

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6549E
As of June 3, 2022

Subject: Progress on Energy Storage Procurement at the Mesa Substation in Compliance with Decision 22-02-004

Division Assigned: Energy

Date Filed: 04-01-2022

Date to Calendar: 04-06-2022

Authorizing Documents: D2202004

Disposition:	Accepted
Effective Date:	06-03-2022

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

415-973-4587

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

April 1, 2022

Advice 6549-E

Pacific Gas and Electric Company (U 39 E)

Public Utilities Commission of the State of California

Subject: Progress on Energy Storage Procurement at the Mesa Substation in Compliance with Decision 22-02-004

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this Tier 1 advice letter to the California Public Utilities Commission (CPUC or Commission) on its progress as part of its procurement requirements adopted in Decision (D.) 21-06-035 and whether any project has been identified that meets the operational requirements identified in the California Independent System Operator Corporation's (CAISO) 2020-2021 Transmission Planning Process (TPP) for a 50 megawatt (MW) four-hour storage project at the Mesa 115 kilovolt (kV) Substation.¹ This Tier 1 advice letter is submitted in compliance with Ordering Paragraph (OP) 13 of D.22-02-004 (the Decision).

Background

On February 10, 2022, the Commission issued D.22-02-004 adopting the Preferred System Plan (PSP) after evaluating the 2020 individual integrated resource plan (IRP) filings of all of the load serving entities (LSE) under the Commission's jurisdiction and IRP purview.

OP 13 of D.22-02-004 states as follows:

Pacific Gas and Electric Company (PG&E) shall file a Tier 1 Advice Letter by April 1, 2022 explaining whether a storage project has been procured as part of the procurement required by Decision 21-06-035, and otherwise meeting the operational requirements identified in the California Independent System Operator's 2020-2021 Transmission Planning Process for a 50 megawatt four hour storage project at the Mesa Substation as a transmission alternative. If a suitable project has not been identified by April 1, 2022, then PG&E shall conduct a solicitation and file a Tier 2 Advice Letter by the end of 2022 indicating its progress toward procuring a storage project that will meet the identified need and may seek

¹ D.22-02-004, p. 157.

cost recovery via the cost allocation mechanism but then shall not count the storage toward its procurement required in Decision 21-06-035. These storage projects are exempted from the risk reporting requirements for general rate cases emanating from Decision 21-11-009.

As part of its 2020-2021 Transmission Plan, the CAISO identified two non-transmission alternatives where energy storage projects would be acceptable for meeting system reliability needs: (1) a 95 MW 4-hour storage resource on the Kern-Lamont 115 kV system; and (2) a 50 MW 4-hour storage resource at the Mesa 115 kV system.² The Commission agreed with this recommendation, recognizing that more expensive alternatives may be procured if the development of storage projects was infeasible. The Commission directed PG&E to submit a Tier 1 advice letter by April 1, 2022, explaining whether a 50 MW storage project with operational characteristics sufficient to meet the CAISO's identified reliability needs is expected to be developed and online by the end of 2022.³ This advice letter is submitted in compliance with the requirements of OP 13 as stated above.

Discussion of PG&E's Procurement Progress

No storage project has been procured by PG&E as part of its procurement requirements adopted in D.21-06-035 that meets the operational requirements identified in the CAISO's 2020-2021 TPP at the Mesa 115 kV Substation.

As of this submission, PG&E's Advice 6477-E is pending Commission approval for the contracts executed to comply with D.21-06-035.⁴ These agreements are listed below:

² See CAISO's 2020-2021 Transmission Plan, p. 118 at <http://www.caiso.com/Documents/BoardApproved2020-2021TransmissionPlan.pdf>.

³ D.22-02-004, OP 13; See also Discussion, p. 161.

⁴ On March 18, 2022, the Commission's Energy Division issued draft Resolution E-5202 approving without modification PG&E's Advice 6477-E at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M460/K327/460327750.PDF>. The earliest date the Commission will consider this draft Resolution is April 21, 2022.

TABLE 1: EXECUTED LONG TERM RESOURCE ADEQUACY AGREEMENTS (LTRA)

Line No.	Counterparty (Project Name)	Technology	Size (MW)	Interconnection
1	Beaumont ESS I, LLC (Beaumont Energy Storage Project)	Lithium Ion Batteries	100	[REDACTED]
2	Sanborn ESS I, LLC (Edwards Sanborn Energy Storage Project)	Lithium Ion Batteries	169	SCE's 230 kV Windhub Substation
3	Canyon Country ESS I, LLC (Canyon Country Energy Storage Project)	Lithium Ion Batteries	80	[REDACTED]
4	Moss Landing Energy Storage 3, LLC (MOSS350 Energy Storage)	Lithium Ion Batteries	350	[REDACTED]
5	Poblano Energy Storage, LLC (Inland Empire Energy Storage)	Lithium Ion Batteries	100	Single-line tap on SCE Alder-Falcon Ridge 66 kV line
6	NextEra Energy Resources Development, LLC (Corby Energy Storage)	Lithium Ion Batteries	125	PG&E's Vaca-Dixon 230 kV Substation
7	NextEra Energy Resources Development, LLC (Kola Energy Storage)	Lithium Ion Batteries	275	PG&E's Tesla 230 kV Substation
8	Nighthawk Energy Storage, LLC (Nighthawk Storage)	Lithium Ion Batteries	300	SDG&E's Sycamore Substation 138 kV
9	Caballero CA Storage, LLC (Caballero Energy Storage)	Lithium Ion Batteries	99.7	PG&E's 230 kV Mesa substation
10	Total MW		1,598.7	

Of these, one project, Caballero CA Storage, LLC (line 9), is interconnecting at the Mesa 230 kV system and not at the Mesa 115 kV system. The 50 MW 4-hour storage resource at the Mesa 115 kV system proposed by D.21-06-035 is intended to address the maintenance issues on both the 230 kV lines and 230/115 kV banks. Resources connected to the Mesa 230 kV system, such as the Caballero CA Storage, LLC resource, only addresses the 230 kV lines maintenance concerns but not the 230/115 kV banks. As such, the Caballero CA Storage, LLC will not fully meet the CAISO's operational needs. The CAISO confirmed this in an email communication to PG&E on March 10, 2022.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 21, 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 PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
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 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 1 advice letter become effective on April 1, 2022, which is the date this advice letter was submitted with the Commission.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for Rulemaking (R.) 20-05-003. 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: Nathan Barcic, CPUC Energy Division
Lily Chow, CPUC Energy Division
Paul Worhach, Public Advocates Office
Service List for R.20-05-003



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) #: 6549-E

Tier Designation: 1

Subject of AL: Progress on Energy Storage Procurement at the Mesa Substation in Compliance with Decision 22-02-004

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.22-02-004

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: See Confidential Declaration and Matrix
 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: Soumya Sastry, SVS6@pge.com.

Resolution required? Yes No

Requested effective date: 4/1/22

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: (415)973-2093
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

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF SOUMYA SASTRY
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN PG&E'S ADVICE LETTER 6549-E**

I, Soumya Sastry, declare:

1. I am a Manager in the Energy Procurement and Policy Organization at Pacific Gas and Electric Company (PG&E). In this position, I am responsible for procurement of various electric resources and products including energy storage and renewable energy. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's Advice Letter 6549-E pursuant to Ordering Paragraph 13 of Decision 22-02-004.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066, Appendix 1, and Public Utilities Code §454.5(G). The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on April 1, 2022 at San Francisco, California.

/s/

Soumya Sastry

Pacific Gas and Electric Company (U 39 E)

ADVICE LETTER 6549-E

April 1, 2022

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	PG&E's Justification for Confidential Treatment	Length of Time
Confidential Appendices			
TABLE 1: Executed Long Term Resource Adequacy Agreements (LTRAA)	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the Long-Term Resource Adequacy Agreement with Energy Settlement (LTRAA w/ES) presented in this appendix are generally confidential. The terms of this contract that are public pursuant to Item VII. B. are publicly disclosed in Section IV. Selected Projects.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.

**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