



FILED
06-11-13
01:33 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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)

ADMINISTRATIVE LAW JUDGE'S RULING TO (1) ISSUE WORKING GROUP PAPER ON AUTONOMOUS INVERTER FUNCTIONALITIES (2) SET COMMENT DATES AND WORKSHOP (3) ENTER WORKING PAPER INTO THE RECORD AND (4) ANNOUNCE NEW RULE 21 WORKING GROUP

On September 26, 2012, the assigned Commissioner issued an Amended Scoping Memo identifying six issues for consideration in phase II of this rulemaking. The sixth issue is generally referred to as Technical Operating Standards. Included within the sixth issue is determining the technical operating standards required to be responsive to the goals of this proceeding, including potential electric grid reliability needs. Toward this end, this ruling incorporates a working paper into the record on autonomous inverter functionalities, seeks comments on the working paper, and announces a June 21, 2013 workshop at the Commission. This ruling also announces a new Rule 21 working group.

1. Working Paper - Autonomous Inverter Functionalities

Consistent with the Technical Operating Standards issue in the September 26, 2013 Amended Scoping Memo, this ruling incorporates into the record a working paper prepared by the Smart Inverter Working Group. The

working paper is entitled, *Candidate DER Capabilities: Recommendations for Updating Technical Requirements in Rule 21*.

This working paper is the product of a working group which was formed to develop a working paper on expanded inverter functionality and improved safety, reliability and efficiency of Distributed Generation (DG) interconnected to the distribution grid. The working group was not established under the auspices of the Commission and consists of engineers, industry, regulators and advocacy groups, and has functioned as a consensus building process with the goal of producing the following: (1) a technical working paper detailing autonomous inverter functionalities to be utilized to increase safety and reliability of the grid under high levels of DG penetration and (2) an proposed implementation plan.

The joint working paper, *Candidate DER Capabilities: Recommendations for Updating Technical Requirements in Rule 21*, is divided into two parts. The first part, Part A, details the technical autonomous inverter functionalities proposal. The second part, Part B, provides for plans and procedures for testing and validating the smart inverter functions. Part B also discusses how the smart inverter functions must be tested before they will be permitted to interconnect to the utility power systems to ensure that these systems do not compromise the safety and reliability of the utility's power system and that they meet the smart inverter functional requirements identified in Rule 21.

A workshop to discuss the working paper is scheduled for Friday, June 21, 2013 from 9:15 a.m. to 4:00 p.m. in the Auditorium of the California Public Utilities Commission.

In addition, the working paper is attached here to at Attachment 1 and is incorporated into the record of the proceeding.

Opening comments on the working paper may be filed on July 31, 2013 and reply comments on August 30, 2013. Comments should also include a table of contents and include the party's name at the bottom of each page.

2. New Rule 21 Working Group – Additional Issues

This ruling also serves to announce the creation of a new working group. This new working group will be known as the Rule 21 Working Group. I envision this working group to achieve the following three goals:

1. Develop a proposal delineating the required reporting of interconnection data and the frequency to be reported to the Commission and made available publically.
2. Develop a common understanding of (a) the current utility interconnection upgrade construction practices, timelines and pricing; (b) the current utility interconnection upgrade permitting practices, timelines and pricing; (c) the utility interconnection upgrade constraints and the range of possible experiences to align expectations.
3. Develop a proposal to address interconnection upgrade construction issues, dispute resolution issues, and improve all processes.

Additional information about this working group will soon be provided to the service list of this proceeding.

3. Rule 21 - Directive to Energy Division and the Utilities to Identify Minor Improvements

Energy Division has suggested that improved clarity to Rule 21 could be achieved by minor improvement, such as including additional forms and more specifically identifying the location of forms within Rule 21. To further explore this issue, I direct Energy Division and the utilities to work collaboratively to identify any such minor improvements in the drafting of Rule 21. At the appropriate time, I will then inform the service list of this proceeding of any

proposals to make minor clarifying changes to Rules 21 and seek the input of parties.

IT IS RULED that:

1. The Smart Inverter Technical Smart Inverter working paper entitled, *Candidate DER Capabilities: Recommendations for Updating Technical Requirements in Rule 21* is attached hereto at Attachment 1 and entered into the record of this proceeding.

2. The Commission's Energy Division Staff will hold a workshop on June 21, 2013 from 9:15 a.m. to 4:00 p.m. in the Auditorium of the California Public Utilities Commission to discuss the attached working paper, *Candidate DER Capabilities: Recommendations for Updating Technical Requirements in Rule 21*.

3. After the June 21, 2013 Energy Division workshop on the working paper, parties may file opening comments on July 31, 2013 and reply comments on August 30, 2013.

4. A new Rule 21 Working Group is announced and directed to address this issues set forth above. Additional information about this working group will be provided to the Service List of this proceeding.

5. To achieve further clarify in Rule 21, Energy Division and the utilities are directed to work collaboratively to identify any minor changes to Rule 21 for the parties to this proceeding to later comment upon.

Dated June 11, 2013, at San Francisco, California.

/s/ REGINA DEANGELIS

Regina DeAngelis

Administrative Law Judge