Docket No.: A.24-11-007

Exhibit No.: CalCCA-01

Date: June 30, 2025

Witness: Lori Mitchell, San Jose Clean Energy
Kris Van Vactor, Silicon Valley Clean Energy

AMENDED TESTIMONY OF THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR APPROVAL OF ELECTRIC RULE 30 FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE A.24-11-007

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APPENDIX

ATTACHMENTS

I. INTRODUCTION AND SUMMARY

The California Community Choice Association (CalCCA) [1] presents this testimony in the *Application of Pacific Gas and Electric Company for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service*.[2] Sections I, II, and IV of this testimony were prepared by or at the direction of Lori Mitchell, Director of San Jose Clean Energy (SJCE). Ms. Mitchell's qualifications are set forth in Attachment A. Section III was prepared by or at the direction of Kris Van Vactor, Director of Power Resources, Silicon Valley Clean Energy (SVCE). Mr. Van Vactor's qualifications are set forth in Attachment B.

In its Application, Pacific Gas and Electric Company (PG&E) proposes a new Rule 30 Tariff to address interconnection of new customers requesting retail electric service at transmission level voltages between 50 kilovolts (kV) and 230 kV (Large Loads).[3] The Scoping Ruling in this proceeding includes as Issue 4.b: "What information-sharing requirements should PG&E adopt to ensure that the [Community

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[1] CalCCA represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy (Ava), Central Coast Community Energy (3CE), Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy (MCE), Orange County Power Authority, Peninsula Clean Energy (PCE), Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority (RCEA), San Diego Community Power, San Jacinto Power, San José Clean Energy (SJCE), Santa Barbara Clean Energy, Silicon Valley Clean Energy (SVCE), Sonoma Clean Power, and Valley Clean Energy. A subset of CalCCA members (Ava, 3CE, MCE, PCE, RCEA, SJCE and SVCE, collectively the Joint CCAs) addressed Pacific Gas and Electric Company's (PG&E) application by, among other things, filing a response, dated December 23, 2024, and filing a reply to PG&E's request for interim implementation, dated April 11, 2025. On June 18, 2025, the Assigned Administrative Law Judge (ALJ) to this proceeding approved the Motion for Party Status for CalCCA, which will represent all of its members in this proceeding, including the Joint CCAs.

[2] *Application of Pacific Gas and Electric Company (U 39 E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service*, Application (A.) 24-11-007 (Nov. 21, 2024) (Application).

[3] Application, at 1.

Choice Aggregators (CCAs)] affected by Rule 30-related load growth can meet projected demand in their service areas?"[4] Issue 4.b. is included because while PG&E provides delivery service, CCAs are the default generation service providers in their service areas. Therefore, in areas served by CCAs, PG&E will receive information when a customer seeks to interconnect at the transmission level through a Rule 30 application. However, as discussed further, CCAs do not currently receive information regarding a Large Load customer seeking interconnection to PG&E's system.

CalCCA generally supports PG&E's efforts to attract new load by streamlining and expediting interconnection of new customers to PG&E delivery system. Greater clarity and coordination regarding new loads among all interests – PG&E, CCAs, and new customers – will serve this goal. As acknowledged by Scoping Ruling Issue 4.b., the coordination should extend to information-sharing between PG&E and the affected CCAs during the interconnection process to enable timely procurement of generation supply to the new load.

This testimony addresses CCAs' role serving California customers (Section II) and CCAs' need for information regarding new load (Section III). It includes a proposal for information-sharing from PG&E to the affected CCAs to ensure a customer's chosen generation supplier has sufficient notice to procure the supply cost-effectively and equitably (Section IV). This testimony also identifies changes needed to PG&E's proposed Rule 30 Tariff to effectuate the proposed information-sharing requirements (Section IV).

[4] *Assigned Commissioner's Scoping Memo and Ruling*, A.24-11-007 (Mar. 11, 2025) (Scoping Ruling), at 8.

PG&E states that it "has received 40 active applications for transmission level service with demand of 4 MW or greater [and the] total combined current requested load of the 40 applications is 8,422 MW" in 2023-2024.[5] PG&E represents that as of April, 2025, none of these applications have been withdrawn, and all are in the study/planning or design phases.[6] In 2025, PG&E states that it has received four additional applications for transmission level service.[7]

PG&E is "seeing the growth of Data Centers in [its] service territory and expect[s] this growth to continue with the large amounts of electrical demand needed to power such facilities."[8] As represented by PG&E, many of the data centers seeking interconnection in PG&E's service territory are located in areas served by CCAs.[9] Despite the role of CCAs as default providers for generation service in PG&E's service territory, CCAs often receive limited, if any, advance notice of new customer load, including large load retail customers interconnecting at the transmission-level (referred to herein as Large Load).[10] Load expansion is included in the California Energy

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[5] PG&E Supplemental Testimony, A.24-11-007 (Mar. 21, 2025) (replacing PG&E's originally filed Testimony, submitted Nov. 21, 2024) (PG&E Testimony), at 4, lines 4-7; *see also Pacific Gas and Electric Company's (U 39 E) Response to Administrative Law Judge's Ruling Requesting Information on the Motion for Interim Implementation of Electric Rule No. 30 [Public Version],* A.24-11-007 (Apr. 4, 2025) (PG&E Response to Interim Implementation Ruling), at 8.

[6] PG&E Response to Interim Implementation Ruling, at 3, 8.

[7] *Id.* at 9.

[8] PG&E Testimony, at 5, lines 10-12.

[9] *See Pacific Gas and Electric Company's (U 39 E) Response to the California Public Advocates Office's Motion to Amend the General Rate Case Phase II Scoping Memo to Include Issues from Application 24-11-007,* A.24-09-014, at 11 ("in California, retail choice means that PG&E may not be the Load Serving Entity that provides generation service to new very large load customers, even where PG&E is the utility providing delivery services from its transmission or distribution lines. *A significant number of the very large load applications received thus far are for projects within areas served by [CCAs],* and it is uncertain which customers may choose CCA service and which customers CCAs will elect to serve.") (emphasis added).

[10] CalCCA notes that large load customers may also interconnect at the distribution system level, resulting in similar information sharing needs for CCAs with respect to those customers. CalCCA

Commission's (CEC) Integrated Energy Policy Report (IEPR) forecast communicated to CCAs by PG&E. However, CCAs receive only an aggregate number, which does not identify customers, their location, or timing of interconnection. The information provided is insufficient for procurement planning. In addition, often the IEPR forecast for Large Load differs significantly from the CCAs' own forecasts. Attempts to reconcile the load information, which ultimately impacts each CCA's Resource Adequacy (RA) and/or Integrated Resource Plan (IRP) requirements, have not been successful because CCAs have no access to underlying customer information regarding forecasted Large Load. Consequently, this lack of information prevents CCAs from proactively and cost-effectively procuring preferred energy products for Large Load customers.

