

May 16, 2022

Alice Busching Reynolds
President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Alice.Reynolds@CPUC.CA.GOV

**Subject: PG&E Efforts to Prioritize Generator Interconnections to Meet
CPUC Grid Reliability Initiatives**

Dear President Reynolds:

Thank you for your March 11 letter. I want to assure you that we take seriously our responsibility to maintain safe and reliable operation of the bulk electric system, including the safe interconnection of electric generation resources. PG&E has reviewed the interconnection issues highlighted and assessed our current efforts to meet our shared reliability goals for 2022 to 2026.

We respectfully respond to the requests included in the March letter in the sections below:

1. [Ensure] PG&E has sufficient resources, including increasing staffing as necessary, to support the interconnection of new projects critical to grid reliability in Summer 2022 and 2023.

PG&E continually monitors, evaluates, and addresses the staffing and resources to meet the needs of the existing and future generator interconnection portfolio volumes. In addition, PG&E is undergoing an extensive update of its policies and procedures related to these interconnection projects to ensure we are able to analyze and process the interconnection queue efficiently and expeditiously.

PG&E continuously reviews and updates our processes and procedures across the company. Where procedures are being developed or revised, PG&E uses a combination of subject matter expertise and benchmarking from other utilities in the region and across the nation to determine the necessary updates.

As actual or projected workload demands, PG&E also evaluates work allocations to ensure sufficient staffing for that necessary work. For example, PG&E has proactively created new departments to support the interconnection of new generation projects to the electric system.



In 2021, PG&E established a Substation Engineering Group and a Transmission Line Engineering group specifically for generator interconnections. In addition, PG&E's Transmission Planning team has a focused Interconnection Planning Group that leads generation interconnection studies by areas (North of Greater Bay Area, Greater Bay Area, Fresno, Kern and South 500 kV) to streamline and efficiently study generator interconnection requests. The Interconnection Planning Group staffing levels have been augmented from 5 to a total of 11 positions and are supplemented with consultants as needed. These groups are dedicated full-time planning resources to support the increased generation interconnection study work and to support the interconnection customers as they implement their generation projects.

It should be noted that several projects on the generator interconnection list provided in the March 11, 2022, letter will not meet the earlier proposed In-Service Dates for 2022 or 2023. In five cases, the customers have withdrawn these projects for various reasons. In other cases, additional information garnered from the interconnection studies or from field visits during the initial stages of the engineering and design have necessitated updates to those In-Service Dates. PG&E is working with those customers to revise the interconnection agreements to reflect this updated information. PG&E has reviewed the projects list and is providing an updated version as Attachment 1 to this letter. Attachment 2 uses the updated project data in Attachment 1 to provide a table showing the projected generation in service dates by year and quarter.

PG&E will continue to evaluate and update our interconnection resources and will seek additional support from the Energy Division if needed.

2. Take action to identify the necessary interconnection resources and process improvements to facilitate the ongoing interconnection required to support the CPUC's recent procurement of 14,800 MW NQC of new resources by 2026.

PG&E organizations supporting generation interconnections have increased staffing levels in recent years and will continue to evaluate generation interconnection application volumes going forward to determine if and when additional resources are needed.

In addition to staffing updates and creating dedicated resource groups to support generation interconnection work, PG&E also is working on initiatives to help reduce timelines identified in generation customer interconnection studies. For example, PG&E identified fault interrupting concerns on some of the 500 kV transmission breakers in recent reassessments and cluster study reports. To mitigate these concerns, PG&E identified a solution to increase the interrupting capability of the 500 kV breakers in question instead of completing full breaker replacements. This greatly reduced the schedule impact to our generation interconnection customers. PG&E will continue to evaluate opportunities to support the timely interconnection of generation customers.

Another area that PG&E is closely monitoring is the worldwide supply chain issues for various equipment which have led to some project delays. PG&E is working with our current equipment



vendors to ensure timely deliveries while looking to expand new equipment vendor relationships to help minimize the impacts on future interconnection project schedules.

PG&E is working actively to streamline the process to initiate interconnection contract work and is considering any possible lean process solutions to kick off construction activities with customers sooner and avoid Participating Transmission Owner driven delays to In-Service dates negotiated in the Interconnection Agreements.

3. Identify an ombudsperson(s) for CPUC's Energy Division to coordinate with on any interconnection issues or projects.

Mr. Satvir Nagra, Director, Asset Planning, will be PG&E's point of contact for coordinating with and reporting to the CPUC Energy Division on the generator interconnection issues and projects supporting this initiative. He may be reached by phone at 559-341-0126 (office phone) or by email at SXS5@pge.com.

4. Identify regulatory requests, if any, to CPUC or the Federal Energy Regulatory Commission (FERC) that require resolution to support PG&E's activities related to wholesale generator interconnection.

