DEFINITIONS (Cont'd.)

...

Expedited Interconnection Dispute Resolution Panel Process (“Expedited Process”): A process authorized by AB 2861 in which the CPUC’s Executive Director issues binding determinations on interconnection disputes within 60 days of receiving the dispute. Determinations are made based on the recommendations of the Interconnection Dispute Resolution Panel, pursuant to Resolution ALJ-347. See Section K.

ELECTRIC RULE NO. 21
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F. REVIEW PROCESS FOR INTERCONNECTION REQUESTS (Cont'd.)

1. OVERVIEW OF THE INTERCONNECTION REVIEW PROCESS (Cont'd.)

d. Compliance with Timelines (Cont'd.)

- (i) Contact the ombudsman designated by Distribution Provider;
- (ii) If the Distribution Provider ombudsman [EACH YOU TO INSERT THEIR OMBUDSMAN EMAIL ADDRESS] is unable to resolve the dispute within ten (10) Business Days, Applicant may either:
 - a) Contact the Consumer Affairs Branch (CAB) at the Commission.
 - b) Upon mutual agreement with Distribution Provider, make a written request for mediation to the Alternative Dispute Resolution (ADR) Coordinator in the Commission's Administrative Law Judge (ALJ) Division. The request may be made by electronic mail to adr_program@cpuc.ca.gov, and shall state "Rule 21" in the subject line. The request shall contain the relevant facts of the timeline dispute. A copy of the request shall be sent to the Distribution Provider ombudsman. Provided that resources are available, the mediator assigned shall schedule a mediation with Applicant and Distribution Provider within ten (10) Business Days of receiving the request.
 - c) Initiate dispute resolution processes in accordance with Section K.

At any time, Applicant may file a formal complaint before the Commission pursuant to California PUC Section 1702 and Article 4 of the Commission's Rules of Practice and Procedure.

ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

K. DISPUTE RESOLUTION PROCESS

In addition to the informal procedures for timeline-related disputes set out in Section F.1.d, the following procedures will apply for disputes arising from this Rule:

1. SCOPE

The Commission shall have initial jurisdiction to interpret, add, delete or modify any provision of this Rule or of any agreements entered into between Distribution Provider and Applicant or Producer to implement this tariff ("Implementing Agreements") and to resolve disputes regarding Distribution Provider's performance of its obligations under Commission-jurisdictional tariffs, the applicable agreements, and requirements related to the interconnection of Applicant's or Producer's Generating Facility or Interconnection Facilities pursuant to this Rule.

2. INFORMAL DISPUTE RESOLUTION PROCEDURES

Any dispute arising between Distribution Provider and Producer (individually referred to in Section K as "Party" and collectively "the Parties") regarding Distribution Provider's or Producer's performance of its obligations under its tariffs, the Implementing Agreements, and requirements related to the interconnection of Producer's Facilities pursuant to this Rule shall be resolved according to the following procedures:

a. Informal Dispute Resolution

To initiate Informal Dispute Resolution, the aggrieved Party may submit a written notice ("notice") to the other party pursuant to either Section K.2.a.(i) (Bilateral Negotiations) or K.2.a.(ii) (Expedited Bilateral Negotiations).

This notice shall:

- specify whether the aggrieved Party is invoking the Informal Dispute Resolution procedures pursuant to either Section K.2.a.(i) (Bilateral Negotiations) or K.2.a.(ii) (Expedited Bilateral Negotiations);
- state the specific dispute and the relief sought; and
- contain all relevant known facts pertaining to the dispute.

~~The dispute shall be documented in a written notice ("notice") by the aggrieved Party to the other Party containing the relevant known facts pertaining to the dispute, the specific dispute and the relief sought, and express notice by the aggrieved Party that it is invoking the procedures under this Section.~~ The notice shall be sent to the Party's email address and physical address set forth in the Generator Interconnection Agreement or Interconnection Request, if there is no Generator Interconnection Agreement. A copy of the notice shall also be sent to the Energy Division, Office of the Director, at the Commission and Rule21.Disputes@cpuc.ca.gov. The receiving party shall acknowledge the notice within five (5) calendar days of its receipt.

Commented [HH(1): Moved to next section (i) 1) immediately below.