Large Load customers interconnecting at the transmission-level often have a choice of where to locate a new facility. If California seeks to attract and retain these customers—and benefit from the downward pressure on delivery rates their participation can provide—the state must adopt policies that enhance the optionality and support available to Large Load customers. Key among these policies is ensuring coordination between PG&E and CCAs, as the default generation service providers in their service areas. This coordination will allow both the CCAs and PG&E to cost-effectively and equitably serve new customers.

Consistent with California policy goals, this testimony recommends that the Commission adopt information-sharing requirements obligating PG&E, as the delivery service provider, to provide customer-specific information on new Large Loads to affected CCAs within a reasonable timeframe. As an overarching principle for this

acknowledges that this proceeding only relates to retail customers interconnecting at the transmission-level.

proceeding, ***when PG&E has the information, the default provider CCA should have the information, consistent with confidentiality requirements, to enable the CCA to work with customer and maximize the potential for efficient procurement; there is no justification for delay.***

This testimony recommends that the Commission adopt the following load information-sharing requirements:

- For loads for which no application for interconnection service under Rule 30 (Interconnection Application) has been submitted to PG&E, but a load inquiry has been made to PG&E and the utility is incorporating the forecast into internal or external forecasts, PG&E should report to CCAs on a quarterly basis the approximate location, size, and anticipated timeline for integrating the new load. Information should be provided on a per-project basis with a unique identifier that protects the customer's identity if the customer does not wish to have their information shared with the CCA.

- When an Interconnection Application has been submitted, PG&E should provide each affected CCA a copy of the Interconnection Application within 20 calendar days of submission to PG&E, with all information relevant to potential CCA service including, as further described below in Section III.B., customer name, location, facility type (*e.g.,* data center, commercial, retail, manufacturing), capacity ramp schedule, on-site generation, and requested and current expected timing for the interconnection (Key Large Load Information).[11] PG&E should also provide all already submitted Applications for Interconnection, and any additional Key Large Load Information, to an affected CCA within 20 calendar days of a Commission directive to do so.

- PG&E should provide each affected CCA with quarterly reports that provide updates on the proposed interconnection timelines related to Interconnection Applications, and any changes to Key Large Load Information.

[11] PG&E refers to the Interconnection Application as the "Application Phase," namely, the milestone at which the customer first "submits a service energization request and study deposit." *See* PG&E Answer 001 to Data Request Joint CCAs_003-Q001, Question 01 (Apr. 10, 2025) attached hereto in Attachment C. The Interconnection Application process is also described in PG&E's proposed Rule 30 Tariff.

Appendix A to this testimony includes proposed changes to PG&E's proposed Rule 30 Tariff to effectuate the proposed information-sharing framework.[12]

The structure of this testimony is as follows:

- Section II addresses: (1) the role of CCAs as default providers of generation service in their service areas; (2) current CCA service to data center customers; and (3) a recommendation that the Commission adopt information-sharing requirements to provide Key Large Load Information promptly to an affected CCA.

- Section III addresses the importance of providing Key Large Load Information as early as possible, including before an Interconnection Application is submitted, to support affordable rates for California electric customers, and concludes with a recommendation that the Commission adopt information-sharing requirements that require information sharing at the time PG&E learns of new load.

- Section IV outlines the proposed information-sharing framework and associated Rule 30 Tariff revisions, included in a redline to PG&E's proposed Rule 30 Tariff, attached as Appendix A.

II. CCAS SERVE AS THE DEFAULT PROVIDERS FOR GENERATION SERVICE FOR ALL CUSTOMERS IN THEIR SERVICE AREAS INCLUDING LARGE LOAD CUSTOMERS

CCAs serve as the default providers of generation service for all customers (residential and non-residential) in their service areas, subject to each customer's ability to opt out of CCA service. CCA customers continue to receive delivery service from the investor-owned utility (IOU) serving that location. Consistent with the role as default provider, CCAs currently provide 46 percent of electric generation service in PG&E's service territory.[13]

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[12] On June 19, 2025, the Assigned ALJ granted CalCCA's request to submit surrebuttal testimony on September 8, 2025, to provide an opportunity to respond to any proposal for information-sharing submitted by PG&E in its rebuttal testimony.

[13] *See, e.g.*, *California Energy Demand 2023 Baseline LSE and BAA Tables*, Form 1.1c (energy demand for 2023): https://efiling.energy.ca.gov/GetDocument.aspx?tn=255153; *see also* Decision (D.) 24-12-038, at 38 ("PG&E expects CCA and [Direct Access] providers to serve nearly two-thirds of total system sales in 2025.").

New generation load in a CCA territory is automatically enrolled with, or defaulted to, the CCA serving that area.[14] PG&E's Electric Rule 23.K.2 directs that "[c]ustomers establishing electric service within a CCA service area shall be automatically enrolled in CCA Service at the time their electric service becomes active unless the customer submits a request to the CCA to opt-out and the CCA provides notification to PG&E of any such opt out request."[15] Rule 23.K.2 further directs that PG&E "promptly notify" the CCA of the new customer.[16]

A customer can opt out of CCA service in favor of IOU bundled service. However, as outlined in Public Utilities Code section 366.2(c)(2) and stated in PG&E's Electric Rule 23.G., if a customer is in a CCA service area and does not opt out of CCA service, the CCA will serve the customer.[17] As a result, the choice of being served by a CCA solely belongs to the customer. Any new customer located in a CCA service area interconnected under the new Rule 30 Tariff will be served by the CCA serving the location where the new facility is located, unless that customer chooses to opt out of CCA service.

Consistent with the role embraced by CCAs as the default providers of generation service, CCAs already serve Large Load customers interconnected at the transmission level. While Large Load customers primarily take generation service on existing tariffs,

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14 Pub. Util. Code § 366.2(c)(2).

15 PG&E Electric Rule 23.K., Sheet 32 (emphasis added).

16 *Ibid*.

17 PG&E Electric Rule 23.G., Sheet 25 ("Pursuant to D.05-12-041, all customers, including active Direct Access customers, located within a CCA's service area that have been offered service by the CCA that do not affirmatively decline such service (opt-out), shall be served by the CCA.").

CCAs have also worked directly with customers to design special agreements.[18] For example, SJCE currently serves five data centers and SVCE serves eight data centers.

Cost-effective and equitable generation service of Large Loads and all other customers requires early and clear insight into the Large Load's requirements. In its Application, PG&E forecasts significant load growth in its territory. CCAs will likely provide generation service to many, if not most, of these customers.[19] However, no current standards exist for when PG&E will share Key Large Load Information with CCAs. PG&E itself admits that it has not provided notice of the Interconnection Applications for load to the CCAs in its territory.[20] More surprisingly, even in impacted areas, such as the "cluster process for new transmission level retail electric customers located in Alameda and Santa Clara Counties," PG&E did not provide affected CCAs with notice.[21]

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[18] For example, SVCE entered into a special agreement with Google to provide 24/7 carbon-free energy service for Google's offices in Mountain and Sunnyvale, California. SVCE agreed to match carbon-free electricity with Google's local demand for at least 92 percent of all hours in the year – from a tailored portfolio of renewable energy resources meeting additionality requirements. Google also agreed to flex its building electric loads to further improve carbon-free energy and cost performance, and to invest in electrification at its local facilities. The Google/SVCE agreement provides a scalable model for others to follow, and demonstrates the power of community collaboration in accelerating the transition to a clean energy future. *See* "Silicon Valley Clean Energy and Google Announce Comprehensive 24/7 Carbon-Free Energy Agreement" (June 15, 2022), located at *https://svcleanenergy.org/news/silicon-valley-clean-energy-and-google-announce-comprehensive-24-7-carbon-free-energy-agreement/*

[19] *See* PG&E Testimony, at 4, lines 4-7; *see also* note 9, *supra* (PG&E acknowledging that a "significant number" of Large Load applications received thus far are in CCA service areas).

