

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 14, 2022

Advice Letter 6678-E, 6678-E-A

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94177
E-mail: PGETariffs@pge.com

SUBJECT: Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E 5172 and PG&E's Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2 and 11 as Discussed in Resolution E-5172

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 6678-E, 6678-E-A is effective as of November 4, 2022.

Sincerely,

A handwritten signature in cursive script that reads "Leuwam Tesfai".

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

November 4, 2022

Advice 6678-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E-5172 and PG&E's Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2 and 11 as Discussed in Resolution E-5172

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this Supplemental Tier 1 Advice Letter ("AL") to modify Electric Rule 21 - Generating Facility Interconnections - in compliance with the California Public Utilities Commission ("CPUC" or "Commission") Resolution E-5172,¹ *Approval, with Modifications, of utilities' Advice Letters seeking proposed modifications to Electric Rule 21 Tariff in Compliance with Decision 20-09-035, Ordering Paragraphs 2, 6, 11, 12, and 23* ("Resolution E-5172" or "Resolution"), incorporating guidance through the CPUC's granting of PG&E's *Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2, 6, and 11 as Discussed in Resolution E-5172 for items effective as of September 26, 2022*, and CPUC Decision ("D.") 22-10-020, *Order Correcting Errors in Resolution E-5172*.²

This advice letter supplements PG&E's AL 6678-E submitted on August 12, 2022 by including corrections ordered by the Commission from D. 22-10-020. Concurrent with this advice letter, PG&E will also make another correction ordered in D. 22-10-020 in a separate supplemental AL 6663-E-B.

¹ [CPUC Resolution E-5172](#) - Date of Issuance June 23, 2022 – *Approval, with Modifications, of utilities' Advice Letters seeking proposed modifications to Electric Rule 21 Tariff in Compliance with Decision 20-09-035, Ordering Paragraphs 2, 6, 11, 12, and 23*

² [Decision 22-10-020](#) – Date of Issuance 10/27/2022 – *Order Correcting Errors in Resolution E-5172*

Background

On July 25, 2022, PG&E submitted to the Energy Division AL 6663-E,³ which provided modifications to PG&E's Electric Rule 21, *Generating Facility Interconnections*, in compliance with Ordering Paragraph ("OP") 2 of Resolution E-5172, which required PG&E to modify its Electric Rule 21 in accordance with the Resolution OPs 3 through 6. On August 12, 2022, PG&E split AL 6663-E into two advice letters, supplemental AL 6663-E-A⁴ and AL 6678-E.^{5 6}

On August 15, 2022, the Public Advocates Office at the California Public Utilities Commission ("Cal Advocates") submitted a protest of PG&E's AL 6663-E, and protests of 6663-E-A and 6678-E on August 19, 2022, stating that although PG&E complied with OP 4 of the Resolution, a wording error contained within Resolution E-5172 violated OPs 11 and 12 of D. 20-09-035. Cal Advocates noted that as a result of this wording error, approval could occur of generators that may not be supported by the local grid and may result in overloading distribution equipment and/or safety issues. To remedy this concern, Cal Advocates requested the Energy Division suspend ALs 6663-E, 6663-E-A, and 6678-E until Resolution E-5172 was corrected.

On October 17, 2022, the CPUC issued Decision 22-10-020 to correct two errors in Resolution E-5172, revising the word "any" in certain sections of the Electric Rule 21 tariff to reflect the correct wording "every."

Therefore, based on all the above, PG&E modifies the Electric Rule 21 tariff as discussed below.

³ [PG&E AL 6663-E](#) - *Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E-5172*, submitted July 25, 2022

⁴ [PG&E AL 6663-E-A](#) - *Supplemental: Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E-5172*, submitted August 12, 2022

⁵ [PG&E AL 6678-E](#) - *Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E-5172 and PG&E's Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2 and 11 as Discussed in Resolution E-5172*, submitted August 12, 2022

⁶ PG&E submitted a request for an extension of time to comply with CPUC Resolution E-5172. The CPUC granted PG&E's request in part, making certain changes ordered in Resolution E-5172 effective on a different date (September 26, 2022), but denied an extension for other changes. To account for the different effective dates for language originally submitted in AL 6663-E (and also to incorporate recommended changes from IREC), PG&E split the changes into 2 advice letters, 1) supplemental AL 6663-E-A for changes that were still effective on the original effective date, which replaced 6663-E in its entirety; and a second advice letter, 6678-E, for changes that were effective on the revised effective date.

