



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

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Order Instituting Rulemaking on the)
Commission's own motion to improve)
distribution level interconnection rules and)
regulations for certain classes of electric)
generators and electric storage resources.)

Rulemaking 11-09-011
(Filed September 22, 2011)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) MOTION TO ADOPT
TRANSITION PLAN**

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Dated: **April 23, 2012**

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Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), Southern California Edison Company (“SCE”) respectfully submits this *Motion to Adopt Transition Plan* (“Motion”) and requests that the Commission approve the attached transition plan.

I. BACKGROUND

In August 2011, the Commission initiated a settlement process on CPUC-jurisdictional distribution-level interconnection issues and encouraged all parties interested in interconnection issues to participate in the settlement discussions. The interested parties (“Settlement Parties”) began confidential settlement negotiations on August 23, 2011. On September 22, 2011, the Commission issued an Order Instituting Rulemaking on the Commission’s own motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources, R.11-09-011 (“OIR”). The OIR sought to “address the key policy and technical issues essential to timely, non-discriminatory, cost-

effective and transparent interconnection.”¹ It was also contemplated that the OIR might be used by the Commission as the procedural forum for the distribution-level interconnection settlement efforts.²

With guidance from Commission Staff, Settlement Parties engaged in frequent and lengthy meetings for seven months. The Settlement Parties reached a settlement in March 2012, and submitted a Settlement Agreement to the Commission for approval on March 16, 2012. The Settlement Agreement encompasses nearly all issues identified in the OIR by either capturing them via revisions to the existing Rule 21 Tariff (“Revised Rule 21”) or recommending they be addressed in a second phase of the OIR proceeding.

On March 2, 2012, The Vote Solar Initiative (“Vote Solar”) submitted a *Motion to Adopt Interim Procedure*. That motion sought Commission approval to permit certain “interim” issues to move forward while the Commission evaluates the Settlement Agreement, including the development of a transition plan that will explain how the Revised Rule 21 will be applied to existing Rule 21 Applicants.³ On April 20, 2012, Administrative Law Judge Regina DeAngelis issued a ruling granting the motion of Vote Solar, and ordering each utility to file its transition plan by April 23, 2012. Pursuant to the instant *Motion to Adopt Transition Plan*, SCE submits the attached Transition Plan⁴ for Commission review and approval.

II. TRANSITION PLAN

The proposed Transition Plan, set forth in Attachment 1 to this Motion, is summarized below. The Transition Plan is intended to explain how the Revised Rule 21 Tariff will be applied to Applicants already in SCE’s interconnection queue and in various stages of the interconnection process.

Section II.A of this Motion explains when SCE will start to apply the Revised Rule 21. Section II.B addresses limited exceptions to the application of the Revised Rule 21 for certain Applicants. Specifically, Section II.B.1 outlines an exception for Applicants whose projects are in transmission-interdependent areas

¹ OIR at 4.

² *Id.* at 2.

³ Existing Rule 21 Applicants are those Applicants who have a submitted an Interconnection Request prior to the effective date of the Revised Rule 21 tariff.

⁴ Capitalized terms not defined in this Motion have the meaning set forth in the Revised Rule 21.

and have a queue date⁵ on or before March 16, 2012. Section II.B.2 outlines particular aspects of the study results that Applicants eligible for this exception will receive. Section II.C clarifies the implications of the proposed Transition Plan for Applicants that have projects in transmission-interdependent areas that have a queue date after March 16, 2012.

A. SCE Will Begin Applying the Revised Rule 21 on the Date it is Effective

SCE proposes that the Revised Rule 21 apply to each Applicant on the date the revised rule is deemed effective by the Commission (“Effective Date”), except as described below in Section II.B. For applicants who started the Rule 21 process prior to the Effective Date, SCE will apply the Revised Rule 21 to all steps in the interconnection process as outlined in the Transition Plan.