[20] *See* PG&E Answer to Data Request Joint CCAs_001-Q001, Question 01-a. (Jan. 29, 2025) (attached hereto in Attachment C) ("These applications do not concern the provision or procurement of electric commodity service. Thus, PG&E did not provide notice to energy providers such as Community Choice Aggregators (CCAs)….").

[21] *See* PG&E Answer to Data Request Joint CCAs_001-Q002, Question 02-a. (Jan. 29, 2025) (attached hereto in Attachment C) ("Given that the Pilot Cluster Process involved the interconnection of new electric customers, not the procurement of the electric commodity, PG&E did not provide notice directly to Community Choice Aggregators (CCAs).").

The Commission should adopt requirements for information sharing that ensure both the CCA, for unbundled customers, and the IOU, for bundled customers, can secure the most affordable rates for their customers. Absent such requirements, it is evident from PG&E's past conduct (discussed further in Section III below) that PG&E will not share Large Load information with CCAs. There should be no difference in the amount of time PG&E, as the delivery service provider, has customer-specific information, and the amount of time CCAs have the same customer-specific information. Any information shared will be protected consistent with current oversight by the Commission of CCAs and in accordance with currently effective Non-Disclosure Agreements (NDAs) between the CCAs and PG&E.

CCAs are the default providers of generation service for new transmission-level service customers in the CCA's respective service area. Given this primary role serving generation service, CCAs should receive information on new loads promptly, and consistent with the framework described in Section IV of this testimony.

III. CCAS AS DEFAULT PROVIDERS OF GENERATION SERVICES NEED EARLY ACCESS TO LARGE LOAD CUSTOMER INFORMATION

As noted above, cost-effective procurement decisions are driven by access to customer information. As demonstrated by the load applications PG&E has received and not shared with the CCAs, including PG&E Advice Letter (AL) 7604-E[22] (discussed below), the CCAs are getting notice of new customers materially after PG&E is aware of the load. These delays frustrate the ability of CCAs to make cost-effective procurement decisions

[22] PG&E Advice Letter (AL) 7604-E, *Electric Rules 2, 15, and 16 Exceptional Case Submittal for Electric Transmission Interconnection for Sunnyvale Technology Partners LLC c/o Menlo Equities* (May 27, 2025), at 2.

consistent with compliance requirements. Given the role of CCAs as default providers of generation service, CCAs should have load information at the same time as PG&E.

A. PG&E Has Not Timely Shared New Large Load Information

PG&E has not timely shared information regarding Interconnection Applications for Large Loads. For example, on May 27, 2025, PG&E submitted AL 7604-E for approval of an agreement between PG&E and Menlo Equities for a new 49 MW data center in Sunnyvale, California. SVCE is the default generation provider for the proposed location of the data center. According to AL 7604-E, Menlo Equities submitted its application for service on April 11, 2024.[23] Therefore, at that time PG&E obtained information on the facility's "peak demand," "system load and generation forecasts" and "future energy resource needs."[24] At no point, however, did PG&E provide SVCE with any notice of the prospective customer. SVCE only learned of the potential new load when AL 7604-E was publicly submitted, 13 months after the application for service was submitted to PG&E by the customer.

A similar advice letter for a data center in SJCE's territory was submitted on April 18, 2025.[25] In that instance, PG&E acknowledged that it did not share any information with the affected CCA in advance of the advice letter submittal.[26]

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[24] *See* PG&E Response to Interim Implementation Ruling), at 20-21 (describing PG&E's use of customer information for determining Resource Adequacy and future energy needs, and PG&E's provision of customer information to the California Independent System Operator and California Energy Commission).

[25] *See* PG&E Advice Letter 7569-E, *Electric Rule 2, 15, and 16 Exceptional Case Submittal for Electric Transmission Service Facilities for STACK* (Apr. 18, 2025).

[26] *See Pacific Gas and Electric Company's Reply to the Response to Joint CCAs to Advice 7569-E-Electric Rule 2, 15 and 16 Exceptional Case Submittal for Electric Transmission Service Facilities for STACK* (May 15, 2025), at 2.

PG&E stated in April, 2024 that it "anticipates there will be up to nine (9) applications ready to submit to the Commission for review and approval by the end of June 30, 2025," with additional filings "in the remainder of 2025 and 2026."[27] Only two filings have been made as of the date of this Testimony (Stack and Menlo Equities), leaving many still to be filed. To the extent that any of these facilities are in SVCE's service area, SVCE has received no notice of the new load from PG&E.

B. Access to Timely, Customer-Specific Data Enables Proactive Procurement Strategies

Cost-effective procurement requires the CCA to consider the needs of each individual customer as well as the broader compliance requirements for the CCA, including RA, IRP, and the Renewables Portfolio Standard (RPS) requirements. The further in advance the CCA can assess the needs of a particular customer and the timing of its energization, the better able the CCA is to engage in a thoughtful and dynamic procurement strategy.

A dynamic procurement strategy includes purchasing energy in long, medium, and short-term markets to ensure that the CCA can cost-effectively meet the needs of its customers without unnecessary reliance on any one market. However, a dynamic procurement strategy is reliant on good data. Without timely information about potential new load, and in particular Large Loads, and the timing of interconnection, the CCA could under or over procure, increasing risk to its supply portfolio and customers.

As it stands now, CCA procurement strategies begin with the load forecast in the IEPR as well as CCA internal load forecasting, which become more refined over time as better information about individual customers becomes available. The challenge with this

[27] PG&E Response to Interim Implementation Ruling, at 8.

approach is that "better information," including information on Large Loads, has not been made available to CCAs by PG&E until an advice letter is submitted, which is too late. Going forward, to ensure that CCA procurement strategy results in the lowest possible cost to ratepayers, it is necessary to ensure that Large Load information known by PG&E as the delivery service provider is shared at the earliest possible point with CCAs. This information can inform the IEPR load forecast, and it can be used to inform the load forecast used for procurement over time.

The IEPR forecast materially impacts CCAs compliance requirements. Substantial and sudden changes to CCA forecasts can increase RA requirements with limited notice. IEPR forecasts have also historically been used to determine Load Serving Entity (LSE) procurement requirements and, depending on the outcome of the ongoing Reliable Clean Power Procurement Program (RCPPP), may continue to be used for this purpose. In both cases, these compliance requirements endure regardless of whether the load comes to fruition.

