

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 13, 2023

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**Subject: Energy Division Approval of the Pacific Gas and Electric Advice Letter 6847-E/6847-E-A, Southern California Edison Advice Letter 4963-E/4963-E-A, and San Diego Gas & Electric Advice Letter 4154-E/4154-E-A – Modifications to Existing Tariffs as Directed by Decision 22-12-056**

Dear Sidney Dietz, Tara Kaushik, and Greg Anderson,

This disposition letter approves Pacific Gas and Electric (PG&E) Advice Letter (AL) 6847-E (with modifications made by PG&E AL 6847 E-A), Southern California Edison (SCE) AL 4963-E (with modifications made by SCE AL 4963-E-A), and San Diego Gas & Electric (SDG&E) AL 4154-E (with modifications made by SDG&E AL 4154-E-A as well as substitute sheets submitted on April 5, 2023 and April 10, 2023), effective March 1, 2023.

California Public Utilities Commission (CPUC) Decision (D.)22-12-056 was approved on December 15, 2023. The decision established the framework for the net billing tariff, a successor to Net Energy Metering 2.0 (NEM 2.0). Ordering Paragraph 12 of the decision directs PG&E, SCE, and SDG&E (collectively “the utilities”) to file tier 2 advice letters no later than 45 days after the adoption date of D.22-12-056. The utilities timely submitted their advice letters on January 30, 2023.

On February 21, 2023, the California Solar and Storage Association (CALSSA), the Solar Energy Industries Association (SEIA), the County of Santa Clara, and the City of Fresno submitted protests to PG&E AL 6847-E. The same day, CALSSA and SEIA also submitted protests to SCE AL 4963-E and SDG&E AL 4154-E. On February 22, 2023, the Oakland Unified School District (OUSD) late submitted a protest to PG&E AL 6847-E. On February 24, 2023, Energy Division elected to accept OUSD’s late submitted protest under authority granted by CPUC General Order 96-B Rule 7.4.4.

On March 1, 2023, PG&E, SCE, and SDG&E submitted replies to all protests. In those replies, the utilities indicated their intention to file supplemental advice letters at a later date to address protests.

On March 17, 2023, PG&E submitted supplemental advice letter 6847-E-A. On March 27, 2023, SCE submitted supplemental advice letter 4963-E-A. On March 31, 2023, SDG&E submitted supplemental advice letter 4154-E-A, on April 5, 2023, SDG&E submitted substitute sheets to SDG&E AL 4154-E-A, and on April 10, 2023 SDG&E submitted additional substitute sheets to SDG&E AL 4154-E-A.

Energy Division finds that PG&E AL 6847-E (with modifications made by PG&E AL 6847 E-A), SCE AL 4963-E (with modifications made by SCE AL 4963-E-A), and SDG&E AL 4154-E (with modifications made by SDG&E AL 4154-E-A as well as substitute sheets submitted on April 5, 2023 and April 10, 2023) comply with D.22-12-056 and are approved with an effective date of March 1, 2023. Attachment 1 contains a detailed discussion of the background, protests, reply, supplemental and staff's determination.

Please direct any questions regarding Energy Division's findings in this disposition to Chris Westling ([christopher.westling@cpuc.ca.gov](mailto:christopher.westling@cpuc.ca.gov)).

Sincerely,

Handwritten signature of Leuwam Tesfai in black ink, followed by the word "FOR" in a simple, sans-serif font.

Leuwam Tesfai  
Deputy Executive Director for Energy and Climate Policy /  
Director of Energy Division

cc:

Tadashi Nakadegawa, Deputy Chief of Facilities Planning and Management, Oakland Unified School District  
James R. Williams, County Counsel, County of Santa Clara  
Ann D. Kloose, Sustainability Division Manager, City of Fresno  
Jeanne B Armstrong, Senior Regulatory Attorney, Solar Energy Industries Association  
Brad Heavner, Policy Director, California Solar and Storage Association

## Attachment 1

### Background

Pursuant to California Public Utilities Code Section 2827.1, Decision (D.)22-12-056 was adopted on December 15, 2023. The decision adopted the net billing tariff (NBT) – a successor to the net energy metering successor tariff (NEM 2.0). The new tariff addressed the guiding principles adopted in D.21-02-011 as well as the requirements of the Public Utilities Code. The NBT was established to balance the multiple requirements of the Public Utilities Code and the needs of the electric grid, the environment, participating ratepayers, as well as all other ratepayers.

Ordering Paragraph 12(f) of D.22-12-056 directed a series of implementation procedures, including directing PG&E, SCE, and SDG&E (collectively “the utilities”) to file advice letters 45 days after the decision was adopted to update current NEM tariffs and establish the future NBT tariffs. On January 30, 2023, the utilities each submitted three separate advice letters. PG&E AL 6847-E, SCE AL 4963-E, and SDG&E AL 4154-E (the ALs subject to this disposition) were submitted to make modifications to the utilities’ existing tariffs.

