

November 18, 2025

Advice 7764-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Update the Electric Preliminary Statement IT to Record Stranded

Cost Expense for Any Terminated Microgrid Incentive Program

projects in the MUIU sub-account of the MGBA

Purpose

Pacific Gas and Electric Company ("PG&E") files this advice letter to update the Electric Preliminary Statement IT to record any cancelled project costs for any terminated Microgrid Incentive Program ("MIP") projects in the Microgrid Utility Infrastructure Upgrades ("MUIU") sub-account of the Microgrids Balancing Account ("MGBA").

The Preliminary Statement for the MGBA in its current form only allows for the recovery of capital costs recorded to the MUIU. In the further development of the MIP, PG&E has identified the need to record expense costs to the MUIU related to two sources:

- The cost of maintenance for the Microgrid Special Facilities constructed, as approved by the California Public Utilities Commission ("CPUC") in Resolution E-5127.
- Cancelled capital costs that may be incurred in the development of Microgrid Special Facilities related to a MIP project that ended in an event of default or early termination by the MIP participant.

To clarify the second point, MIP projects may face challenges such as construction difficulties, higher than expected costs, loss of third-party funding, or changes in market/tax incentive conditions, which could cause the community/developer to abandon the project. In such cases, the associated Community Microgrid Enablement Program ("CMEP") capital project developing the Microgrid Special Facilities would also be cancelled. Standard PG&E accounting practice would be to convert the cancelled capital charges to below the line costs. However, in this situation, the cancelled capital project would be due to factors outside of PG&E's control in a CPUC mandated program. Thus, PG&E seeks to recover these cancelled capital costs by converting them to expense and recovered via the MUIU.

The Joint IOU MIP Implementation Plan ("MIPIP") proposed creating the MUIU and stated explicitly that the intent was to record both expense and capital costs to that account. "The Utilities anticipate that the types of costs recorded to the Microgrid Utility Infrastructure Upgrades Subaccount of the MGBA would be: (1) actual expenses incurred for implementation and administration of the Matching Funds, as well as any enhanced utility technical support and development of planning tools; and (2) the capital revenue requirement associated with actual capital expenditures for Microgrid Special Facilities." The recorded expense were to include costs for "implementation ... of Matching Funds" for special facilities. PG&E interprets this to include expense costs that are stranded due to project terminations.

In approving the MIP Implementation Plan, the CPUC directed PG&E to modify its MGBA to include the MUIU sub-account for: (a) "recording microgrid utility infrastructure upgrades"; and (b) "to prospectively record the revenue requirement for its CMEP capital costs." The first type of cost to be recorded to the MUIU – for special facilities – is not limited to capital costs by Decision 23-04-034. Accordingly, PG&E's present request to include expense costs related to "microgrid utility infrastructure upgrades" in its MUIU is consistent with that Decision.

Tariff Revisions

Proposed change in the *Electric Preliminary Statement Part IT, Microgrids Balancing Account*, to record expense related costs for microgrid utility upgrades and CMEP in the MUIU subaccount. The project costs have previously been approved as part of Decision 20-06-017 and Decision 21-01-018.

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

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than **December 8, 2025**, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

¹ Proposed Microgrid Incentive Program Implementation Plan of San Diego Gas & Electric Company (U 902-E), Pacific Gas And Electric Company (U 39-E), and Southern California Edison Company (U 338-E), filed on December 3, 2021, Appendix A, "Microgrid Incentive Program Implementation Plan of the Joint Investor-Owned Utilities," p. 48.

² Decision 23-04-034, Ordering Paragraph 6.

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, and OP 6 of D.23-04-034, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, December 18, 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.19-09-009. 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
CPUC Communications

