

**From:** [Doug Boccignone](#)  
**To:** [O'Connor, Kevin](#)  
**Cc:** [Barry Flynn](#)  
**Subject:** Re: interconnection application  
**Date:** Monday, April 27, 2020 1:59:59 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

[External Email]

Kevin,

We are in the process of pulling together the information required for the interconnection application, plus the additional information that we anticipate PG&E will likely request after they review the application. Our thinking is that we should provide only the basic information required by Items 1 through 4 from TO Tariff Section 10.3 (see below). The information for Item 5 re: on-site solar and storage, as well the additional information we identified as follow up information likely to be requested by PG&E is important, so we want to be ready to respond quickly. We think it is important to discuss these items as well as the basic information with Google. But we don't think the information beyond the basic information should be included in the initial application.

Our plan is to:

Identify the City Contact (you or Lori?)

Identify the POI(s) on the Station B – Station A and El Patio – Station A lines points (pending construction of the vaults for the underground connections).

Identify the expected load for 2026 of 25.2 MW and for 2035 of 47.9 MW.

Specify an Interconnection date of January 2025 (but no term).

We think it would be good to have an internal call on Wednesday to discuss key items for discussion with Google (e.g., solar, storage assumptions, high level substation plan, etc.) We are available for an internal call Wednesday before 9:00 or 9:30-10:30

Doug

## Completed Application

Applications for interconnection service must be in writing and include the informational items identified in Section 10.3 of the TO Tariff. These can be summarized as follows:

1. Contact Information
2. Point of Interconnection (POI)
3. Maximum load to be connected
4. Interconnection date and term
5. Source of power (optional)
6. Whatever else PG&E may request

This last category gives PG&E significant latitude to request additional information, which can delay the process. In Flynn RCI's experience, it is common for PG&E to request:

- a) A load forecast by year, and potentially broken down further if the load varies substantially over the year. This breakdown may be either seasonal (summer/winter peak demand) or monthly.
  - a. The load power factor should also be indicated. If the load power factor does not meet the CAISO minimum requirement of 0.97 lag and 0.99 lead, additional information may be requested on facilities to be installed to meet this requirement.<sup>21</sup>
- b) An electric single line diagram of the proposed interconnection.
- c) A high-level site plan of the applicant's substation. This is to identify the substation location and the length of the transmission line connecting to the substation.
- d) Information on any Behind the Meter (BTM) generation.
  - a. For small generators (less than 0.5 MW), this may be simply the capacity and expected operational pattern. PG&E typically processes such requests quickly, though both an application and a Generation Interconnection Agreement may be required. For larger

---

<sup>20</sup> For PG&E retail transmission interconnections, applications are made to PG&E under its E-19 and E-20 retail tariffs. While technical requirements are similar, the application process is through PG&E's customer portal under CPUC jurisdiction. Wholesale distribution connections are made pursuant to PG&E's Wholesale Distribution Tariff (WDT).

<sup>21</sup> CAISO Tariff Section 8.2.3.3

generators, detailed modeling information similar to a generation interconnection application may be requested. Caution – such generator models can be complex and require significant effort and time to prepare.

- b. The TO Tariff is not explicit on the study process for such internal generation or storage. If internal generation or storage is anticipated at levels that do not exceed the local load, no net export to PG&E, the interconnection process would likely include steps from PG&E's Electric Rule 21 (Generating Facility Interconnections),<sup>22</sup> though this interconnection would not be a CPUC jurisdictional service. Under this rule, if the generator passes a number of screens and PG&E and CAISO agree that the generation is not likely to trigger transmission upgrades nor impact other queued projects (Section G.3.a-Screen Q), it may proceed independently of the generation interconnection cluster process. The Electric Rule 21 Independent Study process has similar steps as the TO Tariff study.

The interconnection application is sent to the PG&E contact identified in the TO Tariff Appendix VII as follows:

Pacific Gas and Electric Company  
Electric Transmission Rates Mail Code B13L  
P.O. Box 770000  
San Francisco, California 94177

Attention: Manager, Electric Transmission Rates

The TO Tariff identifies a response time of ten (10) Business Days of receipt of the application.

Principal  
Flynn Resource Consultants Inc.  
5440 Edgeview Drive  
Discovery Bay, CA 94505  
888-634-7509 (phone and fax)  
[dougbocc@flynnrci.com](mailto:dougbocc@flynnrci.com)

This electronic message contains information from Flynn Resource Consultants Inc., which is confidential or privileged. The information is intended to be sent to the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying or distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by email at [Security@FlynnRCI.com](mailto:Security@FlynnRCI.com).

---

**From:** "O'Connor, Kevin" <Kevin.Oconnor@sanjoseca.gov>  
**Date:** Monday, April 27, 2020 at 12:02 PM  
**To:** Barry Flynn <brflynn@flynnrci.com>, Doug Boccignone <dougbocc@flynnrci.com>  
**Subject:** interconnection application

Hello Barry and Doug,

I'm checking in to confirm that you have the information needed from Google and are making progress on the interconnection application.

I think our best outcome would be for us to present and run through a draft application for review during our Energy Working Group meeting on Wednesday afternoon and submitting a final application to PG&E later this week.

Is there anything needed from me or Google to accomplish this?

Should we plan a check-in on Wednesday morning to discuss status, address any questions or needed decisions, and review the information to be shared with Google?

Kevin O'Connor  
Energy Resilience Coordinator  
City of San Jose Community Energy Department  
Email: [kevin.oconnor@sanjoseca.gov](mailto:kevin.oconnor@sanjoseca.gov)  
Ph: (408) 535-8538

This message is from outside the City email system. Do not open links or attachments from untrusted sources.



### Completed Application

Applications for interconnection service must be in writing and include the informational items identified in Section 10.3 of the TO Tariff. These can be summarized as follows:

1. Contact Information
2. Point of Interconnection (POI)
3. Maximum load to be connected
4. Interconnection date and term
5. Source of power (optional)
6. Whatever else PG&E may request

This last category gives PG&E significant latitude to request additional information, which can delay the process. In Flynn RCI's experience, it is common for PG&E to request:

- a) A load forecast by year, and potentially broken down further if the load varies substantially over the year. This breakdown may be either seasonal (summer/winter peak demand) or monthly.
  - a. The load power factor should also be indicated. If the load power factor does not meet the CAISO minimum requirement of 0.97 lag and 0.99 lead, additional information may be requested on facilities to be installed to meet this requirement.<sup>21</sup>
- b) An electric single line diagram of the proposed interconnection.
- c) A high-level site plan of the applicant's substation. This is to identify the substation location and the length of the transmission line connecting to the substation.
- d) Information on any Behind the Meter (BTM) generation.
  - a. For small generators (less than 0.5 MW), this may be simply the capacity and expected operational pattern. PG&E typically processes such requests quickly, though both an application and a Generation Interconnection Agreement may be required. For larger

---

<sup>20</sup> For PG&E retail transmission interconnections, applications are made to PG&E under its E-19 and E-20 retail tariffs. While technical requirements are similar, the application process is through PG&E's customer portal under CPUC jurisdiction. Wholesale distribution connections are made pursuant to PG&E's Wholesale Distribution Tariff (WDT).

<sup>21</sup> CAISO Tariff Section 8.2.3.3

generators, detailed modeling information similar to a generation interconnection application may be requested. Caution – such generator models can be complex and require significant effort and time to prepare.

- b. The TO Tariff is not explicit on the study process for such internal generation or storage. If internal generation or storage is anticipated at levels that do not exceed the local load, no net export to PG&E, the interconnection process would likely include steps from PG&E's Electric Rule 21 (Generating Facility Interconnections),<sup>22</sup> though this interconnection would not be a CPUC jurisdictional service. Under this rule, if the generator passes a number of screens and PG&E and CAISO agree that the generation is not likely to trigger transmission upgrades nor impact other queued projects (Section G.3.a-Screen Q), it may proceed independently of the generation interconnection cluster process. The Electric Rule 21 Independent Study process has similar steps as the TO Tariff study.

The interconnection application is sent to the PG&E contact identified in the TO Tariff Appendix VII as follows:

Pacific Gas and Electric Company  
Electric Transmission Rates Mail Code B13L  
P.O. Box 770000  
San Francisco, California 94177

Attention: Manager, Electric Transmission Rates

The TO Tariff identifies a response time of ten (10) Business Days of receipt of the application.