PG&E AL 6847-E, SCE AL 4963-E, and SDG&E AL 4154-E all make nearly identical changes to the net energy metering tariff (NEM 1.0) and the net energy metering successor tariff (NEM 2.0). A summary of the changes is presented below:

- For the NEM 1.0 tariff, the ALs clarify that the transition of NEM 1.0 customers whose 20-year legacy period has expired would be paused during 2023. During the 2023 transition period, rather than migrating to NEM 2.0 at the end of their legacy period, these customers would be moved directly to the net billing tariff (NBT) once NBT billing system updates become operational.
- For the NEM 2.0 tariff:
  - The utilities propose that the NEM 2.0 tariffs be modified to note that the tariff would be closed to new customers after the NEM 2.0 sunset date ordered in D.22-12-056 (120 days after the adoption of the decision, or April 14, 2023).
  - Customers submitting interconnection applications on or after April 15, 2023 would be served on the NEM 2.0 tariff on an interim basis and would transition to NBT at the end of their first Relevant Period (also known as the customer’s 12-month true-up period) once billing systems for the NBT become operational. As foreseen by the transition process established in D.22-12-056, should the advice letters establishing the NBT fail to be disposed of by April 14, 2023, the language proposed by the utilities would still allow for customers to take interim service on NEM 2.0 until the new tariff is approved and operational.
  - All customers who have applied for interconnection under NEM 2.0 on or before April 14, 2023 (including customers who applied prior to December 15, 2023) would have three years to complete construction and permitting.
- Net energy metering aggregation (NEMA):
  - The NEM 2.0 subtariff, net energy metering aggregation or NEMA, would remain open. Applications submitted on April 15, 2023 or later would a) be required to have had two or

more meters installed on the premises as of December 15, 2022 and b) would receive a nine year legacy period in accordance to the Decision.

Additionally, SDG&E AL 4154-E proposes modifying SDG&E's EV-TOU-5 tariff to expand eligibility to NBT customers.

## **Protests and Responses**

Protests to the advice letters were submitted by the City of Fresno, the County of Santa Clara, the California Solar and Storage Association, the Solar Energy Industries Association, and the Oakland School District.

On February 15, 2023, February 16, 2023, and February 22, 2023,<sup>1</sup> the City of Fresno, the County of Santa Clara, and the Oakland Unified School District (OUSD), respectfully, submitted protests to PG&E AL 6847-E. These protests posit that the three-year build deadline should only apply to projects submitting applications during the sunset period (applications submitted between December 15, 2022, to April 14, 2023).

On February 21, 2023, the Solar Energy Industries Association (SEIA) and the California Solar and Storage Association (CALSSA) submitted protests of PG&E AL 6847-E, SCE AL 4963-E, and SDG&E AL 4154-E. Their protests also addressed the three-year build deadline as well as a range of other issues, discussed below.

On February 28, 2023, the utilities submitted nearly identical replies to the aforementioned protests.

### *The Three-year Deadline*

In protests, the City of Fresno, County of Santa Clara, CALSSA, SEIA, and OUSD argued that the three-year build deadline should only apply to projects submitting applications during the sunset period (applications submitted between December 15, 2022 to April 14, 2023).

In their replies, the utilities argue that Ordering Paragraph 12 of D.22-12-056 does not explicitly address whether these time limits apply to applications submitted *before* the adoption date of the decision. However they argue that a establishing a cutoff date for these projects is consistent with the intent of the decision “to prevent applications ‘that linger in the interconnection system.’”<sup>2</sup> The utilities’ replies signaled their intent to file supplemental advice letters that would modify the NEM 2.0 tariffs so that all pending NEM 2.0 applications (regardless of application date) would have until April 14, 2026 (three years from April 14, 2023) to complete construction, submit final building permit sign off, and obtain electrical clearing by the authority having jurisdiction. The replies argue that this is reasonably consistent with the decision’s intent.

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<sup>1</sup> On February 24, 2023, Energy Division elected to accept OUSD’s late filed protest under authority granted by CPUC General Order 96-B Rule 7.4.4.

<sup>2</sup> Southern California Edison’s “Reply to Solar Energy Industries Association and the California Solar & Storage Association Protests of Southern California Edison Company’s Advice 4963-E” at p.2

### *Required Document List*

In protests, CALSSA and SEIA argue that the ALs should modify the list of documents required for NEM 2.0 eligibility during the sunset period to match the language in the decision.

In their replies, the utilities note that some portions of CALSSA and SEIA's protests do not comport with the decision. For example, "supplemental forms" are not listed in the decision among the items required for NEM 2.0 eligibility during the sunset period. The utilities' replies note an intent to provide additional information in their interconnection portals and websites to clarify the documents required. They also note that utilities would propose augmented tariff language via a supplemental advice letter that adds an "Authorization to Act on the Customer's Behalf" document for non-residential customers.

### *Discretion for Utility-caused Delays*

In protests, CALSSA and SEIA argue that the ALs should grant the utilities discretion to assign NEM 2.0 eligibility to customers who are delayed in meeting the three-year construction and permitting deadline if the delays are the fault of the utility.

In their replies, the utilities state that they agree with the protests and note an intent to file supplemental advice letters accordingly. The supplemental advice letter would clarify that 1) the utilities have discretion to provide NEM 2.0 eligibility to a customer if a delay in meeting the NEM 2.0 sunset date is caused by the utility and 2) the utilities have discretion to grant NEM 2.0 eligibility to a customer who fails to submit necessary permitting documentation by April 14, 2026 if the delay is caused by the utility.

