

From: [Smith, Martin](#)
To: [O'Connor, Kevin](#)
Cc: [Collette, Nicole](#); [Virani, Nadim \(ET\)](#); [Downtown West Project](#)
Subject: RE: San Jose Downtown West Interconnection Application
Date: Monday, August 24, 2020 1:50:35 PM

Hello Kevin,

Thanks for reaching out regarding the City of San Jose's inquiry of June 29th, specifically the question as to why PG&E standards do not allow any new interconnections to tap PG&E transmission lines.

Because Transmission Owners such as PG&E are responsible for the design, operation, safety and reliability of their systems, they are authorized to establish interconnection standards that are appropriate for their circumstances and do not require CAISO or FERC approval of those standards. For reliability reasons, PG&E implemented its "no tapping rule" in 2016, and incorporated the change into its publicly-available Transmission Interconnection Handbook (TIH), which provides guidance and mandatory requirements for all transmission-level PG&E interconnections. By that time, PG&E had received numerous interconnection requests, via taps, resulting in the segmentation of PG&E transmission lines to the point of compromising PG&E's ability to protect its facilities and operate them reliably. While there are some legacy transmission services that PG&E serves with a "tap" approach, these types of interconnections have not been available since 2016.

Please be aware that PG&E has received a previous large load application for interconnection at the same location. In accordance with our tariffs, PG&E will process the City's application assuming the prior applicant's loads are already on the system. This will likely result in transmission system overloads that must be addressed prior to the City's interconnection. PG&E would like to discuss the City's load projections to better understand the forecasts and prevent double counting or over estimating.

PG&E is open to discussing alternative interconnection approaches, such as adding switching stations to the existing 115kV lines to interconnect the requested load, connecting directly to a PG&E substation bus by a replacement and upgrade to the SJ Station A 115kV bus, or any other feasible solutions that comply with PG&E's TIH.

For your reference, a hyperlink to the NERC's Facility Connection Requirements Standard is provided here: <https://www.nerc.com/pa/Stand/Reliability%20Standards/FAC-001-3.pdf>

If you would like to schedule a conference call to discuss further, please feel free to reach out to Nicole or myself with dates that would work for you.

Best Regards,

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From: Collette, Nicole <NACa@pge.com>

Sent: Monday, August 17, 2020 1:19 PM

To: O'Connor, Kevin <Kevin.Oconnor@sanjoseca.gov>; Smith, Martin <MES3@pge.com>

Cc: Virani, Nadim (ET) <nxyg@pge.com>; Downtown West Project <downtownwest@esassoc.com>

Subject: RE: San Jose Downtown West Interconnection Application

Hi Kevin,

Apologies for the delayed email. We should be sending out an email to you shortly related to your June 29 responses.

And yes, let me know when you hear back on the confidentiality waiver. Once received we can schedule a meeting with all parties.

Thanks!

Nicole Collette

Expert Program Manager

State Infrastructure Projects

Pacific Gas & Electric Company

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From: O'Connor, Kevin <Kevin.Oconnor@sanjoseca.gov>

Sent: Wednesday, August 12, 2020 9:34 AM

To: Smith, Martin <MES3@pge.com>; Collette, Nicole <NACa@pge.com>

Cc: Virani, Nadim (ET) <nxyg@pge.com>; Downtown West Project <downtownwest@esassoc.com>

Subject: San Jose Downtown West Interconnection Application

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Hello Nicole and Martin,

It's been a while since we've touched base on the City's interconnection application for the Downtown West Development Project.

I'm wondering if there are any follow-up questions or related information you can provide related to the City's June 29 responses to the additional questions and comments you had about our interconnection application. If so, please feel free to reach out to me at any time. Email is best.

Also, I want you to know that I did not forget about the request to provide a confidentiality of information waiver so we can share and discuss the interconnection application among PG&E, Google and the City. The City's attorney's office is working on it and I'm hoping to have something back to you soon. I apologize for the delay and appreciate your patience. As you can expect, they are very busy with so many other things occurring right now.

I look forward to talking with you soon. Best regards.

Kevin O'Connor
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