Tariff Changes

Consistent with Resolution E-5172 and D. 22-10-020, the following changes has been made to PG&E's Rule 21.

- G. ENGINEERING REVIEW DETAILS (Cont'd.)
1. INITIAL REVIEW SCREENS (Cont'd.)
- m. Screen M: When ICA Values are available at the requested Point of Interconnection, the Distribution Provider shall compare the ICA Values to the Gross Nameplate Rating or typical PV Generation Profile.
- ...
- For Interconnection Requests based on typical PV Generation Profile:
- a. Is the Generating Facility Generation Profile based on PVWatts® or equivalent less than or equal to 90% of the ICA-SG 576 value in **any every** hour? or
- b. Is the Generating Facility Generation Profile based on PVWatts® or equivalent less than or equal to 90% of the ICA-OF 576 value in **any every** hour?

PG&E's changes from this supplemental AL will be denoted in the redlined tariff in **tan**.⁷

For convenience of the reader, PG&E has included "track-change" or "redline" revisions of Rule 21 in Attachment 2. PG&E implemented the use of the "(P)" symbol for Electric Rule 21 to signify material subject to change under a pending advice letter. The redlines in Attachment 2 are color coded to the specific advice letter. See Attachment 2 cover sheet for more details.

Protests

Pursuant to GO 96-B, General Rule 7.5.1, PG&E requests to maintain the original protest and comment period designated in Advice 6678-E and not reopen the protest period.

Effective Date

Pursuant to Resolution E-5172, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is November 4, 2022.

⁷ Other proposed changes to the Rule 21 Tariff in compliance with E-5172 are reflected in PG&E's previously-submitted advice letters.

Notice

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

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: Service List R.17-07-007

Attachments:

Attachment 1 – Clean version of updated Rule 21 Tariff

Attachment 2 – Redline Tariff Revisions



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) #: 6678-E-A

Tier Designation: 1

Subject of AL: Supplemental: Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E-5172 and PG&E's Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2 and 11 as Discussed in Resolution E-5172

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 E-5172, D.20-09-035

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 11/4/22

No. of tariff sheets: 3

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

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

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

Tariff schedules affected: See Attachment 1

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: 6678-E, 6682-E-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

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
54494-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 161	51806-E
54495-E	ELECTRIC TABLE OF CONTENTS Sheet 1	54492-E
54496-E	ELECTRIC TABLE OF CONTENTS Sheet 20	54493-E



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 161

G. ENGINEERING REVIEW DETAILS (Cont'd.)

1. INITIAL REVIEW SCREENS (Cont'd.)

m. Screen M: When ICA Values are available at the requested Point of Interconnection, the Distribution Provider shall compare the ICA Values to the Gross Nameplate Rating or typical PV Generation Profile.

For Interconnection Requests based on Gross Nameplate Rating:

- a. Is the Generating Facility aggregate Gross Nameplate Rating less than or equal to 90% of the lowest value in the ICA-SG 576 Profile? or (P)
(P)
- b. Is the Generating Facility aggregate Gross Nameplate Rating less than or equal to 90% of the lowest value in the ICA-OF 576 Profile? (P)

If the response is "yes" to both a) and b), the Interconnection Request passes Screen M. (P)
(P)

If the response is "no" to either a) or b), the Interconnection Request fails Screen M and must be evaluated under the Supplemental Review to determine mitigation requirements. (P)

For Interconnection Requests based on typical PV Generation Profile:

- a. Is the Generating Facility Generation Profile based on PVWatts® or equivalent less than or equal to 90% of the ICA-SG 576 value in every hour? or (P)
(P)
(T)
- b. Is the Generating Facility Generation Profile based on PVWatts® or equivalent less than or equal to 90% of the ICA-OF 576 value in every hour? (P)
(P)
(T)

