

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

ENERGY DIVISION

Agenda ID# 24148  
RESOLUTION E-5423  
June 11, 2026

**R E S O L U T I O N**

Resolution E-5423. Pacific Gas and Electric Company (U39E).  
Caltrain's Peninsula Corridor Joint Powers Board electrification project  
generating facility interconnection agreement.

PROPOSED OUTCOME:

- Approves Pacific Gas and Electric Company's (PG&E's) special billing agreement with Caltrain.
- Approves Caltrain's requested status as an essential customer.
- Approves with modifications PG&E's two interconnection agreements deviating from certain requirements in PG&E's Electric Rule 21 Filed Form 79-973. Orders deficits and remedies to be addressed in a subsequent Tier 1 Advice Letter.

SAFETY CONSIDERATIONS:

- There is risk of Caltrain's intermittent regenerative braking unexpectedly energizing PG&E's transmission system through established Points-of-Interconnection, introducing a safety risk for PG&E maintenance personnel. This risk can be mitigated via operating procedures. PG&E must continue to comply with existing utility and California Public Utilities Commission policy on safety requirements and standards, as well as the standards of the Federal Energy Regulatory Commission, among others.

ESTIMATED COST:

- There are no costs associated with this resolution.

ADVICE LETTERS ("AL") RESOLVED:

- PG&E AL 7616-E filed June 5, 2025
  - PG&E AL 7616-E-A filed June 20, 2025
  - PG&E AL 7616-E-B filed July 30, 2025
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## SUMMARY

Caltrain is a commuter transit rail service in California, governed by the Peninsula Corridor Joint Power Board (JPB), serving San Francisco, San Mateo, and Santa Clara Counties. Caltrain's route extends from the 4<sup>th</sup> and King station in San Francisco, as its northern terminus, to Gilroy in the south. Caltrain also has a major passenger terminal in San Jose at the Diridon station.

In 2024, Caltrain underwent an effort to replace its existing diesel trains with electrified trains for the portion operating between 4<sup>th</sup> and King to the Tamien<sup>1</sup> station in San Jose<sup>2</sup>. Each train both consumes energy, while accelerating, and is capable of reducing energy consumption by generating and capturing electricity through its braking mechanism, a process known as regenerative braking. Caltrain's generation will occur intermittently, meaning the generation will be unscheduled, multiple occurrences will occur each day, and each occurrence will be for brief periods of time. Some occurrences may also move from one Point of Interconnection (POI) to another, and simultaneous braking by two or more trains is also possible.

Under all Caltrain current and foreseeable operating forecasts, any simultaneous regenerative braking combination scenarios will only offset Caltrain's instantaneous demand, and not result in an export to PG&E's system at either of the two POIs serving the Caltrain system. However, if a sufficient number of trains were to simultaneously brake, the resulting generation would be additive and have the potential to export power to the PG&E system.

It is these characteristics--that the Caltrain generation profile under all foreseeable conditions will be non-exporting, but that the potential for intermittent export under rare and extreme scenarios is possible--that require this Resolution to address: (1) PG&E and Caltrain's negotiated interconnection agreements that deviate from certain requirements in PG&E's Electric Rule 21, and (2) Caltrain's applications for Essential Customer Use Status.

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<sup>1</sup> Tamien Station is the first station south of Diridon Station and is used by Caltrain for operations in addition to passenger-related service.

<sup>2</sup> The southern portion of Caltrain's route, between Diridon and Gilroy, is served by diesel-powered trains.

## **BACKGROUND**

Caltrain operates commuter trains that were electrified in 2024 for most of its route. The electric trains both consume electricity as loads, when accelerating, and inject electricity as generation, when braking. Caltrain operates two traction substations, one interconnected to PG&E's East Grand 115 kV substation in South San Francisco, and a second traction substation interconnected to PG&E's FMC 115 kV substation in San Jose.

This Resolution addresses the following PG&E Tier 3 Advice Letters (ALs):

- AL 7616-E – requesting approval for three agreements. Two of these agreements are interconnection agreements deviating from PG&E's Electric Rule 21 Filed Form 79-973. The third agreement is a special billing agreement to address that Caltrain has more than one traction load location.
- AL 7616-E-A - Supplement A corrected an error in the wording of Section 10.a of the special billing agreement. This AL only augments AL 7616-E with the amendment to the special billing agreement and does not replace AL 7616-E in its entirety.
- AL 7616-E-B – Through this supplement, PG&E submits Caltrain's Applications for Essential Customer Use Status for Commission approval. As specified in PG&E's Commission-approved Application For Essential Customer Use form, rail rapid transit is eligible for such classification "as approved by CPUC."