While RPS compliance is not directly impacted by the IEPR process, failure for LSEs to accurately predict their own load could significantly impact the entity's ability to remain compliant. This is especially true for compliance with Senate Bill (SB) 350,[28] which requires LSEs to have sufficient long-term contracts, many of which are new build and require several years to bring online. If an LSE learns, either through the IEPR or through a new customer energizing, of significant new load too late (especially near the end of a compliance period), it may materially impact their ability to comply. These load

[28] SB 350 (DeLeón, Ch. 547, Statutes of 2015).

forecast issues may also materially impact an IOU's Energy Resource Recovery Account (ERRA) forecast, and resulting Power Charge Indifference Adjustment charges.

A document recently presented by the CEC underscores these points. The IEPR forecast for data centers includes projects that have: (1) active applications with completed or to-be-completed engineering studies; (2) active applications prior to initiating engineering studies; and (3) project inquiries.[29] The latter two categories included in the forecast count for thirty-eight percent of the total projected capacity for PG&E.[30] PG&E, however, acknowledges that this load remains uncertain, assigning confidence intervals to the forecast load.[31] Including uncertain load is important for planning. However, including such load can also lead to planning for load that never arrives, leaving an LSE potentially on the hook for a long position. Without access to the customer-specific information, the CCA is unable to assess for itself and its own procurement portfolio how certain that load is and what changes to procurement strategy may be required.

The IEPR forecast also fails to provide any detail on the new load and the individual needs of the customer. For instance, a new customer may be intending to purchase its own specific product (*e.g.,* 24/7, carbon free), which would impact the procurement choices made on behalf of the customer. Details on ramp schedule, load type and interconnection schedule will also impact the type and timing of the procurement and should be made known to CCAs at the time PG&E has the information. There should be no material difference in the amount of time PG&E, as the delivery

[29] *See* CEC, "Data Center Forecast" (Dec. 23 2024), at 3: https://www.energy.ca.gov/sites/default/files/2024-12/Data_Center_Forecast_Update_ada.pdf.
[30] *Ibid*.
[31] *Id*. at 4.

service provider, has customer-specific information and the amount of time CCAs have the same customer-specific information. The more notice available, the more competitive the CCA (or PG&E, if the customer opts for bundled service) can be in its procurement. This will result in cost savings for all customers.

Only receiving notice of Large Loads during the IEPR process is insufficient for procurement decision-making. PG&E's IEPR forecast does not provide information that allows the CCA to: (1) independently determine the relative certainty of new Large Load; and (2) modify load forecasts to reflect the evolving needs of the customer.

C. Insufficient Information-Sharing Disadvantages CCAs and Harms CCA Customers

As the delivery service provider for customers in its territory, PG&E is often the first stop for a new Large Load considering locating a facility in California. By withholding the customer information required for load planning, PG&E impedes cost-effective procurement by the affected CCA. As described below, the lack of information regarding planned Large Loads creates the following disadvantages for CCAs and CCA customers: (1) lack of competitive parity between CCAs and PG&E; (2) inadequate information to plan for reliability; (3) lack of notice to customers of their generation service options; and (4) inability to capitalize on affordability benefits of cost-effective procurement.

Competitive concerns: To maintain competitive parity between an affected CCA and PG&E, there should be explicit rules ensuring the affected CCA has the same information available to PG&E regarding Large Loads. Failure to do so allows PG&E potentially to be able to use its exclusive role as delivery provider to preference PG&E's

procurement department. As one example, at a recent technical conference at the Federal Energy Regulatory Commission (FERC) on RA, Gillian Clegg, Vice President, Energy Policy and Procurement at PG&E stated "I think what we're saying publicly now is 12.8 gigawatts (GW) of applications have been submitted and about 1.4 GW of that is already through final engineering and so we do think about 90 percent of what's in final engineering will come to bear."[32] That the head of PG&E's procurement department has a defined confidence level in the PG&E forecast implies a degree of certainty in the load which no CCA procurement team can have given their forecasters lack any information to develop any assurance these loads will come online. The Commission should therefore affirm in this proceeding that PG&E and affected CCAs obtain information on new Large Load concurrently. Specifically, CCAs should receive such information within a reasonable amount of time (20 calendar days) after PG&E's delivery service team receives information on new Large Load.

Reliability Concerns: Key Large Load Information is necessary for CCAs' resource planning purposes. Without this information, CCAs are unable to validate or assure that a particular customer's load is included in the IEPR load forecast. As a result, unvalidated information could be used to set the RA or IRP requirements for the CCA. This is problematic on a number of fronts, including affordability. However, as it relates to reliability, unvalidated information can lead to a CCA planning for less resources to satisfy RA requirements than necessary. To properly align planning with realistic load forecasts, a CCA should have all relevant customer information necessary to afford the

[32] FERC Docket AD25-7-000, "Day 2: Commissioner-led Technical Conference Regarding the Challenge of Resource Adequacy in RTO and ISO Regions," (June 5, 2025), at 5:33, video recording available at: https://ferc.gov/news-events/events/day-2-commissioner-led-technical-conference-regarding-challenge-resource (transcribed from video).

opportunity to investigate on its own behalf the certainty of the load. The customer's chosen provider, CCA or PG&E, should be provided sufficient time to ensure reliability requirements are met cost-effectively.

Customer Notice: Customers may not be aware that a CCA serves a location targeted for development. PG&E should be transparent regarding the customer's option at the time of an Interconnection Application. Customers should be aware that the CCA will be their generation service provider subject to the customer's choice to opt out of CCA service. Regardless of whether the customer is aware of the potential for CCA service, the customer may not be aware of the need for the CCA to have early notice of their new load. CCAs should have the opportunity to educate their presumptive customers on the role of the CCA.

Affordability: As described throughout this section, ultimately all customers benefit when the affected CCA and PG&E have sufficient notice of new loads, and especially Large Loads. A longer runway for new procurement requirements enables the affected CCA or PG&E, to cost-effectively procure for the new load. Without sufficient notice, the generation provider will have to rely on the riskier short-term market, which could result in higher prices for customers. In short, reasonable requirements for timely information sharing empowers the affected CCA or PG&E to cost-effectively procure generation for new Large Loads.

To promote cost-effective and equitable procurement, PG&E should be directed to provide information on new Large Loads to the CCA promptly upon receipt of notice of or an Interconnection Application. Legal requirements and customer relationships already require that the CCA protect customer confidentiality. Any customer information provided

to CCAs by PG&E will be treated consistent with California law, rules established by the Commission, and pursuant to the applicable NDA with PG&E.

IV. THE COMMISSION SHOULD ADOPT A FRAMEWORK FOR TIMELY INFORMATION-SHARING BY PG&E FOR NEW LARGE LOADS

This testimony recommends that an information-sharing framework between PG&E and any applicable CCA be adopted in connection with the Rule 30 Tariff. As set forth below, this information-sharing framework will: (1) ensure a CCA serving the location of a proposed new Large Load receives quarterly information regarding customers seeking information regarding interconnection with PG&E's transmission system; (2) require PG&E to provide affected CCAs with Interconnection Applications, including Key Large Load Information, within 20 calendar days of PG&E's receipt (and requires already submitted Interconnection Applications to be provided to the affected CCAs); and (3) require PG&E to provide quarterly updates on the status of Interconnection Applications and any changes to Key Large Load Information. In addition, the Commission should require changes to the proposed Rule 30 tariff and form Interconnection Application to effectuate such information sharing, as set forth in redlines attached hereto as Appendix A.

A. The Commission Should Adopt a Framework for Information-Sharing Between PG&E and the CCA with Clear Notice to the Potential Customer

As explained in Section II above, the CCA is the default generation service provider to new customer load sited in the CCA service area. As demonstrated in Section III, sufficient advance notice of new Large Load is required to ensure that the Large Load can be served cost-effectively and equitably. Further, the affected CCA requires ongoing information on any changes to the interconnection timeline and Key Large Load

Information for a new facility. Consistent with these facts, the Commission should adopt the following framework for information- sharing between PG&E and the affected CCA:

- For loads for which no Application for interconnection service under Rule 30 (Interconnection Application) has been filed, but a load inquiry has been made to PG&E and the utility is incorporating the forecast into internal or external forecasts, PG&E should report to CCAs on a quarterly basis the approximate location, size, and anticipated timeline for integrating the new load. Information should be provided on a per-project basis with a unique identifier that protects the customer's identity if the customer does not wish to have their information shared with the CCA.

- When an Interconnection Application has been submitted, PG&E should provide each affected CCA a copy of the Interconnection Application within 20 calendar days of submission to PG&E, with Key Large Load Information. PG&E should also provide all already submitted Applications for Interconnection, and any additional Key Large Load Information, to an affected CCA within 20 calendar days of a Commission directive to do so.

- PG&E should provide each affected CCA with quarterly reports that provide updates on the proposed interconnection timelines related to Interconnection Applications, and any changes to Key Large Load Information.

PG&E has stated in discovery that it is "willing to work with the Joint CCAs on the appropriate information to be provided by PG&E to potential transmission level customers during the Electric Rule 30 application process."[33] The above-described requirements provide a reasonable framework for PG&E to provide necessary and timely customer information to affected CCAs.

B. Proposed Rule 30 Requires Clarification of the Respective Roles of the CCA and PG&E, Information to be Provided to Customers Regarding Customer Choice, and Information to be Provided to CCAs as Default Providers

[33] *See* PG&E Answer to Data Request Joint CCAs_001-Q007, Question 07 (Jan. 29, 2025) (attached hereto in Attachment C).

Consistent with the proposed information-sharing requirement described above, the approved Rule 30 tariff and any form Interconnection Application associated with Rule 30 should also notify customers that if the proposed load is sited in a CCA's service area the affected CCA is the default provider of generation service. In addition, the customer should be informed that, in light of this role and responsibility, the affected CCA is entitled to and will receive information on the customer. The Commission should direct PG&E to add the following language to Section 1. General of proposed Rule 30, as reflected in the Rule 30 Tariff redline attached hereto as Appendix A:

> 8. For any Facility at a location within the service area of a Community Choice Aggregator (CCA), the CCA is the default provider of generation service. The affected CCA will automatically serve any new Applicant in its service area subject to the choice of the Applicant to opt out of CCA service to receive generation service from PG&E. Upon receipt of an Application for a Facility in a CCA's service area, PG&E will provide the affected CCA a copy of the Application within 20 calendar days of receipt, to ensure the CCA receives key information about the service request to inform the CCA of the new customer, including the customer name, location, facility type (e.g., data center, commercial, retail, manufacturing), capacity ramp schedule, on-site generation, and requested timing for the interconnection. PG&E will also provide to the affected CCA within 20 calendar days any subsequent changes to the Application and periodic updates to the interconnection timeline. Information provided by PG&E to the CCA is subject to confidentiality protections established by the Commission.

Additionally, ambiguity exists in the Rule 30 Tariff language regarding the definition of "Retail Service." The proposed Rule 30 Tariff definition of Retail Service is the following:

> "RETAIL SERVICE: Electric service to PG&E's end-use or retail customers which is of a permanent and established character and may be continuous, intermittent, or seasonal in nature."[34]

[34] Proposed Rule 30 Tariff, at 17.

Given the concerns of customer awareness discussed in Section III above, the proposed Rule 30 Tariff should be updated to clarify the role of the CCA as the default generation service provider and PG&E's role as the default delivery service provider. PG&E stated in discovery that it is amenable to making this change:

> PG&E is willing to work with the Joint CCAs to clarify that the term "Retail Service" does not include or relate to generation service. As an initial proposal, PG&E suggests adding the following sentence to the defined term "Retail Service":
>
> For purposes of this Rule, Retail Service does not include or relate to providing generation service and/or the electric commodity.[35]

PG&E's proposed clarification should therefore be incorporated into Rule 30, as reflected in CalCCA's redline attached hereto as Appendix A.

The Commission should also direct PG&E to include in its proposed Rule 30 Interconnection Application language consistent with these redlines and the proposed information-sharing requirements. In addition, the Interconnection Application should provide a tool to assist the applicant to determine if the proposed facility will be in a CCA's service area. For any proposed facility in a CCA's service area, PG&E should provide information on how to contact the CCA and, as noted above, clear disclosures that the information will be provided to the affected CCA as the facility's default provider of generation service.

California customers will benefit from new loads choosing to site new facilities in the state. Clear policies and procedures, as well as the benefit of choice, are most likely to encourage these facilities to site in California while protecting existing customers. The changes described herein will also ensure competitive parity between PG&E and CCAs

[35] PG&E Response to Data Request Joint CCAs_001-Q006, Question 06. *See* PG&E Answer to Data Request Joint CCAs_001-Q006, Question 06 (Jan. 29, 2025) (attached hereto in Attachment C).

in serving new Large Loads. Improved information sharing and cooperation will maximize the ability of both the CCAs and PG&E to serve these new customers.

APPENDIX A
TO
AMENDED TESTIMONY OF
THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR APPROVAL OF ELECTRIC RULE 30 FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE

REDLINES TO PG&E'S PROPOSED ELECTRIC RULE 30

APPENDIX A

TO

AMENDED TESTIMONY OF THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR APPROVAL OF ELECTRIC RULE 30 FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE A.24-11-007

PROPOSED REDLINES TO
PACIFIC GAS AND ELECTRIC COMPANY
PROPOSED ELECTRIC RULE NO. 30: RETAIL SERVICE TRANSMISSION FACILITIES

Proposed text deletions show as ~~**bold and strikethrough**~~
Proposed text additions show as **bold and underlined**

A. GENERAL

8. For any Facility at a location within the service area of a Community Choice Aggregator (CCA), the CCA is the default provider of generation service. The affected CCA will automatically serve any new Applicant in its service area subject to the choice of the Applicant to opt out of CCA service to receive generation service from PG&E. Upon receipt of an Application for a Facility in a CCA's service area, PG&E will provide the affected CCA a copy of the Application within 20 calendar days of receipt, to ensure the CCA receives key information about the service request to inform the CCA of the new customer, including the customer name, location, facility type (e.g., data center, commercial, retail, manufacturing), capacity ramp schedule, on-site generation, and requested timing for the interconnection. PG&E will also provide to the affected CCA within 20 calendar days any subsequent changes to the Application and periodic updates to the interconnection timeline. Information provided by PG&E to the CCA is subject to confidentiality protections established by the Commission.