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(i) **Bilateral Negotiations**

- 1) The receiving Party shall acknowledge the notice within five (5) Calendar Days of its receipt.
- a.2) ~~Upon the aggrieved Party notifying the other Party of the dispute,~~
Each Party must designate a representative with the authority to make decisions for its respective Party to review the dispute within seven (7) Calendar Days of receiving Party's receipt of the notice.
- 3) ~~In addition, upon receipt of the notice,~~ The Distribution Provider shall provide the aggrieved Party with all relevant regulatory and/or technical details and analysis regarding any Distribution Provider interconnection requirements under dispute within twenty-one (21) Calendar Days of receiving Party's receipt of the notice.
- 4) Within forty-five (45) Calendar Days of the date of the notice, the Parties' authorized representatives will be required to meet and confer to try to resolve the dispute. Parties are expected to operate in good faith and use best efforts to resolve the dispute.
- 5) Parties may by mutual agreement extend any deadline identified in this section.

Commented [HH(2)]: Moved from above.

(ii) **Expedited Bilateral Negotiations**

- 1) The receiving Party shall acknowledge the notice within five (5) Calendar Days of its receipt.
- 2) Each Party must designate a representative with the authority to make decisions for its respective Party to review the dispute within seven (7) Calendar Days of receiving Party's receipt of the notice.
- 3) Distribution Provider shall provide the aggrieved Party with all relevant regulatory and/or technical details and analysis regarding any Distribution Provider interconnection requirements under dispute within ten (10) Business Days of receiving Party's receipt of the notice.
- 4) Within fifteen (15) Business Days of the date of the notice, the Parties' authorized representatives will be required to meet and confer to try to resolve the dispute. Parties are expected to operate in good faith and use best efforts to resolve the dispute.
- 5) Parties may by mutual agreement extend any deadline identified in this section.

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- b. If a resolution of a dispute raised as part of section K.2.a is not reached in forty-five (45) Calendar Days from the date of the notice, either
- 1) a Party may request to continue negotiations for an additional forty-five (45) Calendar Days; or
 - 2) the Parties may by mutual agreement make a written request for mediation to the ADR Coordinator in the Commission's ALJ Division.

The request may be submitted by electronic mail to adr_program@cpuc.ca.gov. Alternatively, both Parties by mutual agreement may request mediation from an outside third-party mediator with costs to be shared equally between the Parties.

- c. ~~At any time, either Party may file a formal complaint before the Commission pursuant to California PUC section 1702 and Article 4 of the Commission's Rules of Practice and Procedure.~~

Commented [HH(3)]: Moved to K.4 below

~~Nothing in this section shall be construed to limit the rights of any Party to exercise rights and remedies under Commission law.~~

3. EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS

The Expedited Interconnection Dispute Resolution process ("Expedited Process") may be used to resolve eligible disputes between the Distribution Provider and an Applicant according to the following procedures.

For a complete description of all Expedited Process rules and requirements, please refer to Resolution ALJ-347, Exhibit A "Expedited Interconnection Dispute Resolution Process FINAL". Information can also be found on the Commission's website at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/rule-21-interconnection/expedited-interconnection-dispute-resolution>. In the event of a conflict between the terms of this section and the terms of Resolution ALJ-347, the terms of Resolution ALJ-347 shall govern.

a. Eligibility

- i) An Applicant may apply for Expedited Process at any stage of the interconnection process if it can demonstrate that:
 - it has, in compliance with Section K.2 requirements, invoked the Section K.2.a Informal Dispute Resolution procedures and has been unable to resolve the dispute in accordance with Section K.2.a¹;
 - it has, in compliance with Section K.2 requirements, invoked the Section K.2.b Informal Dispute Resolution procedures and has been unable to resolve the dispute in accordance with Section K.2.b¹;
 - the subject matter of the dispute at issue concerns whether one or both parties' actions are compliant with established interconnection rules and/or are reasonable, cost efficient and necessarily required

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¹ The Commission's Energy Division has the discretion to grant waivers to this eligibility requirement when the Applicant and Distribution Provider have already engaged in a dispute resolution process equivalent to Section K.2.a or K.2.b, including equivalent duration and with equivalent opportunity for both parties to understand the facts of the dispute and prepare responses. The Applicant or Distribution Provider must make a request to the Energy Division to waive the requirement.

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under those rules to ensure safe and reliable interconnection.

