

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6875E
As of April 17, 2023

Subject: Information-Only Notification Only Pilot Cost Data

Division Assigned: Energy

Date Filed: 03-07-2023

Date to Calendar: 03-10-2023

Authorizing Documents: D2106002

Disposition:	Accepted
Effective Date:	03-07-2023

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

March 7, 2023

Advice 6875-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Information-Only Notification Only Pilot Cost Data

Purpose

Pursuant to Decision (D.) 21-06-002 (Decision) of the California Public Utilities Commission (Commission) Pacific Gas and Electric Company (PG&E) submits this advice letter to provide monthly cost data for the Notification-Only Pilot.

Background

On June 4, 2021, the Commission issued the Decision, which, among several requirements, adopted a two-year pilot of a notification-only interconnection application approach beginning 45 days from the issuance of the Decision (the Notification-Only Pilot). The Notification-Only Pilot began July 19, 2021. The Commission also directed SCE, Pacific Gas and Electric Company, and San Diego Gas & Electric Company (collectively, the Utilities) to garner stakeholder recommendations on data to collect to measure the impacts of the Notification-Only Pilot.

On September 2, 2021, the Utilities submitted Joint Advice Letter SDG&E 3843-E, PG&E 6315-E, and SCE 4582-E with Attachment A, the Notification-Only Data Collection Template, in compliance with Ordering Paragraph (OP) 4 of D.21-06-002 to identify the data they would collect to study the impacts of the Notification-Only Approach Pilot.

In October 2021, the Utilities met with Commission Energy Division staff to discuss the Utilities' Data Collection Plan for the Notification Only Pilot per D.21-06-002, OP 4, during which Energy Division staff recommended changes to Attachment A.

On November 19, 2021, the Utilities submitted Joint Advice Letter SDG&E 3843-E-A, PG&E 6315-E-A, and SCE 4582-E-A, which supplemented previously submitted Joint Advice 3843-E et. al., in its entirety.

In the Decision, the Commission addressed party comments questioning maintaining the \$800 application fee for notification-only projects. The Commission determined it was premature to waive or reduce fees in the pilot stage, but directed the Utilities, as part of

the data collection discussed above, to collect data on monthly costs associated with the pilot. The Commission directed the Utilities in the discussion portion of the Decision to submit the monthly cost data in a Tier 1 (Information Only) advice letter 13 months after the pilot began and 20 months after the pilot began (for the first 18 months of the pilot).¹ OP 5 included the 20-month advice letter requirement but did not reflect the 13-month advice letter requirement.

In preparation for the Notification-Only Pilot workshop required by OP 6 of the Decision, PG&E became aware that it inadvertently did not submit the 13-month Tier 1 (Information Only) advice letter, which would have been due August 19, 2022. PG&E regrets the oversight and is submitting the Advice Letter now to remedy its omission as promptly as possible.

As discussed at the workshop, PG&E did not have any developers or projects participate in the Notification-Only Pilot. However, PG&E identifies below the technology set-up costs associated with the pilot and estimated costs associated with the audit process. PG&E provided this same information to parties at the Notification-Only Pilot workshop held on February 14, 2023.

Discussion

PG&E provides cost data for the first 13 months of the Notification-Only Pilot in Attachment A in the format agreed upon by the parties and set forth in Joint Advice Letter SDG&E 3843-E-A, PG&E 6315-E-A, and SCE 4582-E-A.

As discussed above, PG&E did not receive any Notification-Only Pilot application submissions. Accordingly, it does not have data to provide for many of the categories set forth in the data collection template. Given that the parties agreed on a description for Tracking activity 3 – Audit costs (office audits) that provided “if no office audits were conducted, provide an estimate,” PG&E is providing an estimated cost for this Tracking activity based on previously calculated NEM and Rule 21 Non-Export estimates. PG&E is also providing data for Tracking activity 5 – Technology costs, as it incurred actual costs in connection with setting up the Notification-Only Pilot.

For readability in Attachment A, PG&E has color-coded the tracking activity column as red, yellow, or green. Green indicates the tracking attribute was available; yellow indicates PG&E is providing an estimated value for the tracking attribute; and red indicates data was unavailable due to zero project submissions.

¹ Decision at page 13.

Tier Designation

Pursuant to D.21-06-002, page 13, PG&E submits this advice letter with a Tier 1 (Information-Only) designation.

Protest

This is an information-only advice letter submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest.

Effective Date

This advice letter will become effective on March 7, 2023, the same date submitted.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for R.11-09-011 and R.17-07-007. 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

Attachment:

Attachment A: Notification-Only Data Collection

cc: Service Lists R.11-09-011 and R.17-07-007



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) #: 6875-E

Tier Designation: Information-Only

Subject of AL: Information-Only Notification Only Pilot Cost Data

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.21-06-002

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: 3/7/23

No. of tariff sheets: 0

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

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

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

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

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

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

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

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

Contact Name:
Title:
Utility/Entity Name:

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

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

Clear Form

Advice 6875-E
March 7, 2023

Attachment A

Notification-Only Data Collection

Attachment A Data Collection (PG&E)

Intake Process Tracking and Reporting		
Tracking activity	Description	Tracking Attribute
1	Count of total projects	Numeric
2	Count of projects per approved developer	Numeric
3	Count of projects with deficiencies	Numeric
4	Deficiency description (Notes 1 and 2)	Text
5	Day when applicant was notified of deficiency	date
6	Day when applicant responded to the deficiency	date
7	Day when IOU cleared deficiency	date
8	Day when IOU issued a suspension	date
9	Day when suspension was cleared	date
10	Day when suspension changed to revocation	date
11	Count of revocation due to inability to clear deficiencies (Note 2)	Numeric
12	Count of revocation due to safety violations (Note 1)	Numeric
13	Count of developers who were approved for the pilot	Numeric
14	Count of developers who were removed from the pilot	Numeric
15	Count of total non-program projects (Note 4)	Numeric

Impact Study Tracking and Reporting		
Tracking activity	Description	Tracking Attribute
1	Number of circuits reaching program limits (10 per approved developer)	Numeric
2	Number of circuits where the number of program + non-program projects (Note 4) exceeds 10	0
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
5	On a per circuit basis, for the circuits identified in (2), [summation of program and non-program projects on the circuit] / [number of customers on the circuit]	0

Impact Study Costs (Average \$/Application)		
Tracking activity	Description	Tracking Attribute
1	Intake processing costs	\$
2	Engineering review	\$
3	Audit costs (office audits) (If no office audits were conducted, provide an estimate)	*\$200
4	Audit costs (field audits)	\$
5	Technology costs (costs spread over two years)	\$340,000

* PG&E does not plan to perform office audits but per the guidance we are providing a cost estimate as part of the order

Note 1: Safety Evaluations List

- Connection within secondary networks
- Connecting on line-side taps
- Not using approved controls systems
- Not using approved inverters
- Project gross nameplate capacity >30 kVA
- Project paired with other generation, unless total project is non-export
- Project not connected to 120/240-volt service

Note 2: Notification Deficiency Types

- Single-line diagram needs clarification
- Authority having jurisdiction needs clarification
- Exceedance of 10 projects per circuit
- General application information needs clarification
- Service account (service meter) needs clarification

Note 3: Operational Issues

- Unexpected system load flows caused by (1)+(2)
- Unexpected safety issues caused by (1)+(2)

Note 4: Non-Program Projects

Non-program projects are those project which add storage capacity to existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

**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