### *Treatment of "Hybrid" Systems*

In protests, CALSSA and SEIA argue that the ALs should clarify how they "hybrid" systems<sup>3</sup> on both NEM 2.0 and NBT will be treated and should explicitly allow NEM 2.0 customers who expand their system to retain NEM 2.0 status for the original system if they separately meter the additional capacity and take service on NBT for the new expanded capacity.

In their replies, the utilities state that the only tariff option that would allow for the allocation of the correct amount of NEM 2.0 credits would be the Rule 21 non-export tariff for the new portion of the system. The replies note that "it is infeasible for the utilities to bill two separate systems connected behind the same meter with these very different crediting mechanisms" and that they intend to clarify these limitations in a supplemental advice letter.<sup>4</sup>

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<sup>3</sup> Customers with NEM 2.0 projects that are expanded more than 10% of their original capacity or by more than 1 kW (whichever is less) must either bifurcate their system through NEM-Multi-Tariff or move the entire system to the currently available tariff (e.g. NBT)

<sup>4</sup> "Pacific Gas and Electric Company's Reply to the Protests from the City of Fresno, County of Santa Clara, Oakland Unified School District, California Solar & Storage Association (CALSSA) and Solar Energy Industries Association (SEIA) to Advice 6847-E – Modifications to Electric Schedule NEM2- Net Energy Metering Service Per Decision (D.) 22-12-056, Ordering Paragraphs 11,12d and 12P" at p.5

### *PG&E's Proposed Land Review of NEMA Applications*

In protests, CALSSA and SEIA argue that PG&E should not delay review of NEMA tariff applications by conducting a land review of the parcels before further examining the NEMA application.

In their replies, the utilities state that there is a need to maintain the integrity of the Rule 21 interconnection process. However, the utilities note they will attempt to resolve SEIA and CALSSA's concerns by adopting the language that SEIA proposed to address this issue in a supplemental advice letter.

### *System Size Calculation*

In its protests, CALSSA argues that the ALs should modify the system size calculation to conform to Rule 21.

In their replies, the utilities disagree that this change is needed. They note that the language that CALSSA takes issue with already exists in the tariff, is not proposed to be modified through these advice letters, and is not addressed in the decision. Further, the utilities note that the language in Rule 21 is related to system modifications while the language in the NEM 2.0 tariff is not. The utilities state that by changing the language now, it could "introduce unnecessary gaming for cost-responsibility."<sup>5</sup>

### *Addition of Storage*

In protests, CALSSA argues that the NEM 2.0 tariffs should be clear that customers can add storage without impacting their current legacy period.

In their replies, the utilities state that they agree with the protest and note their intention to propose the necessary changes to the tariff language via a supplemental advice letter.

### *Updates to Rule 21*

In protests, CALSSA argues that PG&E and SDG&E should include changes to Rule 21 to match the Rule 21 changes proposed by SCE.

In their responses, the utilities agree and note their intent to propose necessary changes through a supplemental advice letter.

## **Supplementals**

On March 17, 2023, PG&E submitted supplemental advice letter 6847-E-A. On March 27, 2023, SCE submitted supplemental advice letter 4963-E-A. On March 31, 2023, SDG&E submitted supplemental advice letter 4154-E-A and on April 5, 2023, submitted substitute sheets to SDG&E AL 4154-E-A.

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<sup>5</sup> "Pacific Gas and Electric Company's Reply to the Protests from the City of Fresno, County of Santa Clara, Oakland Unified School District, California Solar & Storage Association (CALSSA) and Solar Energy Industries Association (SEIA) to Advice 6847-E – Modifications to Electric Schedule NEM2- Net Energy Metering Service Per Decision (D.) 22-12-056, Ordering Paragraphs 11,12d and 12P" at p.6

In the supplemental advice letters, changes proposed by SEIA were made to add language to ensure that for NEMA applications the utilities will review the application for major deficiencies before beginning a land review. Changes were made by all utilities to clarify that the construction and permitting submission deadline for all applications (both prior to December 15, 2022 and after December 15, 2022) will have until April 14, 2026 to submit all documents. The utilities also propose language providing utility discretion to grant NEM 2.0 eligibility if the customer fails to submit documentation on time due to a utility-caused delay. Further modifications were made to clarify that the addition of battery storage does not impact a customer's current NEM 1.0 or NEM 2.0 tariff legacy period. And finally, changes were made to note that customers who expand their NEM 2.0 system more than 10% or 1 kW will have the option to separately meter that additional new capacity under the Rule 21 non-export tariff. Alternatively, the customer may elect to move the entire system to NBT, in which case they will be eligible for the same benefits as a new NBT customer would be (applicable ACC Plus adder, 9 year export credit lock-in, 9 year legacy period) if the customer applies prior to January 1, 2028 (the end of the glidepath).

## **Discussion**

On many of the protested issues there appear to be broad or partial consensus between the protestors and the utilities. These issues include granting the utilities discretion to extend deadlines for specific customers if the utility is the cause of the delay, modifications of the NEMA application approval process to notify customers of deficient applications as soon as possible, modifications to the tariffs to make it clear that the addition of storage does not force customers to change tariffs, and the adoption of SCE's proposed changes to Rule 21 by PG&E and SDG&E.