- ii) The Energy Division has the authority to determine that a dispute is noteligible for this process in response to notice submitted in Section K.2.b.

b. Initiation of Expedited Process by Applicant

To request resolution of a dispute pursuant to the Expedited Process, the Applicant shall download a PDF application form from the CPUC Expedited Interconnection Dispute Resolution WebpageRule 21 website (<https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/rule-21-interconnection/expedited-interconnection-dispute-resolution>), complete the application, <https://www.cpuc.ca.gov/rule21/>) and email an electronically signed-machine-readable PDF application formnotice to Rule21.disputes@cpuc.ca.gov.

~~For information regarding format for the submission of a written notice, please see the Commission's website at www.cpuc.ca.gov.~~

- i) ~~The Applicant shall include the following in the written notice~~PDF application form shall additionally contain:
- all relevant known facts pertaining to the dispute;
 - the specific dispute and the relief sought;
 - express notice by the Applicant that it is requesting resolution usingthe Commission's Expedited Process;
 - a description of all efforts to date to resolve the dispute directly withthe Distribution Provider, including at minimum a showing that the Applicant meets the eligibility requirements described above; and
 - names of all Interconnection Dispute Resolution Panel memberswho may have a conflict of interest as defined in Public Utilities Code Section 769.5(b)(1).
- ii) ~~The written notice~~Applicant shall also attach to the PDF application form all materials that may aid in review of the dispute, including a copy of the Interconnection Request, any interconnection study performed for that Interconnection Request, and all correspondence between the Applicant and the Distribution Providerrelevant to the dispute. For treatment of confidential materials, please refer to Resolution ALJ-347 and the relevant notes on pages 1 and 3 of the PDF application form.
- iii) The Applicant shall serve this written notice on:
- Energy Division (Rule21.Disputes@cpuc.ca.gov);
 - the Distribution Provider's email address set forth in the Generator Interconnection Agreement or Interconnection Request, if there is no Generator Interconnection Agreement;
 - the ombudsman designated by Distribution Provider; and
 - any other interested persons. "Interested persons" for the purposesof this section are defined as the applicant, utility, a person who hassubmitted comments on the recommendation of the Review Sub- Panel, or a person who has a demonstrable

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interest in the outcome of the dispute and has written Energy
Division requesting to be added to the distribution list for the
dispute.

Please refer to Resolution ALJ-347 for more information and
instructions for applying to the Commission for the Expedited
Process.

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c. Eligibility Verification

- i) The Energy Division will evaluate the submission of an Expedited Process written notice and notify the Applicant and the Distribution Provider of the dispute's eligibility within three (3) Business Days of receiving the request.
- ii) The Energy's Division's notice shall contain specific instructions regarding how the Expedited Process will be resolved. Please refer to Resolution ALJ-347 for more information.

d. Distribution Provider Response

- i) Upon receiving notice from the Energy Division of the dispute's eligibility for the Expedited Process, the Distribution Provider shall have five (5) Business Days to serve its response to the ~~Energy Division's Review Sub-Panel~~ (as defined in Resolution ALJ-347) assigned to the dispute, the Applicant, Energy Division and other interested persons in accordance with the procedures outlined in Resolution ALJ-347 ~~identified on the dispute's service list~~.
- ii) The Distribution Provider's response shall include:
 - the relevant known facts pertaining to the dispute, including the dispute's impact on safe and reliable grid operations;
 - its position on the dispute as presented by the Applicant;
 - a response to the relief requested by the Applicant; and
 - a description of the efforts to date to resolve the dispute directly with the Applicant.
- iii) The Distribution Provider shall also include in its response a copy of documentation in its possession that was not previously submitted in the Applicant's written notice that requested the Expedited Process that Distribution Provider believes may aid in review of the dispute, including the Applicant's Interconnection Request, any interconnection study performed for that Interconnection Request, and all correspondence between the Applicant and the Distribution Provider relevant to the dispute. For treatment of confidential materials, please refer to Resolution ALJ-347 and the relevant notes on pages 1 and 3 of the PDF application form

The Distribution Provider shall serve this written notice on:

- Energy Division (Rule21.Disputes@cpuc.ca.gov);
- the Applicant's email address ~~and physical address~~ set forth in Applicant's written notice requesting the Expedited Process; and
- any other interested persons in accordance with the procedures outlined in Resolution ALJ-347.