There is one change in the Revised Rule 21 review process that should be highlighted for certain Applicants with PUC section 2827 Generating Facilities that include non-inverter based Generators and/or Generators with non-Certified Equipment. These Applicants should submit a completed Net Energy Metering Interconnection Request including all supporting documents sufficient for the Distribution Provider, i.e., SCE, to start the review process without waiting for the final inspection clearance. Applicants with such Generating Facilities should submit their Interconnection Request at least six (6) months in advance of their planned Commercial Operation Date. The advance submission of the Interconnection Request will better accommodate the SCE’s review and studies in a manner consistent with the timelines established in the Revised Rule 21 that may be required to complete the processing for interconnection of non-inverter based Generators and/or Generators with non-Certified Equipment.

B. Exceptions That Will Be Applied To Certain SCE Applicants in Transmission-Interdependent Areas

In order to facilitate a smooth transition from the current Rule 21 to the Revised Rule 21, SCE proposes certain limited exceptions that would allow Applicants to continue to be studied under a serial

⁵ The term “queue date,” as used in this Motion, is a reference to the date assigned to an Applicant’s project by SCE which reflects the position of that Applicant’s interconnection request relative to other interconnection requests.

study process even though they would have been placed in the cluster study process under the Revised Rule 21, thereby maintaining their current queue positions after the Effective Date. By implementing these exceptions for Applicants, SCE is anticipating and trying to accommodate the needs and concerns of its customers. For example, Silverado Power stressed the importance of maintaining the queue position of already-queued generators in its response to the *Motion of The Vote Solar Initiative to Adopt an Interim Procedure* stating, “Silverado Power believes that the Commission should address the development of a policy to transition customers queued under the current Rule 21 Tariff to an adopted, revised Rule 21 Tariff in such a way that allows already-queued projects to maintain their queue positions.”⁶ The exceptions, explained in Section II.B.1, are intended to address such concerns. A flowchart summarizing how the exception is applied is in Attachment 2.

1. Applicants in Transmission-Interdependent Areas With Queue Dates On or Prior to March 16, 2012 Will Be Studied Serially Subject to Revised Timelines

SCE believes that there should be a distinction between those Applicants whose assigned queue date is on or before March 16, 2012 (the date of the filing of the Revised Rule 21) and those Applicants whose assigned queue date is after March 16, 2012. Most importantly, SCE proposes that Applicants with projects that are in transmission-interdependent areas and have a queue date on or before March 16, 2012 should continue to be studied in a serial process. The complete proposal is discussed below.

SCE has roughly 400 Rule 21 Applicants that proposed to locate generation in transmission-interdependent areas and have a queue date on or before March 16, 2012. These Applicants are in various stages of the interconnection process, *e.g.*, have not executed study agreements, have studies that are in process, have completed interconnection studies, etc.

⁶ *Silverado Power Response to Motion of The Vote Solar Initiative to Adopt an Interim Procedure* at 3.

SCE proposes to require Applicants who have received study agreements, but have not yet signed such study agreements, to execute a study agreement and provide the required deposit according to the timelines of the Revised Rule 21. If the Applicant is unwilling or unable to move forward with an interconnection study under the Revised Rule 21 process, the Applicant will be subject to withdrawal under the terms of the Revised Rule 21. If the Applicant executes the study agreement under the Revised Rule 21, or has already signed one under the current Rule 21, SCE will perform and process the interconnection studies in a manner identical to the Independent Study Process (“ISP”) detailed in the Revised Rule 21, *i.e.*, a serial process, regardless of whether their projects would have otherwise been deemed eligible for the ISP.

Due to the number and expected complexity of these interconnection studies, SCE does not believe it can complete the required serial studies in the 90 day timeline prescribed by the ISP. The timing of the studies to be performed will vary based on the queue date of the Applicant. SCE will endeavor to have an SIS completed by November 30, 2012 for Applicants that qualify under Section II.B.1 and have a queue date no later than the WDAT Queue Cluster 4 (March 31, 2011) that have yet to receive a System Impact Study (“SIS”). SCE will endeavor to have a SIS completed by February 28, 2013 for Applicants that qualify under Section II.B.1, have a queue date after March 31, 2011, and have yet to receive a SIS. The deadlines will only apply to Applicants who have signed study agreements by July 31, 2012. SCE will complete the Facilities Study in the timeframes set forth in the Revised Rule 21 for Applicants that qualify under Section II.B.1, have received the SIS, and wish to continue to a Facilities Study or are required to have a Facilities Study, until the number of Facilities Studies requested totals 75. At that point, due to the volume of studies required, SCE will endeavor to complete any Facilities Study requested in twice the number of days prescribed in the Revised Rule 21 until the number of Facilities Studies requested totals 150. At that point, due to the volume of studies required, SCE will endeavor any Facilities Study requested in three times the number of days prescribed in the Revised Rule 21.

Once studies are complete, if an Applicant wishes to continue to a Generator Interconnection Agreement, SCE will provide one in the number of days prescribed in the Revised Rule 21 until the number of Generator Interconnection Agreements requested reaches 75. At that point, due to the volume of Generator Interconnection Agreements required, SCE will provide a Generator Interconnection Agreement

to an Applicant in twice the number of days prescribed in the Revised Rule 21 until the number of requests reaches 150. At that point, SCE will provide a Generator Interconnection Agreements to an Applicant in three times the number of days prescribed in the Revised Rule 21.

2. Expectations for Study Results of Applicants That Are Studied in a Serial Study Process

All Applicants with projects that are in transmission-interdependent areas are in a complex situation because they are requesting interconnection in areas where there is already excess generation (either existing generation or earlier-queued generation). Due to this excess generation, they will be unlikely to be able to serve local load and transmission upgrades may be required. Moreover, because of the nature of the serial study process, SCE is not currently able to specify for the Applicants affected: (1) what upgrades will ultimately be required; (2) whether those upgrades will be paid for by an earlier-queued Applicant; and (3) the exact time frame when interconnection will occur. SCE's inability to provide specific results is caused by the volume of earlier-queued megawatts and by the uncertainty about whether each of those generators will interconnect as planned or will withdraw from the queue. For example, SCE currently has over 900 active interconnection requests, representing 30,000 MWs of capacity inclusive of interconnection requests under the California Independent System Operator ("CAISO"), Wholesale Distribution Access Tariff ("WDAT"), and Rule 21 procedures. A further complication is that transmission upgrades are often complex and take a long time to plan, site, permit and construct (estimated to require 6 – 8 years). In light of this uncertainty, SCE will provide study results which provide the best information available at the time and will include a range of cost estimates. The range of cost estimates will identify the upgrades triggered by the Applicant, assuming all earlier-queued generators interconnect and fund the upgrades they triggered. The range of cost estimates will also identify the facilities that are required by studies of earlier-queued generators that, if not funded by the earlier-queued generators, may still be required for interconnection, and would thus become the cost responsibility of the Applicant ("Other Potential Facilities").¹ This proposal is

¹ Upon changes to the queue (e.g., withdrawal of an earlier-queued generator), a technical evaluation would be performed to determine if a portion of or all of the Other Potential Facilities would still be required to interconnect a particular Applicant.

designed to address the uncertainty surrounding cost responsibility by providing the range of possible outcomes.

An additional component that adds further complexity is the proposed commercial operation date (“COD”) for each generator. There is no necessary relationship between the queue order of generators and the proposed CODs. It is not unusual for an Applicant to have a proposed COD prior to an earlier-queued generator’s COD. Consequently, an Applicant who is waiting for an earlier-queued generator to fund particular upgrades may not achieve its desired COD. In order to accommodate such Applicants, SCE will perform an operational study if requested,⁸ and if the project is located in an area that is not an area with known, current existing transmission constraints, that would not allow for early interconnection. This operational study will inform the Applicant of whether there is a feasible means of interconnecting their project in advance of upgrades triggered by earlier-queued projects. If not, the operational study will show the Applicant what earlier-queued upgrades do need to be built in order to meet its desired COD. The operational study will also provide estimates of the cost and timing for such upgrades. If the Applicant is willing to initially fund such upgrades in order to satisfy its planned COD, provisions will be made in the Generator Interconnection Agreement such that if the earlier-queued Applicant who triggered the needed upgrades proceeds with interconnection, the earlier-queued Applicant will be required to reimburse the later-queued Applicant for the cost of the upgrade that was advanced by the earlier-queued Applicant. It should be noted that some Applicants will not be able to interconnect (without requiring upgrades) under an operational study because of current transmission constraints in the area they have chosen to locate. In addition, there are some generators that have previously completed studies, but have not signed a generator interconnection agreement and may benefit from having an updated study. When such conditions exist, SCE will contact the Applicant to arrange for a re-evaluation under the terms described above.

After presenting these options to the Applicant, if an Applicant determines to continue with a particular Interconnection Request, the applicant will be required to post Financial Security and execute a

⁸ The operational study will be conducted at the Applicant’s expense with an estimated completion date provided by SCE at the time the study is requested.

Generator Interconnection Agreement as required by the Revised Rule 21. It is important that nonviable projects withdraw from the queue so that viable projects can obtain accurate information about their prospects for interconnection. If an Applicant determines that the length of time required for interconnection is not consistent with their business model, the Applicant should withdraw from the queue. SCE believes this process and requirements will ensure that only viable projects remain in the queue while providing the most flexibility to Applicants given the reality of its existing queue and the capacity of its system.

C. Applicants In Transmission-Interdependent Areas Who Have A Queue Date After March 16, 2012 Will Be Subject To The Cluster Process Under The Revised Rule 21

Under the Revised Rule 21, SCE will study Applicants with projects that are in transmission-interdependent areas, and have a queue date after March 16, 2012, in a cluster study process with other generators interconnecting in the same area, pursuant to the WDAT Queue Cluster Process. SCE chose the March 16, 2012 date because it is the date that the Settlement Agreement was filed and the terms of the Revised Rule 21 were made available to the public. The Settling Parties were well aware of the need to study transmission interdependent projects together in a cluster study when they approved of the use of the transmission cluster process in the Revised Rule 21. Thus, while SCE provided an exception to the cluster process for a very large number of generators, it needed to draw a line. This is particularly necessary given that many generator projects are not suited for the serial process, making it more difficult to provide timely and accurate results to all participants. SCE tried to tailor its exceptions to minimize the impact of the transition on already-queued Applicants where possible. A timeline of the Rule 21 reform efforts and the demarcation line between clustered and serial projects can be found in Attachment 3.

III. ADDITIONAL ISSUES RELATING TO APPLICANTS

A. Queue Posting

The Revised Rule 21 requires SCE to post a queue listing of all Rule 21 Interconnection Requests (except net energy metering interconnection requests) and allows SCE to post a combined queue listing

containing both Rule 21 and FERC-jurisdictional Interconnection Requests to the distribution system. The information that will be posted can be found by viewing SCE's FERC-jurisdictional WDAT queue. The queue is posted on SCE's website.² SCE will begin posting the Rule 21 queue at the next regularly scheduled update (such updates occur monthly) after the Effective Date.

IV. CONCLUSION

For the foregoing reasons, SCE respectfully requests the Commission approve this Motion and the attached Transition Plan.

Respectfully submitted,

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² This information can be found at: http://www.sce.com/nrc/aboutsce/regulatory/openaccess/wdat/wdat_queue.xls

Attachment 1

ATTACHMENT 1

PROCEDURES FOR TRANSITIONING INTERCONNECTION REQUESTS SUBMITTED PRIOR TO EFFECTIVE DATE OF THE REVISED RULE 21 TARIFF

I. Objective

- A. The objective of this Transition Plan is to set forth procedures for the transition of existing Rule 21 Interconnection Requests to the Revised Rule 21.

II. Definitions

- A. Capitalized terms shall have the meaning set forth in the Revised Rule 21 or in the Motion.

III. Transition of Interconnection Requests of Existing Rule 21 Applicants

A. General

- i. For Applicants who submitted an Interconnection Request under Rule 21 prior to the Revised Rule 21 Effective Date, the Revised Rule 21 shall be applied to Applicant's interconnection process as outlined in this Transition Plan.
- ii. Withdrawals occurring before the Effective Date will be processed in accordance with the existing Rule 21. Withdrawals occurring on or after the Effective Date will be processed in accordance with the Revised Rule 21. Accordingly, on or after the Effective Date, refunds of the application fee will not be provided.
- iii. The tariff sections referred to here are for convenience and do not imply that other applicable provisions of the Revised Rule 21 do not apply.
- iv. Section references refer to the Revised Rule 21 unless otherwise noted.

B. Applicants Who Have Not Yet Received A Queue Date

- i. Interconnection Requests that have been submitted, but have not received a queue date on or before the Effective Date will be processed in accordance with the timelines in Section E.5 of the Revised Rule 21, but will not be required to submit a new Interconnection Request. Interconnection Requests will be deemed complete based on the requirements of the existing Rule 21.

C. Applicants In The Initial Or Supplemental Review Process

- i. Interconnection Requests that have a queue date on or before the Effective Date and are being evaluated under Initial or Supplemental Review, but have not completed the evaluation by the Effective Date will be processed in accordance with Section F.2 of the Revised Rule 21 using the Revised Rule 21 Fast Track evaluation, provided the Revised Rule 21 eligibility requirements are met.¹⁰ If the eligibility requirements are not met, the Applicant will be processed in accordance with Section E or F of this Transition Plan, as applicable.

D. Applicants That Have Passed Initial Or Supplemental Review

- i. Interconnection Requests that have passed Initial or Supplemental Review, but have not signed a Generator Interconnection Agreement by the Effective Date will be processed in accordance with Section F.2.e of the Revised Rule 21.
 - 1. Applicants who have previously been provided a draft or executable interconnection agreement or an Interconnection Facilities Financing and Ownership Agreement, but have not yet executed the agreement, may elect to finalize and execute the agreement they were provided or request one of the new Generation Interconnection Agreements approved in connection with the Revised Rule 21, provided the Applicant is eligible for such Generation Interconnection Agreement.

E. Applicants That Have Failed Supplemental Review and Have A Queue Date No Later Than March 16, 2012

- i. Projects with a queue date no later than March 16, 2012, will be studied under the Independent Study Process in accordance with Section F.3.d of the Revised Rule 21 as follows:
 - 1. Applicants that failed Supplemental Review but did not have their scoping meeting by the Effective Date will be processed in accordance with Section F.3.d.i of the Revised Rule 21.
 - 2. Applicants that had their scoping meeting but were not tendered a study agreement prior to the Effective Date will be provided the Standardized Study Agreement in

¹⁰ See Section E.2.b of the Revised Rule 21 for eligibility requirements.

accordance with the timelines set forth in the Revised Rule 21.¹¹

3. Applicants that have been tendered a study agreement, but have not executed it, will be required to execute the study agreement within the timelines set forth in the Revised Rule 21. To avoid duplication of work, new study agreements will not be issued.
4. Applicants that have started the study process, but have not completed studies, will be processed in accordance with Section F.3.d of the Revised Rule 21 except that the timelines for completion of the System Impact Study are modified as follows:
 - a. Applicants with a queue date no later than the WDAT Queue Cluster 4 (March 31, 2011) will have a System Impact Study completed by November 30, 2012.
 - b. Applicants with a queue date after March 31, 2011 will have a SIS completed by February 28, 2013.
 - c. If the Applicant requests a Facilities Study or is required to have a Facilities Study, it will be completed in the timeframes set forth in the Revised Rule 21 until the number of Facilities Studies requested reaches 75. At that point, any Facilities Study requests will be completed in twice the number of days prescribed in the Revised Rule 21 to complete Facilities Studies until the number of Facilities Studies requested reaches 150. At that point, any Facilities Study requests will be completed in three times the number of days prescribed in the Revised Rule 21.
 - d. If the Applicant requests a Generator Interconnection Agreement, it will be provided in the time prescribed in the Revised Rule 21 until the number of Generator Interconnection Agreements requested reaches 75. At that point, any Generator Interconnection Agreement requests will be completed in twice the number of days prescribed in the Revised Rule 21 to complete Generator Interconnection Requests until the number of Generator Interconnection Agreements requested reaches 150. At that point, any Generator Interconnection Agreement requests will be completed in three times the number of days prescribed in the Revised Rule 21.
 - e. These timelines apply to Applicants who have executed study agreements by July 31, 2012. Applicants who have not executed study agreements by July 31, 2012

¹¹ If the Standardized Study Agreement is not approved, the existing study agreement will be provided.

will be provided a schedule of completion dates after the study agreement is executed.

- f. Applicants who are not in transmission-interdependent areas will be processed according to the timelines set forth in the Revised Rule 21.

F. Applicants That Have Failed Supplemental Review And Have A Queue Date Later Than March 16, 2012

- i. If an Applicant has failed either Initial or Supplemental Review, and has not been evaluated for transmission interdependence by the Effective Date, then the Distribution Provider will provide an assessment of whether the Applicant is in a transmission-interdependent area in accordance with Screen Q within 20 Business Days of the Effective Date.
- ii. Applicants that have been identified as being located in a transmission-interdependent area will be processed in accordance with Section F.3.c. of the Revised Rule 21, which requires the Applicant to withdraw from Rule 21 and allows the Applicant to apply under the WDAT for the next cluster study.
- iii. Applicants that are not in a transmission-interdependent area will be processed in accordance with Section F.3.d of the Revised Rule 21 depending on their stage in the process as described in Section E.i.1 through E.i.4 of this Transition Plan, except that the timelines for study completion will be as specified in the Revised Rule 21.

G. Applicants That Have Completed Detailed Studies But Have Not Signed A Generator Interconnection Agreement

- i. Applicants that have completed detailed studies but have not signed a Generator Interconnection Agreement by the Effective Date will be processed in accordance with Section F.3.e of the Revised Rule 21, except as provided below.
 - 1. Applicants who were previously provided a draft or executable interconnection agreement or an Interconnection Facilities Financing and Ownership Agreement, but have not yet executed the agreement, may elect to finalize and execute the agreement they were provided or request one of the new Generation Interconnection Agreements approved in connection with the Revised Rule 21, provided the Applicant is eligible for such Generation Interconnection Agreement.

2. Applicants that SCE has identified as potentially benefiting from a re-evaluation, will be processed in accordance with Section F.3 of the Revised Rule 21 beginning when the re-evaluation results have been provided to the Applicant.

H. Financial Security Posting For Applicants

- i. All Applicants will be required to comply with the provisions in Section F.4 of the Revised Rule 21 (for Independent Study Process) and the new Generator Interconnection Agreement (for Fast Track) regarding Financial Security posting.
- ii. For projects being studied under the ISP, the initial posting of Financial Security will be due in accordance with the timelines set forth in Section F.4.b of the Revised Rule 21. If the System Impact Study was completed prior to the Effective Date, the same timeline will apply, but the start of the timeline will be as described in Section III.B of this Transition Plan. The second posting of Financial Security will be due in accordance with the timelines set forth in Section F.4.c of the Revised Rule 21. If the Facilities Study was completed prior to the Effective Date, the same timeline will apply, but the start of the timeline will be as described in Section III.B of this Transition Plan. Similar treatment will apply to the third posting of Financial Security.

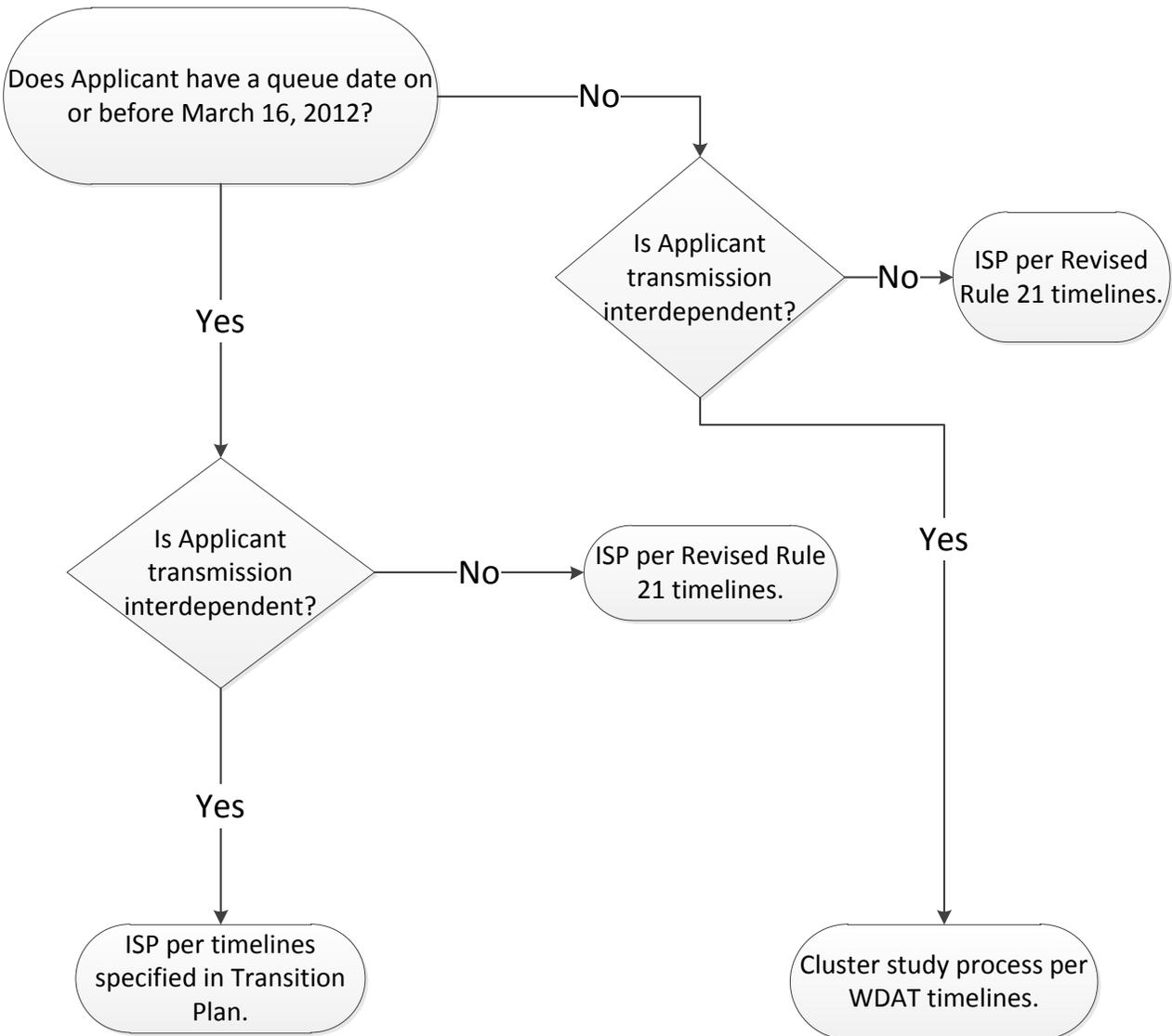
IV. Timelines

- A. The intent of this Section is to ensure that all timelines in the Revised Rule 21 begin to apply as of the Effective Date of the revised tariff and that notice is given to Applicants.
- B. For purposes of the transition, notice of timelines that require a response from the Applicant will be provided via a written communication from the SCE project manager to the Applicant informing the Applicant of the due date.
 1. Example: If an Applicant was provided a study agreement that it had not yet executed, the timeline for execution and submission of a deposit for that study agreement will begin when an email is sent advising the Applicant that the executed study agreement and study deposit are due on a certain date, regardless of how long the Applicant had the study agreement prior to the email.
- C. For purposes of the transition, upon approval of the Revised Rule 21 or the Effective Date, SCE shall abide by all timelines in the Revised Rule 21 that require action on the part of SCE, except where noted in this Transition Plan.

1. Example: If an Interconnection Request was submitted prior to the Effective Date and was not reviewed by SCE, the timeline for SCE to complete its review will begin on the Effective Date, regardless of when the Applicant submitted the Interconnection Request.

Attachment 2

Flowchart Summarizing How The Exception Is Applied



ISP stands for Independent Study Process

Attachment 3

Timeline of Rule 21 Reform and Line of Demarcation Between Serial and Cluster Study Process for Transmission Interdependent Projects