### *Applicability of Rule 21*

PG&E's East Grand 115 kV and FMC 115 kV POIs are transmission assets nominally in California Independent System Operator (CAISO) control, seemingly placing Caltrain's generation under CAISO's tariff. Both nodes appear in CAISO.<sup>3</sup> Rule 21, however, specifies exceptions to Caltrain's unique regenerative braking generation injections that establish CPUC jurisdiction and Rule 21 as the appropriate tariff.<sup>4</sup>

Rule 21 states that, "All Generating Facilities seeking Interconnection with Distribution Provider's (PG&E's) Transmission System shall apply to CAISO for Interconnection and

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<sup>3</sup> Local Capacity Area Substation List, Based on 12/1/2025, [Local Capacity Area Substation List 12/1/2025](#), accessed on 1/16/2026.

<sup>4</sup> ELECTRIC RULE NO. 21, GENERATING FACILITY INTERCONNECTIONS, B.1., APPLICABILITY, [PG&E Electric Rule 21](#), accessed on 1/16/2026.

be subject to CAISO Tariff..."<sup>5</sup>, with the following exception applicable to Caltrain's regenerative braking generation:

"ii) Generating Facilities that do not export to the grid or sell any exports sent to the grid (Non-Export Generating Facilities)."

The Caltrain generation is single-phase and created in short time durations by trains that are braking. Although the generation from a single train can energize PG&E circuits through the Caltrain POIs, several trains would need to brake simultaneously to concentrate enough power to export to the PG&E system.

To assure that PG&E system reliability was adequate for any expected Caltrain generation, reliability studies were performed presuming four trains were braking simultaneously.

Caltrain has two POIs with PG&E, both generally under CAISO control, as follows:

1. East Grand 115 kV located in South San Francisco
2. FMC 115 kV located in San Jose

PG&E deemed Rule 21 to be the appropriate applicable tariff given 1) the nature of Caltrain's single-phase regenerative braking generation and the two POIs, and, 2) that Caltrain's intermittent generation will neither send nor sell exports to the grid. PG&E has designated Caltrain's regenerative braking generation as non-export, although with the potential for intermittent export to the PG&E system at Caltrain's POIs.

Additionally, Caltrain's generation is uncompensated, one of the prerequisites for Rule 21 applicability, noted above.

### Agreement Approval Requests

PG&E is seeking approval of five agreements, which can be categorized as follows:

1. Special Billing Agreement
2. Generating Facility Interconnection Agreements
  - a. East Grand 115 kV (4054-RD / 60O925163)
  - b. FMC 115 kV (4055-RD / 60O925165)
3. Caltrain's Applications for Essential Customer Use Status

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<sup>5</sup> Ibid.

- a. East Grand 115 kV
- b. FMC 115 kV

### Special Billing Agreement

Caltrain owns and operates more than one traction power facility location and, as a train travels up or down the peninsula, the mobile load or generation (if braking) quickly transfers from one traction power location to another. An adjustment to the metered demand is required for certain billing components to prevent duplicative charges for the same service. This is accomplished by combining the interval data on an interval-by-interval basis for all of the traction power meters. This calculates the coincident demand of Caltrain's traction load. This adjusted demand is prorated back to each of the traction power points.

Additionally, there are two electric meters at each of Caltrain's two traction power locations. Each location has an extra meter because Caltrain requested parallel transmission services at each location. Caltrain pays only one customer charge for each traction power location because the extra meters and meter-related facilities were installed as a Special Facility under Electric Rule 2, Section I. Furthermore, these meters are included as part of the coincident demand.

PG&E included a Clean Special Billing Agreement, although there was an error in the language of Section 10, which was corrected by PG&E Tier 3 AL 7616-E-A.

### Corrected Version of Section 10.b

Tier 3 Advice Letter Supplement 7616-E-A includes an amendment to the Special Billing Agreement and does not replace AL 7616-E in its entirety. The corrected version of Section 10.a of Special Billing Agreement is as follows:

#### 10. Term

1. This Agreement is effective (Effective Date) as of the date of full execution by the Parties. If final approval by the CPUC is not an unqualified approval of this Agreement, then the Parties shall attempt in good faith to renegotiate the terms and conditions of the Agreement so as to restore the original balance of benefits and burdens contemplated by the Parties. If a new Agreement cannot be negotiated within sixty (60) calendar days after qualified approval of the CPUC, or such longer period as the Parties shall mutually agree, either Party

shall have the right to terminate this Agreement provided that such Party gives thirty (30) calendar days advance written notice.