G. DEFINITIONS FOR RULE 30

RETAIL SERVICE: Electric service to PG&E's end use or retail customers which is of a permanent and established character and may be continuous, intermittent, or seasonal in nature. **For purposes of this Rule, Retail Service does not include or relate to providing generation service and/or the electric commodity.**

ATTACHMENT A
TO
AMENDED TESTIMONY OF
THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR APPROVAL OF ELECTRIC RULE 30 FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE
A.24-11-007

CURRICULUM VITAE OF LORI MITCHELL

LORI MITCHELL

PROFESSIONAL SUMMARY

Executive professional with more than 25 years of experience in utilities and renewable energy. Expert in clean energy, utility operations, and management. Proven relationship builder with stakeholders, elected officials, and staff. Recognized for track record of success in building and leading high performing organizations.

SKILLS

- Executive Leadership
- Clean Energy
- Utility Operations
- Technical Advising
- Local Government
- Problem Solving

BOARD POSITIONS

California Community Power, President, previous Vice Chair

California Community Choice Association, previous President

California Foundation on the Environment and the Economy

EDUCATION

Cal Poly, Humboldt State University:

BS: Engineering

Texas A&M: MBA

WORK HISTORY

CITY OF SAN JOSE, ENERGY - Director
San Jose, CA • 11/2017 - Current

- Successfully worked with the Mayor, City Council, and the City Manager's office to start-up a new Department providing electric generation service under the community choice aggregation model.
- San Jose Clean Energy serves 350,000 customers and has saved ratepayers more than $50 million dollars while providing over 60% renewable energy.
- Successfully negotiated power supply agreements totally over 1GW of new renewable projects valued at over $4 billion dollars.
- Successfully managed an operating budget of over $500 million a year and ensured regulatory compliance with the CPUC, CEC, CAISO as well as other agencies.
- Hired, trained, and onboarded over 60 staff
- Provided executive leadership to form a new municipal utility to support data centers including managing the interconnection and electrical distribution design.

CITY OF SAN JOSE, ESD - Acting Director
San Jose, CA • 8/2024 – 3/17/25

- Provided executive leadership to oversee the Environmental Services Department which includes over 600 staff and operates retail water, regional wastewater facility, recycling and garbage services, stormwater, and other utility services.

CITY Of SAN FRANCISC0, SFPUC **Multiple Positions, ending in Director**

San Francisco, CA • 2007 - 2017

- Provided executive leadership to synchronize efforts across: Power Supply and Scheduling; Renewable Generation; Energy Efficiency; Distribution and Transmission Planning.
- Successfully managed a $500 million capital budget to ensure projects were completed within budget. Projects included solar, energy efficiency, and initial designs for the Bay Corridor Transmission and Distribution project located on the southeast side of the city.
- Led negotiations for the energy contracts to support the launch and growth San Francisco's CleanPowerSF Community Choice Aggregation Program valued at $100 Million dollars.
- Managed SF's Hetch Hetchy hydroelectric assets to optimize power production within the constraints of the water supply systems.
- Successfully represented the Department at public meetings with the SF Board of Supervisors and the SF Public Utilities Commission to obtain project approvals and discuss critical issues.
- Built high performing teams and successfully managed a team of over 100 people to achieve the agencies strategic business goals.
- Strategically led the team in constructing the largest municipal solar project located in an urban environment.
- Led the power supply and scheduling group responsible for power trading and scheduling 385 MW of hydroelectric generation into the CAISO market.
- Provided oversight for the implementation of the City's renewable energy program that consisted of solar PV, wind, wave, and small hydro projects.
- Achieved $6M in savings by streamlining forecasting procedures and implementing cost reduction strategies for energy purchases and services as well as increasing coordination with the CAISO scheduling and settlements groups.

POWERLIGHT / SUNPOWER CORPORATION - Senior Engineer
Berkeley, CA • 1999 - 2007

- Oversaw the power modeling of various utility-scale solar projects, including a 10MW project in Germany, a 15 MW project in Portugal, 20 MW in Spain, and several smaller rooftop projects in the United States.
- Resolved performance and operational issues of hundreds of solar projects to meet performance specifications.
- Controlled engineering activities to maintain work standards, adhere to timelines and meet quality assurance targets.
- Produced and presented multiple technical papers in various industry conferences.
- Educated clients on the energy production and performance of their solar project.

NATIONAL RENEWABLE ENERGY LABORATORY
Washington, DC • 1998

CALIFORNIA ENERGY COMMISSION
Sacramento, CA • 1997

CALIFORNIA AIR RESOURCES BOARD
Sacramento, CA • 1996

LICENSE

California Professional Engineer (PE): Mechanical

AWARD:

Silicon Valley Business Journal: Women of Influence 2023

PUBLICATIONS

Authored multiple technical papers on the performance of solar energy projects, published in IEEE journals

ATTACHMENT B
TO
AMENDED TESTIMONY OF
THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR APPROVAL OF ELECTRIC RULE 30 FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE
A.24-11-007

CURRICULUM VITAE OF KRIS VAN VACTOR

S. Kris Van Vactor

5850 Balcom Ave., Encino, CA 91316
503-544-5142 | kris.vanvactor@gmail.com

Professional Profile

Results-oriented leader in procurement, policy, and energy market strategy with over 20 years of experience spanning utility operations, regulatory policy, wholesale energy markets, and economic consulting. Proven success in managing multidisciplinary teams, leading major market transitions, and negotiating complex energy contracts. Skilled in economic analysis, project implementation, and cross-functional collaboration in regulated and deregulated energy environments.

Core Competencies

Strategic Energy Procurement, Policy Analysis & Regulatory Affairs, Team Leadership & Development, Economic & Statistical Analysis, Program & Project Management, Technical Writing & Reporting, Contract Negotiation, Contract Management, Organizational Budgeting, Procurement Planning, Market Operations (CAISO, FERC), Resource Adequacy, Energy Hedging, Software: Microsoft Office, VBA, eViews

Professional Experience

Director of Power Resources

Silicon Valley Clean Energy (SVCE), Sunnyvale, CA
2024 – Present

• Lead an organization of procurement professionals that specialize in Front-office, Back-office and Planning activities

• Oversaw the management of a clean portfolio of generation assets with contracts totaling ~2 billion

• Provide strategic guidance for short-term and long-term procurement needs

• Assess and manage group functions and needs as workflow dictates

Wholesale Energy Markets Manager

Silicon Valley Clean Energy (SVCE), Sunnyvale, CA

2022 – 2024

• Lead procurement and operations for energy hedging and Resource Adequacy.

• Oversaw transition to CAISO's "Slice of Day" RA market structure

• Represent SVCE in stakeholder forums (CalCCA and others)

• Led joint negotiations for a 100 MW New Mexico wind import (SunZia project).

• Supported integration of long-term renewable contracts (e.g., Yellow Pine, Victory Pass).