Commented [HH(4): Defined "Review Sub-Panel" used throughout after defining it here

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K. DISPUTE RESOLUTION PROCESS (Cont'd.)

3. EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS
(Cont'd.)

e. Comments on Review Sub-Panel Recommendations

The Review Sub-panel will issue recommendations to the Executive Director of the Commission's ~~Energy Division~~ on how to resolve an Expedited Process's dispute.

Within five (5) Business Days of the issuance of the Review Sub-Panel's recommendations, Applicant, Distribution Provider, and any other interested persons may serve comments on those recommendations via Rule21.Disputes@cpuc.ca.gov.

The Applicant and Distribution Provider may serve a reply to any comments within three (3) Business Days of the last day for service of opening comments via Rule21.Disputes@cpuc.ca.gov.

Please refer to Resolution ALJ-347 and <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/rule-21-interconnection/expedited-interconnection-dispute-resolution> for more information regarding the service requirements.

f. Appealing the Executive Director's Order

Upon receipt of the Review Sub-Panel's recommendations, the Executive Director of the ~~Commission's Energy Division~~ will issue an order resolving the dispute within thirty (30) Calendar Days.

Within ten (10) Calendar Days of the issuance of the Executive Director's Order, the Applicant, Distribution Provider, or any interested person may appeal the Order and request Commission review. Such a request must set forth specifically the grounds on which the requester considers the Order to be unlawful or erroneous. Requests for review should be emailed to ~~the Energy Division Director at~~ Rule21.Disputes@cpuc.ca.gov.

g. Withdrawal

At any time following Applicant's submission of a written notice under this Section, the Applicant may withdraw its notice. If the Applicant and Distribution Provider reach a settlement independent of the Commission, it is not necessary for the Commission to approve the settlement.

Notices of withdrawal should be sent to all interested parties and Rule21.Disputes@cpuc.ca.gov. Please refer to Resolution ALJ-347 for more information regarding the service requirements.

4. FORMAL COMPLAINT

At any time, either Party may file a formal complaint before the Commission pursuant to California PUC section 1702 and Article 4 of the Commission's

Advice 6503-E
Model Tariff

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Rules of Practice and Procedure. ~~If the formal complaint contains allegations or requests for relief that are also the subject of an active Section K.2 or Section K.3 dispute, that Section K.2 or Section K.3 dispute is deemed withdrawn.~~

March 24, 2022

Attachment C

EIDR_IntakeForm_Final.pdf

EXPEDITED INTERCONNECTION DISPUTE RESOLUTION INTAKE FORM

To request resolution of a dispute via the Expedited Interconnection Dispute Resolution (EIDR) process (per ALJ-347, 2017), please complete and sign this form (E-Signatures and scanned, signed copies of this form are the acceptable methods of submission) and email it to Rule21.Disputes@cpuc.ca.gov. If you prefer to submit a physical copy of this form, please mail a completed, signed form to California Public Utilities Commission; Energy Division, Interconnection and Distribution Engineering Section; 505 Van Ness Ave.; San Francisco, CA 94102.

IMPORTANT NOTE: Documents you submit will be published on the California Public Utilities Commission's public web page and distributed via email list. You have the option of submitting public and confidential versions of this form and accompanying materials. If submitting public and confidential versions, please clearly label each version and redact any personally identifiable information that you prefer not to be posted publicly. California Public Utilities Commission is not responsible for redacting personally identifiable information from your forms and attachments. Decision 06-06-066 and related Decisions, General Orders and statutes contain additional information regarding confidentiality. Please submit any questions regarding confidentiality to Rule21.Disputes@cpuc.ca.gov before you submit this form.

Applicant Name

Applicant Email

Applicant Phone

Name of Applicant Organization

Please describe in detail the relevant known facts pertaining to the dispute. Please feel free to refer to materials that accompany this document in your description (3,000 character limit).

Please describe in detail the specific dispute and relief sought. Please feel free to refer to materials that accompany this document in your description (3,000 character limit).