Attachments

Attachment 1 – Clean Tariffs
Attachment 2 – Redline Tariff Revisions

cc: Service List R.19-09-009





California Public Utilities Commission

ADVICE LETTER



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MUST BE COMPLETED BY UT	ILITY (Attach additional pages as needed)			
Company name/CPUC Utility No.: Pacific Gas as	nd Electric Company (U 39 E)			
Utility type: LC GAS WATER PLC HEAT	Contact Person: Baylee Larson Phone #: (279) 789-6486 E-mail: PGETariffs@pge.com E-mail Disposition Notice to: baylee.larson@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) #: 7764-E	Tier Designation: 2			
Subject of AL: Update the Electric Preliminary Statement IT to Record Stranded Cost Expense for Any Terminated Microgrid Incentive Program projects in the MUIU sub-account of the MGBA				
Keywords (choose from CPUC listing): Complian				
AL Type: Monthly Quarterly Annu	_			
If AL submitted in compliance with a Commissi	on order, indicate relevant Decision/Resolution #:			
Does AL replace a withdrawn or rejected AL?	If so, identify the prior AL: $_{ m No}$			
Summarize differences between the AL and the prior withdrawn or rejected AL: $\mathrm{N/A}$				
Confidential treatment requested? Yes VO				
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 V No				
Requested effective date: 12/18/25	No. of tariff sheets: 8			
Estimated system annual revenue effect (%): N	N/A			
Estimated system average rate effect (%): N/A	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 $^{ ext{l:}}$ $_{ ext{N/A}}$	A			
Pending advice letters that revise the same ta	riff sheets: $_{ m N/A}$			

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: Sidney 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

Attachment 1 Advice 7764-E

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
60511-E	ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA) Sheet 1	55943-E
60512-E	ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA) Sheet 2	55944-E
60513-E	ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA) Sheet 3	55945-E
60514-E	ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA) Sheet 4	55946-E
60515-E	ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA) Sheet 6	55948-E
60516-E	ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA) Sheet 7	55949-E
60517-E	ELECTRIC TABLE OF CONTENTS Sheet 1	60509-E
60518-E	ELECTRIC TABLE OF CONTENTS Sheet 18	60510-E

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

60511-E 55943-E

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Sheet 1

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

IT. MICROGRIDS BALANCING ACCOUNT (MGBA)

- 1. PURPOSE: The purpose of the Microgrids Balancing Account (MGBA) is to record actual incremental incurred expenses and capital-related revenue requirements, as applicable, related to: (1) Electrical Isolation Technology Evaluation; (2) Microgrids Evaluation; (3) the Clean Substation Microgrid Program; (4) the Make-Ready program to prepare substations island in a microgrid configuration; (5) the Utility-Owned Generation program for resources to power multi-season substation microgrids; (6) Third-Party Distributed Generation-Enabled Microgrid Services (DGEMS) Contracts for multi-season substation microgrids; (7) the Microgrid Incentive Program (MIP); and (8) Microgrid Utility Infrastructure Upgrades related to the Community Microgrid Enablement Program (CMEP). Each of these programs and sub-accounts of the MGBA are more fully described below. The account consists of seven one-way subaccounts, which separately track the Electrical Isolation Technology Evaluation, the Microgrids Evaluation, the Clean Substation Microgrid Program, Make-Ready investments, Utility-Owned Generation, Microgrid Incentive Program, and Microgrid Utility Infrastructure program costs. The account has one two-way subaccount, which tracks Third-Party DGEMS Contracts.
- APPLICABILITY: The MGBA shall apply to all electric customer classes, except for those specifically excluded by the Commission.
- 3. REVISION DATE: Disposition of the balances of the Electrical Isolation Technology Evaluation Subaccount, the Microgrids Evaluation subaccount, Make-Ready subaccount, and Utility-Owned Generation subaccount, Microgrid Incentive Program subaccount, and the Microgrid Utility Infrastructure Upgrades subaccount will be in the distribution component of electric rates through the Distribution Revenue Adjustment Mechanism (DRAM) as part of PG&E's Annual Electric True-up (AET) advice letter filing at the end of the related project work. Disposition of the balance of the Third-Party DGEMS Contracts subaccount will be in the distribution component of electric rates through the DRAM as part of PG&E's AET advice letter filing on an annual basis. Additionally, for the Make-Ready subaccount, Utility-Owned Generation subaccount, and Third-Party DGEMS Contracts subaccount the costs will be recovered based on the allocation of wildfire mitigation costs adopted in D.21-11-016. Disposition of the balances of the Clean Substation Microgrid Program Subaccount for the period of 2021-2026 will be in the distribution component of rates through the DRAM as part of PG&E's AET advice letter filing and for the period beginning 2027 the revenue requirement will be included in the General Rate Case (GRC) application for recovery through distribution rates. Specifically, recovery through distribution rates will utilize the special revenue allocation that was originally approved in Phase II of PG&E's 2020 GRC, D.21-11-016, for costs associated with wildfire efforts.
- 4. RATES: The MGBA does not have a rate component.