*Form 79-973 Generating Facility Interconnection Agreement for Non-Export Generating Facilities*

The parties revised PG&E's form 79-973, making it a negotiated agreement between the parties rather than a standard form agreement. The revisions more closely reflect the capabilities and operations of Caltrain's regenerative braking technology and remove terms deemed not relevant to the project.

PG&E provided a single clean unexecuted Form 79-973 that mentions both Caltrain Points-of-Interconnection (East Grand 115 kV and FMC 115 kV). This agreement deviates from PG&E's Electric Rule 21 Filed Form 79-973<sup>6</sup>, revised to address project-specific requirements for Caltrain's Intermittent Export Generating Facility using regenerative braking technology associated with each of Caltrain's two POIs.

The deviations are offered pursuant to General Order 96-B, General Rules Sections 3.4,<sup>7</sup> 9.2.3, pertaining to Service to Government Agencies<sup>8</sup>, and Energy Industry Rules 5.3(5)<sup>9</sup>.

Section 2, Summary and Description of Producer's Generating Facility was left blank to keep the generating data confidential.

A redline version of the revised Form was also included. Appendices included with the revised Form 79-973 are as follows:

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<sup>6</sup> "Generating Facility Interconnection Agreement For Non-Export Generating Facilities", [https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC\\_FORMS\\_79-973.pdf](https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_FORMS_79-973.pdf), accessed 12/30/2025.

<sup>7</sup> Per G.O. 96-B, General Rule 3.4 Deviation – "Deviation" means the furnishing by a utility of any service at rates or under conditions other than the rates and conditions contained in its tariffs then in effect, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K938/502938128.PDF>, accessed 12/30/2025.

<sup>8</sup> See G.O. 96-B, General Rule 9.2.3, Emergency Service; Service to Government Agencies, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K938/502938128.PDF>, accessed 12/30/2025.

<sup>9</sup> Per G.O. 96-B, - Energy Industry Rule 5.3 Matters Appropriate to Tier 3 (Effective After Commission Approval) An advice letter submitted under (8) of this Industry Rule may be designated by the Utility as effective pending disposition; all other matters appropriate to Tier 3 may become effective only after Commission approval. Matters appropriate to Tier 3 are:... (5) Except as provided in Industry Rule 5.1(4) and in (8) of this Industry Rule, a Contract or **other deviation**. (See also Industry Rule 7.), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M502/K938/502938128.PDF>, accessed 12/30/2025.

- Appendix A- Description of Generating Facility and Single-Line Diagram (Supplied by Caltrain)
- Appendix B – Copies of Rules 2 and 21 and other selected rules and tariffs of PG&E
- Appendix C – Not Applicable
- Appendix D – Operating Requirements for Generating Facility with Regenerative Braking

*Caltrain's Applications for Essential Customer Use Status*

Tier 3 Advice Letter Supplement 7616-E-B augments the prior two ALs, 7616-E and 7616-E-A, Caltrain's Applications for Essential Customer Use Status, and does not replace AL 7616-E in its entirety.

Considering the electrification of Caltrain's rail fleet, Caltrain submitted Application of Essential Customer Use Status (one application for each of its four service points) seeking exemption from rotating outages.

Rotating outages are controlled power interruptions that are instituted at the direction and under the supervision of state regulators when there is an insufficient supply of electricity to meet customer demand. In Decision 91548 (1978), the CPUC created a priority system in which certain customers who provide essential public health, safety, and security services should normally be exempt from rotating outages. The priority system was modified on April 3, 2001, pursuant to Decision 01-04-006, on May 24, 2001, pursuant to Decision 01-050089, on June 28, 2001, pursuant to Decision 01-06-085, on September 6, 2001, pursuant to Decision 01-09-020, and on April 22, 2002, pursuant to Decision 02-04-060. Pursuant to those decisions, rail rapid transit systems as necessary to protect public safety are normally exempt from rotating outages "to the extent exempted by the Commission."<sup>10</sup>

Through AL 7616-E-B, PG&E submits Caltrain's Applications for Essential Customers Use Status for Commission approval. As specified in PG&E's Commission-approved Application For Essential Customer Use form, rail rapid transit is eligible for such classification "as approved by CPUC."

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<sup>10</sup> D.02-04-060, Attachment B.

## Timing of the Advice Letters

The series of advice letters relating to Caltrain electrification were submitted to the Commission after service had already begun. Under most circumstances, PG&E would seek Commission approval prior to beginning service to the PG&E customer. General Order 96-B, General Rule 9.2.3<sup>6</sup> describes an exception to this rule, allowing emergency service to be established to government agencies, such as Caltrain.

The language of General Order 96-B, Section 9.2.3 is as follows:

“The utility may begin such service without prior Commission approval, but the utility shall promptly submit an advice letter to the appropriate Industry Division to notify the Commission of the utility’s provision of such service and of the rates, charges, terms and conditions under which the service is provided. Although the advice letter may be effective pending disposition under General Rule 7.5.3, the Commission may determine, in an appropriate proceeding, the reasonableness of such service.”

The application arrived at the Commission after service to Caltrain had already begun due to the unique nature of the Caltrain trains in generation injection to the PG&E grid. The relevant dates are as follows:

- September 21, 2024: Caltrain began operation of electrified trains.
- June 5, 2025: PG&E filed AL 7616-E
- June 20, 2025: PG&E filed AL 7616-E-A
- July 30, 2025: PG&E filed AL 7616-E-B

When PG&E performed the System Impact Study for the Caltrain Electrification study, the capability of regenerative braking to generate sufficient power to export to the grid was not evident. However, PG&E’s single-phase component of the traction load study did evaluate the potential regenerative braking impacts on the power grid. Regenerative braking would not require generator interconnection if output from the trains’ braking is dissipated (for example, as heat). PG&E questioned whether Caltrain’s trains could, in fact, result in exports to the grid, in comparison to regenerative braking on mechanisms like elevators, where any energy from elevators braking is not normally captured.

Although General Order 96-B, General Rule 9.2.3, Emergency Service; Service to Government Agencies, permits Caltrain to begin electric service without prior

Commission approval, PG&E expressed concern that Caltrain had announced its intention to run the new electric trains on/around September 21, 2024, without starting the generation interconnection process. PG&E informed Caltrain that if it intended to export energy to the grid, it would need to submit applications for interconnection for each of its POIs (FMC and East Grand).

However, Caltrain sought modification to PG&E's CPUC-approved form Interconnection Agreement, prompting the parties to engage in contract negotiations. Caltrain submitted its interconnection applications on September 16, 2024, a few days before Caltrain officially launched its electric train service on September 21, 2024.

The parties finalized negotiations and executed the interconnection agreement in February 2025, after which PG&E submitted the advice letter requesting approval for a deviation from the standard Form 79-973.

*The Rail Service that Caltrain Provides Is A Public Good*

Section 5.6 of the Interconnection Agreement negotiated between PG&E and Caltrain states the following:

*"Transmission/Distribution Provider acknowledges that rail service is a public good, and that efforts will be made to minimize the instance and duration of any rail service curtailments."*

Based on PG&E's Form 79-1038<sup>11</sup>, "Essential Use Customer Classification and Priority System for Rotating Outages", listing rail service among item J, the importance of Caltrain's service is duly established. The Commission also acknowledges that rail service is a public good.

**NOTICE**

Notice of AL 7616-E and supplements were made in the Commission's Daily Calendar as follows:

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<sup>11</sup> PG&E Form No. 79-1038, APPLICATION FOR ESSENTIAL USE CUSTOMER STATUS, [ELEC FORMS 79-1038.pdf](#)

**Table 1:**  
**PG&E AL 7616-E Applicable Dates**

<b>Document</b>	<b>Document Date</b>	<b>CPUC Daily Calendar Edition Date</b>	<b>Document Received Date</b>
AL 7616-E	June 5, 2025	June 11, 2025	June 5, 2025
AL 7616-E-A	June 20, 2025	June 25, 2025	June 20, 2025
AL 7616-E-B	July 30, 2025	July 31, 2025	July 30, 2025
AL 7616-E Suspension Notice	June 10, 2025	June 11, 2025	July 5, 2025
AL-7616-E <sup>12</sup> Additional Suspension Notice	January 23, 2026	January 28, 2026	N/A

PG&E states that a copy of the Advice Letter and its two supplements were sent electronically to “all parties to the Contract or other deviation” and in accordance with General Rule 3.2 of General Order 96-B.

PG&E ALs 7616-E, and associated supplements, was suspended on June 11, 2025, to allow more time for review.

## **PROTESTS**

PG&E Advice Letter 7616-E, and its supplements, 7616-E-A and 7616-E-B, were not protested.

## **DISCUSSION**

Caltrain’s single-phase regenerative braking generation is not a typical generation resource interconnected by PG&E. Caltrain, as a load customer, requires traction service to trains that travel from San Francisco (4<sup>th</sup> and King station) to San Jose (Diridon station<sup>13</sup>). PG&E POIs to Caltrain’s traction substations are East Grand 115 kV, in South

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<sup>12</sup> Including AL supplements 7616-E-A and 7616-E-B.

<sup>13</sup> Electric service to Tamien station, approximately two miles south of Diridon station, exists. Diridon is the larger train station and where most passengers board, de-board, and change trains.

San Francisco, and FMC 115 kV, in San Jose. Although service can be provided along the entire Caltrain peninsula corridor from either POI and either Caltrain traction power station, normal operation includes PG&E serving Caltrain load from both POIs. Additionally, during Caltrain's service periods, one or more Caltrain trains requiring traction power can quickly transition from drawing power from one traction power station (and from one PG&E POI) to another. Finally, each traction power station has a second revenue meter, resulting in four meters devoted to measuring Caltrain's energy usage.

The mobile characteristic of Caltrain's electric rail traction needs can result in duplicative charges for the same service. Duplicative charges are prevented by combining interval data on an interval-by-interval basis for all four traction power meters, which calculates the coincident demand of Caltrain's traction load. This adjusted demand is then prorated back to each traction power point.

There was a misstatement identified in Section 10 of the Special Billing Agreement that was corrected by Supplemental PG&E AL 7616-E-A.

The Special Billing Agreement, as modified in AL 7616-E-A, and, otherwise, as presented in Attachment 4 in AL 7616-E, is approved.

For Caltrain's intermittent non-export generation, which under unique conditions has the potential for export, Rule 21 is the appropriate tariff by which to interconnect and account for the generation and assure operational safety and reliability. The applicability is identified in Rule 21 and applies to transmission-connected generating facilities that do not export to the grid or sell any exports sent to the grid. The two POIs satisfy the definition as transmission-connected, and Caltrain does not export or sell exports sent to the grid.

Caltrain is a commuter transit rail service operating on the San Francisco Peninsula and Santa Clara Valley from 4<sup>th</sup> and King station in the north to Gilroy in the south. Caltrain's importance to the local economy is acknowledged in PG&E's Form 79-1038, listing in priority order Essential Use Customers. Item J is, "Rail transit systems as necessary to protect public safety, to the extent exempted by the Commission." In 2024, Caltrain electrified the northern portion of its rail system from Tamien station northward. Caltrain's rail service is a public good, as listed and prioritized among

PG&E's customers in Form 79-1038<sup>14</sup>, and, therefore, Caltrain's applications for Essential Customer Use Status, for four traction power substations served from PG&E's Points-of-Interconnection at East Grand 115 kV and FMC 115 kV, as presented in Supplemental AL 7616-E-B, should be [REDACTED].

With the exception of the following sections in the negotiated and modified Form 79-973 to apply to Caltrain's intermittent regenerative braking technology, the general form of the agreement is acceptable. PG&E shall report to the Commission via a Tier 1 advice letter the following:

1. Two completed versions of Form 79-973, one for each POI with the below omissions completed.
  - a. Section 2, titled, "SUMMARY AND DESCRIPTION OF PRODUCER'S GENERATING FACILITY", filled in for each POI.
  - b. APPENDIX A, titled, "DESCRIPTION OF GENERATING FACILITY AND SINGLE-LINE DIAGRAM", completed for each POI.
  - c. APPENDIX D, titled, "OPERATING REQUIREMENTS FOR GENERATING FACILITY WITH REGENERATIVE BRAKING", completed as follows:
    - i. PG&E shall confirm and demonstrate that a suitable operating procedure exists for each POI to assure worker safety from potential excitation from Caltrain's intermittent regenerative braking technology.
    - ii. For the East Grand POI, PG&E shall document the level of generation that assures voltage phase imbalance during the East Grand – Martin outage does not exceed the 2.5% criterion<sup>15, 16</sup>.
    - iii. For the FMC POI, PG&E shall document the level of generation that assures voltage phase imbalance during the FMC – San Jose B outage does not exceed the 2.5% criterion<sup>17</sup>.

