

March 14, 2025

Via Electronic Mail

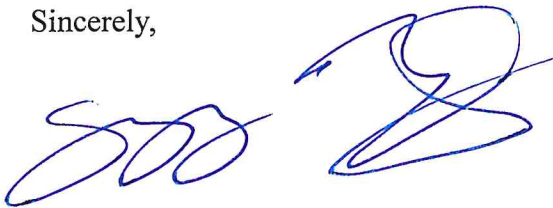
Aisha Collier
Assistant Clerk of Council
1300 Perdido St
Suite 1E09
New Orleans, LA 70112

Re: Comments on UD-24-02, Distributed Energy Resources

Dear Ms. Collier,

The Office of Resilience and Sustainability submits the following comments regarding UD-24-02. The Office of Resilience and Sustainability is available to answer questions and concerns about the filing. Questions can be directed to Greg Nichols, Deputy Chief Resilience Officer, and Sophia Winston, Energy Policy & Program Manager.

Sincerely,



Greg Nichols
Deputy Chief Resilience Officer
Office of Resilience & Sustainability
1300 Perdido St
Suite 7E05
New Orleans, LA 70112

**IN RE: RESOLUTION AND ORDER
ESTABLISHING A DOCKET AND
PROCEDURAL SCHEDULE TO
ENHANCE DISTRIBUTED
ENERGY RESOURCE PROGRAMS
DOCKET UD-24-02**

March 14, 2025

**Office of Resilience & Sustainability
Comments on UD-24-02 Distributed Energy Resource Programs**

Introduction

The Office of Resilience & Sustainability (ORS) commends the City Council for opening Docket UD-24-02 that allows for the exploration and future establishment of a program or programs that aim to increase distributed energy resources (DERs). This initiative has the potential to make our homes and businesses more resilient in the face of increased weather threats while exploring innovative approaches to operating an electric grid. As noted in Resolution R-24-624, which established Docket UD-24-02, “the Administration, through the Mayor’s Office of Resilience & Sustainability...has been working with the National Renewable energy Laboratory (“NREL”) to explore ways to evaluate the availability of clean energy generating resources through DERs.” One of the methods discussed in-depth with NREL is the creation and operation of an area microgrid, an asset which will benefit communities and can involve community participation and feedback throughout the development process. The creation of a program to increase DERs, as well as the deployment of 55 MW of community solar, create a favorable environment for area microgrids to improve grid reliability in the City.

In 2022, the Office of Resilience & Sustainability launched an updated Climate Action Plan, which outlined several energy related goals – one of which being the establishment of a microgrid on City property by 2025. An area microgrid is defined by the Department of Energy (DOE) as “a group of interconnected loads and distributed energy resources with clearly defined electrical boundaries that act as a single controllable entity with respect to the grid.”¹ An area microgrid, which would primarily consist of both solar photovoltaic panels and back-up battery storage systems, could be a critical addition to the City’s Emergency Resource Centers (ERCs), which are activated in emergency situations such as extreme heat, cold, or prolonged periods of outages.

By creating an area microgrid with ERCs or other municipal or critical facilities as an anchor, ERCs would be able to operate on renewable energy resources and could power both the designated ERC facility as well as other nearby buildings and homes during a grid power outage, due to their ability to “island,” or remain powered, while the rest of the grid has failed. Examples of area microgrids are found in Chicago’s Bronzeville community² (a collaboration between the ComEd Utility, the Illinois Institute of technology, and the Chicago Housing Authority), as well is in various areas in California in partnership with Pacific Gas & Electric (PGE)³ such as the Redwood Coast Airport and California Polytechnic Institute.

¹<https://www.energy.gov/sites/prod/files/2016/06/f32/The%20US%20Department%20of%20Energy%27s%20Microgrid%20Initiative.pdf>

² <https://news.wttw.com/2024/07/03/bronzeville-community-microgrid-charts-path-green-energy-future>

³ <https://www.pge.com/en/save-energy-and-money/rebates-and-incentives/community-microgrids.html#accordion-3ef283978b-item-43e32b5667>

With recent funding from the Environmental Protection Agency (EPA), the City of New Orleans will be able to deploy federally funded subsidies to increase the number of solar systems on residential properties, with additional funding support from the State's Solar for Y'all program. Similarly, the City Council's Community Solar Program is at the early stages of implementation, creating the opportunity for 55 MW of utility scale solar on the grid. In concert with the proposed program submitted by Together New Orleans and the Alliance for Affordable Energy, these initiatives will drastically scale up the amount of solar and battery on our grid and create an environment where a powerful virtual power plant can be tapped into during peak demand and where residents and businesses can utilize interconnected and islandable DERs through area microgrids to keep the power on during grid outages. Removing policy barriers for the creation of an area microgrid and creating incentives and opportunities for additional residential, commercial, and industrial solar power and battery storage would allow Entergy New Orleans to tap into the myriad distributed energy resources that will be available in the city, while greatly increasing resiliency during larger grid failures.

UD-24-02 Could Explore the Possibility of a Utility Owned Area or Community Microgrid Modeling Efforts seen in California under Pacific Gas & Electric

In January 2023, The City of New Orleans Office of Hazard Mitigation was awarded a Federal Emergency Management Agency (FEMA) Building Resilient Infrastructure and Communities (BRIC) Program Grant to establish a solar-powered emergency backup power system at the Sanchez Multi-Service Center in the city's Lower Ninth Ward. The 2023 FEMA BRIC grant allowed the City of New Orleans to partner with the National Renewable Energy Laboratory (NREL) to conduct feasibility studies to establish a neighborhood wide solar powered microgrid. Simultaneously, the City of New Orleans received additional support from NREL

through the Communities LEAP Program, which aims to provide a technical roadmap for the City to undertake more renewable energy projects like the solar-powered system at the Sanchez Center. New Orleans was one of 22 communities across the nation to receive this type of technical assistance related to clean and resilient energy infrastructure and has had regular meetings with the teams at NREL related to both FEMA BRIC and Communities LEAP projects.

Through this technical assistance, the NREL team also explored pathways to increasing the number of microgrids, including area microgrids, across the city. The team analyzed Entergy New Orleans' Interconnection Policy as a first step and found that "unintentional islanding" is prohibited under these regulations, stating, "under no circumstances will a Customer's DER be allowed to sustain an island condition with any part of the Company's Distribution System beyond the point of Common Coupling due to potential damage to Company or other Customers' equipment."⁴ The NREL team noted that language around intentional islanding was not included in the interconnection policy and suggested the following courses of action to address this barrier:

- 1) Begin a collaborative stakeholder process to address islanding potential;
- 2) Include Intentional Island and Intentional Area Island in section 2.0 – *Definitions*;
- 3) Add cases for intentional islanding in *Introduction and Summary of Interconnection Types*, and in subsection 3.42;
- 4) And finally, adopt the IEEE Standard 1547-2018 which provides a framework for, "the technical specifications for, and testing of, the interconnection and interoperability between utility electric power systems (EPSs) and distribute energy resources."⁵

⁴ ENO Distributed Energy Resource Standards for Distribution Interconnection;
https://cdn.entergy.com/userfiles/utility/standards/conn_small_elec_generators.pdf

⁵ <https://standards.ieee.org/ieee/1547/5915/>

The Office of Resilience & Sustainability and NREL previously communicated to Entergy New Orleans (ENO) these recommendations. ENO expressed several concerns regarding the establishment of an area microgrid, including concerns around the safety, billing, and asset ownership. **ORS wants to clearly state that an area microgrid should only be established when the safety of ENO's workers and New Orleans residents can be guaranteed.** We do believe, however, that this condition can be met based off previous conversations with both NREL and PG&E.

ORS recently met with representatives from PG&E to discuss their Community Microgrid Program and how it operationalizes and funds these grid assets. In the discussion, PG&E made clear that these grid resources are possible, but that in order to operationalize, the project must be led and ultimately owned by the utility – an option that ORS fully supports.

According to PG&E's website on Community Microgrids, the "sources of localized power, such as solar photovoltaic (PV) system and battery, can be owned by third parties. And they can participate in wholesale markets for energy and related services. PG&E will continue to own and operate the distribution system on which the microgrid capability is built."⁶ While the projects take anywhere from 3-5 years to build, including initial consultation, applications, studies, and more, the utility works with interested parties to launch projects and offers financing along the way to ensure the proper protocols are taken. This is an area where settlement funds could be used to

⁶ <https://www.pge.com/en/save-energy-and-money/rebates-and-incentives/community-microgrids.html#tabs-4fb119b8f0-item-dc099a88d4-tab>

operationalize a utility owned area microgrid that not only benefits anchor institutions, but potentially other homes and businesses in the vicinity.

In Attachment A, members of the UD-24-02 Service List will find PG&E's *Community Microgrid Enablement Tariff*, which outlines standards related to applicability, territory, eligibility, interconnection studies, islanding study, community microgrid development and operation, services and fees, metering, and more. This document can serve as a starting point for discussion around area microgrid feasibility within the ENO territory that aligns and stacks on top of the goals of UD-24-02.

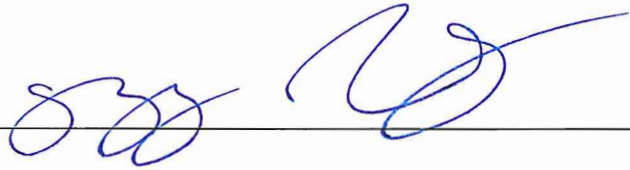
Conclusion

The City of New Orleans is now at a critical turning point where the utility, engaged stakeholders, and the City can work together to increase accessibility to clean energy resources such as residential commercial, and industrial solar and/or battery storage systems, and utility scale community solar. These assets not only diversify power options and reduce the load on the grid but will help lower emissions and increase resilience in the face of more serious weather events and related power outages. The increase in distributed energy resources can be tied together through the creation and implementation of area microgrids as well – further enhancing resiliency and establishing New Orleans as a city on the cutting edge of sustainable energy resilience.

**Before
The Council of the City of New Orleans**

**Re: Comments on UD-24-02 – Distributed Energy Resources
CERTIFICATE OF SERVICE**

I do hereby certify that I have, this March 14, 2025, served the foregoing correspondence upon all other known parties of this proceeding by electronic mail.

A handwritten signature in blue ink, consisting of stylized, overlapping loops and curves, positioned above a horizontal line.

Greg Nichols, City of New Orleans Office of Resilience & Sustainability

Attachment A:
Pacific Gas & Electric Company Community
Microgrid Enablement Tariff



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 1

1. **APPLICABILITY:** The Community Microgrid Enablement Tariff (CMET) schedule (Schedule CMET or this Schedule) implements, in part, on an experimental basis the Community Microgrid Enablement Program (CMEP) pursuant to Public Utilities Commission (CPUC) Decision (D.) 20-06-017 and CPUC Resolution E-5127. This CMET governs the eligibility, engineering studies, development, and island and transitional operation of Community Microgrids, as defined herein. As an experimental tariff, this Schedule is available, on a first-come, first-served basis, to applicants (CMET Applicants) who (i) meet the CMET Eligibility Criteria in Section 3, and (ii) submit a complete CMET Application (Application). This Schedule will close to CMET Applicants on the date set forth in Section 4, below. Capitalized terms specific to this tariff are defined in section 14 below. (T)
2. **TERRITORY:** This schedule applies throughout PG&E's electric service area.
3. **CMET ELIGIBILITY CRITERIA:** A CMET Applicant must meet all of the eligibility criteria outlined below (CMET Eligibility Criteria):
 1. **Community Microgrid:** The CMET Project must meet the needs of at least two customers or two customer premises connected by PG&E's distribution infrastructure within the Microgrid Boundary. All customers within the Microgrid Boundary of the CMET Project must be PG&E retail Distribution Customers; provided that, where PG&E determines in its sole discretion that inclusion of electrical loads or customers which do not take PG&E retail distribution service in a CMET Project will benefit PG&E retail Distribution Customers, PG&E may agree to the inclusion of such loads and/or customers and will submit a notice of and justification for this determination through a Tier 1 Advice Letter.
 2. **Location:** The CMET project must be located in an area served, entirely or in part, by PG&E retail distribution service.

(Continued)

<i>Advice</i>	7457-E	<i>Issued by</i>	<i>Submitted</i>	December 18, 2024
<i>Decision</i>	D.24-11-004	Shilpa Ramaiya	<i>Effective</i>	December 18, 2024
		<i>Vice President</i>	<i>Resolution</i>	
		<i>Regulatory Proceedings and Rates</i>		



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 2

**3. CMET
ELIGIBILITY
CRITERIA
(Cont'd.)**

3. Community Microgrid Parameters: The CMET Project must include interconnected Project Resources, including a Grid-Forming Project Resource, within a clearly defined Microgrid in PG&E's Distribution System; the CMET Project must act as a single, controllable entity; the CMET Project must be able to connect to, disconnect from, and run in parallel with larger portions of the electrical grid; and the CMET Project must be capable of maintaining electrical supply and service quality when isolated to connected customers during larger grid disturbances. Project Resources must be interconnected to PG&E's Distribution System pursuant to PG&E's Wholesale Distribution Tariff, Attachment I "Generator Interconnection Procedures" (WDT GIP) and/or Electric Rule 21 as applicable. (T)
4. Pre-Application Report: The CMET Applicant has the option to complete a Community Microgrid Pre-Application Report (CM Pre-Application Report) and consultation with PG&E prior to submitting a CMET Application.
5. Applicant Experience: The CMET Applicant must provide to PG&E an attestation that it has retained, or will retain, technical partners with experience in the development and operation of grid-forming and grid-following resources. The CMET Applicant must identify the entity(ies), if not the Applicant, that will be responsible for: (1) development of the CMET Project; and (2) acting as CMG Aggregator to coordinate operation of the CMET Project with PG&E pursuant to an executed CMET Microgrid Operating Agreement ("CMET MOA" or "MOA"). (T)
(T)
(T)

(Continued)

Advice 7457-E
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ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 3

4. CMET PERIOD CMET Availability Period: The CMET shall begin on the Effective Date and shall continue thereafter until the CPUC directs, approves, or makes effective a request by PG&E that this tariff be closed. At the close of the CMET, this Schedule will close to new Applications and no new CMET MOAs will be offered by PG&E. Applications submitted prior to the close will continue to be processed under this Schedule, unless otherwise directed by the CPUC. Any MOA executed under this Schedule will continue in effect pursuant to the terms of the agreement. (T)
(T)
5. INTERCON-
NECTION
STUDIES
1. Each Project Resource is required to be interconnected to PG&E's Distribution System under PG&E's WDT GIP or Electric Rule 21, according to the applicability of each of those tariffs.
 2. Interconnection Study: A CMET Project will require a separate application for Interconnection Study of each of a CMET Project's proposed Project Resources pursuant to PG&E's WDT GIP or Electric Rule 21, as applicable, for each of the Generating Facilities participating as a Project Resource. (T)
(T)
 3. Interconnection Agreement: The Interconnection Study will identify any required Interconnection Facilities, Distribution Upgrades, or Network Upgrades consistent with PG&E's WDT GIP and Electric Rule 21, as applicable. The CMET Project is required to execute an Interconnection Agreement for each Project Resource.
 4. Applicant may continue with the interconnection of resources under PG&E's WDT GIP or Rule 21 independent of a withdrawn CMET Application.

(Continued)

Advice 7042-E
Decision D.23-04-034

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Meredith Allen
Vice President, Regulatory Affairs

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ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 4

**6. MICROGRID
ISLANDING
STUDY**

1. In advance of the completion of the Interconnection Study, PG&E and the CMET Applicant may, at each party's discretion, agree to begin the mandatory Microgrid Islanding Study.
2. Once it has received an agreement with the Applicant to do so, PG&E will conduct a Microgrid Islanding Study, requiring cooperation of the Applicant, to ensure the operational safety and stability of the Community Microgrid during Islanded Operations. This Microgrid Islanding Study will include a description of operations for the CMET Project that includes a logical architecture for the associated protection, controls, communications, cybersecurity, and other system components. One outcome of the Microgrid Islanding Study will be to produce a required Microgrid Special Facilities Agreement, pursuant to Electric Rule 2. Customer owned microgrid controllers and protective relays must be validated by PG&E for the interoperability with PG&E's electric distribution system. PG&E has published a list of equipment for microgrids in PG&E's Community Microgrid Technical Best Practices Guide and has an established process for vendors to seek acceptance of equipment by PG&E.
3. CMET Applicant Review
 - a. CMET Applicant will have up to 30 business days to review the Microgrid Islanding Study and sign the Microgrid Special Facilities Agreement (Microgrid SFA). (T)
 - b. PG&E will grant a one-time 30-business day extension, if needed. If, after review of the Microgrid Special Facilities Agreement, the CMET Applicant declines to proceed with the CMET Project, the CMET Applicant will notify PG&E in writing within 5 business days and the Application will be deemed withdrawn. (N)
(N) (T)

(Continued)

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ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 5

7. **COMMUNITY MICROGRID DEVELOPMENT AND OPERATION** CMET Project development and operation will be governed by the MOA and/or other similar agreement(s) to carry out this tariff. A CMET Project's use of PG&E's Distribution System to form a Community Microgrid requires operational coordination for public safety and overall Distribution System operation.
1. **Roles and Responsibilities.**
 - a. **Distribution Provider.** PG&E as utility distribution owner and operator is responsible for Distribution Service under both Blue Sky and Island Modes including the sole determination of Emergency Events.
 - b. **Distribution Service.** PG&E will provide Distribution Service for the customers and resources within the CMET Project during Blue Sky and Island Modes pursuant to all applicable rules on file with the CPUC.
 - c. **Community Microgrid Aggregator (CMG Aggregator).** The entity that coordinates control of distributed resources, including Project Resources, consistent with relevant provisions of Electric Rule 2, PG&E's WDT GIP, and Electric Rule 21 including frequency and voltage and other power quality requirements within PG&E established control parameters to enable the CMET Project to operate in Island Mode. (T)
(T)
 2. **Microgrid Operating Agreement.** An MOA between the CMG Aggregator and PG&E will govern CMET Project development testing and commercial operations. The MOA will include operational coordination requirements applicable to the unique characteristics of the CMET Project and general requirements consistent with relevant provisions of Electric Rule 2, Electric Rule 21, PG&E's WDT GIP and associated Interconnection Agreements, Microgrid SFA and operating protocols of the Distribution Provider to ensure operational coordination for public safety and overall system operation. The MOA is dependent upon execution of any required Interconnection Agreements and Microgrid Special Facilities Agreements. (T)
(T)

(Continued)

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ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 6

**7. COMMUNITY
MICROGRID
DEVELOP-
MENT AND
OPERATION
(Cont'd.)**

2. Microgrid Operating Agreement. (Cont'd.)

- a. Applicant and PG&E will execute a mutually agreeable MOA within 90 days of execution of the later of any applicable Interconnection or Microgrid Special Facilities Agreements.
- b. If the CMG Aggregator and PG&E fail to execute a MOA within the specific time period, the Application will be considered rejected.

3. System Change. A System Change will require re-study of the changes in a new Microgrid Islanding Study.

4. PG&E reserves the right to suspend CMET Project operation, change the Microgrid Islanding Point, or other Distribution System changes required to meet its service obligations pursuant to all applicable rules on file with the CPUC. For any such unplanned changes that are necessary to maintain safety or reliability, PG&E shall take immediate action with no prior notification necessary to the CMG Aggregator. Within 24 hours, PG&E shall notify the CMG Aggregator of the unplanned change and provide an estimate of how long the changes are expected to persist. If any such unplanned changes are permanent or expected to persist for longer than 3 calendar days, the CMG Aggregator will be given an opportunity to respond or request more information. If any such planned changes are permanent or expected to persist for longer than 3 calendar days, PG&E will notify the CMG Aggregator at least 30 business days in advance and the CMG Aggregator will be given an opportunity to respond or request more information. If any such planned changes are expected to persist for 3 calendar days or fewer, PG&E will notify the CMG Aggregator at least 5 business days in advance with no opportunity for the CMG Aggregator to respond or request more information. In the event the date that PG&E determines there is a need for a planned change precludes the ability of PG&E to honor the timing of these notice provisions, PG&E shall provide notice as soon as practicable.

(N)

(N)

(Continued)

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ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 7

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| 8. CMET SERVICES AND FEES | <p>1. CMET Applicant is responsible for all applicable including NEM or D.02-03-057 as may pertain to individual Project Resources. Such study fees and distribution upgrades may be eligible for credits to offset any applicable costs to Applicant pursuant to MIP.</p> <p>2. CMET Applicant is responsible for the Microgrid Islanding Study fees and subsequent Microgrid Special Facilities costs pursuant to Electric Rule 2. Such study fees and Special Facilities costs may be eligible for credits to offset any applicable costs to Applicant pursuant to the CMEP.</p> | <p>(L)</p> <p>—</p> <p>(L)</p> |
| 9. PG&E TARIFFS, PROGRAMS AND SERVICE AGREEMENTS | <p>1. PG&E Tariffs During Island and Blue Sky Modes. Billing for PG&E Customers will continue to occur under their applicable PG&E tariff provisions and rules.</p> <p>2. Participation in Programs. Project Resources are eligible to provide distribution services and/or participate in demand side management programs during Blue Sky Mode consistent with applicable tariffs, programs or procurements. However, participation in programs shall not impede the ability to enable Island Mode, as determined by the Distribution provider, at any time during which this tariff applies to the CMET Project or the CMET MOA for the CMET Project is in effect.</p> <p>3. Services Agreements. An existing power purchase agreement or other contract for energy, capacity or distribution services to PG&E, or any other counterparty, is prohibited for a CMET Project, if such power purchase agreement or other contract impedes the ability to enable Island Mode, as determined by Distribution Provider, at any time during which this tariff applies to the CMET Project or the CMET MOA for the CMET Project is in effect.</p> | <p>(T)</p> <p>(T)</p> <p>(T)</p> |
| 10. CAISO MARKET PARTICIPATION | <p>1. Participation in CAISO Market: Subject to Paragraph 3 of Section 9, Project Resources may be eligible to, but are not required to, participate in the CAISO markets consistent with applicable tariffs and the governing Interconnection Agreement for each Generating Facility during Blue Sky Mode. During Island Mode, the settlement of energy transactions associated with the Project Resources will continue to occur according to applicable CAISO tariff provisions and rules, as further described in the CMET MOA.</p> | |

(Continued)



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 8

11. METERING CMET Project metering requirements are defined in the applicable PG&E Electric Rules including, but not limited to, 2, 15, 16, 17, 18, 21, and PG&E's WDT GIP, and for resources participating in the CAISO's wholesale markets, the applicable CAISO metering rules. (L/T)
(L/T)
12. TERMINATION
1. Applicant Termination:
- a. Applicant may terminate the application process, including Microgrid Islanding Study, for any reason with 30 business days written notice. Applicant will be responsible for any PG&E costs incurred through termination date. (T)
- b. CMET Project development or operation may be terminated pursuant to the terms of the MOA.
2. PG&E Termination: PG&E may terminate a CMET Project pursuant to the terms of the MOA, or as otherwise provided under this Schedule.
13. CMET SPECIAL CONDITIONS
- The following Special Conditions apply to PG&E's CMET:
1. CMET Suspension: Because this is an experimental tariff, PG&E may file a Tier 2 Advice Letter (AL) with the CPUC to suspend service under this Schedule. The AL will be served on the applicable CPUC service list and will be served on CMG Aggregators, CMET Applicants and any CMET Customers. The AL shall identify the portion of the CMET suspended, the reasons for the suspension, and PG&E's proposal for resolving the issue.

(Continued)



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 9

14. CMET DEFINITIONS Capitalized terms in this Schedule have the meaning as defined in this Section.

1. Blue Sky Mode. The normal mode of operation when the Community Microgrid is Interconnected to and operating in parallel with the Distribution System, is not operating in Island Mode, and PG&E maintains operational coordination of the delivery of electric service.
2. CMET Applicant. The person or entity who submits an Application for a CMET Project to PG&E to apply to participate on this Schedule.
3. CMET Customer. A customer receiving PG&E Distribution Service within the CMET Project Microgrid Boundary.
4. CMET Project. Tangible and non-tangible assets, facilities and equipment needed to create and operate a Community Microgrid, including the CMET Project Resources, Microgrid Special Facilities, CMET Project Balance of System, contract rights, easements, rights of way, licenses and other interests or rights in real estate reasonably necessary for the construction, operation, and maintenance of the Community Microgrid subject to this CMET. (T)
(T)
(T)
5. Community Microgrid. For the purposes of this Schedule, a Community Microgrid is defined as a microgrid with distribution system connected Project Resources that supply energy to at least two customers or two customer premises connected by PG&E's distribution infrastructure within a Microgrid Boundary capable of Island Mode.
6. Community Microgrid Aggregator (CMG Aggregator). As defined in Section 7.1.c, above. (T)
(T)

(Continued)

Advice 7042-E
Decision D.23-04-034

Issued by
Meredith Allen
Vice President, Regulatory Affairs

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Resolution	E-5127



Oakland, California

Cal. P.U.C. Sheet No. 56670-E
Cal. P.U.C. Sheet No. 54462-E

Sheet 10

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|--------------------------------|---|-------------------------------|
| 14. CMET DEFINITIONS (Cont'd.) | 7. Community Microgrid Balance of System. All of the CMET Project tangible and non-tangible assets, facilities, and equipment owned or controlled by the CMG Aggregator, other than the CMET Project Resources, necessary to meet the requirements of the CMET Project as identified in the Microgrid Islanding Study. | (N)

(N) |
| | 8. Community Microgrid Enablement Program (CMEP). PG&E program to enable community-proposed microgrids that provide enhanced resilience for critical facilities and vulnerable customer groups pursuant to D.20-06-017. | (T)

(D)
(D) |
| | 9. Distribution Customer. An end-use customer taking Distribution Service from PG&E. | (N)
(N) |
| | 10. Distribution Provider. PG&E, which owns, controls, and operates facilities used to provide Distribution Service to the customers within the Microgrid Boundary under this CMET. | (T)

(T) |
| | 11. Distribution Service. The transporting of electric power over and through various PG&E facilities owned by the Distribution Provider for delivery to a Distribution Customer. The Distribution Service provided under this CMET is the distribution of capacity and energy from the point(s) of receipt to the point(s) of delivery to a Distribution Customer under this CMET. | (T)

(T)

(T) |
| | 12. Distribution System. PG&E's distribution system broadly consists of the stepdown substations, the primary distribution circuits, and the secondary distribution system. The secondary distribution system consists of the line transformers that step the primary voltage down to a secondary voltage, and the secondary conductors including service drops and meters. The provisions of this CMET apply to service on this Distribution System. | (T)

(T)
(T) |
| | 13. Effective Date. The date upon which any CPUC disposition of the CMEP Advice Letter makes that Advice Letter effective. | (T) |

(Continued)



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 11

- | | | |
|--------------------------------------|--|--------------------------------------|
| 14. CMET
DEFINITIONS
(Cont'd.) | 14. Emergency Events. As determined by PG&E in its reasonable discretion, a condition or situation requiring prompt action by PG&E (a) to maintain the reliable operation of the Distribution System; (b) to prevent or limit the loss of load or generation; (c) to maintain public safety or the safety of PG&E's personnel; (d) to protect PG&E, Customer, or third-party property; or as a Scheduled Island Mode Operation as a preventative action ahead of impending weather events or natural disasters or in response to other unusual conditions. | (T) |
| | 15. Generating Facility. All generators, electrical wires, equipment, and other facilities, excluding Interconnection Facilities, owned or provided by producer for the purpose of producing electric power, including storage. | (T) |
| | 16. Grid-Forming Project Resource(s). A Project Resource that, among other features, has the ability to (i) black start the CMET Project when in Island Mode and deenergized, and (ii) provide voltage and frequency stability and control within a range acceptable to PG&E during Island Mode operation. | (N)
—
(N) |
| | 17. Interconnection Agreement. The agreement and associated documents or any successor agreement and associated documentation governing the terms and conditions of the interconnection of the Project Resource(s) with PG&E's grid, including any description of the plan for interconnecting the Project Resource(s) to the grid. | (D)
(D)
(T)
(N)
—
(N) |
| | 18. Interconnection Study. A study to establish the requirements for Interconnection of a Generating Facility with Distribution Provider's Distribution System or Transmission System, pursuant to PG&E's WDT GIP or Rule 21, as applicable. | (T) |
| | 19. Island Mode. Operation of the Microgrid by the Distribution Provider when a Microgrid that normally operates in Blue Sky Mode (parallel mode) is disconnected from the Distribution System at the Microgrid Islanding Point. The Distribution Provider will operate the Microgrid in Island Mode by (i) direct dispatch of Project Resources within the Microgrid Boundary, and/or (ii) by authorizing Project Resources to operate within parameters specified by the Distribution Provider for voltage, frequency, and power quality. | (T)
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(T) |

(Continued)



Oakland, California

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Cal. P.U.C. Sheet No. 54464-E

Sheet 12

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| 14. CMET DEFINITIONS (Cont'd.) | | |
| 20. Microgrid. An interconnected system of loads and energy resources, including, but not limited to, distributed energy resources, energy storage, demand response tools, or other management, forecasting, and analytical tools, appropriately sized to meet customer needs, within a clearly defined Microgrid Boundary that can act as a single, controllable entity, and can connect to, disconnect from, or run in parallel (Blue Sky Mode) with, larger portions of the electrical grid, or can be managed and isolated to withstand larger disturbances and maintain electrical supply to connected critical infrastructure. | (T) | |
| 21. Microgrid Boundary. An electrically contiguous area beyond a Microgrid Islanding Point on the Distribution System that defines a microgrid as a single controllable entity. | (T) | |
| 22. Microgrid Islanding Point(s) (MIP). The point(s) (e.g., line recloser) on PG&E's Distribution System that allows the microgrid to separate from and reconnect to the rest of the Distribution System. | (T) | |
| 23. Microgrid Islanding Study. An engineering study conducted by the Distribution Provider or its agents of the microgrid operation in an Island Mode and operating mode transitions. The study shall determine the required modifications to the Distribution Provider's distribution facilities and associated cost required to support Island Mode operation and microgrid transitions while maintaining voltage, frequency and power quality within PG&E control parameters in accordance with Rule 2. | (T) | |
| 24. Microgrid Operating Agreement. As defined in Section 7.2. | (T) | |

(Continued)

<i>Submitted</i>	October 11, 2023
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<i>Resolution</i>	E-5127



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 13

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| 14. CMET
DEFINITIONS
(Cont'd.) | 25. Microgrid Pre-Application Study. An optional preliminary study of a proposed Community Microgrid and consultation for the purpose of enabling an Applicant to develop an effective CMET Application. | (T) |
| | 26. Microgrid Special Facilities. Modifications to the Distribution Provider's distribution facilities required to operationalize the Microgrid Boundary and Island Mode such that the Microgrid is capable of maintaining voltage, frequency and power quality within the Distribution Provider's control parameters in accordance with Rule 2. This shall include all CMET Project tangible and non-tangible assets, facilities, and equipment owned or controlled by PG&E that are necessary to meet the requirements of the CMET Project as identified in the Microgrid Islanding Study. | (T)
(N)
—
(N) |
| | 27. Microgrid Special Facilities Agreement (Microgrid SFA). The agreement that describes the upgrades on the Distribution System, and at the project site to be installed under the terms and conditions regarding Special Facilities (or added facilities) on file with the Commission, pursuant to Electric Rule 2, and incorporated in the MOA. | (T)

(D)

(D) |
| | 28. Non-Project Resource(s). Electric generation, storage technology, and/or demand management technology within the Microgrid Boundary that are not Project Resources. | (N)

(N)

(D)
(D)

(L)
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(L) |

(Continued)



ELECTRIC SCHEDULE E-CMET
COMMUNITY MICROGRID ENABLEMENT TARIFF

Sheet 14

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| 14. CMET
DEFINITIONS
(Cont'd.) | <p>29. Project Resource(s). Electric generation, storage technology, and/or load management technology that the CMG Aggregator has control over consistent with relevant provisions in this Agreement to enable the CMET Project to safely and reliably operate in Island Mode. The CMG Aggregator must have at least one Grid-Forming Project Resource that has a resource controller and has grid-forming capability sufficient to allow acceptable frequency and voltage during Island Mode operation. Project Resources must comply with the emissions standards adopted by the State Air Resources Board pursuant to the distributed generation certification program requirements of Section 94203 of Title 17 of the California Code of Regulations, or any successor regulation, and must be interconnected to the Distribution System within the Microgrid Boundary (either directly as front-of-the-meter Project Resources or indirectly as behind-the-meter Project Resources) pursuant to the Wholesale Distribution Tariff or Electric Rule 21.</p> <p>30. Scheduled Island Mode Operation. A Microgrid operating in Island Mode that is scheduled and coordinated between the CMG Aggregator and PG&E.</p> <p>31. Special Facilities. Shall have the same meaning as defined in PG&E's Electric Rule 2, as may be modified from time to time.</p> <p>32. System Change. Any change in Project Resources, Non-Project Resources, or customer loads within the Microgrid Boundary, or other affected systems outside the Microgrid Boundary that has a material impact on the ability of a CMET Project to function in Island Mode.</p> | <p>(T)/(L)</p> <p>-----</p> <p>(T)/(L)</p> <p>(L)</p> <p> </p> <p>(L)</p> <p>(D)</p> <p> </p> <p>(D)</p> <p>(T)</p> <p>(D)</p> <p> </p> <p>(D)</p> <p>(T)</p> <p>(D)</p> <p> </p> <p>(D)</p> |
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