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Advice 7764-E Decision D. 23-04-034 Issued by **Shilpa Ramaiya**Vice President
Regulatory Proceedings and Rates

Submitted Effective Resolution

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No. 60512-E 55944-E

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Sheet 2

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

5. ACCOUNTING PROCEDURE: The MGBA consists of the following subaccounts:

The Electrical Isolation Technology Evaluation Subaccount (one-way subaccount) records actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred for the Electrical Isolation Technology Evaluation as described in D.21-01-018.

The Microgrids Evaluation Subaccount (one-way subaccount) records actual incurred expenses for the Microgrids Evaluation as described in D.21-01-018.

The Clean Substation Microgrid Program Subaccount (one-way subaccount) records actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred for the Clean Substation Microgrid Program¹ as described in D.21-01-018.

The Make-Ready Subaccount (one-way subaccount) tracks the difference between actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred against total adopted revenue requirement for the Make-Ready investments related to multi-season substation microgrids as described in D.22-11-009.

The Utility-Owned Generation Subaccount (one-way subaccount) tracks the difference between actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred against the total adopted revenue requirement for the Utility-Owned Generation related to multi-season substation microgrids, net of market revenues for blue-sky products², if any, as described in D.22-11-009.

The Third-Party DGEMS Contracts subaccount (two-way subaccount) records actual incurred expenses for Third-Party DGEMS contracts, net of market revenues for blue-sky products, if any as described in D.22-11-009.

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Advice 7764-E Issued by Submitted November 18, 2025 Decision D. 23-04-034 Shilpa Ramaiya **Effective** Vice President Resolution Regulatory Proceedings and Rates

¹ For the Calistoga Clean Substation Microgrid (CSM) Project, Non-PSPS-related variable costs associated with courtesy dispatches under the Energy Vault resources would not be recorded in the Clean Substation Microgrid Program Subaccount of the MGBA. These costs will be recovered through GRC funding or, if it is for a non-PSPS-related catastrophic event, the Catastrophic Event Memorandum Account (CEMA).

² In this context, PG&E refers to "blue sky products" as those that the distributed energy resources (DER) that power a substation microgrid may be able to provide to the wholesale market during normal ("blue sky") grid operations. They may include, for example, energy, ancillary services, and capacity.

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

60513-E 55945-E

Sheet 3

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

5. ACCOUNTING PROCEDURE (Cont'd)

The Microgrids Incentive Program Subaccount (one-way subaccount) records the actual incurred costs of the MIP, specifically 1) the actual incremental incurred expenses and passthrough costs, 2) the capital-related revenue requirement related to the actual incremental capital costs, and 3) the revenue requirement related to the "customer-side infrastructure" incurred for the MIP up to its share of the separate program and administrative budget caps. The administrative costs will be tracked separately from all other costs through the use of internal orders. Any unspent funds for administrative costs must be returned to customers at the end of the related project work. The CPUC adopted a \$15 million per project cap that consists of \$1 million for Interconnection Allowance and \$14 million for Incentive Award. Internal orders will also be used to separately track the Interconnection Allowance and Incentive Award for each project. The types of costs eligible for the third-party's Incentive Award are listed in the Microgrid Incentive Program Implementation Plan (MIPIP).³ The revenue requirement related to the "customer-side infrastructure" will be recorded as a regulatory asset at a rate equivalent to PG&E's weighted average cost of authorized debt during the period in which financing costs for the regulatory asset are incurred and amortized over 5 years pursuant to D.23-04-034. "Customer-side infrastructure" costs that receive regulatory asset treatment would include those third-party Incentive Award costs that are "paid for by Utility customers that if acquired by the Utility would be capitalized due to the types of costs, i.e., property, plant and equipment"4 plus supportive activities that are normally capitalized to put the asset into service.