We appreciate and value the ongoing support from the CPUC regarding the wholesale generation interconnection process. While we do not have any specific requests at this time, please be assured we will request assistance from the CPUC Energy Division and/or FERC when such regulatory support is necessary.

PG&E hopes that all parties to these interconnection efforts will collaborate as the need arises to identify and expeditiously work to resolve project deliverables and resource concerns as they occur.

5. Please commit to PG&E's continuing participation in the quarterly Transmission Development Forums held by the CAISO in coordination with the CPUC Energy Division.

PG&E reaffirms its commitment to support and participation in the Transmission Development Forum, as evidenced by our recent participation in and presentations at the most recent Forum held on April 26, 2022.

My team and I look forward to continued discussions with the CPUC and the CAISO on necessary actions to ensure that reliability resources are interconnected in a timely and efficient manner to meet the energy needs of California.



If you have any further questions, please do not hesitate to contact me.

Sincerely,

Patricia Poppe
Chief Executive Officer
Pacific Gas and Electric Company
Patricia.poppe@pge-corp.com

Attachments:

Confidential - Attachment 1 - PG&E Updates to CPUC list of Grid Reliability projects in PG&E Territory

Confidential - Attachment 2 - Table showing current estimated generation amounts coming online by year and quarter

Declaration of Confidentiality

cc: Clifford Rechtschaffen, CPUC Commissioner, Cliff.Rechtschaffen@cpuc.ca.gov
Genevieve Shiroma, CPUC Commissioner, Genevieve.Shiroma@cpuc.ca.gov
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David Erne, California Energy Commission, David.Erne@energy.ca.gov
Elliot Mainzer, California Independent System Operator, CEO, eemainzer@caiso.com
Neil Millar, California Independent System Operator, NMillar@caiso.com
Kaina Pereira, Governor's Office of Business and Economic Dev., kaina.pereira@gobiz.ca.gov
All Parties to the Service List on R.20-11-003 (Redacted Version)

Attachment 1
(REDACTED)

PG&E Updates to CPUC list of Grid Reliability projects in PG&E Territory

**Attachment 2
(REDACTED)**

Table showing current estimated generation amounts coming
online by year and quarter

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Satvir Nagra, am a/the Director of Asset Planning of Pacific Gas and Electric Company (“PG&E”), a California corporation. Christine Cowser, the Vice President of Asset and Regulatory of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
705 P Street
Fresno, CA 93721

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding: R2011003 (Reopened) “Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Reliable Electric Service in California in the Event of an Extreme Weather Event in 2021.”

3. Title and description of document(s): PG&E is attaching two confidential documents with the response to President Reynolds’ letter to PG&E’s CEO Patti Poppe on March 11, 2022.

These include:

1. Attachment 1: Updated CPUC GR Data (pdf): CPUC Grid Reliability Initiative, Priority Projects List
2. Attachment 2: Summary Table (pdf): Summary Table detailing forecasted Generation (MW) to come online by Year and Quarter

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data (Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029; and General Order (G.O.) 77-M)</p>	<p>Attachment 1: Updated CPUC GR Data -and - Attachment 2: Summary Table</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual (Protected under Civ. Code §§ 1798 <i>et seq.</i> and G.O. 66-C)</p>	
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 (Protected under Govt Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR §29.2)</p>	
<input type="checkbox"/>	<p>Accident reports (Protected under PUC § 315 and G.O. 66-C, 2.1)</p>	
<input type="checkbox"/>	<p>Commercial records that, if revealed, would place PG&E at an unfair business disadvantage, including market-sensitive data; business plans and strategies; long-term fuel buying and hedging plans; price, load, or demand forecasts; power purchase agreements within three years of execution; and internal financial information</p>	

(Protected under Govt Code §§ 6254, 6276.44; Evid Code § 1060; Civ. Code § 3426 *et seq.*; and G.O. 66-C, 2.2 (b))

Proprietary and trade secret information or other intellectual property
(Protected under Civ. Code § 3426 *et seq.*; Govt Code § 6254.15)

Corporate financial records
(Protected under Govt Code § 6254.15)

Third-Party information subject to non-disclosure or confidentiality agreements or obligations
(*See, eg.*, D.11-01-036)

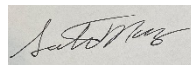
Attachment 1: Updated
CPUC GR Data

-and -

Attachment 2: Summary
Table

Other basis: _____

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on May 11, 2022 at Fresno, California.



Satvir Nagra
Director of Asset Planning
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

R2011003 – SUMMER RELIABILITY 2022

ATTACHMENT TO DECLARATION

May 16, 2022

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Attachment 1	Updated CPUC GR Data	Customer-specific data and Third-Party information subject to non-disclosure or confidentiality agreements or obligations	The entire document
Attachment 2	Summary Table	Customer-specific data and Third-Party information subject to non-disclosure or confidentiality agreements or obligations	The entire document