Senior Project Manager/Senior Advisor, CAISO Settlements

Southern California Edison (SCE), Rosemead, CA
2017 – 2022

• Spearhead policy, strategy and implementation of products for use in organized energy markets

• Uphold role as workgroup representative on simultaneous projects while assuring the completion of project-specific goals, milestones and timelines

• Identify and implement various CAISO based initiatives including changes to Congestion Revenue Rights settlements, Market Settlement Timeline Transformation, Intertie Deviation Settlement and CAISO Summer Readiness changes

• Identified a policy gap where energy storage resources were being charged Resource Adequacy Availability Incentive Mechanism despite bidding their full capacity

• Represented SCE Back office in internal and external market design and policy forums.

Project Manager

Southern California Edison (SCE), Rosemead, CA
2013 - 2017

• Identified changes and implemented them in order to support market changes initiated by CAISO including updated Capacity Procurement Mechanism and Reliability Services Initiative rules as well as Full Network Model Expansion.

• For each project identified software needs, tracked development and adjusted timelines accordingly

• Developed a strategic framework for bidding standalone batteries into CAISO marketplace

• Onboarded 92 MW of aggregated distribution level solar resources into CAISOs market.

•Represented SCE Front office in internal and external market design and policy forums.

Energy Operations Specialist

Southern California Edison (SCE), Rosemead, CA
2011 - 2013

• Developed a position report to track various market specific metrics for real-time traders

• Provided project support on a variety of projects

• Onboarded renewable resources into Southern California Edison's generation portfolio

Senior Financial Analyst

Southern California Edison (SCE), Rosemead, CA
2009 - 2011

• Developed and implemented strategies and software changes for Virtual Bidding

• Provided project support on a variety of projects

Economist / Reporter

Economic Insight, Inc., Portland, OR
2004 – 2009

• Conducted analysis on natural gas costs and energy contract valuations.

• Published and edited "Energy Market Report" newsletter tracking market dynamics.

• Developed automated data workflows, improving analytical efficiency.

Sales and Marketing Manager

E-Business International, Inc., Beaverton, OR
2000 – 2002

• Managed supply chain strategies and client development.

• Initiated and executed successful cross-border supply chain projects connecting U.S. companies with Chinese manufacturers.

Education

Bachelor of Science in Economics
University of Oregon, Eugene, OR

2003

Additional Information

• Technical Skills: Microsoft Office Suite, VBA, eViews

• Languages: English (native)

• Professional Affiliations: Participant in CalCCA and other energy policy coalitions

• Public Engagement: Regular contributor in public energy forums and stakeholder discussions

ATTACHMENT C
TO
AMENDED TESTIMONY OF
THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR APPROVAL OF ELECTRIC RULE 30 FOR TRANSMISSION-LEVEL RETAIL ELECTRIC SERVICE
A.24-11-007

SELECT DISCOVERY RESPONSES

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 – Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	JointCCAs_001-Q001
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_JointCCAs_001-Q001
Request Date:	January 23, 2025
Requester DR No.:	001
Requesting Party:	JointCCAs
Requester:	Scott Blaising
Date Sent:	January 29, 2025
PG&E Witness(es):	Karen Khamou Ornelas – Engineering, Planning and Strategy

QUESTION 001

In its Prepared Testimony ("**PG&E Testimony**"), PG&E states that it "has seen a significant increase in applications for transmission level interconnections for new retail electric customers. Since 2023, PG&E has received 34 applications for transmission level service with demand of 4 MW or greater…. The total combined load of the 34 applications is 4,440 MW." (PG&E Testimony at 1-4.)

a. For the 34 applications, please indicate whether (and if so, how and when) PG&E provided notice of the applications to the affected community choice aggregators ("**CCAs**") in whose service area the new retail customers were to be located ("**Potentially Affected CCA**").

b. Please describe the process that PG&E currently follows to provide notice to Potentially Affected CCAs of new applications for service by very large (i.e., 4 MW or greater) retail customers ("**Mega Customers**").

c. As related to issues in this proceeding, is PG&E amenable to developing a formal procedure or amending its proposed Rule 30 to include a written process by which PG&E provides advance and continuing notice to Potentially Affected CCAs of applications for transmission service by Mega Customers?

   i. If not, please explain why PG&E is not amenable.

   ii. If so, please further describe, including a description of what information PG&E would provide, when and under what terms and conditions.

ANSWER 001

a. The applications described in PG&E's testimony concern the physical interconnection of a facility into PG&E's electrical system. These applications do not concern the provision or procurement of electric commodity service. Thus, PG&E did not provide notice to energy providers such as Community Choice Aggregators (CCAs) or Direct Access (DA) providers. In addition, the applications

often include commercially sensitive customer information that is not shared outside of PG&E.

b. PG&E objects to term “mega customers” and will not use this terminology in its response. Subject to this objection, *see* subpart (a).

c. Given the issues in this proceeding and the need for a timely Commission determination on Electric Rule 30, PG&E does not believe that communications with CCAs or DA providers regarding new transmission level customer interconnections should be in scope in the proceeding. However, PG&E would be supportive of working with the CCAs and other procurement providers to develop written procedures regarding such communications and then submitting these procedures to the CPUC through a separate advice letter.

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 – Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	JointCCAs_001-Q002
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_JointCCAs_001-Q002
Request Date:	January 23, 2025
Requester DR No.:	001
Requesting Party:	JointCCAs
Requester:	Scott Blaising
Date Sent:	January 29, 2025
PG&E Witness(es):	Karen Khamou Ornelas – Engineering, Planning and Strategy

QUESTION 002

In the PG&E Testimony, PG&E states that it "is presently conducting a pilot program for a cluster process for new transmission level retail electric customers located in Alameda and Santa Clara Counties." (PG&E Testimony at 1-6.)

a. Please indicate whether the Potentially Affected CCAs have been informed of the pilot program. If so, please provide supporting information.

b. Please provide further information on the pilot program, including (but not necessarily limited to) its intended results, its current status, whether Commission review is anticipated, and its relevance, if any, to PG&E's request in this proceeding.

c. As related to issues in this proceeding, is PG&E amenable to including the Potentially Affected CCAs in a working group with PG&E for the purpose of providing timely, non-public information on the pilot program?

   i. If not, please explain why PG&E is not amenable.

   ii. If so, please describe how PG&E might structure and implement a working group for the sharing of timely, non-public information about the pilot program.

ANSWER 002

a. *See* PG&E's response to Question 1(a). Given that the Pilot Cluster Process involved the interconnection of new electric customers, not the procurement of the electric commodity, PG&E did not provide notice directly to Community Choice Aggregators (CCAs). However, PG&E has provided information in this proceeding regarding the Pilot Cluster Process which is equally available to CCAs.

b. PG&E provided the following information in response to Cal Advocates Data Request Set #1, Question 6:

In 2024, PG&E piloted a cluster study approach to study the increased number of data center applications received in the San Francisco South Bay area, mainly in Santa Clara and Alameda counties ("Pilot Cluster Process"). The clustering of large data center applications in certain areas and studying them in a serial process created complex, high-cost interconnection, and capacity upgrades. When projects are studied serially, the study timelines are lengthy and often do not study the cumulative impacts of the total load in a geographic area.

PG&E's Pilot Cluster Process is a streamlined approach for handling applications for large data center loads within a specific geographic area, allowing customers to submit applications and be grouped based on their proximity to PG&E's transmission and distribution system. We also offered customers with active or previously completed applications the chance to restudy, downsize, or change their project's Point of Interconnection within the same calendar year. Customer Engagement Meetings have been or will be held during the Pilot Cluster Process to provide each customer a dedicated meeting where PG&E and the customer can discuss feasible connection options, available capacity, land, permitting, and planned capacity projects. This helps customers make informed decisions about proceeding with or withdrawing their applications.

The Pilot Cluster Process also sets clear timelines and procedures for study milestones, customer engagement, and project initiation. Customers will be informed about the expected scope, costs, and duration of their project during the application phase. The Pilot Cluster Process aims to produce meaningful results that consider system capabilities and establish shared cost allocation and responsibility, supporting the development of a consolidated engineering and implementation plan.

PG&E expects that agreements that result from the Pilot Cluster Process will either be approved pursuant to the process proposed in PG&E's interim implementation motion and/or through exceptional case filings at the Commission.

c. Given the issues in this proceeding and the need for a timely Commission determination on Electric Rule 30, PG&E does not believe that sharing non-public Pilot Cluster Process information with CCAs should be in scope in the proceeding. However, PG&E would be supportive of working with the CCAs on sharing information, subject to confidentiality protections, at the appropriate time in the Pilot Cluster Process.

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 – Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	JointCCAs_001-Q006
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_JointCCAs_001-Q006
Request Date:	January 23, 2025
Requester DR No.:	001
Requesting Party:	JointCCAs
Requester:	Scott Blaising
Date Sent:	January 29, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

QUESTION 006

In Attachment A to Chapter 2 of the PG&E Testimony, PG&E sets forth a proposed rule that, among other things, contains the following definition for "Retail Service": "Electric service to PG&E's end-use or retail customers which is of a permanent and established character and may be continuous, intermittent, or seasonal in nature." (PG&E Testimony at 2-AtchA-17.)

a. As related to issues in this proceeding, is PG&E amenable to changing the term "Retail Service" to "Retail Delivery Service" or another term that does not imply that the service described in Proposed Rule 30 relates to or includes generation service?

   i. If not, please explain why PG&E is not amenable.

   ii. If so, please provide a description of the revised term that PG&E agrees to use.

ANSWER 006

PG&E is willing to work with the Joint CCAs to clarify that the term "Retail Service" does not include or relate to generation service. As an initial proposal, PG&E suggests adding the following sentence to the defined term "Retail Service":

> For purposes of this Rule, Retail Service does not include or relate to providing generation service and/or the electric commodity.

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 – Transmission-Level Interconnections
Application 24-11-007
Data Response

PG&E Data Request No.:	JointCCAs_001-Q007
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_JointCCAs_001-Q007
Request Date:	January 23, 2025
Requester DR No.:	001
Requesting Party:	JointCCAs
Requester:	Scott Blaising
Date Sent:	January 29, 2025
PG&E Witness(es):	Ben Moffat – Engineering, Planning and Strategy

QUESTION 007

In D.22-11-009, the Commission clarified that PG&E's substation microgrid solutions "does not impact a customer's choice of, or experience with, their [CCA]." (D.22-11-009 at 62.)

a. As related to issues in this proceeding, is PG&E amenable to providing advance notice to customers (at the earliest stages of the proposed Rule 30 process) that, among other things, identifies the CCA for the customer's service location, describes the role that CCAs play in providing electric generation service to customers in their respective service areas, provides contact information (supplied by the CCA) for the CCA, and clearly states that the customer's application for and election of transmission delivery service does not impact the customer's rights with respect to electric generation service provided by the CCA?

   i. If not, please explain why PG&E is not amenable.

   ii. If so, please identify where in the proposed Rule 30 stages PG&E would propose adding customer notification about these CCA-related matters.

ANSWER 007

PG&E is willing to work with the Joint CCAs to develop a procedure by which, during the Electric Rule 30 process, PG&E explains to an applicant that interconnection under Electric Rule 30 does not "impact a customer's choice of, or experience with" a CCA or other energy provider such as a Direct Access provider. PG&E is willing to work with the Joint CCAs on the appropriate information to be provided by PG&E to potential transmission level customers during the Electric Rule 30 application process.

PACIFIC GAS AND ELECTRIC COMPANY
Electric Rule 30 – Transmission-Level Interconnections
Application 24-11-007
Data Response

Request Date:	March 28, 2025
Requesting Party:	Joint CCAs
Requester:	Scott Blaising
Date Sent:	April 10, 2025

QUESTION 001

Please provide a description of and associated timelines for expected activities under proposed Rule 30 (including, but not necessarily limited to, activity related to the submittal of an application, preliminary study, design review, engineering, interconnection agreement, procurement, construction and energization). The preceding examples are intended to be general descriptions of certain activity, and PG&E should not feel limited by these descriptions; PG&E may use whatever terminology it believes is most appropriate so long as PG&E's response describes expected activities and provides associated timelines for these activities. As much as reasonably possible, the Joint CCAs request that PG&E describe activities in a sequential manner.

ANSWER 001

PG&E's large load interconnection process includes a number of phases: application, preliminary engineering study, design, preconstruction, construction, and closeout. These phases can be described as the following:

- Application Phase: The customer submits a service energization request and a study deposit.
- Preliminary Engineering Phase: PG&E defines the initial scope of analysis and performs studies to determine service options and initial costs.
- Design Phase: PG&E and the customer agree on the scope of work, creating a project design and refining the project cost.
- Preconstruction Phase: This phase confirms dependencies between the customer and PG&E, including obtaining necessary permits and easements.
- Construction Phase: PG&E schedules and completes all construction activities, including traffic control and scheduling outages.
- Closeout Phase: All inspections are completed, and the site is energized, allowing the customer to start receiving service.

While this process is generally sequential, certain components, such as design and preconstruction, can occur concurrently. The associated timelines are not solely under PG&E's control and depend on customer decisions, agency permit timelines, and land negotiations. As noted in our Application, until 2023, PG&E had a limited number of customers requesting retail electric service at transmission-level voltages. Infrequent requests for transmission-level interconnections were addressed through exceptional case filings. However, starting in 2023, the number of customers requesting transmission-level service began to significantly increase.

As we continue to refine our load interconnection processes, we lack the granularity to provide specific timelines for each phase. Nevertheless, the Preliminary Engineering Phase is planned to take 200 calendar days. Additionally, many projects require upstream capacity upgrades, which often involve more complex work. The CPUC has recently adopted the following maximum statewide timelines[1] for upstream capacity projects, based on the lowest average among the three investor-owned utilities:

- New or upgraded circuit: 684 calendar days
- Substation upgrade: 1,021 calendar days
- New substation: 3,242 calendar days.

[1] D.24-09-020 at 47.