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The Microgrid Utility Infrastructure Upgrades Subaccount (one-way subaccount) records expenses for microgrid utility upgrades and capital-related revenue requirement related to the Community Microgrid Enablement Program (CMEP) as of April 14, 2023, which was the issuance date of D.23-04-034.5

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A. The Electrical Isolation Technology Evaluation Subaccount

The following entries will be made each month, or as applicable, net of Revenue Fees and uncollectibles (RF&U):

- 1. A debit equal to the actual incremental incurred expenses;
- A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;

(N)

Advice Decision

7764-E D. 23-04-034

³ Joint IOU's Microgrid Incentive Program Implementation Plan, pp. 32-33.

⁴ Joint IOU's Microgrid Incentive Program Implementation Plan, p. 49.

⁵ Actual costs incurred for the CMEP were recorded to the CMEP Subaccount of the Microgrids Memorandum Account (MGMA, Electric Preliminary Statement Part IG) pursuant to OP 16 of D.20-06-017 beginning January 1, 2020 (effective date of the subaccount per Advice Letter 5883-E). Disposition of the balance in the CMEP Subaccount of the MGMA will be addressed in a separate application or in a future General Rate Case. Microgrid utility upgrades and the capital-related revenue requirement for the CMEP incurred on or after April 14, 2023, which is the issuance date of D.23-04-034, will no longer be recorded in the CMEP Subaccount of the MGMA and will be prospectively recorded in the Microgrids Utility Infrastructure Upgrades Subaccount of the MGBA.

Cal. P.U.C. Sheet No.

60514-E 55946-E

Cal. P.U.C. Sheet No.

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 4

5. ACCOUNTING PROCEDURE (Cont'd)

A. The Electrical Isolation Technology Evaluation Subaccount (Cont'd)

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- 3. A credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

B. The Microgrids Evaluation Subaccount

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit equal to the actual incremental incurred expenses;
- 2. A credit to transfer the balance or amounts to the DRAM for true-up in rates; and

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- 3. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
- C. The Clean Substation Microgrid Program

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit equal to the actual incremental incurred expenses;
- 2. A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 3. A credit to transfer the balance or amounts in this subaccount, to the DRAM for future rate recovery; and
- 4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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Advice 7764-E Decision D. 23-04-034

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Submitted November 18, 2025 **Effective**

Resolution

Revised Cancelling Original

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

60515-E 55948-E

(T)

Sheet 6

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

5. ACCOUNTING PROCEDURE (Cont'd)

F. Third-Party DGEMS Contracts

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit equal to the actual incremental incurred expenses;
- 2. A credit equal to any value received from Resource Adequacy credits, energy or ancillary services wholesale market transactions, and Renewable Energy Credits;
- 3. A debit or credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
- G. The Microgrids Incentive Program Subaccount

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit entry equal to the actual incremental incurred expenses;
- 2. A debit entry equal to the actual incremental incurred program costs, including pass-through costs related to remittances to customers participating in the program;
- 3. A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 4. A debit or credit entry equal to the revenue requirement related to the "customer-side infrastructure" incurred. The revenue requirement will include amortization expense, return on investment, and federal and state income taxes associated with the costs of installed equipment. The "customer-side infrastructure" costs are recorded as a regulatory asset and will be amortized over five years, at a rate equivalent to PG&E's weighted average cost of authorized debt during the period in which the financing costs for the regulatory asset are incurred;
- 5. A debit or credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 6. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or it successor.

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Advice 7764-E Decision D. 23-04-034 Issued by **Shilpa Ramaiya**Vice President
Regulatory Proceedings and Rates

Submitted November 18, 2025
Effective

Resolution

Revised Cancelling Original

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

60516-E 55949-E

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Sal. P.U.C. Sheet No.

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 7

5. ACCOUNTING PROCEDURE (Cont'd)

H. The Microgrid Utility Infrastructure Upgrades Subaccount

The following entries will be made each month, or as applicable, net of RF&U:

- A debit entry equal to the actual incremental incurred expenses; (N)
- A debit or credit entry equal to the capital-related revenue requirement related to the
 actual incremental capital costs incurred associated with the CMEP. Capital-related
 revenue requirements include depreciation expense, return on investment, federal
 and state income taxes, and property taxes associated with the costs of installed
 equipment;
- A debit or credit to transfer the balance or amounts to the DRAM for true-up in rates;
 and
- 4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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Advice 7764-E Decision D. 23-04-034 Issued by **Shilpa Ramaiya**Vice President
Regulatory Proceedings and Rates