On several issues, the utilities and protestors are not in complete agreement, but Energy Division finds the proposed changes that the utilities have made to accommodate the protestor's concerns are reasonable. These issues include the inclusion of a list of documents required for NEM 2.0 status during the sunset period within the tariff language, and the issue of system size calculation within Rule 21 and NEM 2.0.

The primary issue about which all protestors expressed concern was the three-year construction and permitting deadline applying to projects which applied for interconnection prior to December 15, 2022. While the decision is not explicit in how these applications should be handled, it is reasonable for both interconnection logistics and reduction of the NEM 2.0 cost shift that there be a final deadline for NEM 2.0 applications. There are several avenues that this deadline could be established: a) the original application date could be used, even if it is prior to December 15, 2022, b) all applications submitted prior to December 15, 2022 could be assigned December 15, 2022 as the de facto application date, thus granting customers until December 15, 2025 to complete their projects, or c) all customers (who applied both before and after December 15, 2022) could be assigned the latest possible date, April 14, 2023, as their de facto application date, thus granting all customers until April 14, 2026.

Energy Division finds that the first option (a) could jeopardize projects currently under construction and put undue burden on the customer. While the second option (b) provides more flexibility for customers, it would create incentives for early NEM 2.0 applicants to withdraw their applications and resubmit them on April 14, 2023. This could cause a surge of unnecessary paperwork for the utilities and subsequent delays in the processing of interconnection applications for all customers. The final option (c) is the most reasonable – it provides the most flexibility to customers while maintaining the intent of the decision that applications

not “linger in the interconnection system” indefinitely.<sup>6</sup> We find the changes proposed by the utilities in their supplemental advice letters to be reasonable and in conformance with D.22-12-056.

Finally, CALSSA and SEIA expressed concern over the treatment of “hybrid” systems (e.g. a NEM 2.0 system that is expanded beyond the allowable limits) once the NBT is in effect. The utilities raise valid concerns about the inability to calculate and allocate credits for each “portion” of such a system. In light of those challenges, the utilities propose a reasonable compromise whereby a customer can either separately meter the additional new capacity on a Rule 21 non-export tariff or the customer may elect to move the entire system (the original and expanded components) to the NBT. In the latter option, the utilities propose that the customer would then be eligible for the new customer benefits of the NBT if interconnected prior to January 1, 2028. Energy Division acknowledges this arrangement would impose an additional near-term cost shift burden on non-participating ratepayers and could negatively impact equity and decarbonization goals. However, Energy Division ultimately finds this proposal to be a reasonable compromise, because it may encourage NEM 2.0 customers to move to the NBT – an outcome that ultimately benefits all ratepayers over time.

In summary, all protests of PG&E AL 6847-E, SCE AL 4963-E, and SDG&E AL 4154-E are dismissed or resolved by the submission of PG&E AL 6847-E-A, SCE AL 4963-E-A, and SDG&E AL 4154-E-A. Therefore, Energy Division approves PG&E AL 6847-E-A, SCE AL 4963-E-A, and SDG&E AL 4154-E-A, effective March 1, 2023.

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<sup>6</sup> D.22-12-056 at pp.199-200

March 17, 2023

**Advice 6847-E-A**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: Modifications to Electric Schedule NEM2- Net Energy Metering Service Per Decision (D.) 22-12-056, Revising Net Energy Metering Tariff and Sub-tariffs, Ordering Paragraphs 11,12d and 12f**

**Purpose**

Pacific Gas and Electric Company (PG&E) respectfully submits this Tier 2 supplemental Advice Letter (AL) to modify its NEM2 tariff language based on the changes proposed in “PG&E’s Reply to Protest on AL 6847-E”, submitted on February 28, 2023. This supplemental AL partially replaces the original advice letter. The following parties protested PG&E’s original Advice Letter: City of Fresno and County of Santa Clara protests dated February 16, 2023, the California Solar and Storage Association (CALSSA) and the Solar Energy Industries Association (SEIA) protests dated February 21, 2023, and Oakland Unified School District protest dated February 22, 2023.

**Background**

Senate Bill (SB) 656 (Alquist, Stats. 1995, ch. 369), codified at Section 2827 to the Public Utilities Code, established net energy metering (NEM) in California. The statute directed every electric utility in California to develop a standard contract or tariff to allow eligible customer-generators (customers who own and operate an electrical generating facility to offset part or all their own electrical requirements) to receive a financial credit on their electric bills for energy fed back to the utility’s grid. The statute was subsequently amended several times, including among other changes, to add a new “option” to the NEM program to allow customers to aggregate load from multiple meters (“load aggregation,” also referred to as “net energy metering aggregation”).<sup>1</sup>

In 2013, Assembly Bill (AB) 327 (Perea, Stats. 2013, ch. 611) added Section 2827.1 to the Public Utilities Code and mandated that the Commission adopt a successor to the existing NEM tariff. Subsequently, the Commission approved Decision (D.) 16-01-044, which adopted a revised NEM tariff, now referred to as NEM2.

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<sup>1</sup> SB 594 (Wolk, 2012) codified at [Public Utilities Code Section 2827](#) (h)(4)(D).

