

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



August 29, 2025

**SCE AL 5549-E  
PG&E AL 7619-E**

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**SUBJECT: Rejection of Southern California Edison Company and Pacific Gas and Electric Company Advice Letters to Modify Final Due Date for Documents Related to Net Energy Metering Aggregations and Virtual Net Energy Metering**

Dear Tara Kaushik and Sidney Dietz,

Pacific Gas and Electric Company (PG&E) Advice Letter (AL) 7619-E and Southern California Edison Company (SCE) AL 5549-E are rejected as of August 22, 2025.

**Background**

Decision (D.) 22-12-056 was adopted on December 15, 2022. The decision adopted the net billing tariff (NBT) – a successor to the net energy metering successor tariff (NEM 2).

Ordering Paragraph (OP) 9 of D.22-12-056 modified the Virtual Net Energy Metering (VNEM) tariff for customers applying to interconnect after the NEM2 tariff sunset date by reducing the legacy period for these customers from 20 to nine years. Similarly, OP 11 of the decision modified the Net Energy Metering Aggregation (NEMA) subtariff for customers applying to interconnect after the NEM2 tariff sunset date by reducing the legacy period for these customers from 20 to nine years. OP 12(d) established April 14, 2023 as the final date for applications to interconnect under the NEM2 tariff (120 days after the effective date of the decision). OP 12(f) further directed the utilities to grant customers applying to interconnect to the NEM2 tariff three years from the date of application submission to submit final building permit sign off and electrical clearing by the authority having jurisdiction.

On November 16, 2023, D.23-11-068 was adopted. That decision adopted the Net Billing Tariff Aggregation (NBTA) subtariff to NBT – a successor to NEMA. It also adopted the Virtual Net Billing Tariff (VNBT) – a successor to the Virtual Net Energy Metering (VNEM) tariff.

OP 12(c) of D.23-11-068 established a final date for NEMA and VNEM applications for interconnections as February 14, 2024 (90 days after the effective date of the decision). OP 12(e) of D.23-11-068 required that three years from the application submission, all customers seeking to interconnect the VNEM tariff or NEMA shall submit final building permit sign-off.

### **Advice Letters**

SCE submitted SCE AL 5549-E on May 8, 2025 and PG&E submitted PG&E AL 7619-E on June 9, 2025. Both Tier 2 ALs seek to modify the deadline for customers to submit final documentation on NEMA and VNEM applications which were submitted on or before April 14, 2023 from February 14, 2027 to April 14, 2026. Both utilities claim that this change is in compliance with D.22-12-05 and D.23-11-068.

### **Protests**

During the protest periods, between May 27, 2025 and June 30, 2025, protests were submitted on PG&E AL 7619-E and SCE AL 5549-E from the following parties: the California Solar & Storage Association (CALSSA), the Solar Energy Industries Association (SEIA), School Project for Utility Rate Reduction (SPURR), BrightSky Renewables, Wente Vineyards, Regatta Solutions (on behalf of Wente Vineyards), Cedar Avenue Recycling and Transfer Station (CARTS), Napa Valley Unified School District, St. Helena Unified School District, Benjamin Land LP (represented by Nancy Myers), Woolf Farming, City of Palm Desert, City of Apple Valley, Ivy Energy, Airosa Dairy, and the Local Government Sustainable Energy Coalition (LGSEC). Protestants oppose PG&E's and SCE's respective proposals to advance the construction deadlines for projects filed under NEMA or VNEM tariffs from February 14, 2027, to April 14, 2026.

Protestants argue that these ALs contradict the Commission's adopted decisions (D.22-12-056 and D.23-11-068), deviate from approved and published tariffs, and unfairly curtail previously established timelines relied upon by customers and developers. CALSSA, SEIA, and SPURR emphasize that the Commission has consistently recognized a three-year development window from the February 14, 2024 sunset date for all eligible NEMA and VNEM projects. Protestants contend that SCE and PG&E's proposals would retroactively shorten this period without legal or procedural basis, creating regulatory uncertainty and undermining customer investments.

Multiple protestants—including BrightSky, Ivy Energy, Wente Vineyards, CARTS, Napa Valley Unified School District, St. Helena Unified School District, Benjamin Land LP, and the cities of Palm Desert and Apple Valley—cite specific projects currently in permitting, procurement, or construction that were planned based on the February 2027 deadline. These parties argue that advancing the deadline to April 2026 would render many of these projects infeasible or

financially impaired, as the compressed timeline does not accommodate typical development cycles or public sector constraints, such as school-year limitations or public bidding requirements. SEIA and CALSSA further assert that long lead times for components, labor shortages, and seasonal limitations make the accelerated deadline unworkable.