If the response is "yes" to both a) and b), the Interconnection Request passes Screen M. (P)
(P)

If the response is "no" to either a) or b), the Interconnection Request fails Screen M and must be evaluated under the Supplemental Review to determine mitigation requirements. (P)

(Continued)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Title Page.....		54495-E (T)
Rate Schedules.....	52160,53684*, 52162,52163,52164,52165,52034,49654,49184-E	
Preliminary Statements.....	49185,48878,50629,50630,53576,50058,53577-E	
Preliminary Statements, Rules.....	52251,50633,54496-E	(T)
Rules, Maps, Contracts and Deviations.....	52223-E	
Sample Forms.....	50636,49743,50637,50638,50639,49735,	
.....	50640,53589,52256,52257,49309,49310,49311-E	

(Continued)



ELECTRIC TABLE OF CONTENTS

Sheet 20

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
	Rules (Cont'd)	
Rule 21	Generating Facility Interconnections..... 53729,49771,50319,50320,50321,50812,50813,50814,50815,50816,50817,52998,53730,53731,42312,53732,53733,53734,53735,53736,53737,53001,42320,50821,42322,53738,53739,53740,53741,53742,53743,42329,42330,42331,42332,42333,42334,50334,42336,42337,42338,42339,42340,46374,42342,42343,42344,42345,42346,42347,42348,50335,50336,50337,50338,49785,49786,49787,49788,49789,49790,49791,49792,50339,49794,49795,49796,49797,50340,49799,50341,53938,53939,50344,50345,50346,53002,50348,50349,50350,50351,50352,50353,50354,50355,50356,50357,50358,50359,50360,50361,50362,50363,50364,50365,50366,50367,50368,50369,50370,50371,50372,50373,50374,50375,50376,50377,50378,50379,50380,50381,50382,50383,50384,50385,50386,50387,50388,50389,50390,50391,50392,50393,50394,50395,50396,50397,50398,50399,50400,50401,50402,50403,50404,50405,50406,50407,50408,50409,50410,50411,50412,50413,50414,53930,53931,54494,50418,50419,50420,51652,51653*,51654,51980*,50425,50823,50824,50825,51655,51656,53940,53941,54491,53933,53934,53935,50834,50835,50836,50837,53746,53747,53748,53749,50842,53750,50844,50845,50846,53751,53752,50849,53753,50851,53754,50853,50854,50855,50856,50857,50858,50859,50860,50861,50862,50863,50864,50865,50866,50867,50868,53942,50870,53943,53944,50873,53945,53946,53947,50877,50878,50879,53948,50881,50882,50883,50884,50885,50886,50887,50888,50889,53949,50891,50892,50893,50894,50895,53003,53004,53005,53006,53007,53008,53009,53010,53011,53012,53755,53756,53015,53757,53017,53758,53759,53760,53021,53761,53023,53024,53025,53026,53027,53028,53029,53030,53031,53032,53033,53034,53035,53036,53037,53038,53039,53040,53041,53762,53043,53044,53045,53046,53047,53048,53049,53050,53051,53052,53053,53054,53055,53056,53763,53764,53765,53766,53767,53768,53769,53770,53771,53772,53773,53774,53775,53776,53777,53778,53779,53780,53781,53782,53783,53784,53785,53786,53787,53788,53789,53790,53791,53792,53793,53794,53795,53796,53797,53798,53799,53800,53801-E	(T)
Rule 22	Direct Access Service 33491,29165,29166,29167,29168,29169,29170,29171,14896,30872,30873,32758,32992,32993,32994,32995,30879,30880,30881,30882,30883,30884,30885,30886,30887,30888,30889,30890,30891,30892,30893,30894,30895,43002,30897,30898,30899,30900,30901,30902,30903,30904,30905,30906,30907,30908,30910,30911,30912,30913,30914,30915,51173,30493,30494,30495,30496,30497,30498,30923,30924,30925,30926,33499,33500,33501,33502,33503-E	
Rule 22.1	Direct Access Service Switching Exemption Rules..... 44759,32404,44760,44761,44762,44763,44764,44765,44766,44767,44768,44769,44770,44771,44772,44773,44774-E	
Rule 23	Standby Service..... 48308,48309,32810,25530*,25531*25532*,25533*,25534*,30933,29202,25537*,48310,48311,48312,48313,48314,48315,48316,48317,48318,48319,48320,48321,48322,48323,48324,48325,48326,48327,48328,48329,48330,48331,48332,48333,48334,48335,48336,48337,48338,48339,48340,48341,48342,48343,48344,51174,51478,48347,48348,48349,48350,48351,483452,48353,48354,48355,48356,48357,48358,48359,48360,48361,48362,48363,48364,48365,48366,48367-E	
Rule 23.2	Community Choice Aggregation Open Season25575,25576,25577,27270,27271-E	

