

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6791E
As of September 19, 2023

Subject: Pacific Gas & Electric Company's Request for Certification of Energy Storage Procurement in Other Proceedings for Assembly Bill 2514 Compliance Targets

Division Assigned: Energy

Date Filed: 12-15-2022

Date to Calendar: 12-16-2022

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	12-15-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

December 15, 2022

Advice 6791-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Pacific Gas & Electric Company's Request for Certification of Energy Storage Procurement in Other Proceedings for Assembly Bill 2514 Compliance Targets

Purpose

In Decision (D.)13-10-040, and reaffirmed by D.22-04-044, the California Public Utilities Commission (CPUC) required PG&E to submit a Tier 1 Advice Letter providing a summary of all projects approved in other venues and proceedings at the Commission seeking approval to count toward Assembly Bill (AB) 2514¹ energy storage targets.

PG&E respectfully requests that the following project be included in the aforementioned compliance filing to Energy Division to count toward the AB 2514 distribution-domain target:²

- Poblano Energy Storage – Inland Empire (50 megawatts MW)³

Background

On April 21, 2022, the Commission adopted D.22-04-044, approving PG&E's 2020 AB 2514 energy storage plan and acknowledged that PG&E had "completely or nearly completely met [its] entire...procurement obligation,"⁴ noting surplus capacity in the transmission and customer domains but a 20.5 MW deficit in the distribution domain that "mainly resulted from project terminations that seem to have occurred in good faith."⁵ D.22-04-044 also provided a procedural pathway to count procurement in other

¹ Stats 2010, Ch. 469, codified at Cal. Pub. Util. Code §§ 2835-2839.

² PG&E has an overall 37 megawatt (MW) procurement obligation under AB 2514 for storage projects in the distribution domain.

³ On December 1, 2022, the CPUC adopted Resolution E-5243, which approved an amended contract for the Poblano Energy Storage (Inland Empire) project, reducing the project's capacity to 50 MW and changing the Initial Delivery Date to June 1, 2024.

⁴ D.22-04-044, pg. 2.

⁵ *Id.*, pg. 13.

proceedings for purposes of AB 2514 compliance. Specifically, Ordering Paragraph (OP) 1 of D.22-04-044 directs each of the large investor-owned utilities (IOUs) to, as necessary and as described in Section 3.5 of that Decision:

- 1) Certify sufficient energy storage procurement that has been approved in other processes at the Commission by filing a Tier 1 Advice Letter requesting such certification; or
- 2) File a Tier 2 Advice Letter with the Commission requesting the authority to hold an additional energy storage procurement solicitation to meet its prescribed targets.

PG&E has been actively soliciting new system-reliability projects within the Integrated Resource Plan (IRP) and related proceedings. Under D.21-06-035, the Commission required PG&E to procure 2,302 MW for its bundled service customer portion to help replace the current supply of energy from the Diablo Canyon Power Plant. PG&E executed nine agreements (including the Poblano Energy Storage Project) and sought approval for those contracts on January 1, 2022, which the Commission approved on April 21, 2022.⁶ The rationale for counting the Poblano Energy Storage Project towards PG&E's AB 2514 distribution-domain target under D.13-10-040, is that the resource will be installed in 2024 (before the 2024 deadline for storage projects to be online) and supports grid optimization by providing a clear contribution to key system reliability needs identified in D.21-06-035.

On June 15, 2022, PG&E submitted its first "Bi-Annual Energy Storage Progress Report," noting plans for a future Tier 1 Advice Letter – this submission – to certify the Poblano Energy Storage Project (Inland Empire) to meet its AB 2514 distribution-domain target. Consequently, PG&E requests approval to add 50 MW to its reported totals⁷ to eliminate the current 20.5 MW procurement deficit through this filing.

PG&E's 2020 Energy Storage Application (A.20-03-002), which was disposed in D.22-04-044, referenced additional procurement that PG&E has undertaken in other proceedings, not solely intended to meet AB 2514 requirements, to procure energy storage that counts toward PG&E's AB 2514 requirements. Because that procurement was previously reviewed by the Commission in the context of A.20-03-002, this Advice Letter details only the incremental procurement of the Poblano Energy Storage Project and incorporates by reference the previously-reviewed and counted procurement from other proceedings detailed in A.20-03-002.

⁶ As noted in footnote 2 above, the contract for Poblano Energy Storage was subsequently amended, and that amended contract was approved by the Commission in Resolution E-5243 on December 1, 2022.

⁷ PG&E will reflect this addition in its next Bi-Annual Energy Storage Progress Report, which it expects to separately submit by December 15, 2022.

Approved Project Description

The Poblano Energy Storage Project (Inland Empire) is a 50 MW Lithium Iron Phosphate Battery Storage project, located in Rialto, California. The project will be distribution interconnected to Southern California Edison's system at its Alder-Falcon Ridge 66 kV line (Oswald Substation) and has an Initial Delivery Date of June 1, 2024. The term of the Long Term Resource Adequacy Agreement between PG&E and Poblano Energy Storage, LLC, commences on the Initial Delivery Date and continues for a period of 15 contract years.

Update on AB 2514 Compliance Status

PG&E will be submitting its second Bi-Annual Energy Storage Progress Report on or before December 15, 2022, to update the Commission on all progress towards fulfilling the AB 2514 targets.

In summary, PG&E continues making progress to bring AB 2514-compliant energy storage projects online by the end of 2024. Since the June 15 Progress Report six months ago, PG&E reports that an additional 26.6 MW of SGIP projects (customer domain) have been installed and the 10 MW Pomona Energy Storage project (distribution domain) has been terminated. With the addition of the 50 MW Poblano Energy Storage Project (distribution domain) from this Advice Letter, PG&E will be fully compliant in all three domains for AB 2514 procurement.

The submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **January 4, 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 submittal become effective upon date of submittal, which is December 15, 2022.

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 A.20-03-002, A.20-03-003, A.20-03-004. 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 A.20-03-002, A.20-03-003, A.20-03-004.



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) #: 6791-E

Tier Designation: 1

Subject of AL: Pacific Gas & Electric Company's Request for Certification of Energy Storage Procurement in Other Proceedings for Assembly Bill 2514 Compliance Targets

Keywords (choose from CPUC listing): Compliance, Procurement

AL Type: Monthly Quarterly Annual One-Time Other:

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

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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

Resolution required? Yes No

Requested effective date: 12/15/22

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

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

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF	Public Advocates Office Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc.
Atlas ReFuel BART	iCommLaw International Power Technology Intertie	Resource Innovations SCD Energy Solutions San Diego Gas & Electric Company
Barkovich & Yap, Inc. Braun Blaising Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission	Intestate Gas Services, Inc. Johnston, Kevin Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	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
California Hub for Energy Efficiency Financing	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Modesto Irrigation District NLine Energy, Inc. NRG Solar	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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 Dish Wireless L.L.C.		