Several protestants also raise procedural concerns. CALSSA, SPURR, and SEIA contend that such a material change to a deadline should not be made through an AL but rather through a formal rulemaking or application. They argue that the PG&E and SCE's framing of the deadline revisions as "clarifications" is misleading, as neither PG&E nor SCE had previously published the proposed April 14, 2026 deadline in their tariffs. Protestants point to explicit language in the approved tariffs grants customers until February 14, 2027 to complete final documents, including building permit sign-off and electrical clearance. For example, CALSSA's protest of PG&E AL 7619-E notes that Special Condition 3(iii) of PG&E's NEM 2 tariff states that "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), and for Load Aggregation Customers three years from the NEM2A sunset date (before February 15, 2027)."

### **Utility Responses**

SCE and PG&E filed separate replies to the protests on June 4, 2025 and July 8, 2025, respectively. PG&E also filed a supplemental response to St. Helena Unified School Districts protest. In its reply to the protests of AL 5549-E, SCE asserts that the earlier April 14, 2026 deadline for "Category 1" customers (i.e., those who submitted interconnection applications before April 15, 2023) is consistent with Commission intent to limit legacy treatment under NEMA and VNEM to three years from the applicable sunset date. SCE acknowledges that its approved tariff language provides a February 14, 2027 deadline for all such customers but argues that this language does not accurately reflect the record in D.22-12-056 or D.23-11-068. SCE further claims that failing to apply the April 2026 deadline to Category 1 customers would create inequities relative to Category 2 customers who had to meet additional eligibility criteria.

PG&E offers a similar justification in its reply to the protests of AL 7619-E. PG&E argues it is not proposing a new deadline but instead clarifying that customers who submitted NEMA or VNEM applications before the NEM2 sunset date (April 14, 2023) are subject to a three-year deadline from that date, consistent with D.22-12-056. PG&E maintains that customers who applied during the NEM2 sunset period are governed by a different three-year timeline ending in February 2027. PG&E contends this distinction avoids giving customers who applied before the sunset period a longer-than-intended development window.

### **Discussion**

The Energy Division has reviewed PG&E AL 7619-E and SCE AL 5549-E, as well as the protests submitted by twenty parties between May 27, 2025 and June 30, 2025.

Protestants uniformly object to PG&E and SCE's proposals to retroactively shorten the construction deadline for projects submitted under NEMA and VNEM tariffs from February 14, 2027 to April 14, 2026. Protestants contend that this proposal contradicts D.22-12-056 and D.23-11-068, which established a three-year construction window following the sunset date of the previous tariffs. Furthermore, multiple protestants—including CALSSA, SEIA, and SPURR—assert that the advice letter process is procedurally improper for effectuating such a substantive change.

We agree with protestants that the deadlines adopted in D.22-12-056 and D.23-11-068 clearly provide all eligible NEMA and VNEM customers with a three-year period from the February 14, 2024 sunset date to complete interconnection, resulting in a consistent deadline of February 14, 2027. D.22-12-056 Ordering Paragraph (OP) 12(f) clearly applies to standard NEM 2 and not to NEMA or VNEM, thus there is no explicit or implicit three year requirement on final documentation for NEMA or VNEM applications submitted after the NEM 2 sunset date. The changes to the NEMA and VNEM tariffs in D.22-12-056 (OP 9 and OP 11) only modify the legacy period and requirements for NEMA and VNEM applications submitted after the NEM 2 sunset date. Nothing in OP 9 or OP 11 establish a deadline for NEMA and VNEM applications. Further, no provision in either D.22-12-056 or D.23-11-068 authorized or contemplated a bifurcation of eligibility timelines based on application date within the pre-sunset period. PG&E and SCE's proposed changes would retroactively shorten this window and do not comply with Commission decisions.

Moreover, per CPUC General Order 96-B General Rule 7.6.1, which states that “the Industry [Energy] Division will (1) reject any advice letter where the advice letter or workpapers are clearly erroneous, including without limitation where there are clear inconsistencies with statute or Commission order, and (2) reject without prejudice an advice letter whose disposition would require an evidentiary hearing or otherwise require review in a formal proceeding,” Energy Division find it inappropriate to use an AL to effectuate this type of change. The scope and impact of the proposed revisions — which affect interconnection eligibility for potentially thousands of customers — extend beyond the ministerial clarifications that are properly addressed through an AL. As such, any effort to revise a Commission order should be proposed through a formal proceeding.

Accordingly, PG&E Advice Letter 7619-E and SCE Advice Letter 5549-E are rejected in full. The existing tariffs with the correct deadline of February 14, 2027 for NEMA and VNEM projects which applied for interconnection by April 14, 2023 remain in effect. It is Energy Division's finding that the current tariffs need no modification on this issue.

Please direct any questions regarding this disposition to Christopher Westling (christopher.westling@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Ken Fleisher (for)". The signature is written in a cursive, flowing style.

