



March 8, 2022

Ms. Angela Calvillo  
 Clerk of the Board of Supervisors  
 City Hall, Room 244  
 1 Dr. Carlton B. Goodlett Place  
 San Francisco, CA 94102-4689

**RE: San Francisco Public Utilities Commission’s Quarterly Report to the Board of Supervisors on the Status of Applications to PG&E for Electric Service**

Dear Ms. Calvillo:

The attached quarterly report has been prepared for the Board of Supervisors (Board) in accordance with Resolution No. 227-18, approved by the Board on July 10, 2018 (File No. 180693), adopted on July 20, 2018 and re-affirmed on April 6, 2021. Pursuant to Resolution No. 227-18, the San Francisco Public Utilities Commission (SFPUC) is required to “provide the Board a quarterly report for the next two years that identifies the following: status of all City projects with applications to SFPUC for electric service, including project schedules and financing and other deadlines; project sponsor and SFPUC concerns in securing temporary and permanent power, including obstacles that could increase costs or delay service to City customers; and the status of disputes with PG&E before the Federal Energy Regulatory Commission (FERC) or in other forums.”

**BACKGROUND:**

The SFPUC provides retail electric service from our Hetch Hetchy Power public utility (Hetchy) to over 4,000 accounts, relying on our Hetch Hetchy generation and other sources for supply. The City pays PG&E to provide transmission and distribution services regulated by FERC. The terms and conditions of the purchased distribution services are described in PG&E’s Wholesale Distribution Tariff (WDT).

In September 2020, PG&E filed an update to the WDT (WDT3) seeking to significantly increase wholesale distribution rates and amend the terms and conditions of service. San Francisco, California Public Utilities Commission, and other customers and agencies have intervened in the FERC proceeding to challenge many of PG&E’s proposed amendments to the WDT. Despite these challenges, under FERC rules WDT3 is now in effect. If FERC rejects any of

**OUR MISSION:** To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

**London N. Breed**  
 Mayor

**Anson Moran**  
 President

**Newsha Ajami**  
 Vice President

**Sophie Maxwell**  
 Commissioner

**Tim Paulson**  
 Commissioner

**Dennis J. Herrera**  
 General Manager



PG&E's proposed revisions, it can order PG&E to provide refunds to the City and its other wholesale customers.

Prior to this filing, San Francisco was paying PG&E \$10 million per year for distribution service. Under an interim agreement with PG&E and its wholesale customers that was approved by FERC in the WDT3 proceeding, San Francisco is now paying nearly double that amount.

The amendments PG&E has proposed in its WDT3 filing are concerning to the City due to the following anti-competitive requirements and restrictions:

- **Elimination of unmetered load** – all unmetered load served by Hetchy, such as streetlights, traffic signals, and bus shelters, would have to install primary equipment or accept PG&E retail service by July 2022 to continue to receive electric service and function.
- **Elimination of any interconnections to PG&E's "downtown network"** – prohibits any new load or upgrades to existing load in SF's downtown area (includes all of Market St. from Embarcadero through Civic Center).
- **Elimination of all new secondary interconnections** – prohibits the connection of any loads at secondary despite the size. This would also prohibit the City from providing secondary service to any existing customers with secondary interconnections if their facilities are being modified for reasons such as building renovations or decarbonization (increased electrification) of existing buildings.
- **Major Increase in Distribution Rates** – the City must now pay double in distribution costs and may face further increases under PG&E's newly filed rates. There are also major concerns about how PG&E's proposed rate design inequitably over-allocates costs to wholesale customers.

For some months now, and as required by FERC, the City and PG&E's other wholesale customers have been discussing settlement of their disputes over PG&E's revisions to the WDT. The settlement discussions are supervised by a FERC Administrative Law Judge (ALJ). The settlement discussions will continue until the ALJ finds that the parties have reached an impasse on one or more issues; at which time, FERC will set the matter for hearing on those issues that cannot be settled.

#### **HEARING AT LAND USE & TRANSPORTATION COMMITTEE:**

On January 31, 2022, Supervisor Ronen called for a hearing on PG&E's obstruction of City projects at the San Francisco Board of Supervisors Land Use and Transportation Committee. The SFPUC and other City departments presented on the impacts of PG&E's efforts to impede City priorities by

imposing unreasonable and costly requirements on City interconnections under the WDT. The SFPUC sent a letter (attached as Attachment D) to the Board on February 23, 2022 addressing remarks made by PG&E's representative, Aaron Johnson, PG&E's Bay Area Regional Vice President, at the hearing that may have mislead the listeners.

**VALUATION PETITION:**

On July 27, 2021, the City submitted a petition to the California Public Utilities Commission (CPUC), requesting a formal determination of the value of PG&E's electric assets in San Francisco. This petition serves as the initial step in what will likely be a lengthy process to acquire PG&E's local electric infrastructure to complete the City's transition to full public power. Owning the grid would allow San Francisco to deliver clean, reliable and affordable electricity throughout the City. The City would have control over climate goals and equity in electric service and workforce development, while providing transparency and public accountability in rates, service and safety.

On September 14, 2021, PG&E filed a motion asking the CPUC to exercise its discretion to decline to hear the petition, which the City had vigorously opposed. On December 14, 2021, the CPUC held a prehearing conference ordering PG&E to appear before the Commission to show cause why the Commission should not proceed to hear the City's petition. At the hearing, PG&E and the City both addressed issues around the scope of the proceeding, schedule and other related matters. In terms of expected next steps, the CPUC will rule on PG&E's motion to dismiss and issue a memo which will determine the scope and schedule for the valuation.

**STATUS OF DISPUTES WITH PG&E BEFORE FERC:**

As we previously informed you, on November 21, 2019, FERC issued an order in the City's 2014 complaint and related cases rejecting the City's claim that all of its load is eligible for service under the Federal Power Act without adding new facilities because the City had been serving the same customers for decades. On December 20, 2019, the City filed a request for rehearing of FERC's order. On June 4, 2020, FERC issued an order on rehearing that, for the most part, affirmed its prior order. The City then filed petitions to review these FERC orders with the Court of Appeals for the District of Columbia Circuit.

On April 16, 2020, FERC issued an order dismissing the City's second complaint against PG&E in which the City claimed that PG&E violated its WDT by demanding primary service for small loads. FERC found that PG&E has the discretion to grant or deny a request for secondary service based on the

specifics of each particular request. On May 18, 2020, the City filed a request for rehearing of FERC's order. On September 17, 2020, FERC issued an order on rehearing sustaining its dismissal of the complaint. The City filed petitions to review these FERC orders with the Court of Appeals for the District of Columbia Circuit.

On January 25, 2022, the D.C. Circuit issued a single opinion that granted San Francisco's petitions for review the FERC orders discussed above. The court vacated the FERC rulings and remanded the cases for further proceedings, finding that FERC's decisions "present a troubling pattern of inattentiveness to potential anti-competitive effects of PG&E's administration of its open-access Tariff."

The court's decision, however, will have no immediate impact on the City's electric operations or service to customers. FERC will eventually specify the procedures it will follow on remand, but there is no deadline for FERC to act on remand. As further discussed below, during the years that passed since FERC's rulings PG&E relied on those earlier rulings to file Tariff changes that reflect those rulings and impose even more obstacles to San Francisco receiving fair service. Those changes are in effect now while FERC reviews them.

In January 2020, the City and PG&E participated in an evidentiary hearing before a FERC ALJ in a dispute over service to an SFMTA substation at 6 Berry Street. The issues in that proceeding are: (i) whether PG&E is wrongfully charging the City for upgrades to its system; and (ii) whether PG&E's cost estimates lack sufficient detail. On July 2, 2020, the ALJ issued an initial decision in which the ALJ found for PG&E on the issue concerning the cost of upgrades and for the City on the issue concerning the cost estimates.

On January 28, 2022, FERC issued a decision that largely affirmed the ALJ's initial decision. The City is reviewing the decision to determine whether to file a request for rehearing with FERC. The City would need to make this filing with FERC if the City intends to seek court review of the decision.

As noted earlier, under WDT3 PG&E will no longer offer secondary service to the City and other wholesale customers. PG&E has stopped taking applications for secondary service. In addition, as discussed below, as of July 2022 PG&E will no longer provide wholesale service to the City's unmetered loads, which consist primarily of streetlights, traffic signal lights, and similar small, predictable municipal loads that are billed based on agreed-upon, FERC-approved usage formulas rather than metered usage.

Since our last report, PG&E has taken a number of steps to implement its plan to require the City to take retail service for its unmetered load unless the City spends in excess of \$1 billion for equipment that is unnecessary for safety or reliability and performs City-wide disruptive construction of primary voltage connections.

On September 30, 2021, PG&E filed an Advice Letter with the California Public Utilities Commission (“CPUC”) advising the CPUC that it would convert the City’s unmetered streetlights to retail service and requiring the City to meter its other unmetered loads (largely traffic signal lights). The City protested the Advice Letter and, as a result, the CPUC suspended the effective date of the Advice Letter until February 28, 2022.

On December 13, 2021, PG&E filed two notices with FERC to discontinue service to the City’s unmetered load. The first notice would terminate that service effective January 31, 2022. The second notice would allow PG&E to continue to provide service to the City’s non-streetlight unmetered load and decorative streetlights until such time as PG&E obtains approval from the CPUC of its proposed tariff modifications to accommodate service to the City’s non-streetlight unmetered delivery points and decorative streetlights. The City protested both of these filings and, as a result, FERC issued an order suspending the effective date of filings until July 11 and 12, 2022 respectively. In that order, FERC found that PG&E had not shown the proposed filings “to be just and reasonable and may be unjust, unreasonable, unduly discriminatory or preferential, or otherwise unlawful.” FERC ordered the parties to enter into settlement discussions. If those discussions are unsuccessful, FERC would set the matters for hearings.

The City has taken additional steps to prevent PG&E from terminating this service, despite the changes to the WDT in WDT3. Under the Federal Power Act and FERC rules, FERC has the authority to issue such orders to PG&E where the request for service meets the requirements of federal law and is in the public interest. In this regard, on August 20, 2021, the City filed an application with FERC for an order requiring PG&E to provide, starting January 1, 2022: (i) wholesale distribution service to the unmetered loads that currently receive service under the WDT; and (2) wholesale distribution service and interconnections for future unmetered load that would satisfy the criteria for unmetered service. The City is considering filing similar applications for other services PG&E has denied.

**REPORT SUMMARY:**

As the City continues its efforts in fighting for fair access to the grid and decreasing dependence on PG&E, important City projects are still being delayed by PG&E's obstruction. PG&E continues to impose unnecessary requirements on projects resulting in delays and additional costs.

Since October 2018, the City has reported on 116 projects that have experienced obstruction by PG&E. The total cost impact (additional project costs and loss of revenue to the City) of PG&E's obstructions since October 2018 has been over \$20M.

For the reporting period of Oct 2021 through Jan 2022, the SFPUC has identified 57 projects that have experienced interconnection delays, arbitrary requests for additional and/or unnecessary information, or increased project costs, as listed in **Attachment A1**. Since the last quarterly report, 4 projects have been added and 6 projects have been energized. Updates and changes to projects since the previous quarterly report are detailed in Column P of Attachment A1.

With the implementation of PG&E's new WDT, many projects can no longer receive service from the SFPUC and must apply to PG&E for retail service where they are charged higher rates. These 11 projects are listed in **Attachment A2**.

**Attachment B** contains a map providing the location of each project.

**Attachment C** contains a detailed report of each category of additional incurred costs and impacts to the City per project, such as redesign costs, construction and equipment costs, and additional staff time (also included in the 'Impacts' column of Attachment A). The total cost impacts to the City for these projects is more than \$10 million. Total costs do not include estimated costs for projects that are at a standstill as those costs are still to be determined.

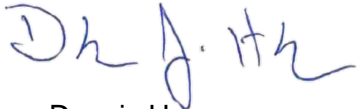
Please find attached copies of the following documents related to this report:

- **Attachment A1:** List of projects with active interconnection applications to PG&E for electric service as of February 2022
- **Attachment A2:** List of projects that were released to receive PG&E retail service as of February 2022
- **Attachment B:** Map of projects with PG&E power connection delays as of February 2022

- **Attachment C:** Cost impacts
- **Attachment D:** January 31, 2022 Hearing Follow-up Letter

Should you have any questions, please contact Barbara Hale, SFPUC Assistant General Manager for Power, at [BHale@sfgwater.org](mailto:BHale@sfgwater.org) and 415-613-6341.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dennis Herrera". The signature is fluid and cursive, with the first name "Dennis" and last name "Herrera" clearly distinguishable.

Dennis Herrera  
General Manager

**Attachment A1: List of Interconnection Issues**

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	PG&E NN#	Project Location	District #	Client Organization	Project Description (what SF applied for)		Project Status	Initial Application Submittal Date	App Deemed Complete Date	Initial Service Need Date	Did PG&E require Primary?	Load Size/Can Be Served at Secondary	PG&E committed to work w/ SF to energize in 2018	Impacts	Updates/Changes since Last Report (Sept. 2021)
1	120533309	600 Arguello Blvd. - Rossi Pool	1	SFRPD	Request for shutdown (for meter replacement)	Delays caused by PG&E providing the Service Agreement late.	Energized	12/11/2020	2/12/2021	4/4/2021	N/A	N/A		Overhead/delays costs TBD. Pool will also not be available for public use until work is done.	Project energized in Aug. 2021. Will be removed off of next quarter's report.
2	N/A	Overlook Dr. - Recycled Water Pump	1	SFPUC	New secondary service	Delays caused by PG&E not refusing to complete project.	Project is at a standstill.	IN FLIGHT (Prior to July 2015)	N/A	N/A	No	186 kW/Yes		If this project is not completed as is, the project will be forced to re-apply and install primary switchgear (an additional \$500k) and incur additional costs and delays as a lot of construction work has already been completed.	Project added.
3	112434942	3455 Van Ness Avenue - AWSS Pump Station No. 2	2	SFPUC - Water	Remove two existing services and replace with one secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	In construction	12/9/2016	1/5/2017	8/1/2017	Yes	144 kW/Yes	X	Seismic improvements and architectural upgrades to increase reliability of the pumping station have been delayed. Additional project costs - \$75k (interrupter, #7 box, & installation) Further delays caused by PG&E not providing necessary cost detail to the Service Agreement (7 month delay).	No impacts update.
4	115675911	2445 Hyde St. - Francisco Park	2	SFRPD	New secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	Energized	1/9/2019	4/7/2020	12/27/2019	Yes	70 kW/Yes		Project delayed - project was in dispute from Jun. 2019 - Oct. 2019 (3-4 months). Additional project costs for low-side metering - \$75k (interrupter, #7 box, & installation) Additional project costs due to PG&E design and approval delays & discovery of underground conflicts - \$330k Additional project costs due to PG&E requiring additional extension of trenching and conduit - \$520k	Project energized in Jan. 2022. Additional project costs added due to PG&E delays and excessive requirements.
5	PG&E withholding NN#	102 Marina Blvd. - Fort Mason (EVGo)	2	EVGo	New secondary service	Delays caused by dispute over primary vs. secondary. Project is still in dispute.	Project is at a standstill.	12/13/2018		7/15/2019	Yes	600 kW/Yes		Project delayed - project has been in dispute since Dec. 2018 (20-21 months). If required, primary switchgear would cost the project an additional \$500k.	PG&E has cancelled this application.
6	Several applications submitted	L Taraval - Streetlights	4	SFMTA	New secondary service (several streetlights)	Delays caused by PG&E being unresponsive.	In construction	3/19/2019	4/27/2019	1/1/2020	No	9.6 kW (per service point)/Yes		Pedestrian and traffic safety is at risk as PG&E delays the energization of these streetlights. Delays continue as PG&E has cancelled these applications which will cause redesign and change orders - costs impact TBD. These delays will impact the construction schedule.	Further delays caused by PG&E.
7	PG&E withholding NN#	1351 42nd Ave - Francis Scott Key Educator Housing (Construction and Perm. Power)	4	MOHCD (MidPen Housing)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	SF to submit updated application for secondary.	3/30/2020 (temp) 2/24/2020 (perm)		12/7/2020 (temp) 12/6/2021 (perm)	Yes	417 kW/Yes (temp) 678 kW/Yes (perm)		Project delayed - project was in dispute from Apr. 2020 to Sept. 2021 (15-16 months). Temp. construction power service by PG&E at retail - \$118k in lost gross revenue to SFPUC. \$25k in additional power costs to the project due to PG&E's higher rates.	No impacts update.
8	PG&E withholding NN#	78 Haight Street - Affordable Housing (63 units)	5	MOHCD (TNDC)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	PG&E reviewing application.	6/15/2020		12/15/2021	Yes	315 kW/Yes		Project delayed - project was in dispute from Jun. 2020 to Sept. 2021 (14-15 months). Temp. construction power service by PG&E at retail - \$38k in lost gross revenue to SFPUC. \$6k in additional power costs to the project due to PG&E's higher rates.	No impacts update.
9	Several applications submitted	Haight Street Traffic Signals	5	SFMTA	New secondary services (several traffic signals)	Delays caused by PG&E cancelling the initial applications.	In construction	4/22/2020	7/16/2020	11/30/2020	Yes			Project delayed as PG&E cancelled the original applications. Public safety is at risk as the traffic signal infrastructure is completed and are just awaiting energization. The public has been inquiring about signal activation status. The traffic signals are moving forward, but there are disagreements on whether or not unmetred holiday lighting can be added to these poles.	No impacts update.
10	111729695	6 Berry Street - Substation	6	SFMTA	Upgrade existing primary service	Delays caused by PG&E being unresponsive, changing requirements, and being non-transparent with costs and design changes.	Energized	6/17/2016	12/12/2016	5/1/2017	N/A	3000 kW/Yes		SFMTA completed the conduit boring under the rails prior to PG&E's approval. As such, parties disagree on costs and design requirements. SFMTA incurred delay claims costs from contractor due to PG&E's failure to approve design and equipment submittals. (actual costs are still to be determined) PG&E delayed the de-energizing the existing to-be-demolished substation which caused delays to the construction schedule.	Further delays and costs incurred by PG&E delaying the shutdown requested to switchover power. The work is finally complete and the project will be removed on next quarter's report.
11	113826990	750 Brannan - Main Library Repository	6	SFPW for SFPL	Increase load request (237 kW to 500 kW)	Dispute over how to process increase in load request.	Energized	11/14/2017	1/18/2018	1/1/2018	No	500 kW/Yes		Plans for a new HVAC system at the library repository have been delayed. No monetary impact - however, SF believes that PG&E's requirements for approving load increase for muni loads is extensive and will cause delays to projects.	Project was completed in Jan. 2022, Project will be removed on next quarter's report.
12	118152147	399 The Embarcadero - Fire Boat #35	6	SFFD	New secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	In construction	1/14/2019	2/8/2020	12/27/2019	Yes	430 kW/Yes		Project delayed - project was in dispute from Jan. 2019 - Oct. 2019 (8-9 months). Additional project costs - \$150k (2 interrupters, 2 #7 boxes, & installation)	No impacts update.
13	115071498	555 Larkin (formerly 500 Turk) - Affordable Housing (108 units)	6	MOHCD (TNDC)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	In construction	10/15/2018	12/18/2019	7/1/2020	Yes	890 kW/Yes		Project delayed - project was in dispute from Nov. 2018 - Oct. 2019 (11-12 months). Temp. construction power service by PG&E at retail - \$196k in lost gross revenue to SFPUC. \$24k in additional power costs to the project due to PG&E's higher rates. Additional project costs - \$150k (2 interrupters, 2 #7 boxes, & installation) 243,000 lbs. of CO2 emissions (construction period of 22 months)	No impacts update.
14	116790877	Market St. & 7th St - BMS Switch	6	SFMTA	New secondary service	Delays caused by PG&E not following WDT timelines and not providing cost explanations.	Service Agreement returned with payment by SFPUC.	3/6/2019	4/9/2019	1/4/2021	No	48 kW/Yes		Project delayed - PG&E was late in providing the service agreement and was unresponsive in providing further cost explanation.	No impacts update.



**Attachment A1: List of Interconnection Issues**

	PG&E NN#	Project Location	District #	Client Organization	Project Description (what SF applied for)	Project Status	Initial Application Submittal Date	App Deemed Complete Date	Initial Service Need Date	Did PG&E require Primary?	Load Size/Can Be Served at Secondary	PG&E committed to work w/ SF to energize in 2018	Impacts	Updates/Changes since Last Report (Sept. 2021)
15	TBD	1064 Mission St. - Affordable Housing (256 units)	6	MOHCD (Mercy Housing)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	In construction	3/28/2019	12/18/2019	4/1/2021	Yes	678 kW/Yes	Project delayed - project was in dispute from Feb. 2019 to Oct. 2019 (7-8 months). Additional project costs - \$150k (2 interrupters, 2 #7 boxes, & installation) Temp. construction power service by PG&E at retail - \$105k in lost gross revenue to SFPUC. \$23k in additional power costs to the project due to PG&E's higher rates. 142,000 lbs. of CO2 emissions (construction period of 18 months)	No impacts up date.
16	N/A	Transbay Transit Center - Transbay Joint Powers Authority	6	SFPUC - Power	Two new primary services (5 MW each)	Potential dispute over reserved capacity.	Energized - PG&E reviewing SF's request.	9/12/2018	2/6/2019	10/1/2018	N/A	10 MW/No	PG&E is currently reviewing SF's request to use 10 MW of reserved capacity that SF applied and paid for. If PG&E denies request, SF may incur additional costs or have to limit the tenants. PG&E is holding up the project by not explaining the discrepancies between its System Impact Study draft agreement to what SF had requested.	Delays continue as PG&E has still not adequately responded to SF's questions regarding load calculations in the System Impact Study draft agreement.
17	117795024	16 Sherman Street - Victoria Park Lighting	6	SFRPD	Upgrading existing secondary service	Delays caused by PG&E providing the Service Agreement late.	Energized	10/30/2019	11/20/2019	2/15/2020	N/A	42 kW/Yes	Park safety is at risk as PG&E caused delays to the energization of these lighting fixtures. Further delays will prevent re-opening of the park and leave SFUSD students without a playground.	Project energized in Oct. 2021. Will be removed off of next quarter's report.
18	PG&E withholding NN#	180 Jones Street - Affordable Housing (70 units)	6	MOHCD (TNDC)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	PG&E reviewing application.	4/28/2020		9/5/2022	Yes	576 kW/Yes	Project delayed - project was in dispute from May 2020 to Sept.2021 (15-16 months). Temp. construction power service by PG&E at retail - \$89k in lost gross revenue to SFPUC. \$20k in additional power costs to the project due to PG&E's higher rates.	No impacts update.
19	PG&E withholding NN#	266 4th Street - Affordable Housing (70 units)	6	MOHCD (TNDC)	New secondary service	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	SF to submit updated application for secondary.	6/15/2020		12/1/2021	Yes	700 kW/Yes	Project delayed - project was in dispute from June 2020 to Sept. 2021 (14-15 months).	No impacts update.
20	PG&E withholding NN#	750 Eddy Street - City College Building	6	CCSF	Upgrade and relocation of existing secondary service	Delays caused by dispute over primary vs. secondary. Project is still in dispute.	Project is at a standstill.	11/9/2020		12/30/2021	Yes	258 kW/Yes	Project delayed - project has been in dispute since Nov. 2020 (8-9 months)	No impacts update.
21	PG&E withholding NN#	600 7th Street - Affordable Housing (70 units)	6	MOHCD	New secondary service	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	PG&E reviewing application.	1/19/2021		5/21/2023	Yes	847 kW/Yes	Project delayed - project was in dispute from Feb. 2021 to Sept. 2021 (6-7 months). Temp. construction power service by PG&E at retail - \$191k in lost gross revenue to SFPUC. \$28k in additional power costs to the project due to PG&E's higher rates.	Cost impacts for construction power being released to PG&E retail added.
22	TBD	270 6th Street - Gene Friend Rec Center	6	RPD	New primary service	Increased costs due to PG&E's primary requirements	SF to review initial estimate and provide payment.	8/16/2021		7/3/2023	Yes	348 kW/Yes	Additional project costs for primary service - \$500k for primary switchgear Accommodating primary service equipment and required clearances displaces critical site elements (storage and trash building cannot be in preferred location near street, service access to facility eliminated, and required utility space impinges on paved walking circuit and athletic court clearances). It also reduces the recreational value of park property.	Project added.
23	PG&E withholding NN#	2685 Ocean Ave. - EV Charging Station	7	SFMTA & EVGo	New secondary service	Delays caused by dispute over primary vs. secondary. Project is still in dispute.	Project is at a standstill.	2/4/2019		7/22/2019	Yes	600 kW/Yes	Project delayed - project has been in dispute since Feb. 2019 (30-31 months). If required, primary switchgear would cost the project an additional \$500k.	PG&E has cancelled this application.
24	TBD	2814 Great Highway - Westside Pump Station	7	SFPUC	Remove one existing secondary service and replace with two (2) primary services	Delays caused by PG&E cancelling the original design and requiring SF to re-apply.	In construction	8/2/2021		9/27/2022	N/A	4000 kW/No	Project delayed - cost impacts TBD. PG&E has already given SF notice that the project will be further delayed due to resource issues on PG&E's end.	Project added.
25	113135782	350 Amber Drive - Police Academy	8	SFPW for SFPD	Upgrade existing secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	Project Cancelled by SF	8/8/2017	5/22/2018	TBD FYE22	Yes	160 kW/Yes	X Project delayed - project was in dispute from Dec. 2017 - May 2018 (6 months).	Project cancelled by SF and will be removed on next quarter's report.
26	PG&E withholding NN#	681 Florida Street - Affordable Housing (131 units)	9	MOHCD (MEDA)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	In construction	2/6/2019		8/3/2020	Yes	785 kW/Yes	Project delayed - project was in dispute from Feb. 2019 - Oct. 2019 (7-8 months). Temp. construction power service by PG&E at retail - \$59k in lost gross revenue to SFPUC. \$12k in additional power costs to project due to PG&E's higher rates. Additional project costs - \$150k (2 interrupters, 2 #7 boxes, & installation) 77,000 lbs. of CO2 emissions (construction period of 15 months)	No impacts update.
27	115148446	3001-3021 24th St. - Affordable Housing (44 units)	9	MOHCD (Mercy Housing)	New secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	Project went to PG&E retail.	11/1/2018		9/1/2020	Yes	362 kW/Yes	Project delayed - project was in dispute from Nov. 2018 to Oct. 2019 (10-11 months).	No impacts update.

**Attachment A1: List of Interconnection Issues**

	PG&E NN#	Project Location	District #	Client Organization	Project Description (what SF applied for)	Project Status	Initial Application Submittal Date	App Deemed Complete Date	Initial Service Need Date	Did PG&E require Primary?	Load Size/Can Be Served at Secondary	PG&E committed to work w/ SF to energize in 2018	Impacts	Updates/Changes since Last Report (Sept. 2021)	
28	PG&E withholding NN#	300 Bartlett Street - Mission Branch Library	9	SFPL	New secondary service	Delays caused by dispute over primary vs. secondary. Project is moving forward with primary.	PG&E reviewing application.	2/26/2020		8/1/2022	Yes	190 kW/Yes		Project delayed - project was in dispute since from Feb. 2020 - Jun. 2021 Additional project costs - \$250k for overhead primary service	No impacts update.
29	111975801	800 Amador Street - Pier 94 - Backlands	10	SFPORT	New secondary service	PG&E required primary. Project is moving forward with primary.	Service Agreement issued by PG&E, but issues remain on land rights. (Project now on hold due to COVID emergency response)	8/19/2016	8/28/2018	2/1/2017	Yes	166 kW/Yes	X	Added costs for primary equipment (overhead) - \$500k Additional staff time for Port - \$50k Costs of redesign - \$50k	This project is now on hold. This location has been used for the emergency shelters for the homeless in response to COVID. The issues regarding the permanent power service still remain. The Port plans to maintain the temporary service until the permanent service is available.
30	112774763	Illinois St. & Terry Francois - Mariposa Pump Station	10	SFPUC - Wastewater	Relocate existing secondary service (for construction)	Delays caused by PG&E requiring primary. Project went to PG&E retail to avoid anymore delays.	Due to the delays, the project has taken PG&E retail service.	4/13/2017		6/1/2018	Yes	169 kW/Yes	X	Temp. construction power service by PG&E at retail - \$526k in lost gross revenue to SFPUC. \$245k in additional equipment, labor, and construction costs due to PG&E not providing retail power in a timely manner \$281k in additional costs for a generator rental while waiting for PG&E retail temp power to be energized \$22k in additional power costs to the project due to PG&E's higher rates. 554,000 lbs. of CO2 emissions (construction period of 36 months)	No impacts update.
31	114408260	684 23rd Street - Potrero North	10	SFPUC - Power	New primary service	Delays caused by PG&E cancelling the application.	Project is at a standstill.	3/12/2018		10/1/2018	N/A	12,000 kW/No		Project delayed - PG&E denied this service request citing inadequate capacity and cancelled the application.	No impacts update - PG&E refuses to provide service.
32	114408263	638 23rd Street - Potrero South	10	SFPUC - Power	New primary service	Delays caused by PG&E cancelling the application.	Project is at a standstill.	3/12/2018		10/1/2018	N/A	12,000 kW/No		Project delayed - PG&E denied this service request citing inadequate capacity and cancelled the application.	No impacts update - PG&E refuses to provide service.
33	114713787	1001 22nd Street - Bus Electrification Pilot	10	SFMTA	New primary service	Delays caused by PG&E being late in providing the Service Agreement.	Energized	6/18/2018	2/14/2019	5/1/2019	N/A	2400 kW/Yes		Initially, PG&E was unresponsive in scheduling a pre-application meeting which has caused some delays. PG&E was also late in providing a deemed complete date for the application and several months late in providing the Service Agreement. PG&E caused another 4-month delay to redesign for a PG&E error in the original design.	Project was energized in Dec. 2021 and will be removed from next quarter's report.
34	114671200	1995 Evans - Traffic Controls and Forensics	10	SFPW for SFPD	New secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	Energized	5/18/2018	9/3/2019	3/1/2020	Yes	2100 kW/Yes		Project delayed - project was in dispute from Jun. 2018 to August. 2019 (13-14 months). Temp. construction power service by PG&E at retail has been delayed causing the project team to use generators Additional project costs - \$75k (interrupter, #7 box, & installation) Generator costs for temp power: \$578k Additional delays caused by pole location issues.	Project was energized in Mar. 2021, but construction is stalled as PG&E continues to delay moving a pole that is obstructing construction.
35	110162018	750 Phelps - Southeast Plant	10	SFPUC - Wastewater	New primary service	Potential delay as PG&E is late in providing SIS agreement.	Project Cancelled by SF	IN FLIGHT (Prior to July 2015)	7/14/2018	5/20/2020	N/A	12000 kW/no		If delays continue and jeopardize the project energization date, the project team will incur a liquidated damage amount of \$3000/day. Further delays caused by PG&E not providing enough design detail with the Service Agreement.	The project has been cancelled by SF and will be removed from next quarter's report.
36	114546573	2401/2403 Keith Street - Southeast Health Center	10	SFPW for SFDPH	New secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward with low-side metering. (See Note 1)	Energized	4/27/2018	11/14/2019	7/26/2020	Yes	200 kW/Yes		Project delayed - project was in dispute from May 2018 - Oct. 2019 (16-17 months). Additional project costs - \$150k (2 interrupters, #7 box, & installation)	Project was energized in Oct. 2021 and will be removed next quarter's report.
37	115415116	1550 Evans Ave. - Southeast Community Center	10	SFPUC	Relocation and upgrade of existing secondary service	Delays caused by dispute over primary vs. secondary. Project moving forward at primary. (See Note 1)	In construction	11/26/2018	5/22/2019	1/4/2021	Yes	800 kW/Yes		Project delayed - project was in dispute from Dec. 2018 - Oct. 2019 (8-9 months). PG&E was also several months late in providing the Service Agreement. Added costs for primary equipment - \$500k Temp. construction power service by PG&E at retail - \$187k in lost gross revenue to SFPUC. \$9k in additional power costs to project due to PG&E's higher rates.	No impacts update.
38	PG&E withholding NN#	1150 Phelps - Construction Trailers	10	SFPUC	New secondary service	Delays caused by dispute over primary vs. secondary. Project is still in dispute.	Project went to PG&E retail.	5/1/2019		6/1/2019	N/A	472 kW/Yes		Project delayed - project was been in dispute from May 2019 to May 2021 (23-24 months). Temp. construction power service by PG&E at retail - \$2M in lost gross revenue to SFPUC. \$286k in additional power costs due to PG&E's higher rates. (assuming temp. power for 5 years)	No impacts update.
39	112875227	1601 Griffith Street - Griffith Pump Station	10	SFPUC - Water	Shutdown & re-energization	Delays caused by PG&E providing energization late.	Energized - Cost impacts due to delay in energization.	N/A	N/A	N/A	N/A	N/A		Project delayed - PG&E pushed back the energization date by 2 weeks. Due to PG&E's delay, the project had to use generators for an additional 2 weeks costing \$27k.	No impacts update.
40	114919920	Harmonia Street - Sunnydale HOPE	10	SFPUC - Power	New primary service	Potential dispute over reserved capacity.	Service Agreement returned with payment by SFPUC. PG&E performing engineering/design.	8/16/2018	4/4/2019	8/1/2020	N/A	1000 kW/Yes		Delays caused by PG&E not responding to SF's questions regarding load calculations in the System Impact Study draft agreement. Due to the urgency of the project, SF has agreed to move forward with PG&E's lower load calcs and will apply to PG&E for additional capacity when the load ramps up. Costs of this are TBD.	No impacts update.
41	115583820	1101 Connecticut Street - HOPE Potrero	10	SFPUC - Power	New primary service	Potential dispute over reserved capacity.	Service Agreement returned with payment by SFPUC. PG&E performing engineering/design.	12/13/2018	4/4/2019	6/1/2019	N/A	4000 kW/No		Delays caused by PG&E not responding to SF's questions regarding load calculations in the System Impact Study draft agreement. Due to the urgency of the project, SF has agreed to move forward with PG&E's lower load calcs and will apply to PG&E for additional capacity when the load ramps up. Costs of this are TBD.	No impacts update.
42	113804831	603 Jamestown Avenue - Redevelopment Project	10	SFPUC-Power	New primary service	Delays caused by PG&E being late in providing Service Agreement.	Service Agreement returned with payment by SFPUC. PG&E performing engineering/design.	11/2/2017	2/26/2018	10/1/2018	N/A	8000 kW/No		Delays caused by PG&E not providing the Service Agreement on time. Further delays caused by PG&E not providing enough design detail with the Service Agreement.	No impacts update.

**Attachment A1: List of Interconnection Issues**

	PG&E NN#	Project Location	District #	Client Organization	Project Description (what SF applied for)	Project Status	Initial Application Submittal Date	App Deemed Complete Date	Initial Service Need Date	Did PG&E require Primary?	Load Size/Can Be Served at Secondary	PG&E committed to work w/ SF to energize in 2018	Impacts	Updates/Changes since Last Report (Sept. 2021)	
43	116967240	702 Phelps Street - SFMTA Substation	10	SFMTA	Request to increase loads	Delays caused by PG&E being late in providing the System Impact Study report.	Service Agreement returned with payment by SFPUC. PG&E performing engineering/design.	2/26/2019	6/28/2019	5/1/2019	N/A	4000 kW/No		Delays caused by PG&E not providing the System Impact Study report on time. More delays caused by PG&E not providing the Service Agreement on time. Further delays caused by PG&E not providing enough design detail with the Service Agreement.	No impacts update.
44	11742971	1800 Jerrold Avenue - Biosolids (Temp. power)	10	SFPUC-Wastewater	New primary service	Delays caused by PG&E being late in providing the Service Agreement.	In construction	5/16/2019	6/28/2019	10/1/2019	N/A	1441 kW/No		Delays caused by PG&E not providing the Service Agreement on time.	No impacts update.
45	117974199	901 Tennessee Street - Streetlights	10	SFMTA	New secondary service	Delays caused by PG&E providing the Service Agreement late.	In construction	2/1/2019	11/20/2019	8/1/2019	No	1 kW/Yes		Pedestrian and traffic safety is at risk as PG&E delays the energization of these streetlights and traffic signals.	No impacts update.
46	N/A	1508 Bancroft Ave. - Sustainable Streets Shops	10	SFMTA	Request for information and shutdown	Delays caused by PG&E being unresponsive.	Information received from PG&E.	4/6/2018	N/A	10/21/2019	No	N/A		Potential power issue - SF could not confirm that the current power system is properly protected without PG&E's response to the information requested. Further delays caused by PG&E on SF's request for shutdown. (cost impact TBD, but construction schedule is now delayed).	Further delays caused by PG&E.
47	PG&E withholding NN#	1001 Potrero Avenue - UCSF/SFGH Research & Academic Building Construction and Perm Power	10	UCSF/SFGH	New primary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary for construction power. Construction power moving forward with PG&E retail.	Service Agreement returned with payment by SFPUC. PG&E performing engineering/design.	5/20/2020 (temp) 4/1/2020 (perm)		1/1/2021	Yes	1356 kW/Yes		Project delayed - construction power was in dispute from Jun. 2020 to Sept. 2020 (4 months). Temp. construction power service by PG&E at retail - \$287k in lost gross revenue to SFPUC. \$30k in additional power costs to the project due to PG&E's higher rates.	No impacts update.
48	114529750	1920 Evans - Arborist Trailer/BUF Yard	10	DPW	New secondary service	Delays caused by issues with overhead poles.	In construction	4/16/2018	8/10/2018	10/1/2018	No	37 kW/Yes		Project has been delayed due to issues with an overhead pole. PG&E's proposed design was not feasible as it required overhead poles to be installed above underground sewer utilities. Project was further when PG&E's re-design took several months.	No impacts update.
49		160 Hahn Street - Herz Recreation Center	10	SFRPD	New primary service	Increased costs due to PG&E's primary requirements	PG&E reviewing application.	11/10/2021		1/3/2022	Yes	150 kW/Yes		Additional project costs for primary service - \$500k for primary switchgear Accommodating primary service equipment and required clearances displaces critical site elements (parking spaces for staff, ADA parking, and a maintenance shed). It also reduces the recreational value of park property.	Project added.
50	PG&E withholding NN#	4840 Mission Street - Affordable Housing (137 units) (Construction and Perm. power)	11	MOHCD (BRIDGE Housing)	New secondary service for perm. Construction power released to PG&E retail.	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	PG&E reviewing application.	2/5/2020		11/1/2022	Yes	1621 kW/Yes		Project delayed - project was in dispute from Feb. 2020 to Sept. 2021 (18-19 months). Temp. construction power service by PG&E at retail - \$301k in lost gross revenue to SFPUC. \$47k in additional power costs to the project due to PG&E's higher rates.	No impacts update.
51	PG&E withholding NN#	35-45 Onondaga Avenue - Health Clinic	11	Real Estate (for DPH)	Upgrade and relocation of existing secondary service	Delays caused by dispute over primary vs. secondary. Project is moving forward at secondary.	Service Agreement returned with payment by SFPUC. PG&E performing engineering/design.	6/1/2020		3/8/2021	Yes	144 kW/Yes		Project delayed - project was in dispute from Jun. 2020 - Mar. 2020 (8-9 months).	No impacts update.
52	PG&E withholding NN#	455 Athens Street - Cleveland Elementary School	11	SFUSD	Upgrade and relocation of existing secondary service	Delays caused by dispute over primary vs. secondary. Project is moving forward with primary.	PG&E reviewing application.	10/26/2020		6/1/2021	Yes	305 kW/Yes		Additional project costs for primary service - \$500k for primary switchgear	Project is moving forward with primary service and will incur additional costs due to primary equipment requirements.
53	PG&E withholding NN#	2340 San Jose Ave. - Affordable Housing (138 units)	12	MOHCD (Mission Housing)	New secondary service	Delays caused by dispute over primary vs. secondary. Project will be moving forward with secondary.	PG&E reviewing application.	11/21/2019		5/1/2020	Yes	800 kW/Yes		Project delayed - project was in dispute from Jan. 2020 to Sept. 2021 (20-21 months). Temp. construction power service by PG&E at retail - \$191k in lost gross revenue to SFPUC. \$34k in additional power costs to the project due to PG&E's higher rates.	No impacts update.
54	N/A	Multiple Locations - Guy Wires (Franchise Issue)	N/A	SFMTA, SFPW, & SFPUC	PG&E's guy wires are impeding on SF projects.	Franchise dispute	Project is moving forward.	N/A	N/A	N/A	N/A	N/A		PG&E's unresponsiveness in removing guy wires is an obstruction to SF projects. 1) SFMTA cannot install a pole replacement to promote safety. 2) SFPW cannot construct a new ADA curb ramp. 3) SFPUC cannot finish parts of construction at the Southeast Water Treatment Plant.	Delay continues for two of the requests. SF and PG&E will continue to work together to get these resolved.
55	N/A	Multiple Service Transfers	N/A	Various City Depts.	Service Transfers	Delays caused by PG&E requiring unnecessary equipment or information for service transfer requests.	Project is at a standstill.	N/A	N/A	N/A	N/A	N/A		Additional costs and staff resources can be incurred if PG&E continues to create barriers for SF service transfer requests. SF continues to experience loss of revenue and increased greenhouse gas emissions as PG&E is refusing to transfer over City department loads.	Delays continue as projects remain at a standstill.
56	N/A	10501 Warnerville Road - Substation Rehabilitation Project	N/A - Oakdale	SFPUC	Remove two existing services and replace with one secondary service	Delays caused by dispute over primary vs. secondary. Project is still in dispute.	Project went to PG&E retail.	12/26/2018	N/A	3/1/2019	Yes	160 kW/Yes		Project delayed - project was in dispute from Jan.- May 2019 (4 -5 months).	Project was released to PG&E retail service to avoid delays. Cost impacts and greenhouse gas emission impacts are TBD.
57	N/A	951 Antoinette Lane - Well Pump & Control Panel	N/A - South SF	SFPUC	Remove two existing services and replace with one secondary service	Delays caused by dispute over primary vs. secondary. Project is still in dispute.	Engineering estimation by PG&E.	11/20/2020	N/A	12/6/2021	Yes	50 kW/Yes		Project delayed - project was in dispute from Feb. - April 2021 (1-2 months).	No impacts update.





**Attachment A1: List of Interconnection Issues**

	PG&E NN#	Project Location	District #	Client Organization	Project Description (what SF applied for)	Project Status	Initial Application Submittal Date	App Deemed Complete Date	Initial Service Need Date	Did PG&E require Primary?	Load Size/Can Be Served at Secondary	PG&E committed to work w/ SF to energize in 2018	Impacts	Updates/Changes since Last Report (Sept. 2021)
--	----------	------------------	------------	---------------------	---	----------------	------------------------------------	--------------------------	---------------------------	---------------------------	--------------------------------------	--	---------	--

Notes:

1. Low-side metering is not the same as secondary service. Low-side metering requires extra equipment costs (i.e. an interrupter, approx. \$75k). The SFPUC believes that many of these loads should be served with secondary service, but has compromised with PG&E to move projects forward.
2. Cost impacts related to lost revenue are estimates calculated off of projected load values.
3. Not all cost impacts are reflected here as increased facility and construction costs are still to be determined.
3. CO<sub>2</sub> emissions are calculated using estimated loads with PG&E's 2016 emissions factor.
4. Delay impacts are only calculated off of the time in which PG&E and SF were in dispute. (Other delays are not included)
5. Primary switchgear is estimated to cost an additional \$500k.

Key

-  Project is currently being disputed or has been delayed due to a dispute/issue and is past the Initial Service Need Date (Column K).
-  Energized, but still facing issues.
-  Project is moving forward, but not yet energized. Some are still facing major delays. Please review the impact column for further descriptions.
-  Project has been energized - no outstanding issues.

**Attachment A2: List of Projects Released to PG&E under WDT3**

<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>
	<b>Project Location</b>	<b>District #</b>	<b>Client Organization</b>	<b>Project Description (what SF applied for)</b>	<b>Impacts</b>
1	970 47th Ave. - Golden Gate Park Clubhouse (temporary trailer)	1	SFRPD	New temporary secondary service	Project has been delayed several months. SF originally applied for service before WDT3 and after months of back and forth, PG&E stated they could not provide the service. Temp. power service by PG&E at retail - \$21k in lost gross revenue to SFPUC. \$33k in additional power costs to the project due to PG&E's higher rates.
2	4200 Geary Blvd.- Affordable Housing (construction power)	1	MOHCD	New temporary secondary service	Temp. construction power service by PG&E at retail - \$45k in lost gross revenue to SFPUC. \$8k in additional power costs to the project due to PG&E's higher rates.
3	Seawall Lots 323 & 324 - Hotel & Theater (construction power)	3	Teatro Zinzanni	New temporary secondary service	Temp. construction power service by PG&E at retail - \$132k in lost gross revenue to SFPUC. \$4k in additional power costs to the project due to PG&E's higher rates.
4	730 Stanyan St. - Affordable Housing (construction power)	5	MOHCD	New temporary secondary service	Temp. construction power service by PG&E at retail - \$148k in lost gross revenue to SFPUC. \$28k in additional power costs to the project due to PG&E's higher rates.
5	240 Van Ness Ave. - Affordable Housing (construction power)	6	MOHCD	New temporary secondary service	Temp. construction power service by PG&E at retail - \$87k in lost gross revenue to SFPUC. \$15k in additional power costs to the project due to PG&E's higher rates.
6	600 7th St. - Affordable Housing (construction power)	6	MOHCD	New temporary secondary service	Temp. construction power service by PG&E at retail - \$189k in lost gross revenue to SFPUC. \$20k in additional power costs to the project due to PG&E's higher rates.
7	India Basin - 900 Innes (construction power)	10	RPD	New temporary secondary service	Temp. construction power using generators - costs TBD.
8	India Basin - Wi-fi Pop-Up	10	RPD	New temporary secondary service	Temp. power service currently using generators - costs TBD. Application has been submitted to PG&E retail for future service - \$15k in lost gross revenue to SFPUC. \$24k in additional power costs to the project due to PG&E's higher rates.
9	1035 Gilman Ave - Bret Harte Elementary (temporary trailer)	10	SFUSD	New temporary secondary service	Temp. power service by PG&E at retail - \$38k in lost gross revenue to SFPUC. \$62k in additional power costs to the project due to PG&E's higher rates.
10	Streetlights	N/A	SFPUC	New unmetered service	Cost impact TBD. New streetlights have had to apply to PG&E for retail service and will have to pay PG&E's higher rates.
11	Traffic Controllers	N/A	SFMTA	New unmetered service	Cost impact TBD. New traffic controllers have had to apply to PG&E for retail service and will incur additional costs due to PG&E now requiring traffic controllers to have meters.

Attachment A2: List of Projects Released to PG&E under WDT3

G
Updates/Changes since Last Report (Sept.2021)
No impacts update.
No impacts update.
No impacts update.
No impacts update.
No impacts update.
No impacts update.
Project added.
Project added.
Project added.
No impacts update.
No impacts update.

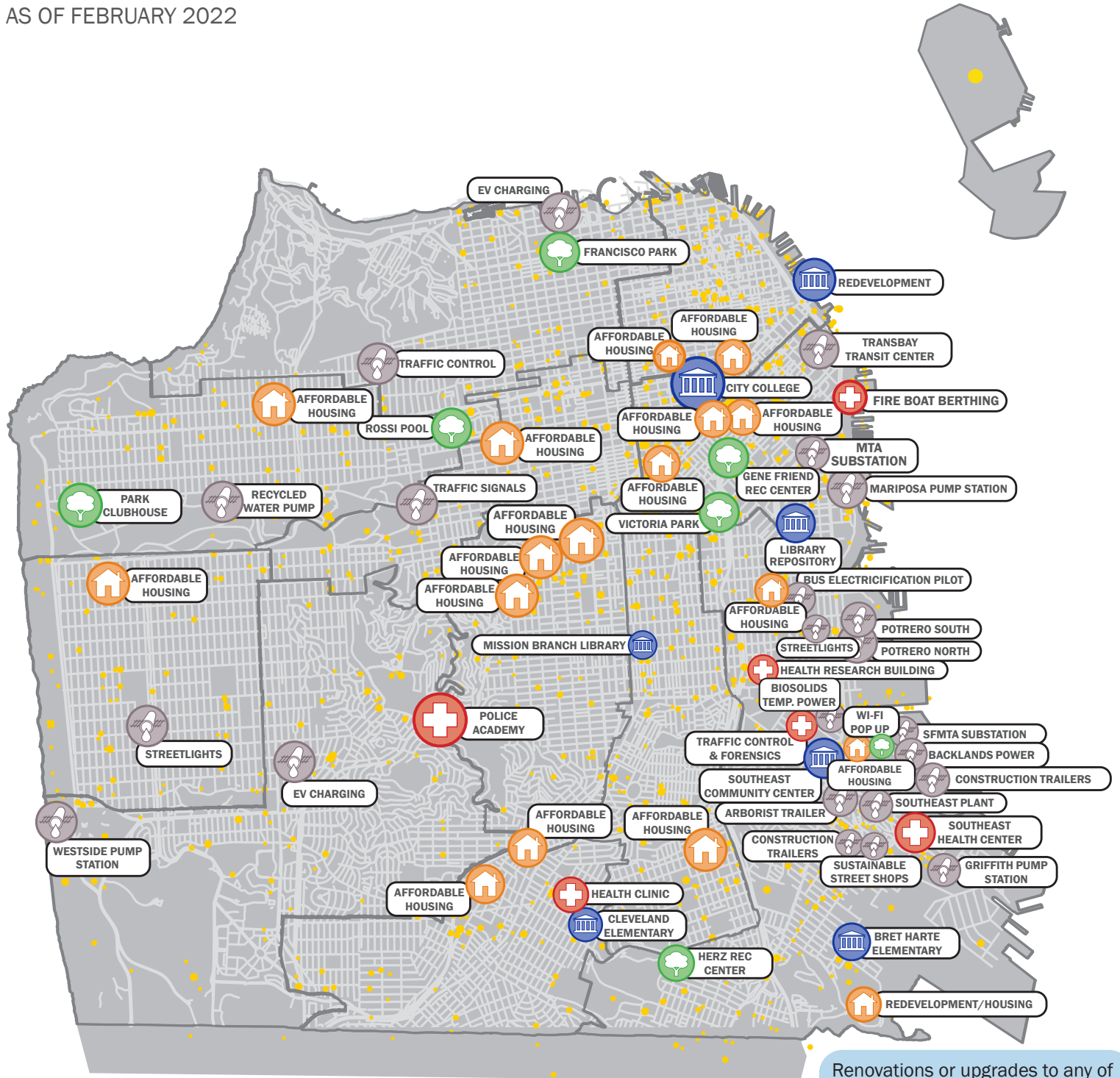


# ATTACHMENT B – MAP OF INTERCONNECTION ISSUES



Services of the San Francisco Public Utilities Commission

AS OF FEBRUARY 2022



HOUSING



INFRASTRUCTURE



HEALTH AND SAFETY



INSTITUTION



RECREATION



SFPUC METERED SERVICE POINT

**Attachment C: Cost Impacts**

	A	B	C	D	E	F	G	H	I	J
		Additional Costs to Project							Other Impacts to SF	
	Project Location	Redesign Costs	Primary or Low-side Metering Equipment Costs	Additional Construction Costs	Additional Costs to Project for PG&E retail service	Additional Const./Project Mgmt Costs Due to Delay	Additional Staff Time Costs	Total Additional Project Costs (B+C+D+E+F+G)	Lost gross revenue to SFPUC	CO2 Emissions (lbs.) from PG&E retail service
1	600 Arguello Blvd. - Rossi Pool							\$ -		
2	35 Overlook Dr. - Recycled Water Pump									
3	3455 Van Ness Avenue - AWSS Pump Station No. 2		\$ 75,000					\$ 75,000		
4	2445 Hyde Street - Francisco Park		\$ 75,000	\$ 520,000		\$ 330,000		\$ 925,000		
5	102 Marina Boulevard - Fort Mason (EVGo)							\$ -		
6	L Taraval - Streetlights							\$ -		
7	1351 42nd Street - Affordable Housing (Francis Scott Key Educator Housing)				\$ 25,000			\$ 25,000	\$ 118,000	
8	78 Haight Street - Affordable Housing				\$ 6,000			\$ 6,000	\$ 38,000	
9	Haight Street Traffic Signals							\$ -		
10	6 Berry Street - Substation							\$ -		
11	750 Brannan - Main Library Repository							\$ -		
12	399 The Embarcadero - Fire Boat #35		\$ 150,000					\$ 150,000		
13	555 Larkin (formerly 500 Turk Street) - Affordable Housing		\$ 150,000		\$ 24,000			\$ 174,000	\$ 196,000	243,000
14	Market St. & 7th St. - BMS Switch							\$ -		
15	1064 Mission Street - Affordable Housing		\$ 150,000		\$ 23,000			\$ 173,000	\$ 105,000	142,000
16	Transbay Transit Center - Transbay Joint Powers Authority							\$ -		
17	16 Sherman Street - Victoria Park Lighting							\$ -		
18	180 Jones Street - Affordable Housing				\$ 20,000			\$ 20,000	\$ 89,000	
19	266 4th Street - Affordable Housing							\$ -		
20	750 Eddy Street - City College (Alemany)							\$ -		
21	600 7th Street - Affordable Housing				\$ 28,000			\$ 28,000	\$ 189,000	
22	270 6th Street - Gene Friend Rec Center		\$ 500,000					\$ 500,000		
23	2685 Ocean Ave. - EV Charging Station							\$ -		
24	2814 Great Highway - Westside Pump Station									
25	350 Amber Drive - Police Academy							\$ -		
26	681 Florida Street - Affordable Housing		\$ 150,000		\$ 12,000			\$ 162,000	\$ 59,000	77,000
27	3001-3021 24th Street - Affordable Housing							\$ -		
28	300 Bartlett Street - Mission Branch Library		\$ 250,000					\$ 250,000		
29	800 Amador Street - Pier 94 - Backlands	\$ 50,000	\$ 500,000				\$ 50,000	\$ 600,000		
30	Illinois St. & Terry Francois - Mariposa Pump Station			\$ 245,000	\$ 303,000			\$ 548,000	\$ 526,000	554,000
31	684 23rd Street - Potrero North							\$ -		
32	638 23rd Street - Potrero South							\$ -		
33	1001 22nd Street - Bus Electrification Pilot							\$ -		
34	1995 Evans - Traffic Controls and Forensics		\$ 75,000		\$ 578,000			\$ 653,000		
35	750 Phelps - Southeast Plant							\$ -		
36	2401/2403 Keith Street - Southeast Health Center		\$ 150,000					\$ 150,000		
37	1550 Evans Ave - Southeast Community Center		\$ 500,000		\$ 9,000			\$ 509,000	\$ 187,000	



**Attachment C: Cost Impacts**

	Project Location	Additional Costs to Project						Other Impacts to SF		
		Redesign Costs	Primary or Low-side Metering Equipment Costs	Additional Construction Costs	Additional Costs to Project for PG&E retail service	Additional Const./Project Mgmt Costs Due to Delay	Additional Staff Time Costs	Total Additional Project Costs (B+C+D+E+F+G)	Lost gross revenue to SFPUC	CO2 Emissions (lbs.) from PG&E retail service
38	1150 Phelps - Construction Trailers				\$ 286,000			\$ 286,000	\$ 2,000,000	
39	1601 Griffith Street - Griffith Pump Station				\$ 27,000			\$ 27,000		
40	Harmonia Street - Sunnydale HOPE							\$ -		
41	1101 Connecticut Street - HOPE Potrero							\$ -		
42	603 Jamestown Avenue - Redevelopment Project							\$ -		
43	702 Phelps Street - SFMTA Substation							\$ -		
44	1800 Jerrold Avenue - Biosolids (Temp. Power)							\$ -		
45	901 Tennessee Street							\$ -		
46	1508 Bancroft Avenue - Sustainable Streets Shop							\$ -		
47	1001 Potrero Avenue - UCSF/SFGH Research & Academic Building Construction and Permanent Power				\$ 30,000			\$ 30,000	\$ 287,000	
48	1920 Evans - Arborist Trailer/BUF Yard							\$ -		
49	160 Hahn Street - Herz Recreation Center		\$ 500,000					\$ 500,000		
50	4840 Mission Street - Affordable Housing				\$ 47,000			\$ 47,000	\$ 301,000	
51	35-45 Onondaga Avenue - Health Clinic							\$ -		
52	455 Athens Street - Cleveland Elementary School									
53	2340 San Jose Avenue - Affordable Housing				\$ 35,000			\$ 35,000	\$ 191,000	
54	Multiple Locations - Guy Wires (Franchise Issue)							\$ -		
55	Multiple Service Transfers							\$ -		
56	10501 Warnerville Road - Substation Rehabilitation Project							\$ -		
57	951 Antoinette Lane - Well Pump & Control Panel							\$ -		
58	970 47th Avenue - Golden Gate Park Clubhouse (Temp)				\$ 33,000			\$ 33,000	\$ 21,000	
59	4200 Geary Blvd.- Affordable Housing (construction)				\$ 8,000			\$ 8,000	\$ 45,000	
60	Seawall Lots 323 & 324 - Hotel & Theater (construction)				\$ 4,000			\$ 4,000	\$ 132,000	
61	730 Stanyan St. - Affordable Housing (construction)				\$ 28,000			\$ 28,000	\$ 1,480	
62	240 Van Ness Ave. - Affordable Housing (construction power)				\$ 15,000			\$ 15,000	\$ 87,000	
63	India Basin - 900 Innes (construction power)				\$ 39,000			\$ 39,000	\$ 18,000	
64	India Basin - Wi-fi Pop-Up				\$ 24,000			\$ 24,000	\$ 15,000	
65	1035 Gilman Ave - Bret Harte Elementary (temporary trailer)				\$ 62,000			\$ 62,000	\$ 38,000	
66	Streetlights							\$ -		
67	Traffic Controllers							\$ -		
	<b>TOTAL</b>	<b>\$ 50,000</b>	<b>\$ 3,225,000</b>	<b>\$ 765,000</b>	<b>\$ 1,666,000</b>	<b>\$ 330,000</b>	<b>\$ 50,000</b>	<b>\$ 6,086,000</b>	<b>\$ 4,643,480</b>	<b>\$ 1,016,000</b>

<b>Total Additional Project Costs</b>	<b>\$ 6,086,000.00</b>
<b>Total Lost Gross Revenue to SFPUC</b>	<b>\$ 4,643,480.00</b>
<b>Total Cost Impact to SF (Project Costs + Lost Revenue)</b>	<b>\$ 10,729,480.00</b>
<b>Total CO2 Emissions (lbs.)</b>	<b>1,016,000</b>

**Attachment C: Cost Impacts**

		Additional Costs to Project						Other Impacts to SF	
Project Location	Redesign Costs	Primary or Low-side Metering Equipment Costs	Additional Construction Costs	Additional Costs to Project for PG&E retail service	Additional Const./Project Mgmt Costs Due to Delay	Additional Staff Time Costs	Total Additional Project Costs (B+C+D+E+F+G)	Lost gross revenue to SFPUC	CO2 Emissions (lbs.) from PG&E retail service

**Note:** These represent estimates of the costs that the City is aware of at the moment. The projects may incur additional costs going forward. The projects in **RED** are projects that are currently at a standstill and may face financial impacts that are TBD depending on how long they will be delayed and how they will move forward.



525 Golden Gate Avenue, 13th Floor  
San Francisco, CA 94102  
T 415.554.3155  
F 415.554.3161  
TTY 415.554.3488

February 22, 2022

Board of Supervisors Land Use and Transportation Committee  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102

Re: File No. 210322, Hearing - City Project Access to City-Owned Clean,  
Affordable Power, Sponsor: Ronen

Dear Committee Members,

On January 31, 2022, the Land Use and Transportation Committee heard testimony on the challenges facing the City and County of San Francisco (City) in connecting services to the electric distribution grid owned by Pacific Gas and Electric Company (PG&E). Representatives from the Public Utilities Commission (SFPUC), Recreation and Parks Department, and Municipal Transportation Agency presented their concerns regarding PG&E's ongoing obstruction to electric service for critical City projects. The Committee also heard from two PG&E representatives.<sup>1</sup>

We write to address and clarify information provided by PG&E at the hearing related to the wholesale service PG&E provides to the SFPUC. That service is necessary for SFPUC to provide clean power from Hetch Hetchy to essential City services, and other customers, because PG&E owns the electric distribution grid serving San Francisco.

**PG&E's Excessive Equipment Requirements Are Not Needed to Ensure Safety or Reliability**

PG&E's Regional Vice President described the company's history of providing more reliable service to San Francisco than it provides across other parts of its system. At the same time, he repeatedly stated that PG&E's recent proposals requiring large, expensive equipment were made to address existing safety and reliability issues.

Despite many opportunities to do so at the Federal Energy Regulatory Commission (FERC), PG&E has yet to identify any substantial engineering, safety, or reliability reasons for requiring this additional equipment. In fact, the

---

<sup>1</sup> Aaron Johnson, Vice President, PG&E Bay Area Region, and Darin Cline, Manager, Local Government Relations, PG&E Bay Area Region.

**OUR MISSION:** To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

**London N. Breed**  
Mayor

**Anson Moran**  
President

**Newsha Ajami**  
Vice President

**Sophie Maxwell**  
Commissioner

**Tim Paulson**  
Commissioner

**Dennis J. Herrera**  
General Manager



City's existing 2,000+ metered secondary service connections have been safely and reliably receiving power for decades without the additional equipment. PG&E does not even allow its retail customers to receive the higher-voltage primary service unless their loads are over 500 kW. However, PG&E is now requiring primary service for all of San Francisco's wholesale connections, no matter the size of the customer, including streetlights and traffic signals that typically require less than 1 kW, effectively forcing San Francisco to overbuild the system or transfer its customers to PG&E's retail service.

For example, for smaller, lower voltage interconnections ("secondary" connections that together account for about half of San Francisco's delivery needs), PG&E is now requiring San Francisco to install large and expensive equipment that is typically only needed for large facilities with significant electric loads (like General Hospital and our wastewater treatment facilities) that require higher voltage "primary" service. The equipment required for primary service generally adds an additional \$500,000 to install and requires a much larger footprint that is often not feasible given the City's dense landscape.

**The January 25, 2022 D.C. Circuit Court of Appeals Ruling Confirms that PG&E Has No Rationale for Its Requirements for Additional Equipment**

In an opinion dated January 25, 2022, the United States Court of Appeals for the D.C. Circuit agreed with the City that FERC improperly dismissed the City's complaint concerning PG&E's refusal to provide secondary service to small loads.<sup>2</sup> The court found that there was no evidence in the record that PG&E's practice of denying secondary service was based on safety, reliability, or any other valid concern. Further, the court concluded that PG&E's administration of the rates and charges for the services it provides to San Francisco are potentially anti-competitive.

During the Land Use and Transportation Committee hearing, PG&E largely dismissed the court's ruling as merely a "remand to that regulatory body [FERC] to strengthen their own decision-making process" and "doesn't express any opinions about PG&E or the substance of the matters at issue." That is not an accurate description of the court's opinion with respect to FERC's dismissal of the City's complaint.

The court was critical of PG&E's explanations for its refusals to provide secondary service to dozens of small loads. The court noted that PG&E identified two concerns with providing secondary voltage service to San

---

<sup>2</sup> A copy of the D.C. Circuit Court of Appeal's opinion in City and County of San Francisco v. FERC is attached hereto.

Francisco: (1) the request for service might be located too far from the necessary infrastructure, and (2) secondary facilities lack operating numbers. *Id.* at 10. According to the court, however, the declaration PG&E submitted to support those claims “does not concretely describe the challenges with respect to San Francisco’s requests for secondary service.” *Id.* at 11.

The court also rejects FERC’s reliance on PG&E’s argument that primary voltage service is an industry norm for utility-to-utility interconnections. The court found that “the Commission applied the industry norm with no explanation beyond stating that such norms ‘inform expectations,’” and that FERC “does not explain why San Francisco should have expected to be bound by an industry norm involving much higher demands than it has historically required, or why its expectations are a valid basis for PG&E’s denials of its requests.” *Id.* at 12.

### **San Francisco is Not Seeking Preferential Treatment From PG&E**

PG&E also accused the City of seeking preferential treatment in how it receives wholesale electric service, asserting that the City wants to be treated like a retail customer while paying wholesale prices. This is a mischaracterization of what the City is requesting and what PG&E is required to provide.

PG&E argued that the City’s electric customers are improperly avoiding paying PG&E’s Public Purpose Program charges, which support low income and energy efficiency programs. But these programs are only open to PG&E retail customers, whereas Hetch Hetchy Power customers receive similar program offerings through the SFPUC. In fact, state law requires publicly-owned utilities to operate and fund these types of programs, and the SFPUC’s programs are in compliance with those laws.

### **San Francisco Pays Its Fair Share**

Contrary to PG&E’s claim, the City pays its fair share of PG&E’s costs to own and operate its distribution grid through the service charges PG&E collects from San Francisco based on rates proposed by PG&E and approved by FERC. Last year, PG&E proposed to at least double and possibly quadruple the City’s service charges, as compared to then-current rates that had been approved as reasonable by FERC. While FERC has approved an interim rate increase for the City and other WDT customers, FERC has not yet ruled on the reasonableness of PG&E’s proposed increases. The City and other customers have argued that PG&E cannot demonstrate that increases of this unprecedented magnitude are just and reasonable.

In conclusion, it is clear that PG&E’s changes to its terms of service for San Francisco have more to do with PG&E’s desire to create additional barriers to

electric service, thereby forcing the City out of the electric business, than with safety and reliability concerns.

Thank you for your support of the SFPUC as we continue to fight for reasonable electric service for our City departments and our other customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Hale', with a stylized flourish at the end.

Barbara Hale  
Assistant General Manager, Power

cc: Supervisor Hillary Ronen