On August 27, 2020, the Commission initiated a rulemaking to revisit the NEM tariffs adopted by D.16-01-044. Subsequently, on December 15, 2022, the Commission adopted D.22-12-056, adopting a successor to the current NEM2 tariff. Specific to this advice letter, D.22-12-056 orders the following changes:

OP 11 : “The Net Energy Metering Aggregation (NEMA) subtariff shall remain unchanged pending further review in this proceeding with the following modifications: (i) for customers applying to interconnect to NEMA after the NEM 2.0 Sunset Date, this decision reduces the legacy period to nine years to align with customers of the net billing tariff; and (ii) for customers applying to NEMA after the NEM 2.0 sunset date, NEMA eligibility is restricted to customers who already had two or more meters.

OP 12d : “(d) Step 4. No later than 120 days after the effective date of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company will implement a tariff sunset on the prior net energy metering tariff, known as NEM 2.0, after which time, no additional customers will be permitted to take service under the NEM 2.0 tariff. Customers with an interconnection application date after this Sunset Date will take service and be billed on the NEM 2.0 tariff on an interim basis and transition to the net billing tariff, once it is operational. These customers shall take service on the retail import rates available to NEM 2.0 tariff customers during this interim period and then be moved to retail import electrification rates adopted in this decision when fully transitioned to the net billing tariff. The NEM 2.0 tariff legacy period is not applicable in this case. The interconnection application date for residential customers is defined as the submission date of an application that is free of major deficiencies and includes a complete application, a signed contract, a single-line diagram, a complete California Contractors State License Board Solar Energy System Disclosure Document, a signed California Solar Consumer Protection Guide, and an oversizing attestation (if applicable). The interconnection application date for nonresidential customers is defined as the submission date of an application that is free of major deficiencies and includes a complete application, a signed Authorization to Act on a Customer’s Behalf, the selection of a single-line diagram, and an oversizing attestation (if applicable.) Joint Utilities are granted the discretion to give NEM 2.0 tariff eligibility to a customer if a delay in meeting the Sunset Date is caused by the utility. Joint Utilities shall work collaboratively to address challenging situations in deeming applications complete. Joint Utilities are directed to pause transition of NEM 1.0 customers to NEM 2.0 until the commencement of Step 5.”

OP 12f: “Three years from the application submission, all customers seeking to interconnect to the NEM 2.0 tariff shall submit final building permit sign off and electrical clearing by the authority having jurisdiction. Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison

Company have the discretion to apply NEM 2.0 eligibility to customers who fail to meet this deadline due to utility-caused delays.”

Multiple parties protested PG&E’s AL 6847-E, to which PG&E responded on February 28, 2023. PG&E submits this supplemental AL to incorporate revisions to the NEM2 tariff in response to the protests as indicated in its February 28 response.

### **Tariff Revisions**

The following specific tariff changes are made to the NEM2 tariff:

- Changes to applicability section to clarify (i) the closure of the NEM2 tariff except for NEM2 aggregation customers, and (ii) temporary enrollment under the NEM2 tariff in the event the Net Billing Tariff is not approved by the NEM2 sunset date.
- Changes to the Interconnection section to clarify the documentation necessary to maintain NEM2 eligibility. Specifically, for systems  $\leq 30$  kW applicants can select a template single line diagram instead of submitting a site-specific single line diagram.
- Changes to the interconnection section, as proposed by SIEA, adding language to ensure that, for load aggregation applications, PG&E will review the interconnection application for major deficiencies prior to commencing land review.
- Changes to the interconnection section to clarify that the building permit submission deadline for all applications (pending and new) is 3-years from the NEM2 sunset date, on or before April 14, 2026. PG&E provided the justification in its reply to the protests to AL-6847-E. Separately, as cited above when referencing OP 12f, PG&E notes that Special Condition 3 provides PG&E the discretion to apply NEM2 eligibility to customers who fail to submit a final building permit by April 15, 2026, if such failure is due to utility-caused delay.
- Changes to the Legacy Provision to clarify that the addition of a battery storage system will not force the customer to a different tariff.
- Changes to Legacy Provision, footnote 7, to clarify the hybrid option for NEM2 customers who modify their existing systems after April 14, 2023 above the allowable threshold. The customer will have the option to either meter the addition separately under Rule 21 non-export (which currently is the only option that would allow a customer to meter the addition separately and maintain the original system on the NEM2 tariff) or have the entire system be billed on the Net Billing Tariff. Also, PG&E clarifies that customers who will be moving to NBT before January 1, 2028, due to modifications/expansions will get the same benefits as a new NBT customer and will get the 9-year legacy period regardless of where they are in their NEM/NEM2 legacy.





# 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) #: 6847-E-A

Tier Designation: 2

Subject of AL: Supplemental: Modifications to Electric Schedule NEM2- Net Energy Metering Service Per Decision (D.) 22-12-056, Revising Net Energy Metering Tariff and Sub-tariffs, Ordering Paragraphs 11,12d and 12f

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.22-12-056

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: 3/1/23

No. of tariff sheets: 5

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 proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: 6395-E, 6778-E

<sup>1</sup>Discuss 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](mailto: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.
55762-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 1	50613-E
55763-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 15	54473-E
55764-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 28	50615-E
55765-E	ELECTRIC TABLE OF CONTENTS Sheet 1	55749-E
55766-E	ELECTRIC TABLE OF CONTENTS Sheet 6	55697-E



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 1

APPLICABILITY: Pursuant to Decision (D.) 22-12-056, this Schedule is closed to new customers with applications submitted after April 14, 2023 unless the customer is applying for Load Aggregation (NEM2A), as detailed in Special Condition 6. Notwithstanding the foregoing, and except for Load Aggregation customers, customers applying on or after April 15, 2023, but before the Net Billing Tariff (NBT) adopted by that decision is approved, may apply for interconnection under this Schedule subject to the terms of Special Condition 11. Customers applying before April 15, 2023, are subject to the application requirements specified in Special Condition 3 (Interconnection) to maintain eligibility on NEM2. (N)

This net energy-metering schedule pursuant to Decision (D.) 16-01-044 is applicable to a customer who takes service on an applicable time-of-use (TOU) rate schedule<sup>1,2</sup> and who uses a Renewable Electrical Generation Facility (REGF) as defined below that is located on the customer's owned, leased, or rented premises, is interconnected and operates in parallel with PG&E's transmission and distribution systems, and is intended primarily to offset part or all of the customer's own electrical requirements (hereinafter "eligible customer-generator" or "customer"). For a NEM REGF paired with storage, see Special Condition 9.

Notwithstanding the definition of "eligible customer-generator" above, eligible customer generator also includes (i) the California Department of Corrections and Rehabilitation (CDCR) pursuant to Special Condition 7 of this tariff.

Subject to the requirements of Special Condition 6, Load Aggregation to determine the customer's own electrical requirements is permitted. Certain incremental billing and metering costs set forth in this schedule that are related to net energy metering are applicable to Electric Service Providers (ESPs) serving eligible customer-generators.

This service is not applicable to a Direct Access (DA) customer where the customer's ESP does not offer a net energy metering tariff. In addition, if the tariffs for the customer's ESP do not permit Load Aggregation, as described in Special Condition 6, this option is not available to the DA customer. In addition, if an eligible customer-generator participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide net energy metering to the customer.

This rate schedule is available to customers that provide PG&E with:

- (a) a completed, signed Net Energy Metering Application and Interconnection Agreement as described in Special Condition 3 including all supporting documents and required payments; AND
- (b) evidence of the customer's final inspection clearance from the governmental authority having jurisdiction over the REGF,

See Special Condition 8 for NEM2 Legacy Provisions.

<sup>1</sup> Customers on Schedules such as ET, ES, and ESR, which have no corresponding TOU Rate, are not required to switch to TOU rates, unless and until such a rate becomes available.

<sup>2</sup> Customers, including those on Load Accounts on NEMA as described in Special Condition 6, switching from Schedule NEM to this NEM2 tariff are required to take any applicable TOU rate, beginning at the time the customer switches to the NEM2 tariff, pursuant to D.14-03-041 and D. 16-01-044. (T)

(Continued)



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 15

SPECIAL  
CONDITIONS:  
(Cont'd.)

3. INTERCONNECTION: (Cont'd.)

For Customers to receive service on this NEM2 schedule, their interconnection application must be submitted on or before April 14, 2023 (NEM2 Sunset Date), and must comply with the following:

- (i) The interconnection application date is defined as the submission date of an application that is free of major deficiencies and includes a complete application, a single-line diagram (for systems smaller than or equal to 30 kW, applicant does not need to upload a site-specific single-line diagram, but can instead select a template single-line diagram in the portal if applicable), a complete California Contractors State License Board Solar Energy System Disclosure Document (if applicable), a signed California Solar Consumer Protection Guide (if applicable) and for standard NEM, a signed Agreement and Customer Authorization.
- (ii) All customers seeking to interconnect on this NEM2 schedule shall submit final building permit sign off and electrical clearing by the authority having jurisdiction by no later than three years from the NEM2 sunset date (before April 15, 2026).
- (iii) For Customers seeking to interconnect on this NEM2 schedule pursuant to Special Condition 6, Load Aggregation, land review does not need to be complete for the application to be determined to be free of major deficiencies. PG&E will review the interconnection application for major deficiencies prior to commencing land review.

PG&E is granted the discretion to give NEM2 tariff eligibility to a customer if a delay in meeting the NEM2 Sunset Date (April 14, 2023) is caused by the utility. Similarly, PG&E has the discretion to apply NEM2 eligibility to customers who fail to submit the final building permit sign off and other necessary documentation within three years from the NEM2 sunset date (before April 15, 2026) if such failure is due to utility-caused delays.

For Load Aggregation, a completed and signed "NEM Load Aggregation Appendix" (Form 79-1202) must be submitted together with the appropriate NEM interconnection agreement listed above.

The eligible customer-generator must meet all applicable safety, and performance standards established by the National Electrical Code, the Institute of Electrical and Electronics Engineers, and accredited testing laboratories such as Underwriters Laboratories and, where applicable, rules of the California Public Utilities Commission regarding safety and reliability.