Submitted Effective Resolution

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No. 60517-E 60509-E

ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page		60517-E	(T)
Rate Schedules		31.59632.58826.52770-E	()
Preliminary Statements		3,54450,60392, 60518 -E	(T)
Rules		60397,57982-E	()
Maps, Contracts and Deviations		59849-E	
Sample Forms	57694, 59678,604	121,60422, 59850,59679,	
	60423 60424 60427 58057 4930		

(Continued)

7764-E Advice D. 23-04-034 Decision

Issued by Shilpa Ramaiya Vice President Regulatory Proceedings and Rates

Submitted **Effective** Resolution

Cal. P.U.C. Sheet No.

60518-E 60510-E

Cal. P.U.C. Sheet No.

ELECTRIC TABLE OF CONTENTS

Sheet 18

Part TITLE OF SHEET CAL P.U.C. SHEET NO.

Preliminary Statements (Cont'd)

Part IB Part IG Part IH Part IM Part IN Part IO Part IQ	General Rate Case Memorandum Account – Electric (GRCMA-E)	
Part IT	Microgrids Balancing Account (MGBA)	(T)
Part IU	AB 841 Memorandum Account (AB841MA)52195,52196-E	(1)
Part IX	Fixed Recovery Charge	
Part IY	Fixed Recovery Charge Balancing Account (FRCBA)	
Part JA	Customer Credit for Fixed Recovery Charge	
Part JD	Microgrid Reservation Capacity Component-Standby Charge Suspension Account (MSCSA)	
	51190, 51191-E	
Part JF	Wildfire Hardening Fixed Recovery Charge52035,52036, 59265,59266-E	
Part JG	Wildfire Hardening Fixed Recovery Charge Balancing Account52038,59002,59267-E	
Part JH	Wildfire and Natural Disaster Resiliency Rebuild Program (WNDRRPBA-E)52234-E	
	Dynamic and Real-Time Pricing Memorandum Account (DRTPMA)54435, 54746, 54747,	
Part JI	54748,59447-E	
Part JJ	AB 1X Refund Balancing Account (AB1XBA)	
Part JK	Cost of Capital Memorandum Account - Electric (COCMA-E)	
Part JL	Percentage of Income Payment Plan Balancing Account – Electric (PIPPBA-E)	
Part JM Part JP	Percentage of Income Payment Plan Memorandum Account – Electric (PIPPMA-E)	
Part JQ	Yield Spread Adjustment Memorandum Account – Electric (YSMA-E)55126-E Diablo Canyon Transition And Relicensing Memorandum Account (DCTRMA)55705,55706-E	
Part JR	Diablo Canyon Extended Operations Balancing Account (DCEOBA)59450,59451,59452,55864-E	
Park KB	Diablo Canyon Extended Operations Balancing Account (DCEOBA)59450,39451,39452,33604-E	
Part KD	Income-Graduated Fixed Charge Memorandum Account (IGFCMA)	
Part KE	Income-Graduated Fixed Charge Balancing Account (IGFCBA)	
Part KF	Community Renewable Energy Program Balancing Account (CREPBA)	
Part KG	Provider of Last Resort Memorandum Account (POLRMA)58646,58647-E	
Part KH	Electric Capacity and New Business Interim Memorandum Account (ECNBIMA)	
Part KI	Comprehensive Gas Advanced Metering Infrastructure Memorandum Account - Electric (GAMIMA -	
	E)	
Part KJ	Public Utility Regulatory Policies Act Implementation Memorandum Account (PURPAIMA)60406-E	
Part KK	Common Facility Cost Treatment Balancing Account (CFCTBA)	
Part KM	Helms Uprate Memorandum Account (HUMA)	
r ai i rivi	Heims Opiate Memorandum Account (HOMA)	

(Continued)

7764-E Advice D. 23-04-034 Decision

Issued by Shilpa Ramaiya Vice President Regulatory Proceedings and Rates

Submitted **Effective** Resolution

Attachment 2

Redline Tariff Revisions

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

55943-E 55053-E

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Oakland, California

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 1

IT. MICROGRIDS BALANCING ACCOUNT (MGBA)

- 1. PURPOSE: The purpose of the Microgrids Balancing Account (MGBA) is to record actual incremental incurred expenses and capital-related revenue requirements, as applicable, related to: (1) the actual incremental capital costs incurred associated with the Electrical Isolation Technology Evaluation; (2) Microgrids Evaluation; (3) the Clean Substation Microgrid Program; (4) the Make-Ready program to prepare substations island in a microgrid configuration; (5) the Utility-Owned Generation program for resources to power multi-season substation microgrids; (6) Third-Party Distributed Generation-Enabled Microgrid Services (DGEMS) Contracts for multi-season substation microgrids; (7) the Microgrid Incentive <u>Program (MIP); and (8) Microgrid Utility Infrastructure Upgrades related to the Community</u> Microgrid Enablement Program (CMEP). Each of these programs and sub-accounts of the MGBA are more fully described below. , the Microgrids Evaluation, and the Clean Substation Microgrid Program to be implemented pursuant to Decision D.21-01-018 and with Make-Ready, and Utility Owned Generation, and Third-Party contracts for Distributed Generation-Enabled Microgrid Services (DGEMS) implemented pursuant to D.22-11-009. The Microgrids Evaluation pursuiant to D.21-01.018 and the Third-Party contracts for Distributed Generation Enabled Microgrid Services (DGEMS) pursuant to D.22-11-009 subaccounts will record actual incremental incurred expenses only. Additionally, the MGBA records 1) the actual incurred expense related costs of for the Microgrid Incentive Program (MIP) and 2) the mMicrogrid uUtility Infrastructure uUpgrades subaccounts, and the The MUIU will record capital-related revenue requirement for the Community Microgrid Enablement Program (CMEP) as of April 14, 2023⁴ pursuant to D.23-04-034. The account consists of seven one-way subaccounts, which separately track the Electrical Isolation Technology Evaluation, the Microgrids Evaluation, the Clean Substation Microgrid Program, Make-Ready investments, Utility-Owned Generation, Microgrid Incentive Program, and Microgrid Utility Infrastructure program costs. The account has; and one two-way subaccount, which tracks Third-Party DGEMS Contracts.
- 2. APPLICABILITY: The MGBA shall apply to all electric customer classes, except for those specifically excluded by the Commission.
- 3. REVISION DATE: Disposition of the balances of the Electrical Isolation Technology Evaluation Subaccount, the Microgrids Evaluation subaccount, Make-Ready subaccount, and Utility-Owned Generation subaccount, Microgrid Incentive Program subaccount, and the Microgrid Utility Infrastructure Upgrades subaccount will be in the distribution component of electric rates through the Distribution Revenue Adjustment Mechanism (DRAM) as part of PG&E's Annual Electric True-up (AET) advice letter filing at the end of the related project work. Disposition of the balance of the Third-Party DGEMS Contracts subaccount will be in the distribution component of electric rates through the DRAM as part of PG&E's AET advice letter filing on an annual basis. Additionally, for the Make-Ready subaccount, Utility-Owned Generation subaccount, and Third-Party DGEMS Contracts subaccount the costs will be recovered based on the allocation of wildfire mitigation costs adopted in D.21-11-016. Disposition of the balances of the Clean Substation Microgrid Program Subaccount for the period of 2021-2026 will be in the distribution component of rates through the DRAM as part of PG&E's AET advice letter filing and for the period beginning 2027 the revenue requirement will be included in the General Rate Case (GRČ) application for recovery through distribution rates. Specifically, recovery through distribution rates will utilize the special revenue allocation that was originally approved in Phase II of PG&E's 2020 GRC, D.21-11-016, for costs associated with wildfire efforts.
- 4. RATES: The MGBA does not have a rate component.

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Advice 6942-E Issued by Submitted May 15, 2023 April 14, 2023 Decision D.23-04-034 Meredith Allen **Effective** Vice President, Regulatory Affairs Resolution

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

55943-E 55053-E

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ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 1

⁴Actual costs incurred for the CMEP were recorded to the CMEP Subaccount of the Microgrids Memorandum Account (MGMA, Electric Preliminary Statement Part IG) pursuant to OP 16 of D.20 06 017 beginning January 1, 2020 (effective date of the subaccount per Advice Letter 5883-E). Disposition of the balance in the CMEP Subaccount of the MGMA will be addressed in a separate application or in a future General Rate Case. Microgrid utility upgrades and the capital related revenue requirement for the CMEP incurred on or after April 14, 2023, which is the issuance date of D.23-04-034, will no longer be recorded in the CMEP Subaccount of the MGMA and will be prospectively recorded in the Microgrids Utility Infrastructure Upgrades Subaccount of the MGBA.

