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FILED
11/27/19
09:38 AM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Consider Streamlining Interconnection
of Distributed Energy Resources and
Improvements to Rule 21.

Rulemaking 17-07-007

**ADMINISTRATIVE LAW JUDGE'S RULING DIRECTING RESPONSES TO
ATTACHED QUESTIONS AND REVISING SCHEDULE**

Summary

A revised schedule for this proceeding, which includes the commencement of Working Group Four, is established herein. Furthermore, as described below, parties are directed to respond to the questions attached to this ruling. Responses to the questions in this ruling and comments on the June 14, 2019 Working Group Three Final Report (Report) shall be filed no later than January 13, 2020. Reply comments on the question responses and the Report shall be filed no later than January 27, 2020.

1. Background

Pursuant to the November 16, 2018 Amended Scoping Memo in this proceeding, Working Group Three filed a final report on June 14, 2019 addressing the following eleven issues in this proceeding: 12, 15, 16, 20, 22, 23, 24, 27, 28 and new issues A and B of this proceeding (Report). On June 19, 2019, the Commission's Energy Division facilitated a workshop to discuss the contents of the Report.

2. Additional Information is Needed

The Commission will review the proposals contained in the Report to determine which proposals to adopt. As indicated during the June 19, 2019 workshop, in order to determine which proposals to adopt, the Commission needs additional information.

Parties shall provide responses to the questions contained in Attachment A of this ruling. Some questions are directed only to certain parties, *e.g.*, the investor-owned utilities. Parties should respond to all other questions. Responses shall be filed no later than January 13, 2020 and reply comments shall be filed no later than January 27, 2020. Parties may also provide comment on the Report itself during this time.

3. Revising the Schedule

The schedule in the proceeding has been delayed. As such, a revised schedule is established as indicated in the table below. Included in this schedule is the commencement of Working Group Four. Given the delay in a proposed decision on Working Group Two proposals, a proposed decision to be issued in spring 2020 will address proposals from the Working Group Two and Working Group Three reports.

Date	Activity
January 13, 2020	Comments to Questions in Attachment 1 Filed
January 27, 2020	Reply Comments to Attachment 1 Responses Filed
February 2020	Working Group Four Commences

IT IS RULED that:

1. Parties shall file detailed responses to the questions in Attachment A of this ruling. The responses shall be filed no later than January 13, 2020. Reply comments shall be filed no later than January 27, 2020.
2. Parties may include comments on the contents of the June 14, 2019 Working Group Three Final Report with their January 13, 2020 responses.
3. Working Group Four is authorized to commence during the month of February 2020.

Dated November 27, 2019, at San Francisco, California.

 /s/ KELLY A. HYMES
Kelly A. Hymes
Administrative Law Judge

Attachment A

Working Group Three June 14, 2019 Report Questions

Working Group Three Report Questions

Issue 12: Distribution Upgrade Timelines

- 12-a: If the Commission adopts proposal 12-a, what reporting venue and format should the Commission require?
- 12-c: Is there any reason that the timelines that Working Group Two recommended establishing for upgrades under Rules 15 and 16, which were addressed as part of Issue 10, should not be extended to all upgrades under Rule 21?
- 12-d:
 - Why has the timeline for Net Generation Output Meters (NGOMs) been singled out?
 - What timeline is reasonable? Explain why.
- 12-e: This proposal is listed as consensus, but there does not seem to be agreement on how it should be implemented. Comment on the apparent areas of disagreement in this proposal. Specifically, how should notification requirements balance the need for site-specific visibility with the reality that some causes of delays will likely impact many projects. Are there situations in which an automated delay notice would meet a developer needs? Should a request to check project status constitute “notice”?
- 12-f:
 - What types of interconnections should be included in the group of interconnections subject to the framework for tracking and reporting?

- What is a reasonable metric for tracking? Explain why your proposed metric is reasonable.
- 12-j: What are the impacts of adding the requirement to provide quarterly updates on substation upgrades to Rule 21?

Issue 15: Itemized Billing

- 15-a:
 - Is any Commission action needed in order to facilitate the implementation of this proposal?
 - Should the utilities be required to report back on their progress in this area? If so, what timeline would be appropriate for this reporting and what procedural venue should be utilized?
- 15-b:
 - What specific question should the Commission consider?

Issue 16: Third Party Construction of Upgrades

- 16-a, 16-b, and 16-c: There is very little discussion of the rationale behind these proposals in the report. Discuss the pros and cons of aligning the rules governing third party upgrades required under Rule 21 with those of Rule 15.
- 16-d: Respond to the scenarios raised by the Green Power Institute (GPI) in Annex A?

Issue 22: Interconnection Portals

- 22-a:
 - State your position on each of the 18 sub-proposals.
 - If you support an improvement, provide an indication of the value of said improvement, both in terms of its use for

individual customers and in terms of the number of customers for whom such a function would be useful.

- If you are opposed to the requirement that the investor-owned utilities make an improvement, explain why.
- For GPI: How were the priority rankings determined? Describe the process by which numerical values were assigned.
- Should the Commission determine that more information is needed before a determination can be made on the sub-proposals, what venue would be appropriate for the collection of such data?
- 22-b: What cost recovery mechanism is appropriate for costs incurred implementing interconnection portal improvements?

Issue 23: Interconnection of Electric Vehicles

- 23-b: Given that the Working Group agrees in 23-c that no Rule 21 changes are needed, why are the changes recommended in Proposal 23-b necessary?
- 23-c: Is Commission action required in order to implement this proposal?
- 23-d:
 - How will said testing demonstrate that the factory default settings are set to unidirectional mode?
 - Assuming that a Vehicle to Grid direct current electric vehicle supply equipment system is certified in compliance with the stated requirements, would any action be necessary on the part of the customer in order to receive permission to connect to the distribution system? If a process is necessary and has yet to be established, what venue would be appropriate for determining the details?

- Are changes to Rule 21 needed to effectuate this recommendation?
Explain any necessary changes.
- Since the publishing of the Working Group Three Report, is there an update to when IEEE 1547.1-2019 will be approved?
- 23-e:
 - Is Commission action required in order to implement this proposal?
If so, describe the action.
 - Are specific Rule 21 tariff changes needed in order to implement this proposal?
 - The WG Three Report mentions implementation details that need to be worked out. Describe what these details entail, and the regulatory process for determining how and when to resolve implementation.
- 23-f:
 - Investor-owned Utilities: Estimate the cost of and timeline for development of this functionality and provide an explanation of the estimate.
 - All parties: Estimate and justify an appropriate timeline for the development of this functionality.
 - Southern California Edison Company (SCE): Provide the timeline for the function to be incorporated into the Generation Interconnection Processing Tool.
- 23-h:
 - Explain why you support or oppose the modifications to Section N.

- 23-i:
 - Both San Diego Gas & Electric Company (SDG&E) and Pacific Gas and Electric Company (PG&E) suggest that it is premature to consider eligibility criteria for the streamlining of Vehicle to Grid alternating current pilot. At what point would this consideration be timely?
 - The proposed implementation of this proposal is unclear. What venue would be appropriate for the determination of implementation details?

Issue 24: Cost of Ownership Calculation (COO)

- All proposals: What is the range of total percentage of cost that COO can make up for a project?
- 24-a: What are the effects of COO calculations on ratepayers, if any?
- 24-b:
 - For investor-owned utilities:
 - Describe the replacement cost options currently offered by each utility.
 - Is replacement cost accounted for separately within cost of ownership or included in the COO value?
 - For non-utilities: What is the benefit of offering all three options?
- 24-c:
 - Define like-for-like as you understand the term to be applied in this context.
 - The discussion of this proposal notes that PG&E utilizes something similar to a net-additional methodology for the COO calculations for upgrades under Rules 15 and 16. How do investor-owned utility

practices for COO calculations for upgrades under Rule 21 currently differ from the described methodology?

Issue 27 & 28: Smart Inverter Operation Requirements & Integrated Distributed Energy Resources Coordination

- 27-b: Issue F asks, “What interconnection rules should the Commission adopt to account for the ability of DERMS and aggregators’ commands to address operational flexibility need?” How should the workshop be scheduled and formatted so as to best support the Issue F4 effort?

Issue A&B: Non-export and Limited Export & Solar+Storage

- A-B #3:
 - Under what scenarios would this option be utilized, and why would it provide advantages over the status quo?
 - What test standards and certifications are necessary before this proposal can be fully implemented?