



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

10-27-11
04:59 PM

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 27, 2011)

**COMMENTS OF THE SOLAR ALLIANCE
ON SCOPE AND SCHEDULE OF
ORDER INSTITUTING RULEMAKING**

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October 27, 2011

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In accord with Ordering Paragraph 8 of the above captioned rulemaking, the Solar Alliance¹ comments on the proposed scope and schedule of this proceeding.

I. INTRODUCTION

The Commission issued this Order Instituting Rulemaking to review the rules and regulations governing interconnecting generation and storage resources to the electric distribution systems of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) which are currently set forth in their respective Tariff Rule 21. The stated purpose is to review, and, if necessary, revise, Rule 21 to ensure that the interconnection process is timely, non-discriminatory, cost-effective, and transparent.² In undertaking this process, the Commission acknowledges the recently initiated settlement efforts to address matters related to Rule 21, and directs that this OIR may be used as the procedural venue for the results of such efforts, as necessary.

¹ The comments contained in this filing represent the position of the Solar Alliance as an organization, but not necessarily the views of any particular member with respect to any issue.

² Order Instituting Rulemaking at p.1.

The Solar Alliance is participating actively in the referenced settlement discussions and is hopeful regarding their chances of success. That said, however, the Solar Alliance remains concerned regarding the breadth of issues which the settlement process is pursuing, and given the expedited nature of the settlement process, that certain issues may not be adequately reviewed and addressed. In this regard, the Solar Alliance would offer a limited number of additional issues to the scope of the rulemaking proceeding

II. SCOPE OF PROCEEDING

The following should be added to the preliminary list of issues identified in the Rulemaking:

Telecommunications Requirements

The telecommunications requirements associated with the interconnection of a generator to an IOU's distribution system are not known up front. Thus, for example, Section F.5 of PG&E's Rule 21 at least provides some guideline, although it is still unclear on the cost responsibility, how that is determined, and the justification for placing these costs on the distributed Generating Facilities:

If the nameplate rating of the Generating Facility is 1 MW or greater, Telemetering equipment at the Net Generator Output Metering location may be required at the Producer's expense. If the Generating Facility is interconnected to a portion of PG&E's Distribution System operating at a voltage below 10 kV, then Telemetering equipment may be required on Generating Facilities 250 kW or greater. PG&E shall only require Telemetering to the extent that less intrusive and/or more cost effective options for providing the necessary data in real time are not available. PG&E will report to the Commission or designated authority, on a quarterly basis, the rationale for requiring Telemetering equipment in each instance along with the size and location of the facility.

Even more obtuse is SCE's Wholesale Distribution Access Tariff, Generator Interconnection procedures, which do not mention telemetry requirements at all and yet they easily, and many times surprisingly, show up in study results.

In practice, all the Participating Transmission Owners require some type of telecommunications facilities generally for the purpose of participation in a special protection system where there are numerous generation projects. The costs for the equipment and installation can be quite high depending on the location of the project and its distance to an existing communication port for the PTO, along with the assumptions of routing requirements. If environmental permitting is required to route redundant telecommunication lines, this only exacerbates the costs estimates. The Solar Alliance submits that, consistent with the objectives of this rulemaking to assure that the interconnection process is cost-effective and transparent, each PTO should address any distribution related telecommunications requirements on a system-wide grid basis rather than on an individual generator basis. Having assessed the needs system wide, the PTO could more effectively determine the telecommunications requirements which would be associated with each interconnection, revealing those requirements upfront, and, thereby, having well defined transparent unit costs.

Installation of Net Meters

Public Utility Code Section 2827 (e) 1 establishes the time frame for net meter installation as follows:

Every electricity distribution utility or cooperative shall ensure that requests for establishment of net energy metering are processed in a time period not exceeding that for similarly situated customers requesting new electric service, but not to exceed 30 working days from the date it receives a completed application form for net energy metering service, including a signed interconnection agreement from an eligible customer-generator and the electric inspection clearance from the governmental authority having jurisdiction.

The utilities apparent interpretation of the statutory requirement is that they have 30 days after the interconnection of a PV system to install the associated net meter, as that appears to be the practice occurring at least with respect to one IOU. The Solar Alliance contends this

interpretation results in an inefficient and more costly process, as it requires two site visits -- i.e., one at the time of interconnection and one to install a net meter-- instead of achieving both during one visit. Moreover, the result of such an interpretation has been substantial delays in receipt of the net meters, and, as a result, substantial delay in the compensation received for generation exported to the grid. Accordingly, the Solar Alliance request that the Commission explore whether the utilities current interpretation of PU Code Section 2827 (e) 1 is consistent with the statutory mandate as well as with the Commission's overall policy goals of advancing the installation of clean energy systems.

More Detailed Mapping

The Commission directed the IOUs to provide additional transparency with respect to network interconnection capacity in the RAM proceeding. As the levels of DG penetration increase it will be exceedingly useful for the IOUs to track system and equipment capacity deeper into the network, which was not required by the RAM Decision and associated implementation resolution.³ The scope of this proceeding should include an assessment of the value of directing the IOUs to collect more data.

III. SCHEDULE

The Rulemaking does not set forth a proposed schedule beyond the filing of opening and reply comments on the OIR. The Solar Alliance is aware that that the schedule will somewhat be driven by the ongoing settlement process on interconnection issues. However, the Solar Alliance would request that in issuing its Scoping Memo and determining a more refined schedule for this proceeding, that the Commission acknowledge that, more likely than not, all issues related to

³ The IOUs were directed to create maps that showed a available capacity at the substation and circuit level