In order to promote the safety and reliability of the customer REGF, the applicant is required to verify as a part of each interconnection request for this tariff, that all major solar system components are on the verified equipment list maintained by the California Energy Commission and other equipment, as determined by PG&E, should be verified by the customer as having safety certification from a nationally recognized testing laboratory.

(N)

(N)

(L)

(L)

(Continued)



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 28

SPECIAL  
CONDITIONS:  
(Cont'd.)

- 8. NEM2 Legacy Provision (Cont'd.) (L)
- b. Modifications<sup>7</sup>. REGFs eligible for the 20-year transition period outlined above that are modified and/or repaired shall remain eligible for the remainder of their 20-year transition period as long as the modifications and/or repairs do not increase the REGF by more than the greater of:
  - 1) 10 percent of the REGF's nameplate rating capacity, as established when the REGF was originally interconnected, or
  - 2) 1 kW;

and provided the modifications and/or repairs do not result in the REGF exceeding the Customer's annual onsite load. (L)

Pursuant to D.22-12-056, the addition of energy storage to the Customer's existing Generating Facility shall not disqualify Customer from the remainder of their 20-year Transition Period on this Schedule. (N)
- c. Transferability. REGF eligible for the 20-year transition period shall not lose their eligibility if transferred to a new owner, operator, or PG&E account, provided the REGF remains at its original location.<sup>8</sup> (L)

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<sup>7</sup> This provision will only be enforced after April 14, 2023. Customers making modifications and/or additions to their REGF that exceed the 10 percent, or 1 kW limit referenced above have the option of either metering the additions and/or modifications separately under another eligible tariff (i.e., Rule 21 non-export), or have the entire REGF served under the Net Billing Tariff (NBT) subject to the terms and conditions contained therein. If an existing NEM2 customer chooses to meter the addition under Rule 21 non-export, the Customer's 20-year transition period is not altered. If an existing NEM2 customer chooses to have the entire system served on the NBT and the REGF receives Permission To Operate (PTO) for service on NBT before January 1, 2028, then the customer will be eligible for the same 9-year legacy period under the NBT as a new NBT customer and, if applicable, they will also receive the 9-year export compensation rate lock-in period and ACC Plus based on the calendar year that they receive PTO of the upgraded system on NBT. (N)

<sup>8</sup> The transfer of an existing REGF to a new location is considered a new installation requiring a new Interconnection Agreement that is subject to the applicable tariffs in place at the time the new Interconnection Request is completed. (L)

(Continued)



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Advice 6847-E-A  
Decision D.22-12-056

Issued by  
**Meredith Allen**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

March 17, 2023



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**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 1

APPLICABILITY: Pursuant to Decision (D.) 22-12-056, this Schedule is closed to new customers with applications submitted after April 14, 2023 unless the customer is applying for Load Aggregation (NEM2A), as detailed in Special Condition 6. Notwithstanding the foregoing, and except for Load Aggregation customers, customers applying on or after April 15, 2023, but before the Net Billing Tariff (NBT) adopted by that decision is approved, may apply for interconnection under this Schedule subject to the terms of Special Condition 11. Customers applying before April 15, 2023, are subject to the application requirements specified in Special Condition 3 (Interconnection) to maintain eligibility on NEM2.

This net energy-metering schedule pursuant to Decision (D.) 16-01-044 is applicable to a customer who takes service on an applicable time-of-use (TOU) rate schedule<sup>1,2</sup> and who uses a Renewable Electrical Generation Facility (REGF) as defined below that is located on the customer's owned, leased, or rented premises, is interconnected and operates in parallel with PG&E's transmission and distribution systems, and is intended primarily to offset part or all of the customer's own electrical requirements (hereinafter "eligible customer-generator" or "customer"). For a NEM REGF paired with storage, see Special Condition 9.

Notwithstanding the definition of "eligible customer-generator" above, eligible customer generator also includes (i) the California Department of Corrections and Rehabilitation (CDCR) pursuant to Special Condition 7 of this tariff.

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This service is not applicable to a Direct Access (DA) customer where the customer's ESP does not offer a net energy metering tariff. In addition, if the tariffs for the customer's ESP do not permit Load Aggregation, as described in Special Condition 6, this option is not available to the DA customer. In addition, if an eligible customer-generator participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide net energy metering to the customer.

This rate schedule is available to customers that provide PG&E with:

- (a) a completed, signed Net Energy Metering Application and Interconnection Agreement as described in Special Condition 3 including all supporting documents and required payments; AND
- (b) evidence of the customer's final inspection clearance from the governmental authority having jurisdiction over the REGF,

See Special Condition 8 for NEM2 Legacy Provisions.

<sup>1</sup> Customers on Schedules such as ET, ES, and ESR, which have no corresponding TOU Rate, are not required to switch to TOU rates, unless and until such a rate becomes available.

<sup>2</sup> Customers, including those on Load Accounts on NEMA as described in Special Condition 6, switching from Schedule NEM to this NEM2 ~~successor~~ tariff are required to take any applicable TOU rate, beginning at the time the customer switches to the NEM2 ~~successor~~ tariff, pursuant to D.14-03-041 and D. 16-01-044.

(Continued)



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 15

SPECIAL  
CONDITIONS:  
(Cont'd.)