The CPUC understands that Rule 2, item C.1.d. allows for momentary excursions and phase voltage imbalances. However, the Commission rejects the premise that Rule 2 momentary phase imbalances are an acceptable long-term planning solution. PG&E was party to two single-phase studies<sup>17, 19</sup> that identified excessive N-1 phase voltage imbalances. It is consistent with good utility practice, therefore, to identify the allowable

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<sup>14</sup> "Essential Use Customer Classification and Priority System for Rotating Outages", Form 79-1038, p 2 of 3.

<sup>15</sup> (Confidential) CDRL 33060-003 Single Phase Study TPS-1, rev.2, Executive Summary, P 2 of 158, item 7

<sup>16</sup> PG&E Rule 2, Section C.d.

<sup>17</sup> (Confidential) CDRL 33060-002 Single Phase Study TPS-2, rev.2, Executive Summary, P 2 of 165, item 7

generation level that satisfies the allowable Rule 2 phase imbalance and to document that in Appendix D of the Generator Interconnection Agreements (Forms 79-973), titled “Operating Requirements For Generating Facility with Regenerative Braking,” in the unforeseen event that such a generation limit would be required.

### **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission’s website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this Resolution was neither waived nor reduced. Accordingly, this draft Resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

### **FINDINGS AND CONCLUSIONS**

1. The Special Billing Agreement, the Agreement Between Peninsula Corridor Joint Powers Board and Pacific Gas and Electric Company for Specified CPUC Jurisdictional Electrical Services, as modified in Supplemental AL 7616-E-A, and, otherwise, as presented in Attachment 4 in AL 7616-E, is reasonable.
2. Rule 21 is the appropriate tariff by which to interconnect Caltrain’s intermittent generation.
3. Caltrain’s rail service is a public good, as listed and prioritized among PG&E’s customers in Form 79-1038<sup>18</sup>, and, therefore, Caltrain’s applications for Essential Customer Use Status, for four traction power substations served from PG&E’s Points-of-Interconnection at East Grand 115 kV and FMC 115 kV, as presented in Supplemental AL 7616-E-B, should be approved.

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<sup>18</sup> “Essential Use Customer Classification and Priority System for Rotating Outages”, Form 79-1038, p 2 of 3.

4. The form of the Generating Facility Interconnection Agreement for the Clean Unexecuted Form 79-973, Generator Interconnection Agreements for Caltrain, the modified version of PG&E's Intermittent Export Generating Facilities, as presented in Attachment 2 of AL 7616-E, is incomplete and needs further elaboration.
5. PG&E's determination to study Caltrain's maximum level of generation is warranted.
6. To enhance reliability and safety, PG&E must further develop an operating procedure that identifies the generation level that satisfies the Rule 2 limitation to keep voltage phase unbalances within 2.50% at each POI, under the applicable demand profile, and the critical N-1 outage condition.
7. An operating procedure needs to be developed, or an existing operating procedure needs to be demonstrated, to assure the safety of maintenance personnel from the effects of unexpected excitation from Caltrain's intermittent generation.

**THEREFORE IT IS ORDERED THAT:**

1. The request of Pacific Gas and Electric to implement a Special Operating Agreement with Caltrain as requested in Advice Letter 7616-E and as modified in Supplemental Advice Letter 7616-E-A is approved.
2. The applications of Caltrain for Essential Customer Use status at four traction power substations served from PG&E's Points-of-Interconnection at East Grand 115 kV and FMC 115 kV, as presented in Supplemental AL 7616-E-B, are approved.
3. PG&E shall submit a Tier 1 advice letter addressing the following:
  - a. Confirm that operating procedures exist to assure worker safety from potential energization from Caltrain's intermittent regenerative braking at each Point-of-Interconnection.
  - b. To support reliability and safety efforts through generation resource documentation, include two modified Forms 79-973, with Section 2 completed for each Point-of-Interconnection.

- c. The two modified Forms 79-973 shall include the levels of Caltrain regenerative braking that can be accommodated, in MW, at each POI during the identified critical N-1 conditions in the Single-Phase Studies completed.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 11, 2026; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added  
upon adoption of the resolution

Dated June 11, 2026, at Sacramento, California