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 Advice
 6942-E

 Decision
 D.23-04-034

Cal. P.U.C. Sheet No.

55944-E

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Cal. P.U.C. Sheet No. 55054-E

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 2

5. ACCOUNTING PROCEDURE: The MGBA consists of the following subaccounts:

The Electrical Isolation Technology Evaluation Subaccount (one-way subaccount) records actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred for the Electrical Isolation Technology Evaluation as described in D.21-01-018.

The Microgrids Evaluation Subaccount (one-way subaccount) records actual incurred expenses for the Microgrids Evaluation as described in D.21-01-018.

The Clean Substation Microgrid Program Subaccount (one-way subaccount) records actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred for the Clean Substation Microgrid Program 12 as described in D.21-01-018.

The Make-Ready Subaccount (one-way subaccount) tracks the difference between actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred against total adopted revenue requirement for the Make-Ready investments related to multi-season substation microgrids as described in D.22-11-009.

The Utility-Owned Generation Subaccount (one-way subaccount) tracks the difference between actual incurred expenses and capital-related revenue requirement related to the actual capital costs incurred against the total adopted revenue requirement for the Utility-Owned Generation related to multi-season substation microgrids, net of market revenues for blue-sky products³², if any, as described in D.22-11-009.

The Third-Party DGEMS Contracts subaccount (two-way subaccount) records actual incurred expenses for Third-Party DGEMS contracts, net of market revenues for blue-sky products, if any as described in D.22-11-009.

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Advice 6942-E Issued by Submitted May 15, 2023 Decision D.23-04-034 Meredith Allen **Effective** April 14, 2023 Vice President, Regulatory Affairs Resolution

For the Calistoga Clean Substation Microgrid (CSM) Project, Non-PSPS-related variable costs associated with courtesy dispatches under the Energy Vault resources would not be recorded in the Clean Substation Microgrid Program Subaccount of the MGBA. These costs will be recovered through GRC funding or, if it is for a non-PSPS-related catastrophic event, the Catastrophic Event Memorandum Account (CEMA).

 $^{^{23}}$ In this context, PG&E refers to "blue sky products" as those that the distributed energy resources (DER) that power a substation microgrid may be able to provide to the wholesale market during normal ("blue sky") grid operations. They may include, for example, energy, ancillary services, and capacity.

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

55945-E 55055-E

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Oakland, California

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 3

5. ACCOUNTING PROCEDURE (Cont'd)

The Microgrids Incentive Program Subaccount (one-way subaccount) records the actual incurred costs of the MIP, specifically 1) the actual incremental incurred expenses and passthrough costs, 2) the capital-related revenue requirement related to the actual incremental capital costs, and 3) the revenue requirement related to the "customer-side infrastructure" incurred for the MIP up to its share of the separate program and administrative budget caps. The administrative costs will be tracked separately from all other costs through the use of internal orders. Any unspent funds for administrative costs must be returned to customers at the end of the related project work. The CPUC adopted a \$15 million per project cap that consists of \$1 million for Interconnection Allowance and \$14 million for Incentive Award. Internal orders will also be used to separately track the Interconnection Allowance and Incentive Award for each project. The types of costs eligible for the third-party's Incentive Award are listed in the Microgrid Incentive Program Implementation Plan (MIPIP).³⁴ The revenue requirement related to the "customer-side infrastructure" will be recorded as a regulatory asset at a rate equivalent to PG&E's weighted average cost of authorized debt during the period in which financing costs for the regulatory asset are incurred and amortized over 5 years pursuant to D.23-04-034. "Customer-side infrastructure" costs that receive regulatory asset treatment would include those third-party Incentive Award costs that are "paid for by Utility customers that if acquired by the Utility would be capitalized due to the types of costs, i.e., property, plant and equipment" plus supportive activities that are normally capitalized to put the asset into service.

