

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

PG&E Data Request No.:	CalAdvocates_009-Q001
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_009-Q001
Request Date:	May 19, 2025
Requester DR No.:	009
Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/ Rachel Dersch/ Jane Roschen
Date Sent:	May 27, 2025
PG&E Witness(es):	Tyrone Hillman, Lynn Spencer – Engineering, Planning and Strategy

QUESTION 001

Define both Local delivery Network Upgrades (LDNU) and Area Delivery Network Upgrade (ADNU) and the difference between them.

- a. Provide which Transmission Facilities, listed 1-13 in the table of the Advice Letter,¹ are considered LDNU and which are considered ADNU.
- b. Define which Transmission Facilities 1-4 of the Proposed Rule 30 Application are LDNU or ADNU.

ANSWER 001

PG&E understands that Cal Advocates is referring to Local Delivery Network Upgrades (LDNU) and Area Delivery Network Upgrades (ADNU) as those terms are used by the California Independent System Operator (CAISO). LDNUs and ADNUs are transmission system enhancements identified through the CAISO's Generation Interconnection Process (GIP). These upgrades are necessary to enable a generating facility to achieve *deliverability status*, allowing its output to be delivered to the aggregate load on the CAISO Controlled Grid and participate in the Resource Adequacy (RA) program.

- **LDNUs** refer to transmission upgrades or additions identified by CAISO during the GIP to address *Local Deliverability Constraints*.
- **ADNUs** refer to transmission upgrades or additions identified in the same process to address *Area Deliverability Constraints*.

¹ See PG&E AL 7579-E at 6.

While LDNUs and ADNUs are integral to the CAISO's generation interconnection framework, they are distinct from transmission upgrades required to support load growth associated with transmission load interconnections. Such load-serving upgrades fall under the scope of Electric Rule 30 and are not directly related to the deliverability upgrades identified in the GIP.

- a. Not applicable. See PG&E's statement above.
- b. Not applicable. See PG&E's statement above.

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PG&E Data Request No.:	CalAdvocates_009-Q002
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Request Date:	May 19, 2025
Requester DR No.:	009
Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/ Rachel Dersch/ Jane Roschen
Date Sent:	May 27, 2025
PG&E Witness(es):	Lorenzo Thompson – Engineering, Planning & Strategy

QUESTION 002

Your Advice Letter states, “Transmission facility costs are generally FERC [Federal Energy Regulatory Commission]-jurisdictional if: (1) the California Independent System Operator (‘CAISO’) exercises operational control over the facilities; and (2) the facility demonstrates ‘any degree of integration’ into the electric transmission network.”¹ PG&E states it “cannot at this point determine what facilities the CAISO will decide to exercise operational control over.”²

- a. Are there prior instances where the CAISO has exercised control over transmission facilities?
- b. If so, was there a reason provided why?
- c. If the CAISO did not provide a reason, is there a set of common factors among the transmission facilities?
- d. What does PG&E consider sufficient to meet the standard of “any degree of integration” into the electric transmission network?³ Is there a line voltage value? If not, what kind of integration is required?

ANSWER 002

- a. Yes. The CAISO exercises operational control over transmission facilities turned over to the CAISO by Participating Transmission Owners (PTO), including PG&E. The CAISO’s operational control is generally described in the Amended and Restated Transmission Control Agreement between the CAISO and PTOs, which is available here: [transmissioncontrolagreement.pdf](#)

¹ See PG&E AL 7569-E at 5.

² 4 See PG&E AL 7569-E at 5.

³ 5 See PG&E AL 7569-E at 5.

- b. Please see subpart (a).
- c. Please see subpart (a).
- d. FERC makes the determination regarding whether there is any degree of integration of an electrical facility into the network transmission system. In its Advice Letter, PG&E provided in footnote 11 a reference to a relevant FERC decision (Opinion 466-B) where the issue of degree of integration is discussed. In addition, in Opinion 466-A (*Pacific Gas and Electric Company*, 106 FERC ¶ 61,144 (2004)), FERC considered specific facilities and decided whether these facilities were integrated into the electric transmission network. This decision is an example of the kinds of information and factors that FERC considers.

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PG&E Data Request No.:	CalAdvocates_009-Q003CONF
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_009-Q003 CONF
Request Date:	May 19, 2025
Requester DR No.:	009
Requesting Party:	Public Advocates Office
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PG&E Witness(es):	Lynn Spencer – Engineering, Planning and Strategy

QUESTION 003

In the Advice Letter CONFIDENTIAL Attachment 2, the Special Facilities are described as follows: “

- a. Explain STACK’s [REDACTED]. How will the [REDACTED] be used? Under what conditions is the [REDACTED] [REDACTED] use?
- b. Does PG&E have operational control over the [REDACTED] use?
- c. Will STACK have any co-located generation in addition to the [REDACTED] connections?
- d. How does PG&E differentiate between other customers’ requests for new electric transmission facilities needs vs STACK’s requests?

ANSWER 003

Please note that the data request question and response reference Confidential Information and is provided pursuant to the attached declaration dated April 18, 2025.

[REDACTED] was requested by STACK for [REDACTED]

1 Advice Letter CONFIDENTIAL Attachment 2, Exhibit A, Page 1.

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- b. Yes, PG&E will have operational control over the [REDACTED] line.
- c. PG&E's understanding is yes, but has no specific information on the additional generation at the STACK Ringwood facility.
- d. PG&E reviews and assesses each customer request for service and provides interconnection options that will meet the specific customer's request for service and feasibility.

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PG&E Data Request No.:	CalAdvocates_009-Q004
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Request Date:	May 19, 2025
Requester DR No.:	009
Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/ Rachel Dersch/ Jane Roschen
Date Sent:	May 27, 2025
PG&E Witness(es):	Lynn Spencer/Lorenzo Thompson – Engineering, Planning & Strategy

QUESTION 004

How do the Transmission Facilities, listed 1-13 in the table of the Advice Letter,¹ correlate with the Transmission Facilities 1-4 in Proposed Rule 30 (i.e., 1. Transmission Service Facilities, 2. Transmission Interconnection Upgrades, 3. Transmission Network Upgrades, and 4. Transmission Network Upgrades)? More specifically, does PG&E's determination of the likely jurisdiction for cost recovery depend on the type of the Transmission Facility?

- a. Provide an example in which CAISO would determine that the transmission facilities PG&E identifies as likely FERC jurisdiction for cost recovery on page 6 of the Advice Letter should not be under CAISO operational control. Provide specific reasons from previous cases where CAISO did not exercise operational control.

ANSWER 004

The transmission facilities (1-8) identified in the advice letter on page 6 are integrated into the overall transmission system, provide benefits to the transmission grid in terms of capability or reliability, and can be relied upon for coordinating grid operation. Please see Table No. 1 for the correlation between each transmission facility and Facility Type in Electric Rule 30.

¹ 7 See PG&E AL 7579-E at 6.

Table 1: Facility Types

No.	Transmission Facility	Facility Type
1	Switching Station	2
2	Transmission Lines	3
3	Newark to Ringwood Switching Station	3
4	Ringwood Switching Station to Milpitas	3
5	Remote End	3
6	Remote End Ringwood Newark	3
7	Remote End Ringwood Milpitas	3
8	FDU Telecom	2
9	115kV Line Connection – Redundant Service Drop	1
10	Interconnection Metering – Redundant Service Drop	1
11	Tradezone Relay	1
12	115kV Line Connection – Main Service	1
13	Interconnection Metering – Main Service	1

PG&E's current assessment of the likely jurisdiction for cost recovery is based on its evaluation of whether the CAISO will exercise operational control over specific transmission facilities and whether the facilities will be integrated into the electric transmission network. These are preliminary assessments.

- This subpart appears to be based on a misunderstanding. The CAISO does not determine whether specific facilities are likely to be recovered in FERC-jurisdictional rates. Rather, the CAISO exercising operational control is one factor in determining whether specific transmission facilities are FERC-jurisdictional for cost recovery purposes or whether the facilities are CPUC-jurisdictional for cost recovery purposes. See PG&E's response to Cal Advocates Set #9, Question 2.

PACIFIC GAS AND ELECTRIC COMPANY
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PG&E Data Request No.:	CalAdvocates_009-Q005
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Request Date:	May 19, 2025
Requester DR No.:	009
Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/ Rachel Dersch/ Jane Roschen
Date Sent:	May 27, 2025
PG&E Witness(es):	Lorenzo Thompson – Engineering, Planning & Strategy

QUESTION 005

What is PG&E's understanding of the process, including expected decision dates, for CAISO to notify PG&E on whether the facilities shall be under CAISO control and then designate such facilities under the CAISO register?

A. Will any part of STACK's interconnection process, including execution of Agreements requested in the Advice Letter, be delayed until PG&E receives notification of CAISO's operational designation of the Transmission Facilities? If so, what parts of the process to initiate electric service for STACK are dependent on the designation of Transmission Facilities as either California Public Utilities Commission (Commission) or FERC-jurisdictional?

ANSWER 005

The Transmission Register (TR) is a database that discloses for each transmission line and associated facilities the dates the CAISO assumed or relinquished Operational Control, among other things. PG&E works with the CAISO to add, modify, or remove assets in the TR based on reviews of maps for transmission facilities, Geographic Information Systems (GIS), and substation documentation. These change requests are either approved or rejected by the CAISO TR Administrator. Once the request is processed, the user (in this case PG&E) receives an email of completion if the request is successful, and no further steps are required.

A. No. PG&E does not anticipate any delays to STACK's interconnection process as a result of the CAISO's operational designation of the Transmission Facilities.

PACIFIC GAS AND ELECTRIC COMPANY
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Data Response

PG&E Data Request No.:	CalAdvocates_009-Q006
PG&E File Name:	ElectricRule30-Transmission-LevelInterconnections_DR_CalAdvocates_009-Q006
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Requesting Party:	Public Advocates Office
Requester:	Kimiko Akiya/ Rachel Dersch/ Jane Roschen
Date Sent:	May 27, 2025
PG&E Witness(es):	Lynn Spencer – Engineering, Planning and Strategy

QUESTION 006

When does PG&E determine that assets should change jurisdictional designation from FERC to the Commission and are those changes more likely to occur before or after CAISO designates the facilities as under CAISO control?

- a. Did STACK and PG&E discuss these designations? If so, please provide notes and materials regarding comments made by PG&E and STACK on cost recovery venues.
- b. Are there specific reasons beyond CAISO's determination of operational control which drive PG&E's jurisdictional designations for various Transmission Facilities included in STACK's request?

ANSWER 006

With regard to whether transmission facilities are FERC-jurisdictional or CPUC-jurisdictional for cost recovery purposes, please see PG&E's response to Cal Advocates Set #9, Questions 2 and 4. Please note that in the Advice Letter, PG&E stated that the table on page 6 reflects our current assessment and may be subject to change.

- a. PG&E and STACK did not discuss the table on page 6 of the Advice Letter.
- b. Please see PG&E's response to Cal Advocates Set #9, Question 2 regarding the standard that FERC applies to determine whether facilities are network transmission facilities and eligible to be included in FERC-jurisdictional rates.

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

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

1. I, Michael Medeiros, am a/the VP, South Bay Delivery, at Pacific Gas and Electric Company (“PG&E”), a California corporation. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Dr.
Oakland, CA 94612

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

Name or Docket No. of CPUC Proceeding (if applicable): _____

3. Title and description of document(s): Electric Rule 2, 15, and 16 Exceptional Case Submittal for Electric Transmission Service Facilities for STACK Advice Letter:
Attachment 1: Signed Agreement to Perform Tariff Schedule Related Work (Form 62-4257),
and Attachment 2: Signed Agreement for Installation or Allocation of Special Facilities (Form 79-255)

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart, with further detail provided in Appendix A, which is incorporated into this declaration:

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>(Protected under Pub. Util. Code § 8380; Civ. Code §§ 1798 <i>et seq.</i>; CPUC Decisions (D.) 14-05-016)</p>	<p>Attachment 1 and Attachment 2 in their entirety</p>
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.</p>	<p>(Protected under Civ. Code §§ 1798 <i>et seq.</i>; Gov. Code § 7927.400; 42 U.S.C. § 1320d-6; General Order (G.O.) 77-M; see also CPUC D. 04-08-055, 06-12-029)</p>
<input type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).</p>	<p>(Protected under Gov. Code § 7927.705, 7929.205; 6 U.S.C. § 671; 6 CFR § 29.2)</p>
<input checked="" type="checkbox"/>	<p>Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.</p> <p>(Protected under Civ. Code §§ 3426 <i>et seq.</i>; Gov. Code §§ 7927.300, 7927.705, 7929.420, 7927.605, 7930.205; Evid. Code §1060; CPUC D.11-01-036)</p>	<p>Attachment 1 and Attachment 2 in their entirety</p>
<input type="checkbox"/>	<p>Corporate financial records.</p> <p>(Protected under Gov. Code §§ 7927.705, 7927.605)</p>	
<input type="checkbox"/>	<p>Third-Party information subject to non-disclosure or confidentiality agreements or obligations.</p>	

(Protected under Gov. Code § 7927.705; see, e.g., CPUC
D.11-01-036)



Other categories where disclosure would be against the
public interest.

(Gov. Code § 7922.000)

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 18th day of April, 2025 at Oakland, California.

/s/ Michael Medeiros
Michael Medeiros

VP, South Bay Delivery

Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

ATTACHMENT TO DECLARATION
April 18, 2025

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
Attachment 1_Ringwood WPA_Agreement and Exhibits_Fully Executed.pdf	Attachment 1: Signed Agreement to Perform Tariff Schedule Related Work (Form 62-4257)	Customer-specific data, which may include demand, loads, names, addresses, and billing data; Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.	PDF in its entirety
Attachment 2_Stack Ringwood SFA Agreement and Exhibits_Fully Executed.pdf	Attachment 2: Signed Agreement for Installation or Allocation of Special Facilities (Form 79-255)	Customer-specific data, which may include demand, loads, names, addresses, and billing data; Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.	PDF in its entirety