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

cc:

Airosa Dairy  
BrightSky Renewables  
CALSSA  
Cedar Ave Recycling & Transfer Station  
City of Fresno  
City of Palm Desert  
County of Fresno  
Ivy Energy  
LGSEC  
Nancy Myers/Bejamin Land LP  
Napa Valley Unified School District  
Port of Hueneme  
Regatta Solutions  
SEIA  
SPURR  
St Helena Unified School District  
Town of Apple Valley  
Wente Vineyards  
Woolf Farming

June 9, 2025

**Advice 7619-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Clarify NEM2 load aggregation and NEM2V building permit timeline requirements**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby submits this Tier 2 advice letter to clarify language in Electric Schedules NEM2 and NEM2V regarding the building permit submission timeline requirements for NEM2 load aggregation customers and NEM2 virtual tariff customers. This clarification aligns with Southern California Edison Company's Advice Letter (AL) 5549-E. PG&E makes these clarifications in accordance with California Public Utilities Commission (CPUC or Commission) Decision (D.) 22-12-056 and D.23-11-068. Both decisions provide for a three-year period for customers to submit their final building permit sign off from the date of application to remain eligible for NEM2V and NEM2 and the current load aggregation sub-tariff. These tariff clarifications align with those directives.

**Background**

D.22-12-056, revising the net energy metering tariff and sub-tariffs, discussed the timeline for submission of the final building permit sign off for applications submitted before the NEM2 sunset date to remain eligible for that tariff. The Commission found "a three-year deadline to submit final building permit sign off and electrical clearance is reasonable."<sup>1</sup> Consistent with this finding, Ordering Paragraph (OP) 12(f) states:

"Step 6: 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."

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<sup>1</sup> D.22-12-056, p. 200.

D.22-12-056 did not sunset NEM2A or the virtual net energy metering tariff (“NEM2V”), but made the following changes to them: (1) reduced the legacy period to 9-years for NEM2A and NEM2V applications submitted after the April 14, 2023 NEM2 sunset date; and (2) required NEM2A applications submitted after the April 14, 2023 NEM2 sunset date to have had 2 meters as of December 15, 2022 to be eligible for NEM2 (the “2-meter requirement”).

In implementing D.22-12-056’s directive regarding the building permit submission deadline, the investor-owned utilities (“IOUs”)<sup>2</sup> proposed language in their tariffs to provide a timeline for building permit submission based on three years from the NEM2 sunset date, rather than application submission, for administrative efficiency. This timeline was approved in Energy Division’s disposition of PG&E AL 6847-E and AL 6847-E-A. Therefore, for customers who submitted their application on or before the April 14, 2023 NEM2 sunset date, the deadline for submission of the final building permit is April 14, 2026 to remain eligible for the NEM2 tariff. PG&E also updated its NEM2V tariff to incorporate this 3-year building permit deadline and clarified in the legacy section of the tariff that NEM2V applications submitted on or before the April 14, 2023 NEM2 sunset date, but that fail to submit the final building permit by April 14, 2026, receive only a 9-year legacy period.

D.23-11-068, addressing the remaining proceeding issues, including the successor to NEM2V and NEM2A, similarly discussed the building permit submission timeline and adopted the same 3-year deadline.<sup>3</sup> OP 12(e) states:

“Step 3: Three years from the application submission, all customers seeking to interconnect to the VNEM tariff or NEMA subtariff 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 VNEM tariff or NEMA subtariff eligibility to customers who fail to meet this deadline due to utility-caused delays.”<sup>4</sup>

Thereafter, PG&E updated the NEM2 and NEM2V tariffs to incorporate the load aggregation and virtual tariff sunset and the 3-year building permit deadline.<sup>5</sup> While PG&E applied the same rationale in setting the building permit deadline running 3 years from the NEM2A and NEM2V sunset, the incorporation of the deadline in the tariffs created an ambiguity as to the applicable deadline for project applications submitted on or before the

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<sup>2</sup> The IOUs are Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company

<sup>3</sup> D.23-11-068, pp. 63, 88.

<sup>4</sup> D.23-11-068, p. 254, OP 12(e).

<sup>5</sup> PG&E AL 7173-E.

April 14, 2023 NEM2 sunset date which were not subject to the shorter 9-year legacy period and, for load aggregation, the 2-meter requirement.

### **Discussion**

PG&E has received inquiries regarding application of the April 14, 2026, building permit deadline to load aggregation projects. The inquiries pertain specifically to load aggregation applications submitted on or before the April 14, 2023 NEM2 sunset date considering tariff language indicating that building permits for load aggregation projects must be submitted on or before February 14, 2027.

As explained in the “Tariff Revisions” section below, and consistent with Southern California Edison Company (SCE) AL 5549-E, PG&E is revising the tariff language to clarify that:

- The April 14, 2026 building permit deadline applies to all project applications (including load aggregation) submitted under the NEM2 tariff on or before the April 14, 2023 NEM2 sunset date, and that
- The February 14, 2027 deadline applies only to load aggregation applications submitted after the April 14, 2023 NEM2 sunset date and on or before the February 14, 2024 NEM2 load aggregation sunset date.

This clarification is appropriate for at least the following reasons:

- (1) As of April 13, 2023, the NEM2 tariff stated that the building permit deadline was April 14, 2026. The tariff language regarding the building permit is applicable to “all customers,” and did not include any carve out for NEM2A applications.<sup>6</sup> Therefore, customers that applied before the NEM2 sunset were on notice that the building permit deadline was April 14, 2026.
- (2) Both D.22-12-056 and D.23-11-068 intend the building permit deadline to run for three years from application submission. The April 14, 2026 deadline was established for administrative efficiency and, as approved, the same logic was applied in implementing the directive in D.23-11-068. However, providing load aggregation customers who submitted their application on or before the April 14, 2023 NEM2 sunset date until February 14, 2027, to submit their building permit would give these customers an additional 10 months in conflict with the three-year timeline established in the decisions.

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<sup>6</sup> PG&E AL 6847-E-A and accompanying tariff sheets at the Applicability section (“Customers applying before April 15, 2023, are subject to the application requirements specified in Special Condition 3 (Interconnection) to maintain eligibility on NEM2”) and at Special Condition 3 sub-part (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)).

- (3) Although load aggregation remained open after the April 14, 2023 NEM2 sunset date, D.22-12-056 imposes new provisions for load aggregation projects submitted after the April 14, 2023 NEM2 sunset date; namely, the two-meter requirement and the shorter 9-year (instead of 20-year) legacy period. Project applications submitted on or before the April 14, 2023 NEM2 sunset date are not subject to these provisions, and therefore it is appropriate that they be subject to the April 14, 2026, building permit submission deadline like all other NEM2 applications submitted on or before the April 14, 2023 NEM2 sunset date (and like any other customer served on NEM2 or sub-schedules under NEM2, e.g., NEM2-MT, NEM2PS).

For consistency with NEM2A and SCE AL 5549-E, and because D.22-12-056 and D.23-11-056 direct the utilities to have uniform tariffs, we also are revising the NEM2V tariff to state similar requirements for building permits and timelines for project applications submitted on or before the April 14, 2023 NEM2 sunset date.

Notwithstanding the above, and consistent with SCE's reply to the protests to SCE AL 5549-E, PG&E agrees to supplement this AL if requested by Energy Division to update its tariff to state that the April 14, 2026 building permit deadline applies to all NEM2A and NEM2V applications submitted before the April 14, 2023 NEM2 sunset date, but if such applications do not meet this deadline they receive a 9-year, instead of a 20-year, legacy period if they meet the later February 14, 2027 deadline.

### **Tariff Revisions**

Based on the above, PG&E is adding language to Schedule NEM2 and NEM2V to clarify that:

- (1) The February 14, 2027 date by which final building permit signoff and electrical clearing must be submitted, applies only to load aggregation and virtual applications submitted after the NEM2 sunset date (April 14, 2023) and on or before the NEM2A and NEM2V sunset date (February 14, 2024)
- (2) The April 14, 2026 deadline applies to all NEM2 applications, including load aggregation, and virtual NEM (NEM2V) submitted on or before the April 14, 2023 NEM2 sunset date.

**Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **June 30, 2025**, which is 21<sup>7</sup> 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**

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, **July 9, 2025**, which is 30 calendar days after the date of submittal.

**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.20-08-020. 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/>.

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<sup>7</sup> Pursuant to Rule 1.5 of General Order 96-B, PG&E requests to extend the protest period by one additional day because twenty days following submission of this advice letter is Sunday, June 29, 2025.





# 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: Michael Finnerty

Phone #: (279) 789-6216

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: michael.finnerty@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) #: 7619-E

Tier Designation: 2

Subject of AL: Clarify NEM2 load aggregation and NEM2V building permit timeline requirements

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, D.23-11-068

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: 7/9/25

No. of tariff sheets: 7

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: N/A

<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.
59760-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 19	59201-E
59761-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 31	59213-E
59762-E	ELECTRIC SCHEDULE NEM2V VIRTUAL NET ENERGY METERING SERVICE Sheet 18	57295-E
59763-E	ELECTRIC SCHEDULE NEM2V VIRTUAL NET ENERGY METERING SERVICE Sheet 27	58310-E
59764-E	ELECTRIC TABLE OF CONTENTS Sheet 1	59675-E
59765-E	ELECTRIC TABLE OF CONTENTS Sheet 6	59592-E
59766-E	ELECTRIC TABLE OF CONTENTS Sheet 7	59701-E



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 19

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 for Load Aggregation on or before February 14, 2024, 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), and for Load Aggregation Customers who applied after the NEM2 sunset date (April 14, 2023) and on or before the NEM2A sunset date (February 14, 2024) three years from the NEM2A sunset date (before February 15, 2027). Customers who miss their applicable building permit deadline will be transitioned to NBT.
- (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.

(T)  
|  
(T)

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) or NEM2A Sunset date (February 14, 2024) is caused by the utility. Similarly, PG&E has the discretion to apply NEM2/NEM2A 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), or for Load Aggregation Customer applications submitted after April 14, 2023 three years from NEM2A Sunset date (before February 15, 2027) if such failure is due to utility-caused delays.

(T)  
(T)

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.

(Continued)

Advice 7619-E  
Decision D.22-12-056,  
D.23-11-068

Issued by  
**Shilpa Ramaiya**  
Vice President

Submitted June 9, 2025  
Effective July 9, 2025  
Resolution







**ELECTRIC SCHEDULE NEM2V**  
**VIRTUAL NET ENERGY METERING SERVICE**

Sheet 27

SPECIAL  
CONDITIONS:  
(Cont'd.)

8. NEM2V Legacy Provisions

This Special Condition is applicable to all Customers receiving service on NEM2V, and who have submitted all documentation necessary to receive service on the NEM2V Electric Rate Schedule.

a. Pursuant to D.22-12-056, Customers applying to take service under this Electric Schedule NEM2V on or after April 15, 2023, until the NEM2V sunset date (February 14, 2024) may continue to take service on NEM2V for nine years from the date of the interconnection of their REGF measured from the date of permission to operate (PTO) and ending at the conclusion of the Customer's applicable Relevant Period that ends immediately on or after the ninth anniversary of the original PTO date. Customers who submit applications to take service under this Electric Schedule NEM2V before April 15, 2023 including customers who have pending applications, are subject to the nine-year provisions in this Special Condition 8a if the application has major deficiencies that are not corrected before April 15, 2023.

(T)  
(T)

b. Pursuant to D.16-01-044, Customers receiving service on this Electric Schedule NEM2V, or who have submitted applications that are free of major deficiencies and include all necessary documents to receive service on NEM2V before April 15, 2023, are eligible to continue receiving service on NEM2V for a period of 20 years from the date of interconnection of their REGF measured from the date of PTO and ending at the conclusion of the Customer's applicable Relevant Period that ends immediately on or after the 20th anniversary of the original PTO date. For example, if a Customer initially received PTO on April 1, 2018, the Customer is eligible to continue receiving service on this tariff through the conclusion of the Relevant Period ending immediately on or after March 31, 2038.

Customers served on Schedule NEMV who elect to make a one-time switch to the NEM2V Schedule prior to the conclusion of their Schedule NEMV 20-year transition period and prior to April 15, 2023, can continue service under the NEM2V Schedule from the date of their original Schedule NEMV PTO through the conclusion of their 20-year transition period; these Customers may not restart their 20-year transition period by electing to move to this Schedule. On or after April 15, 2023, until the NEM2V Sunset date (February 14, 2024) customers served on Schedule NEMV who elect to make a one-time switch to the NEM2V Schedule prior to the conclusion of their Schedule NEMV 20-year transition period can continue service under the NEM2V Schedule from the date of their original Schedule NEMV PTO through the lesser of the conclusion of their 20-year transition period or nine years; these Customers may not restart their 20-year transition period by electing to move to this Schedule.

(T)

(Continued)

Advice 7619-E  
Decision D.22-12-056,  
D.23-11-068

Issued by  
**Shilpa Ramaiya**  
Vice President

Submitted  
Effective  
Resolution

June 9, 2025  
July 9, 2025



**ELECTRIC TABLE OF CONTENTS**

Sheet 1

**TABLE OF CONTENTS**

<b>SCHEDULE</b>	<b>TITLE OF SHEET</b>	<b>CAL P.U.C. SHEET NO.</b>	
Title Page.....		<b>59764-E</b>	(T)
Rate Schedules.....	58802,59676,58804,58805, <b>59765,59766</b> ,59632,58826,52770-E		(T)
Preliminary Statements.....	52771,48064,58835,41723,57693,54450,58831-E		
Preliminary Statements, Rules.....		58888-E	
Rules .....		59677,57982-E	
Maps, Contracts and Deviations.....		57773-E	
Sample Forms.....	57694, 59678,57695,57696, 49303,59679,		
.....	57697,57698,58827,58057,49309,56114,49311-E		

(Continued)

Advice 7619-E  
Decision D.22-12-056,  
D.23-11-068

Issued by  
**Shilpa Ramaiya**  
Vice President  
Regulatory Proceedings and Rates

Submitted June 9, 2025  
Effective July 9, 2025  
Resolution



ELECTRIC TABLE OF CONTENTS

Sheet 6

Table with columns: SCHEDULE, TITLE OF SHEET, and CAL P.U.C. SHEET NO. Includes entries for BEV, S, SB, E-BioMAT, E-CHP, E-CHPS, E-CHPSA, E-DCG, E-DEPART, E-DRP, E-ECR, E-GT, E-NMDL, E-NWDL, E-LORMS, E-SDL, E-STORE, E-TMDL, NEM, NEM2, NEMFC, NEMBIO, NEMCCSF, NEMV.

(Continued)



**ELECTRIC TABLE OF CONTENTS**

Sheet 7

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
<b>Rate Schedules Other</b>		
NEM2V	Virtual Net Energy Metering Service .....	57291,57292,47181,37828,57293,37890, ..... 37831,37832,42046,42047,37835,37836,48535,37838, ..... 42048,37840,57294, <b>59762</b> ,57296,57297,57298,57299,57300,57301, (T) ..... 57302,57303, <b>59763</b> ,57305,57306,57307-E (T)
NEMVMASH	Net Energy Metering – Virtual Net Energy Metering .....	47185,33922*,47186,44525, ..... 33924,33925,31630,36567,31632,31633,36568, ..... 31635,44526,31637,47187,31639,42066,47188,44528-E
NEM2VMSH	Virtual Net Energy Metering For Multifamily Affordable Housing (MASH/NSHP) With Solar Generator(s) .....	44518,42595,44519,37850,46197,42598,38176,38177,42599, ..... 42600,38178,37858,37859,37860,44520,38179,37863,42053,44521,44522-E
NEM2VSOM	Virtual Net Energy Metering Solar on Multifamily Affordable Housing (SOMAH) Properties .....	42116,42117,42118,42119,42120,42668,47183,42123,42124, ..... 42125,42126,42127,42128,46740,42130,42131,42132,42133-E
E-ERA RES-BCT	Energy Rate Adjustments..... Schedule for Local Government Renewable Energy Self-Generation Bill Credit Transfer.....	59111,44102,44103,44104-E  47189,37783,37784,37785,37786, ..... 37787,37788,37789,37790,37791,52982-E
E-OBF	On-Bill Financing Balance Account (OBFB) .....	58052, 58053, 58054-E
E-OBR	On-Bill Repayment (OBR) Pilots .....	54783, 54784, 54785, 54786, 54787, 54788, 54789-E
E-SOP	Residential Electric SmartMeter™ Opt-Out Program .....	35105,57556-E
PEVSP	Plug-In Electric Vehicle Submetering Pilot – Phase 1 .....	40158,35261,34249,40159,35263-E
PEVSP 2	Plug-In Electric Vehicle Submetering Pilot – Phase 2 .....	37688,37689,37690,37691 ..... 37692,37693,37694,37695,37696,37697,37698-E
E-CMET	Community Microgrid Enablement Tariff .....	59694,58962,54456,58963,54458,59695,59696 ..... 59697,54461,59698,54463,59699,54465,56674-E
E-BTMM	Behind-the-Meter Microgrids .....	49666,49667,49668,49669-E
NBT	Net Billing Tariff Service .....	55791,55439,55440,55792,55442,55443,55444,55445,55446, ..... 56815,55794,55449,55450,55451,55452,55453,55454,55455,55456,55457,55795, ..... 55459,55460,55461,55796,55463,55464,55797,55798,55467,55468,55469,55470, ..... 55471,55472,55473,57699,57700,57701,55477,57702,57703-E
E-ART	Automated Response Technology Program.....	58668,58669,58670,58120,58121, ..... 58122,58123-E
<b>Rate Schedules Agricultural</b>		
AG	Time-of-Use Agricultural Power .....	48519,54822,48913,59020,59021,59022, ..... 48917,48918,52959,53335,59023,52962, ..... 52963,52964,52965,52966-E
AG-1	Agricultural Power .....	48927,48928,48929,59572,59024,59025, ..... 59026,53340,53341,59027,53343-E
AG-R	Split-Week Time-of-Use Agricultural Power .....	48971,48972,48973,59409, ..... 52610,59042,59043,59044,53362,53363,53364,53365,59045,53367-E

(Continued)

# **Attachment 2**

Redline Tariff Revisions



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 19

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 for Load Aggregation on or before February 14, 2024, 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), and for Load Aggregation Customers who applied after the NEM2 sunset date (April 14, 2023) and on or before the NEM2A sunset date (February 14, 2024), three years from the NEM2A sunset date (before February 15, 2027). Customers who miss their applicable building permit deadline will be transitioned to NBT.
- (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) or NEM2A Sunset date (February 14, 2024) is caused by the utility. Similarly, PG&E has the discretion to apply NEM2/NEM2A 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), or for Load Aggregation Customer applications submitted after April 14, 2023 three years from NEM2A Sunset date (before February 15, 2027) 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.

(Continued)

Advice Decision 7489-E

Issued by  
**Shilpa Ramaiya**  
Vice President

Submitted Effective Resolution  
January 22, 2025  
January 22, 2025



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 31

SPECIAL  
CONDITIONS:  
(Cont'd.)

8. NEM2 Legacy Provisions

(L)

- 1. As of April 15, 2023, NEM customers, and for Load Aggregation customers as of February 15, 2024, who have completed their 20 years on Electric Schedule NEM/NEMA and must be transitioned to the NBT/NBTA rate schedule will remain on Electric Schedule NEM/NEMA until NBT is operational, at which time these customers will transition to NBT/NBTA at the end of their Relevant Period and will take service on the applicable OAS rates, eligible for NBT/NBTA.

This Special Condition is applicable to all Customers receiving service on this NEM2 Schedule who have submitted all documentation necessary to receive service on this schedule by no later than April 14, 2023, and for Load Aggregation Customers February 14, 2024, as detailed in Special Condition 3. This Special Condition 8 does not apply to customers who have applied to interconnect under this schedule on or after April 15, 2023, and for Load Aggregation Customers applying on or after February 15, 2024. Customers ~~interconnecting~~ applying under NEM2A on or after April 15, 2023, are subject to a 9-year legacy period as specified in Special Condition 6.

- a. 20-Year Transition Period. Pursuant to D.16-01-044, Customers who are receiving service on this NEM2 Schedule, or who have submitted all documentation necessary to receive service on this NEM2 Schedule, are eligible to continue receiving service on this NEM2 Schedule for a period of 20 years from the original year in which their Generating Facility was interconnected to PG&E's grid, indicated by and measured from the date on which the Customer originally received Permission To Operate (PTO) the Generating Facility from PG&E and ending at the conclusion of the Customer's applicable Relevant Period that ends immediately on or after the 20th anniversary of the original PTO date. For example, if a Customer initially received PTO on April 1, 2018, the Customer is eligible to continue receiving service on this Schedule through the conclusion of the Relevant Period ending immediately on or after March 31, 2038.

Customers served on Schedule NEM who elect to make a one-time switch (this voluntary switch should happen before the closure of NEM2) to the NEM2 Schedule prior to the conclusion of their Schedule NEM 20-year transition period can continue service under the NEM2 Schedule from the date of their original Schedule NEM PTO date; these Customers may not restart their 20-year transition period by electing to move to this Schedule. Customers electing to switch to the NEM2 Schedule prior to the conclusion of their Schedule NEM 20-year transition period permanently forfeit any of their Generating Facility's remaining transition period eligibility on Schedule NEM and may not later change back to receiving service under Schedule NEM. Customers at the end of their 20-year NEM enrollment who transitioned to the NEM2 tariff may not restart a 20-year transition period under NEM2. These customers will remain on NEM2 and will be transitioned to the Net Billing Tariff (NBT) once it is operational.

(L)

(Continued)



**ELECTRIC SCHEDULE NEM2V**  
VIRTUAL NET ENERGY METERING SERVICE

Sheet 18

SPECIAL CONDITIONS:  
(Cont'd.)

4. INTERCONNECTION: (L)

For Customers to receive service on this NEM2V schedule, their interconnection application must be submitted on or before February 14, 2024 (NEM2V Sunset Date), and must comply with the following: (N)

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 who applied before the NEM2 sunset date (April 14, 2023) seeking to interconnect on this NEM2V 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), and for NEM2V Customers who applied after the NEM2 sunset date and on or before the NEM2V Sunset date (February 14, 2024), three years from the NEM2V sunset date (before February 15, 2027). Customers who miss their applicable building permit deadline will be transitioned to NBTV.

PG&E is granted the discretion to give NEM2V tariff eligibility to a customer if a delay in meeting the NEM2V Sunset Date (February 14, 2024) is caused by the utility. Similarly, PG&E has the discretion to apply NEM2V eligibility to customers who fail to submit the final building permit sign off and other necessary documentation within three years from the NEM2V sunset date (before February 2027) if such failure is due to utility-caused delays. (N)

In order to receive approval for Parallel Operation of the REGF, including NEM2V Storage per Special Condition 6 (if applicable), or to resume service after being impacted by a Natural or Man-Made Disaster per Special Condition 7, the Owner must submit a completed PG&E application and interconnection agreement form as follows: (L)

Interconnection Costs: The Owner or Operator of the Eligible Generator must pay all interconnection costs and application fees required under Rule 21\*, including but not limited to re-wiring, trenching, conduit, and other facility costs that are needed. This application fee must be paid through PG&E's online application portal in order to complete the application, unless otherwise directed by PG&E. For NEM2V Storage Interconnection cost, see Special Condition 6. For application costs associated with systems impacted by a Natural or Man-Made Disaster, see Special Condition 7. (L)

\* See Rule 21 Section B.1 Applicability regarding NEM-2 projects greater than 1 MW interconnecting on Transmission. (L)

(Continued)



**ELECTRIC SCHEDULE NEM2V**  
VIRTUAL NET ENERGY METERING SERVICE

Sheet 27

SPECIAL  
CONDITIONS:  
(Cont'd.)

8. NEM2V Legacy Provisions

This Special Condition is applicable to all Customers receiving service on NEM2V, and who have submitted all documentation necessary to receive service on the NEM2V Electric Rate Schedule.

a. Pursuant to D.22-12-056, Customers applying to take service under this Electric Schedule NEM2V on or after April 15, 2023, until the NEM2V sunset date (February 14, 2024) may continue to take service on NEM2V for nine years from the date of the interconnection of their REGF measured from the date of permission to operate (PTO) and ending at the conclusion of the Customer's applicable Relevant Period that ends immediately on or after the ninth anniversary of the original PTO date. Customers who submit applications to take service under this Electric Schedule NEM2V before April 15, 2023 including customers who have pending applications, are subject to the nine-year provisions in this Special Condition 8a ~~under either of the following circumstances: (i) if the application has major deficiencies that are not corrected before April 15, 2023; or (ii) if the customer fails to submit final building permit sign off and electrical clearing by the authority having jurisdiction before April 15, 2026.~~

b. Pursuant to D.16-01-044, Customers receiving service on this Electric Schedule NEM2V, or who have submitted applications that are free of major deficiencies and include all necessary documents to receive service on NEM2V before April 15, 2023, are eligible to continue receiving service on NEM2V for a period of 20 years from the date of interconnection of their REGF measured from the date of PTO and ending at the conclusion of the Customer's applicable Relevant Period that ends immediately on or after the 20th anniversary of the original PTO date. For example, if a Customer initially received PTO on April 1, 2018, the Customer is eligible to continue receiving service on this tariff through the conclusion of the Relevant Period ending immediately on or after March 31, 2038.

Customers served on Schedule NEMV who elect to make a one-time switch to the NEM2V Schedule prior to the conclusion of their Schedule NEMV 20-year transition period and prior to April 15, 2023, can continue service under the NEM2V Schedule from the date of their original Schedule NEMV PTO through the conclusion of their 20-year transition period; these Customers may not restart their 20-year transition period by electing to move to this Schedule. On or after April 15, 2023, until the NEM2V Sunset date (February 14, 2024) customers served on Schedule NEMV who elect to make a one-time switch to the NEM2V Schedule prior to the conclusion of their Schedule NEMV 20-year transition period can continue service under the NEM2V Schedule from the date of their original Schedule NEMV PTO through the lesser of the conclusion of their 20-year transition period or nine years; these Customers may not restart their 20-year transition period by electing to move to this Schedule.

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(L)

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(Continued)

Advice 7211-E-A  
Decision D.23-11-068

Issued by  
**Shilpa Ramaiya**  
Vice President

Submitted July 12, 2024  
Effective March 15, 2024  
Resolution

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

AT&T	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
Albion Power Company		Peninsula Clean Energy
Alta Power Group, LLC	Electrical Power Systems, Inc. Fresno	Pioneer Community Energy
Anderson & Poole	Engie North America	Public Advocates Office
Atlas ReFuel BART	Engineers and Scientists of California	Redwood Coast Energy Authority
Ava Community Energy		Regulatory & Cogeneration Service, Inc.
BART		Resource Innovations
Buchalter	GenOn Energy, Inc.	Rockpoint Gas Storage
Barkovich & Yap, Inc.	Green Power Institute	
Biering & Brown LLP		
Braun Blasing Smith Wynne, P.C.	Hanna & Morton LLP	San Diego Gas & Electric Company
		SPURR
California Community Choice Association	ICF consulting	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Association	iCommLaw	Sempra Utilities
California Energy Commission	International Power Technology	Sierra Telephone Company, Inc.
California Hub for Energy Efficiency	Intertie	Southern California Edison Company
California Alternative Energy and Advanced Transportation Financing Authority	Intestate Gas Services, Inc.	Southern California Gas Company
California Public Utilities Commission		Spark Energy
Calpine	Kaplan Kirsch LLP	Sun Light & Power
Cameron-Daniel, P.C.	Kelly Group	Sunshine Design
Casner, Steve	Ken Bohn Consulting	Stoel Rives LLP
Center for Biological Diversity	Keyes & Fox LLP	
Chevron Pipeline and Power		Tecogen, Inc.
City of Palo Alto	Leviton Manufacturing Co., Inc.	TerraVerde Renewable Partners
City of San Jose	Los Angeles County Integrated	Tiger Natural Gas, Inc.
Clean Power Research		TransCanada
Coast Economic Consulting	Waste Management Task Force	
Commercial Energy	MRW & Associates	Utility Cost Management
Crossborder Energy	Manatt Phelps Phillips	Utility Power Solutions
Crown Road Energy, LLC	Marin Energy Authority	
Communities Association (WMA)	McClintock IP	Water and Energy Consulting
	McKenzie & Associates	Wellhead Electric Company
Davis Wright Tremaine LLP	Modesto Irrigation District	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy		Yep Energy
Dept of General Services	NOSSAMAN LLP	
Douglass & Liddell	NRG Energy Inc.	
Downey Brand LLP		
Dish Wireless L.L.C.	OnGrid Solar	