The Microgrid Utility Infrastructure Upgrades Subaccount (one-way subaccount) records expenses- for the microgrid utility upgrades and capital-related revenue requirement related to the Community Microgrid Enablement Program (CMEP) as of April 14, 2023, which was the issuance date of D.23-04-034.⁵

A. The Electrical Isolation Technology Evaluation Subaccount

The following entries will be made each month, or as applicable, net of Revenue Fees and uncollectibles (RF&U):

- 1. A debit equal to the actual incremental incurred expenses;
- A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 3. A credit to transfer the balance or amounts to the DRAM for true-up in rates; and

³⁴ Joint IOUs' Microgrid Incentive Program Implementation Plan, pp. 32-33.

⁴⁵ Joint IOUs' Microgrid Incentive Program Implementation Plan, p. 49.

Actual costs incurred for the CMEP were recorded to the CMEP Subaccount of the Microgrids Memorandum Account (MGMA, Electric Preliminary Statement Part IG) pursuant to OP 16 of D.20-06-017 beginning January 1, 2020 (effective date of the subaccount per Advice Letter 5883-E). Disposition of the balance in the CMEP Subaccount of the MGMA will be addressed in a separate application or in a future General Rate Case. Microgrid utility upgrades and the capital-related revenue requirement for the CMEP incurred on or after April 14, 2023, which is the issuance date of D.23-04-034, will no longer be recorded in the CMEP Subaccount of the MGMA and will be prospectively recorded in the Microgrids Utility Infrastructure Upgrades Subaccount of the MGBA

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Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

55945-E 55055-E

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 3

4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

Cal. P.U.C. Sheet No. Cal. P.U.C. Sheet No.

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Oakland, California

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 4

5. ACCOUNTING PROCEDURE (Cont'd)

B. The Microgrids Evaluation Subaccount

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit equal to the actual incremental incurred expenses;
- 2. A credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 3. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
- 4.3. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
- C. The Clean Substation Microgrid Program

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit equal to the actual incremental incurred expenses;
- A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 3. A credit to transfer the balance or amounts in this subaccount, to the DRAM for future rate recovery; and
- 4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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Advice 6942-E Decision D.23-04-034

ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 6

5. ACCOUNTING PROCEDURE (Cont'd)

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F. Third-Party DGEMS Contracts

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit equal to the actual incremental incurred expenses;
- A credit equal to any value received from Resource Adequacy credits, energy or ancillary services wholesale market transactions, and Renewable Energy Credits;
- 3. A debit or credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
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G. The Microgrids Incentive Program Subaccount

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The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit entry equal to the actual incremental incurred expenses; for administration;
- 2. A debit entry equal to the actual incremental incurred program costs, including pass-through costs related to remittances to customers participating in the program:
- 3. A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 4. A debit or credit entry equal to the revenue requirement related to the "customer-side infrastructure" incurred. The revenue requirement will include amortization expense, return on investment, and federal and state income taxes associated with the costs of installed equipment. The "customer-side infrastructure" costs are recorded as a regulatory asset and will be amortized over five years, at a rate equivalent to PG&E's weighted average cost of authorized debt during the period in which the financing costs for the regulatory asset are incurred;
- 5. A debit or credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 6. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or it successor.

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Advice 6942-E Decision D.23-04-034

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ELECTRIC PRELIMINARY STATEMENT PART IT MICROGRIDS BALANCING ACCOUNT (MGBA)

Sheet 7

5. ACCOUNTING PROCEDURE (Cont'd)

H. The Microgrid Utility Infrastructure Upgrades Subaccount

The following entries will be made each month, or as applicable, net of RF&U:

- 1. A debit entry equal to the actual incremental incurred expenses;
- 4.2. A debit or credit entry equal to the capital-related revenue requirement related to the actual incremental capital costs incurred associated with the CMEP. Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
- 2.3. A debit or credit to transfer the balance or amounts to the DRAM for true-up in rates; and
- 3.4. A debit or credit entry equal to the interest on the average of the balance in this subaccount at the beginning of the month and the balance in this subaccount after the above entries, at a rate equal to one-twelfth the interest rate on three month commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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Advice 6942-E Decision D.23-04-034

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

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