3. INTERCONNECTION: (Cont'd.)

For Customers to receive service on this NEM2 schedule, their interconnection application must be submitted on or before April 14, 2023 (NEM2 Sunset Date), and must comply with the following:

(i) The interconnection application date is defined as the submission date of an application that is free of major deficiencies and includes a complete application, a single-line diagram (for systems smaller than or equal to 30 kW, applicant does not need to upload a site-specific single-line diagram, but can instead select a template single-line diagram in the portal if applicable), a complete California Contractors State License Board Solar Energy System Disclosure Document (if applicable), a signed California Solar Consumer Protection Guide (if applicable) and for standard NEM, a signed Agreement and Customer Authorization.

(ii) All customers seeking to interconnect on this NEM2 schedule shall submit final building permit sign off and electrical clearing by the authority having jurisdiction by no later than three years from the NEM2 sunset date (before April 15, 2026).

(+)(iii) For Customers seeking to interconnect on this NEM2 schedule pursuant to Special Condition 6, Load Aggregation, land review does not need to be complete for the application to be determined to be free of major deficiencies. PG&E will review the interconnection application for major deficiencies prior to commencing land review.

PG&E is granted the discretion to give NEM2 tariff eligibility to a customer if a delay in meeting the NEM2 Sunset Date (April 14, 2023) is caused by the utility. Similarly, PG&E has the discretion to apply NEM2 eligibility to customers who fail to submit the final building permit sign off and other necessary documentation within three years from the NEM2 sunset date (before April 15, 2026) if such failure is due to utility-caused delays.

For Load Aggregation, a completed and signed "NEM Load Aggregation Appendix" (Form 79-1202) must be submitted together with the appropriate NEM interconnection agreement listed above.

The eligible customer-generator must meet all applicable safety, and performance standards established by the National Electrical Code, the Institute of Electrical and Electronics Engineers, and accredited testing laboratories such as Underwriters Laboratories and, where applicable, rules of the California Public Utilities Commission regarding safety and reliability.

In order to promote the safety and reliability of the customer REGF, the applicant is required to verify as a part of each interconnection request for this tariff, that all major solar system components are on the verified equipment list maintained by the California Energy Commission and other equipment, as determined by PG&E, should be verified by the customer as having safety certification from a nationally recognized testing laboratory.

(Continued)

Advice Decision 6735-E

Issued by  
**Meredith Allen**  
Vice President, Regulatory Affairs

Submitted Effective Resolution  
October 12, 2022  
November 11, 2022

Public



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 27

SPECIAL  
CONDITIONS:  
(Cont'd.)

- 8. NEM2 Legacy Provision (Cont'd.)
  - b. Modifications<sup>7</sup>. REGFs eligible for the 20-year transition period outlined above that are modified and/or repaired shall remain eligible for the remainder of their 20-year transition period as long as the modifications and/or repairs do not increase the REGF by more than the greater of:
    - 1) 10 percent of the REGF's nameplate rating capacity, as established when the REGF was originally interconnected, or
    - 2) 1 kW;

and provided the modifications and/or repairs do not result in the REGF exceeding the Customer's annual onsite load.

Pursuant to D.22-12-056, the addition of energy storage to the Customer's existing Generating Facility shall not disqualify Customer from the remainder of their 20-year Transition Period on this Schedule.
  - c. Transferability. REGF eligible for the 20-year transition period shall not lose their eligibility if transferred to a new owner, operator, or PG&E account, provided the REGF remains at its original location.<sup>8</sup>

<sup>7</sup> This provision will only be enforced after April 14, 2023. Customers making modifications and/or additions to their REGF that exceed the 10 percent, or 1 kW limit referenced above have the option of either metering the additions and/or modifications separately under another eligible tariff (i.e., Rule 21 non-export), or have the entire REGF served under the Net Billing Tariff (NBT) subject to the terms and conditions contained therein. If an existing NEM2 customer chooses to meter the addition under Rule 21 non-export, the Customer's 20-year transition period is not altered. If an existing NEM2 customer chooses to have the entire system served on the NBT and the REGF receives Permission To Operate (PTO) for service on NBT before January 1, 2028, then the customer will be eligible for the same 9-year legacy period under the NBT as a new NBT customer and, if applicable, they will also receive the 9-year export compensation rate lock-in period and ACC Plus based on the calendar year that they receive PTO of the upgraded system on NBT. Customers making modifications and/or additions to their REGF that exceed the 10 percent or 1 kW limit referenced above have the option of either metering the additions and/or modifications separately under another eligible tariff or other authorized process, or having the entire REGF served under another eligible tariff, subject to the terms and conditions contained therein. This requirement will only be enforced upon the development of a new NEM Successor Tariff that supersedes D.16-01-044, or by the direction of the CPUC.

<sup>8</sup> The transfer of an existing REGF to a new location is considered a new installation requiring a new Interconnection Agreement that is subject to the applicable tariffs in place at the time the new Interconnection Request is completed.

(Continued)

**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 Blaising 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  
Downey Brand LLP  
Dish Wireless L.L.C.

East Bay Community Energy Ellison  
Schneider & Harris LLP  
Engineers and Scientists of California

GenOn Energy, Inc.  
Green Power Institute  
Hanna & Morton  
ICF

iCommLaw  
International Power Technology  
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin  
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