Expedited Interconnection Dispute Resolution Intake Form

Please describe in as much detail as possible the efforts you and/or your organization have made to resolve the dispute directly with the electric utility, including at a minimum demonstrating that your dispute fits the following description of eligibility "A dispute may be considered eligible for Expedited Process when there is an unresolved disagreement between the applicant and the utility regarding whether one or both parties' actions are compliant with established interconnection rules and/or are reasonable, cost efficient and necessary required under those rules to ensure safe and reliable interconnection (ALJ-347, Exhibit A at 9)." Please feel free to refer to materials that accompany this document in your description (3,000 character limit).

Please list the names of any Expedited Interconnection Dispute Resolution Panel members who may have a conflict of interest as defined in California Public Utilities Code Section 769.5(b)(1) (as codified by Assembly Bill 2861 (Ting, 2016) (1,000 character limit).

Attachment Checklist (Please check all that apply)

- Project Interconnection Application
- Interconnection Study
- Correspondence between interconnection applicant and utility regarding the dispute
- Other(s): please describe below

Expedited Interconnection Dispute Resolution Intake Form

APPLICANTS TO THIS EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS AGREE THAT THEY ENTER VOLUNTARILY AND AS AN ALTERNATIVE TO OTHER DISPUTE RESOLUTION OPTIONS, INCLUDING LITIGATION. THE EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS IS ADMINISTERED BY THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, THROUGH ITS CALIFORNIA INSTITUTE FOR ENERGY & ENVIRONMENT AND ITS CENTER FOR LAW, ENERGY & THE ENVIRONMENT (THE "CONVENERS"); INDIVIDUAL DISPUTE REVIEWS ARE CONDUCTED BY TECHNICAL PANELISTS (SELECTED BY THE CONVENERS BASED ON AVAILABILITY AND CONFLICTS OF INTEREST) WHO MAY BE ADVISED BY TECHNICAL EXPERTS. FOLLOWING DISPUTE REVIEW, THE TECHNICAL PANELISTS MAKE A RECOMMENDATION TO THE EXECUTIVE DIRECTOR OF THE CPUC, WHO SUBSEQUENTLY ISSUES AN OPINION TO THE ELECTRIC UTILITY RESOLVING THE DISPUTE. THE EXECUTIVE DIRECTOR'S ORDER MAY BE APPEALED TO THE CPUC.

LIABILITY WAIVER AND RELEASE: AS A CONDITION OF PARTICIPATING IN THE EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS, THE APPLICANT BY THEIR INITIALS BELOW, ACKNOWLEDGES AND AGREES TO RELEASE FROM LIABILITY AND WAIVES THE RIGHT TO SUE IN STATE OR FEDERAL COURT, THE CONVENERS, TECHNICAL PANELISTS, AND TECHNICAL EXPERTS (together, "RELEASED PARTIES") FOR ANY CLAIM OR CAUSE OF ACTION OTHER THAN GROSS NEGLIGENCE AND/OR INTENTIONAL MISCONDUCT, ARISING OUT OF THE PERFORMANCE OF THE RELEASED PARTIES' DUTIES IN THE DISPUTE RESOLUTION PROCESS, INCLUDING WITHOUT LIMITATION ANY DISPUTE REVIEW RECOMMENDATIONS OR FINAL ORDER, AND ANY ACTIONS TAKEN IN DEVELOPMENT OF SUCH RECOMMENDATIONS.

Applicant Initials

Date Initialed

IMPORTANT NOTE: Documents you submit will be published on the California Public Utilities Commission's public web page and distributed via email list. You have the option of submitting public and confidential versions of this form and accompanying materials. If submitting public and confidential versions, please clearly label each version and redact any personally identifiable information that you prefer not to be posted publicly. Decision 06-06-066 and related Decisions, General Orders and statutes contain additional information regarding confidentiality. California Public Utilities Commission is not responsible for redacting personally identifiable information from your forms and attachments. Please submit any questions regarding confidentiality to Rule21.Disputes@cpuc.ca.gov before you submit this form.

BY SIGNING THIS DOCUMENT, I AFFIRM THAT I AM REQUESTING RESOLUTION OF THIS DISPUTE VIA THE CALIFORNIA PUBLIC UTILITIES COMMISSION'S EXPEDITED INTERCONNECTION DISPUTE RESOLUTION PROCESS PER ALJ-347 (2017).

Applicant Signature

Date Signed

**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 Blasing 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

East Bay Community Energy Ellison
Schneider & Harris LLP
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
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.
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
Uplight
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy