

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 6, 2016

Advice Letter 4935-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

**SUBJECT: Online Payments for Generator Interconnection Related Fees for NEM-2
and other Electric Rule 21 Customers**

Dear Mr. Jacobson:

Advice Letter 4935-E is effective “**when the NEM Cap in PG&E’s Service Territory is Reached.**”

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division

October 10, 2016

Advice 4935-E

(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

**Subject: Online Payments for Generator Interconnection Related Fees for NEM-2
and other Electric Rule 21 Customers****Purpose**

The purpose of this submittal is to provide details regarding the use of online payments for the collection of Rule 21 interconnection related fees and charges for Net Energy Metering¹ (NEM) successor tariff participants pursuant to Decision (D.) 16-01-044 and Resolution E-4792², as well as for other generating facility interconnections under the scope of Rule 21.

Background

Pursuant to D.16-01-044, the NEM successor (NEM-2) program has new interconnection fees and costs as shown in Advice Letter 4802-E-A³ and Rule 21 Table E-1⁴. These include collection of all interconnection costs for NEM-2 generator interconnections sized over one megawatt and a new NEM-2 interconnection fee of \$145⁵ for NEM-2 generators sized one megawatt and under. Unchanged are the other, currently existing fees and costs for interconnections provided for under Rule 21.

PG&E's Advice Letter 4802-E was protested by various parties with regards to the invoicing of interconnection fees for NEM-2 stating "PG&E should establish an

¹ This includes all programs under Rate Schedule NEM2, NEM2V, NEM2VMSh.

² Resolution E-4792 -

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M163/K978/163978119.PDF>

³ AL 4802-E-A, *Supplemental: Implementation of Commission Decision 16-01-044 Creating Pacific Gas and Electric Company's New Net Energy Metering Successor Rate Schedules NEM2, NEM2V, and NEM2VMSh, and Various Associated Filed Forms, and Modifying of Electric Rule 21*

https://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_4802-E-A.pdf

⁴ Page 110 of 428 in AL 4802-E as submitted, Sheet 47 of Rule 21

https://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_4802-E.pdf

⁵ Advice Letter 4802-A Section A - *Interconnection Fee*, page 4 of 157.

electronic payment option, noting “mailing paper checks is no longer a reasonable payment process.”⁶

In PG&E’s March 28, 2016 protest response regarding the “invoicing of interconnection fees,” PG&E generally supported the request for electronic payment of fees, and responded⁷ it would “clarify this in a supplemental Advice letter.”

⁶ March 21, 2016, the Solar Energy Industries Association (SEIA), the California Solar Energy Industries Association (CALSEIA), The Alliance for Solar Choice (TASC) and Vote Solar (collectively, the Joint Solar Parties) submitted a protest to AL 4802-E titled, *Pacific Gas and Electric Company Advice 4802-E: Implementation of California Public Utilities Commission Decision 16-01-044 Creating Pacific Gas and Electric Company's New Net Energy Metering Successor Rate Schedules NEM2, NEM2V and NEM2VMESH, and Various Associated Filed Forms and Modifying of Electric Rule 21*, and raised questions about fees:

Invoicing of Interconnection Fee

PG&E modified Sections E.3 and E.4 and Tables E-1, E-2 and E-3 of its Electric Rule 21 Generating Facility Interconnections Tariff to, among other things, address Decision 16-01-044's requirement that customers on the NEM successor tariff pay a reasonable interconnection fee. It not clear, however, whether payment by either the customer or contractor of the interconnection fee is acceptable. PG&E should be required to accept payment from either the contractor or the customer and its tariff should be modified to set forth such obligation.

*In addition, the Joint Solar Parties submit that **mailing paper checks is no longer a reasonable payment process**. It would slow interconnection and create unnecessary administrative burden. At the very least, PG&E **should establish an electronic payment option**. Online payment is common in the business world today, and PG&E already makes available and encourages online transactions for customer bill payment. Even more efficient would be to bill contractors monthly for the fees or keep a contractor credit card on file for automatic payment and emailed receipts upon submittal of applications. Imperial Irrigation District provides for such an option for payment of meter installation fees. (page 6; emphasis added)*

⁷ In PG&E’s Reply to Protests of Pacific Gas and Electric Company’s (PG&E) Advice Letter 4802-E, *Implementation of California Public Utilities Commission Decision 16-01-044 Creating Pacific Gas and Electric Company’s New Net Energy Metering Successor Rate Schedules NEM2, NEM2V and NEM2VMESH, and Various Associated Filed Forms, and Modifying of Electric Rule 21*, on page5, PG&E writes;

Invoicing of Interconnection Fee –

*The [Joint Solar Parties] feel PG&E needs to clarify whether payment by either the customer or contractor of the interconnection fee is acceptable. According to the JSPs, mailing paper checks is no longer a reasonable payment process and the JSPs believe **PG&E should be required to establish an electronic payment option**.*

*PG&E has already begun exploring potential solutions that will allow contractors and/or customers to pay the interconnection fee via electronic means. However, **PG&E will also continue to allow contractors/customers to pay via check since there may be customers that may not desire or be able to pay the interconnection fee via electronic means.***

***PG&E will clarify this in a supplemental Advice Letter.** (emphasis added)*

Subsequently, on June 24, 2016, the Commission approved Resolution E-4792⁸ supporting the IOUs' plans to implement electronic payment for the NEM-2 interconnection fees and costs.

To collect fees PG&E currently mails an invoice. Then the customer sends PG&E a bank check or wires funds, PG&E then acknowledges receipt. Once the NEM-2 program goes into effect, PG&E plans to start using an electronic payment process through PG&E's online application portal.

In this Advice Letter PG&E proposes to require its use for all NEM-2 interconnection applications.⁹

In addition, PG&E will continue to accept checks until PG&E has completed the work to make this functionality available on all its online portals, at which point PG&E proposes to also make online payments available to all other Rule 21 interconnection programs.^{10,11}

⁸ Resolution E-4792. Adoption of PG&E's, SCE's and SDG&E's Net Energy Metering (NEM) successor tariffs as directed by Decision 16-01-044 states:

The Joint Solar Parties also contend that the IOUs should make electronic payment of the interconnection fee available, arguing that mailing paper checks will slow interconnection and is not a reasonable process. The Joint Solar Parties state that establishing an option to bill contractors monthly for all their interconnection fees or keeping a contractor credit card on file for automatic payment would be preferable but that, at minimum, an electronic payment method should be available. In their replies to protests, PG&E and SDG&E both state that they have begun exploring ways to accept electronic payments. (page 9)... In response to Energy Division data requests, PG&E estimates that it will make an electronic payment method available to customers in October 2016,... Given that the target dates for each IOU roughly coincide with the time periods they are likely to reach their Section 2827 NEM program limits and begin offering the NEM Successor Tariff, we find the projected dates to be reasonable. We agree with the Joint Solar Parties that the IOUs should make electronic payment of the interconnection fee available to NEM applicants and find that the additional information the IOUs provided in their replies to protests is sufficient to address the request. (page 10)

And in Finding Of Fact 4.

The IOUs should make electronic payment of the interconnection fee available to NEM applicants. The additional information the IOUs provided in their replies to protests is sufficient to address the request. (page 29)

⁹ This will include the following application forms: 79-1151B-02 for standard NEM, and 79-974-02 (with program specific appendices)

¹⁰ This would include NEMFC, RES-BCT, and other export and non-export generating facilities interconnection under PG&E's Electric Rule 21.

¹¹ Table in Section 3 From Form 79-1181, submitted in Advice Letter 4869-E, *Advice Letter Modifications to Electric Rule 21 and Establishing New Rule 21 Pre-Application Report Request Form (Form 79-1181)* ... http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_4869-E.pdf and is further described the included revised Rule 21 in Section E.1.i, ii & iii.

Replacing the current paper process for fee and cost payment to a more efficient electronic format will better ensure timely interconnections and maintain operational efficiency with the goal to reduce costs. For this reason, PG&E proposes¹² to not charge any additional fee for use of the online payment service at this time.

PG&E's Online Payment Proposal

- 1) PG&E proposes to require electronic online payment at the time of application for the smaller NEM (Solar and Wind NEM 30 kW or less) applicants. This group constitutes our highest volume of applicants. In other words, in order to start the application process for these applicants, online payment will be required at the time of application.
- 2) For all other Rule 21 programs (including Rule 21 Pre-Applications and Cost Envelope Option), PG&E will continue to accept checks, wired funds or other Automated Clearing House (ACH) payments in the interim until PG&E's automated application portals are modified to accept online payments. At that time, PG&E will transition to online payments at the time of application¹³. After the online payment is implemented for these programs, in order to start the application process for these applicants, the payment will be required.

In order to facilitate automating the fee collection process, PG&E is taking steps to finalize agreements with vendors to facilitate credit card payments or ACH payments online.

Tariff Changes

The NEM2, NEM2V, and NEM2VMSH tariffs will be modified in the *Interconnection Special Condition* to add language about the online requirement.

Specifically for NEM2, Special Condition 3 will be modified (as underlined): [sheet 15]

Customers on this tariff must pay for the interconnection of their REGF as provided in Electric Rule 21, including an application fee. This application fee must be paid

¹² Under CA PUC section 755 Commission approval is needed for acceptance of credit card payments which is one of the options that will be provided through PG&E's online payment portal.

¹³ However, if an applicant applies without paying interconnection fees where owed, PG&E reserves the right to collect the fee at a later time. For example, Single Family Solar Housing (SASH) customer are exempt from the NEM interconnection fee per D. 16-01-044, so an applicant can on the online application select that they are a SASH eligible, bypassing by the interconnection fee requirement. But if subsequently they prove not to be SASH eligible, PG&E would be permitted at a later time to collect the applicable interconnection fees.

through PG&E's online application portal in order to complete the application, unless otherwise directed by PG&E. (Underlined language is added)

For NEM2V, Special Condition 4 will be modified: (sheet 17)

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. (Underlined language is added)

For NEM2VMSH Special Condition, PG&E corrects typos and language that should have been removed in AL 4802-E-A or as with the Single Family Affordable Solar Housing language, was already in Rule 21. The new language is:

Customers on this tariff must pay for the interconnection of their REGF as provided in Electric Rule 21, including an application fee. 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. ~~Customers on this tariff must pay for the interconnection of their systems. Customers eligible for single-family affordable solar housing (SASH) who interconnect under this tariff do not have pay any charge for interconnection. Interconnection fees for REGFs smaller than 1 megawatt in size will be based on PG&E's interconnection costs from its June 2015 Advice Letter filed in compliance with D.14-015-033, and includes NEM Processing and Administrative Costs, Distribution Engineering Costs, Metering Installation and Commission Costs, unless changed by a subsequent Advice Letter approved by the Commission.~~ (Underlined language is added)

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 31, 2016, which is 21 days¹⁴ after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

¹⁴The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-1448
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, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 advice filing become effective when the NEM cap in PG&E's service territory is reached.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for Rulemaking (R.) 12-11-005, R.14-07-002 and R.11-09-011. Address changes to the General Order 96-B service list should be directed to e-mail 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service Lists R.12-11-005, R.14-07-002 and R.11-09-011
Marc Monbouquette, Energy Division
Gabriel Petlin, Energy Division
Mary Claire Evans, Energy Division
Jeffrey Kwan, Energy Division

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **4935-E**

Tier: **2**

Subject of AL: **Online Payments for Generator Interconnection Related Fees for NEM-2 and Other Electric Rule 21 Customers**

Keywords (choose from CPUC listing): Metering

AL filing type: Monthly Quarterly Annual One-Time Other _____

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

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: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: **When the NEM Cap in PG&E's Service Territory is Reached** No. of tariff sheets: **5**

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

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

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

Tariff schedules affected: **See Attachment 1**

Service affected and changes proposed: **See Attachment 1**

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

Protests, dispositions, and all other correspondence regarding this AL are due no later than 21 days¹ after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division
EDTariffUnit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

¹ The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

**ATTACHMENT 1
Advice 4935-E**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
37607-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 15	36241-E
37608-E	ELECTRIC SCHEDULE NEM2V VIRTUAL NET ENERGY METERING SERVICE Sheet 17	36269-E
37609-E	ELECTRIC SCHEDULE NEM2VMSH VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S) Sheet 15	36288-E
37610-E	ELECTRIC TABLE OF CONTENTS Sheet 1	37605-E
37611-E	ELECTRIC TABLE OF CONTENTS RATE SCHEDULES Sheet 6	37588-E



ELECTRIC SCHEDULE NEM2
NET ENERGY METERING SERVICE

Sheet 15

SPECIAL
 CONDITIONS:
 (Cont'd.)

3. INTERCONNECTION: (Cont'd.)

For Load Aggregation, a completed and signed "NEM Load Aggregation Appendix" (Form 79-1153-02) must be submitted together with the appropriate NEM interconnection agreement listed above.

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

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

Applicant is required to verify as a part of each interconnection request for this tariff, that (i) a warranty of at least 10 years has been provided on all equipment and on its installation, or (ii) have a 10-year service warranty or executed "agreement" ensuring proper maintenance and continued system performance.

For Load Aggregation Arrangements Requesting an additional service for Generator – Subject to all other applicable rules, an additional service may be allowed for the Generating Account if it has no load other than that associated directly with the REGF. However, a customer may not subsequently add load to that additional service, and if the REGF is removed, the additional service, may not be converted to a load account.

Customers on this tariff must pay for the interconnection of their REGF as provided in Electric Rule 21, including an application fee. 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.

(N)
 |
 (N)

For the purposes of the NEM2, NEM2V, and NEM2VMSH tariffs, the rating of the generating facility, for the purposes of comparing its size relative to the 1 megawatt (MW) limit, will be determined based on:

- (a) For each PV generator, the California Energy Commission's (CEC) AC rating;
- (b) For each inverter based generator, the gross nameplate rating of the inverter; or
- (c) For each non-inverter based generator, the generator gross nameplate.

(Continued)



ELECTRIC SCHEDULE NEM2V
VIRTUAL NET ENERGY METERING SERVICE

Sheet 17

SPECIAL
 CONDITIONS:
 (Cont'd.)

3. BILLING: (Cont'd.)

k. OAS Payment Option

Eligible Small Customer (as defined in Rule 1) Benefitting Accounts will be required to pay monthly, unless they specifically request to pay annually, for the net energy (kWh) consumed. For commercial Benefitting Accounts other than Small Commercial, the net balance of all moneys owed must be paid on each monthly billing cycle. When the Qualified Customer is a net electricity producer over a monthly billing cycle, the value of any excess kilowatt-hours generated during the billing cycle shall be carried over to the following billing period and appear as a credit on the Qualified Customer's account, until the end of the Relevant Period.

l. Electric Service Providers (ESP) Charges:

If PG&E provides direct access (DA) metering for the ESP, UDC consolidated billing (that is, PG&E Consolidated Billing as described on PG&E's Rule 22), or ESP dual or consolidated billing support services for DA Qualified Customer served under PG&E's rates or their ESP's rates, PG&E may recover the incremental costs related to net energy metering from the customer's ESP as follows:

Metering services: \$104 Metering Service Base charge, plus \$73/hour for on-site work, plus materials.

Billing: \$85/hour plus materials.

4. INTERCONNECTION:

In order to receive approval for Parallel Operation of the Renewable Electrical Generation Facilities, the Owner must submit a completed PG&E application and interconnection agreement form as follows:

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.

(N)
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 (N)

(Continued)



ELECTRIC SCHEDULE NEM2VMSH
 VIRTUAL NET ENERGY METERING FOR MULTIFAMILY
 AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)

Sheet 15

SPECIAL
 CONDITIONS:
 (Cont'd.)

3. INTERCONNECTION:

In order to receive approval for Parallel Operation of the Solar Generating Facilities, the Owner must submit a completed PG&E application form and interconnection agreement as follows:

Facility Type	Application	Interconnection Agreement
For an Eligible Low Income Facility with one Single Point of Delivery	<i>Online Rule 21 Generator Interconnection Application (Form 79-1174-02)</i>	<i>NEM2VMSH Virtual Net Energy Metering Application and Interconnection Agreement for the Building Owner of Multifamily Affordable Housing with a Solar Generating Facility of 1 Megawatt or Less (Form 79-1109-02)</i> <i>Appendix A – Designation of Multifamily Common Area Accounts, Residential Units and Their Respective Solar Energy Credit Allocation</i>
For an Eligible Low Income Facility with Multiple Service Delivery Points and/or Multiple Generators	<i>Online Rule 21 Generator Interconnection Application (79-1174-02)</i>	<i>Eligible Low Income Development Virtual Net Energy Metering (NEM2VMSH) Application and Interconnection Agreement for Multifamily Affordable Housing with Solar Generation Totaling 1 Megawatt or Less (Form 79-1124-02)</i> <i>Appendix A – Designation of Multifamily Common Area Accounts, Residential Units and Their Respective Solar Energy Credit Allocation</i> <i>Appendix B – Designation of Multifamily Common Area Accounts, Residential Units and Their Respective Solar Energy Credit Allocation</i>

Customers on this tariff must pay for the interconnection of their REGF as provided in Electric Rule 21, including an application fee. 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.

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(Continued)



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Sheet 1

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RATE SCHEDULES

Sheet 6

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(Continued)

Advice Letter No: 4935-E
 Decision No.

Issued by
Steven Mainight
 Senior Vice President
 Regulatory Affairs

Date Filed October 10, 2016
 Effective _____
 Resolution No. _____

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

AT&T	Division of Ratepayer Advocates	OnGrid Solar
Albion Power Company	Don Pickett & Associates, Inc.	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Douglass & Liddell	Praxair
Anderson & Poole	Downey & Brand	Regulatory & Cogeneration Service, Inc.
Atlas ReFuel	Ellison Schneider & Harris LLP	SCD Energy Solutions
BART	Evaluation + Strategy for Social Innovation	SCE
Barkovich & Yap, Inc.	G. A. Krause & Assoc.	SDG&E and SoCalGas
Bartle Wells Associates	GenOn Energy Inc.	SPURR
Braun Blaising McLaughlin & Smith, P.C.	GenOn Energy, Inc.	San Francisco Water Power and Sewer
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	Seattle City Light
CENERGY POWER	Green Charge Networks	Sempra Energy (Socal Gas)
CPUC	Green Power Institute	Sempra Utilities
California Cotton Ginners & Growers Assn	Hanna & Morton	SoCalGas
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Spark Energy
California State Association of Counties	Kelly Group	Sun Light & Power
Calpine	Ken Bohn Consulting	Sunshine Design
Casner, Steve	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity	Linde	TerraVerde Renewable Partners
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	TerraVerde Renewable Partners, LLC
City of San Jose	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
Clean Power	MRW & Associates	TransCanada
Clean Power Research	Manatt Phelps Phillips	Troutman Sanders LLP
Coast Economic Consulting	Marin Energy Authority	Utility Cost Management
Commercial Energy	McKenna Long & Aldridge LLP	Utility Power Solutions
Cool Earth Solar, Inc.	McKenzie & Associates	Utility Specialists
County of Tehama - Department of Public Works	Modesto Irrigation District	Verizon
Crossborder Energy	Morgan Stanley	Water and Energy Consulting
Crown Road Energy, LLC	NLine Energy, Inc.	Wellhead Electric Company
Davis Wright Tremaine LLP	NRG Solar	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Nexant, Inc.	YEP Energy
Defense Energy Support Center	ORA	
Dept of General Services	Office of Ratepayer Advocates	