(Continued)

Attachment 2

Redline Tariff Revisions

For convenience of the reader, PG&E has included redline revisions in Attachment 2. **These redline revisions only include redlined sheets that have been modified in this advice letter (AL 6678-E-A).** Where Electric Rule 21 has been revised, the affected sheets are included in Attachment 1.

In this advice letter and accordance to CPUC General Order 96-B, Section 9.5.3, PG&E has implemented the use of the “(P)” symbol to signify material subject to change under a pending advice letter. The redlines in Attachment 2 are color coded to the specific advice letter. The color coding is as follows:

Redline Text Color	Advice Letter	Subject	Comments
	6678-E	Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E 5172 and PG&E’s Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2 and 11 as Discussed in Resolution E-5172	In this advice letter, revisions are made pursuant to Resolution E-5172 following the CPUC’S granting PG&E’s <i>Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2, 6, and 11 as Discussed in Resolution E-5172.</i> Revisions are also made as recommended by IREC.
	6678-E-A	Supplemental: Advice Letter Modifying Electric Rule 21 Pursuant to Resolution E 5172 and PG&E’s Request for Extension of Time to Comply with D.20-09-035 Ordering Paragraphs 2 and 11 as Discussed in Resolution E-5172	This advice letter supplements PG&E’s AL 6678-E submitted on August 12, 2022 by including corrections ordered by the Commission from D. 22-10-020.



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 155

G. ENGINEERING REVIEW DETAILS (Cont'd.)

1. INITIAL REVIEW SCREENS (Cont'd.)

m. Screen M: When ICA Values are available at the requested Point of Interconnection, the Distribution Provider shall compare the ICA Values to the Gross Nameplate Rating or typical PV Generation Profile.

For Interconnection Requests based on Gross Nameplate Rating:

a. Is the Generating Facility aggregate Gross Nameplate Rating less than or equal to 90% of the lowest value in the ICA-SG 576 Profile? (P)
or

b. Is the Generating Facility aggregate Gross Nameplate Rating greater than less than or equal to 90% of the lowest value in the ICA-OF 576 Profile? (P)

If the response is "yes" to both a) and b), the Interconnection Request passes Screen M. (P)

If the response is "no" to either a) or b), the Interconnection Request fails Screen M and must be evaluated under the Supplemental Review to determine mitigation requirements. (P)

For Interconnection Requests based on typical PV Generation Profile:

a. Is the Generating Facility Generation Profile based on PVWatts® or equivalent greater than less than or equal to 90% of the ICA-SG 576 value in any every hour? or (P)
(P)
(T)

b. Is the Generating Facility Generation Profile based on PVWatts® or equivalent greater than less than or equal to 90% of the ICA-OF 576 value in any every hour? (P)
(P)
(T)

If the response is "yes" to both a) and b), the Interconnection Request passes Screen M. (P)
(P)

If the response is "no" to either a) or b), the Interconnection Request fails Screen M and must be evaluated under the Supplemental Review to determine mitigation requirements. (P)

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**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.

Resource Innovations

SCD Energy Solutions
San Diego Gas & Electric Company

SPURR

San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Stoel Rives LLP

Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy