



FILED

07/30/21
04:04 PM

KHY/cmf 7/30/2021

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

E-MAIL RULING NOTICING SEPTEMBER 29, 2021 WORKSHOP

Dated July 30, 2021, at San Francisco, California.

/s/ KELLY A. HYMES

Kelly A. Hymes
Administrative Law Judge

From: Hymes, Kelly A. <kelly.hymes@cpuc.ca.gov>

Sent: Friday, July 30, 2021 1:23 PM

To: 'Lydic.Brian@Fronius.com' <Lydic.Brian@Fronius.com>; 'cseymour@sunedison.com' <cseymour@sunedison.com>; 'sahm@clean-coalition.org' <sahm@clean-coalition.org>; 'matthew@turn.org' <matthew@turn.org>; 'KFox@kfwLaw.com' <KFox@kfwLaw.com>; 'robert.white@us.abb.com' <robert.white@us.abb.com>; 'Adam@SunlightPartners.com' <Adam@SunlightPartners.com>; 'Jessalyn_Ishigo@AHM.Honda.com' <Jessalyn_Ishigo@AHM.Honda.com>; 'Milissa.Marona@gmail.com' <Milissa.Marona@gmail.com>; 'matthew.dwyer@sce.com' <matthew.dwyer@sce.com>; 'JNewlander@sdge.com' <JNewlander@sdge.com>; 'liddell@EnergyAttorney.com' <liddell@EnergyAttorney.com>; 'ted.ko@stem.com' <ted.ko@stem.com>; 'Stanfield@SMWLaw.com' <Stanfield@SMWLaw.com>; Clay, Christopher <christopher.clay@cpuc.ca.gov>; 'william.sanders@sfgov.org' <william.sanders@sfgov.org>; 'ek@a-klaw.com' <ek@a-klaw.com>; 'sww9@pge.com' <sww9@pge.com>; 'BCragg@GoodinMacbride.com' <BCragg@GoodinMacbride.com>; 'hans@silveradopower.com' <hans@silveradopower.com>; 'JArmstrong@GoodinMacBride.com' <JArmstrong@GoodinMacBride.com>; 'pthompson@goodwinprocter.com' <pthompson@goodwinprocter.com>; 'JKarp@winston.com' <JKarp@winston.com>; 'borion@lawyersforcleanenergy.com' <borion@lawyersforcleanenergy.com>; 'ssmyers@att.net' <ssmyers@att.net>; 'Rita.Liotta@navy.mil' <Rita.Liotta@navy.mil>; 'taylor.hollis@schneider-electric.com' <taylor.hollis@schneider-electric.com>; 'TReid@fce.com' <TReid@fce.com>; 'JKeyes@KeyesFox.com' <JKeyes@KeyesFox.com>; 'matt.vespa@SierraClub.org' <matt.vespa@SierraClub.org>; 'Sean@BRBLawGroup.com' <Sean@BRBLawGroup.com>; 'cesa_regulatory@storagealliance.org' <cesa_regulatory@storagealliance.org>; 'GMorris@emf.net' <GMorris@emf.net>; 'JLevin@BioEnergyCa.org' <JLevin@BioEnergyCa.org>; 'RBelur@EnphaseEnergy.com' <RBelur@EnphaseEnergy.com>; 'tom@sunspec.org' <tom@sunspec.org>; 'DarlingtonLaw@gmail.com' <DarlingtonLaw@gmail.com>; 'JPinjuv@caiso.com' <JPinjuv@caiso.com>; 'Brad@calssa.org' <Brad@calssa.org>; 'matt@CalAdvisorsllc.com' <matt@CalAdvisorsllc.com>; 'kmills@cbbf.com' <kmills@cbbf.com>; 'HWilkinson@OutBackPower.com' <HWilkinson@OutBackPower.com>; 'angela.plummer@pristinesun.com' <angela.plummer@pristinesun.com>; 'Brian.Theaker@NRG.com' <Brian.Theaker@NRG.com>; 'RegRelCPUCcases@pge.com' <RegRelCPUCcases@pge.com>; 'CaliforniaDockets@pacificorp.com' <CaliforniaDockets@pacificorp.com>; Lukins, Chloe <chloe.lukins@cpuc.ca.gov>; 'DFranz@Tesla.com' <DFranz@Tesla.com>; 'Eli.Harland@energy.ca.gov' <Eli.Harland@energy.ca.gov>; 'emily.leung@tigoenergy.com' <emily.leung@tigoenergy.com>

Cc: ALJ_Support ID <alj_supportid@cpuc.ca.gov>; ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>; ALJ Process <alj_process@cpuc.ca.gov>

Subject: R1109011 Email Ruling Noticing September 29, 2021 Workshop (email 1 of 5)

From: Hymes, Kelly A. <kelly.hymes@cpuc.ca.gov>

Sent: Friday, July 30, 2021 1:23 PM

To: 'Erin.Grizard@BloomEnergy.com' <Erin.Grizard@BloomEnergy.com>; 'FWahl@Tesla.com' <FWahl@Tesla.com>; 'klatt@energyattorney.com' <klatt@energyattorney.com>; 'jwaen@mceCleanEnergy.org' <jwaen@mceCleanEnergy.org>; 'JMcCawley@SempraUtilities.com' <JMcCawley@SempraUtilities.com>; 'energyideas@gmail.com' <energyideas@gmail.com>; 'joshua.nelson@bbklaw.com' <joshua.nelson@bbklaw.com>; 'k1k3@pge.com' <k1k3@pge.com>; 'katie@clean-coalition.org' <katie@clean-coalition.org>; 'kevin.smith@energy.ca.gov' <kevin.smith@energy.ca.gov>; 'KJoyce@Tesla.com' <KJoyce@Tesla.com>; 'MMCL@pge.com' <MMCL@pge.com>; 'mark.roberts@sunlightpartners.com' <mark.roberts@sunlightpartners.com>;

'maryhoffmanRE@gmail.com' <maryhoffmanRE@gmail.com>; 'regulatory@mceCleanEnergy.org' <regulatory@mceCleanEnergy.org>; 'MNBs@pge.com' <MNBs@pge.com>; 'mpf@stateside.com' <mpf@stateside.com>; 'MMcCarty@Tesla.com' <MMcCarty@Tesla.com>; 'npwrpv@yahoo.com' <npwrpv@yahoo.com>; 'philm@scdenergy.com' <philm@scdenergy.com>; 'Qing.Tian@energy.ca.gov' <Qing.Tian@energy.ca.gov>; 'SBirmingham@seia.org' <SBirmingham@seia.org>; 'sumo@pge.com' <sumo@pge.com>; 'Udi@HelmanAnalytics.com' <Udi@HelmanAnalytics.com>; 'veronica.rocha@dbedt.hawaii.gov' <veronica.rocha@dbedt.hawaii.gov>; 'dwtcpucdockets@dwt.com' <dwtcpucdockets@dwt.com>; 'mrw@mrwassoc.com' <mrw@mrwassoc.com>; 'erik.anderson@pacificorp.com' <erik.anderson@pacificorp.com>; 'sue.mara@rtoadvisors.com' <sue.mara@rtoadvisors.com>; 'Tam@CommunityRenewables.biz' <Tam@CommunityRenewables.biz>; 'berntsen@fce.com' <berntsen@fce.com>; 'Brian.Fitzsimons@QadoEnergy.com' <Brian.Fitzsimons@QadoEnergy.com>; 'DHammell@PrincetonPower.com' <DHammell@PrincetonPower.com>; 'Diamond@EnergyHub.net' <Diamond@EnergyHub.net>; 'kier@energyhub.net' <kier@energyhub.net>; 'Brian@IRECusa.org' <Brian@IRECusa.org>; 'rhupart@solarelectricpower.org' <rhupart@solarelectricpower.org>; 'khojasteh.davoodi@navy.mil' <khojasteh.davoodi@navy.mil>; 'CPUCdockets@eq-research.com' <CPUCdockets@eq-research.com>; 'richard.bravo@sce.com' <richard.bravo@sce.com>; 'HarveyEderPSPC@yahoo.com' <HarveyEderPSPC@yahoo.com>; 'Douglass@EnergyAttorney.com' <Douglass@EnergyAttorney.com>; 'case.admin@sce.com' <case.admin@sce.com>; 'Cindy.Jacobs@sce.com' <Cindy.Jacobs@sce.com>; 'Shiela.Linao@sce.com' <Shiela.Linao@sce.com>; 'dboettcher@tyjil.com' <dboettcher@tyjil.com>; 'DAKinports@SempraUtilities.com' <DAKinports@SempraUtilities.com>; 'KGill@SDGE.com' <KGill@SDGE.com>; 'SWoldegiorgis@sdge.com' <SWoldegiorgis@sdge.com>; 'WFuller@SempraUtilities.com' <WFuller@SempraUtilities.com>

Cc: ALJ_Support ID <alj_supportid@cpuc.ca.gov>; ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>; ALJ Process <alj_process@cpuc.ca.gov>

Subject: R1109011 Email Ruling Noticing September 29, 2021 Workshop (email 2 of 5)

From: Hymes, Kelly A. <kelly.hymes@cpuc.ca.gov>

Sent: Friday, July 30, 2021 1:23 PM

To: 'd@lbtp.net' <d@lbtp.net>; 'Eric.Cardella@bves.com' <Eric.Cardella@bves.com>; 'Paul.Marconi@bves.com' <Paul.Marconi@bves.com>; 'george.bellino@gmail.com' <george.bellino@gmail.com>; 'RussNeal@ieee.org' <RussNeal@ieee.org>; 'CatherineSullivan@yahoo.com' <CatherineSullivan@yahoo.com>; 'john.blair@power-one.com' <john.blair@power-one.com>; 'anthony.harrison@stem.com' <anthony.harrison@stem.com>; 'MDJoseph@AdamsBroadwell.com' <MDJoseph@AdamsBroadwell.com>; 'kevin@craftconsulting.net' <kevin@craftconsulting.net>; Hymes, Kelly A. <kelly.hymes@cpuc.ca.gov>; Landry, Kristin <Kristin.Landry@cpuc.ca.gov>; 'Marcel@turn.org' <Marcel@turn.org>; 'filings@a-klaw.com' <filings@a-klaw.com>; 'TLindl@kfwlaw.com' <TLindl@kfwlaw.com>; 'derek.jones@navigant.com' <derek.jones@navigant.com>; 'EFM2@pge.com' <EFM2@pge.com>; 'EOCommitments@pge.com' <EOCommitments@pge.com>; 'G1GK@pge.com' <G1GK@pge.com>; 'ghsu@wsgr.com' <ghsu@wsgr.com>; 'jwwd@pge.com' <jwwd@pge.com>; 'KACT@pge.com' <KACT@pge.com>; 'KDCI@pge.com' <KDCI@pge.com>; 'RJL9@pge.com' <RJL9@pge.com>; 'SCU1@pge.com' <SCU1@pge.com>; 'troy.helming@pristinesun.com' <troy.helming@pristinesun.com>; 'MWCb@pge.com' <MWCb@pge.com>; 'monica.schwebs@morganlewis.com' <monica.schwebs@morganlewis.com>; 'AnSchwartz@Tesla.com' <AnSchwartz@Tesla.com>; 'foltz@silveradopower.com' <foltz@silveradopower.com>; 'VidhyaPrabhakaran@dwt.com' <VidhyaPrabhakaran@dwt.com>; 'borion@lawyersforcleanenergy.com' <borion@lawyersforcleanenergy.com>; 'cem@newsdata.com' <cem@newsdata.com>;

'SVanCleve@Tesla.com' <SVanCleve@Tesla.com>; 'cpuc-r1109011@OlivineInc.com' <cpuc-r1109011@OlivineInc.com>; 'pucnotices@unioncounsel.net' <pucnotices@unioncounsel.net>; 'jdesouza@dlawcorp.com' <jdesouza@dlawcorp.com>; 'rick.brown@tvrpllc.com' <rick.brown@tvrpllc.com>; 'Stefan.matan@apparent.com' <Stefan.matan@apparent.com>; 'JSimon@EnphaseEnergy.com' <JSimon@EnphaseEnergy.com>; 'JBerdner@EnphaseEnergy.com' <JBerdner@EnphaseEnergy.com>; 'TBrowning@EnphaseEnergy.com' <TBrowning@EnphaseEnergy.com>; 'fcleve@xanthus-consulting.com' <fcleve@xanthus-consulting.com>; 'henrypielage@comcast.net' <henrypielage@comcast.net>; 'john@sunspec.org' <john@sunspec.org>; 'He-Erica@gr.sei.co.jp' <He-Erica@gr.sei.co.jp>; 'douchley@mercedid.org' <douchley@mercedid.org>; 'Munish.Walia@mid.org' <Munish.Walia@mid.org>; 'ed.franciosa@mid.org' <ed.franciosa@mid.org>; 'DHou@caiso.com' <DHou@caiso.com>

Cc: ALJ_Support ID <alj_supportid@cpuc.ca.gov>; ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>; ALJ Process <alj_process@cpuc.ca.gov>

Subject: R1109011 Email Ruling Noticing September 29, 2021 Workshop (email 3 of 5)

From: Hymes, Kelly A. <kelly.hymes@cpuc.ca.gov>

Sent: Friday, July 30, 2021 1:23 PM

To: 'jderosa@ces-ltd.com' <jderosa@ces-ltd.com>; 'lwhouse@innercite.com' <lwhouse@innercite.com>; 'pramod@ces-ltd.com' <pramod@ces-ltd.com>; 'MSwindle@NLineEnergy.com' <MSwindle@NLineEnergy.com>; 'cmkehrein@ems-ca.com' <cmkehrein@ems-ca.com>; 'CPUCFilings@Wellhead.com' <CPUCFilings@Wellhead.com>; 'griffiths@braunlegal.com' <griffiths@braunlegal.com>; 'danielle@ceert.org' <danielle@ceert.org>; 'Wynne@BraunLegal.com' <Wynne@BraunLegal.com>; 'Ostap.Loredo-Contreras@energy.ca.gov' <Ostap.Loredo-Contreras@energy.ca.gov>; 'lmh@eslawfirm.com' <lmh@eslawfirm.com>; 'info@dicapolegal.com' <info@dicapolegal.com>; 'atrowbridge@daycartermurphy.com' <atrowbridge@daycartermurphy.com>; 'BashNola@aol.com' <BashNola@aol.com>; 'steven.rymsha@sunrunhome.com' <steven.rymsha@sunrunhome.com>; 'deb@a-klaw.com' <deb@a-klaw.com>; 'brad.ryan@pacificorp.com' <brad.ryan@pacificorp.com>; 'marc.johnson.pe@gmail.com' <marc.johnson.pe@gmail.com>; 'hcurlee@wsgr.com' <hcurlee@wsgr.com>; 'PUndercuffler@outbackpower.com' <PUndercuffler@outbackpower.com>; 'GShu@qps.ca' <GShu@qps.ca>; 'GShu@qps.ca' <GShu@qps.ca>; 'Brian.McCollough@energy.ca.gov' <Brian.McCollough@energy.ca.gov>; 'Fernando.Pina@energy.ca.gov' <Fernando.Pina@energy.ca.gov>; 'james.ralph@cpuc.ca.gov' <james.ralph@cpuc.ca.gov>; 'jamie.patterson@energy.ca.gov' <jamie.patterson@energy.ca.gov>; 'kiel.pratt@energy.ca.gov' <kiel.pratt@energy.ca.gov>; Minkus, Michael J. <Michael.Minkus@cpuc.ca.gov>; 'nicholas.fugate@energy.ca.gov' <nicholas.fugate@energy.ca.gov>; Enyinwa, Ogeonye <ogeonye.enyinwa@cpuc.ca.gov>; 'Rachel.MacDonald@energy.ca.gov' <Rachel.MacDonald@energy.ca.gov>; Mutialu, Rajan <rajan.mutialu@cpuc.ca.gov>; 'Sandy.Goldberg@opr.ca.gov' <Sandy.Goldberg@opr.ca.gov>; Kamins, Sara M. <sara.kamins@cpuc.ca.gov>; O'Rourke, Shannon <Shannon.O'Rourke@cpuc.ca.gov>; 'steve.ghadiri@energy.ca.gov' <steve.ghadiri@energy.ca.gov>; 'tony.marino@sen.ca.gov' <tony.marino@sen.ca.gov>; 'dietrichlaw2@earthlink.net' <dietrichlaw2@earthlink.net>; 'benjamin.airth@energycenter.org' <benjamin.airth@energycenter.org>; Korpics, Brian <Brian.Korpics@cpuc.ca.gov>; Hammond, Christine J. <christine.hammond@cpuc.ca.gov>; Peck, David B. <david.peck@cpuc.ca.gov>; Petlin, Gabriel <gabriel.petlin@cpuc.ca.gov>; Ormond, Jamie <Jamie.Ormond@cpuc.ca.gov>; Aliaga-Caro, Jose <Jose.Aliaga-Caro@cpuc.ca.gov>; 'jaa@cpuc.ca.gov' <jaa@cpuc.ca.gov>; Miley, Matt <matt.miley@cpuc.ca.gov>; Douglas, Paul <Paul.Douglas@cpuc.ca.gov>; Ciupagea, Radu <radu.ciupagea@cpuc.ca.gov>

Cc: ALJ_Support ID <alj_supportid@cpuc.ca.gov>; ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>;

ALJ Process <alj_process@cpuc.ca.gov>

Subject: R1109011 Email Ruling Noticing September 29, 2021 Workshop (email 4 of 5)

From: Hymes, Kelly A. <kelly.hymes@cpuc.ca.gov>

Sent: Friday, July 30, 2021 1:23 PM

To: George, Simi R. <Simi.George@cpuc.ca.gov>; Roberts, Thomas <thomas.roberts@cpuc.ca.gov>; Drew, Tim G. <tim.drew@cpuc.ca.gov>; Bone, Traci <traci.bone@cpuc.ca.gov>; Kao, Valerie <valerie.kao@cpuc.ca.gov>; Blumer, Werner M. <werner.blumer@cpuc.ca.gov>; 'linda.kelly@energy.ca.gov' <linda.kelly@energy.ca.gov>; 'abtin.mehrshahi@energy.ca.gov' <abtin.mehrshahi@energy.ca.gov>; 'angela.gould@energy.ca.gov' <angela.gould@energy.ca.gov>; 'consuelo.sichon@energy.ca.gov' <consuelo.sichon@energy.ca.gov>; 'john.mathias@energy.ca.gov' <john.mathias@energy.ca.gov>; 'Joseph.Omoletski@Energy.ca.gov' <Joseph.Omoletski@Energy.ca.gov>; 'matt.coldwell@energy.ca.gov' <matt.coldwell@energy.ca.gov>; 'ryan.huft@energy.ca.gov' <ryan.huft@energy.ca.gov>; 'sue.kateley@asm.ca.gov' <sue.kateley@asm.ca.gov>

Cc: ALJ_Support ID <alj_supportid@cpuc.ca.gov>; ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>; ALJ Process <alj_process@cpuc.ca.gov>

Subject: R1109011 Email Ruling Noticing September 29, 2021 Workshop (email 5 of 5)

This Email Ruling notices a remote workshop in Rulemaking (R.) 11-09-011 on September 29, 2021 beginning at 1:00 p.m. The purpose of the workshop is to discuss potential changes to the Rule 21 tariff in order to address safety and reliability concerns related to large net energy metering systems interconnecting to utility transmission grids through Rule 21.

On April 7, 2021, the Administrative Law Judge issued a ruling reopening the record of R.11-09-011 to consider the modification of Decision (D.) 12-09-018 and Rule 21. (Rule 21 describes the interconnection, operation, and metering requirements for generation facilities to be connected to a utility's distribution system.) The April 7, 2021 Ruling stated the purpose of reopening the record is to determine if an exemption for net energy metering generating facilities in Section B.1 of Rule 21 remains appropriate. Section B.1 requires all generating facilities seeking interconnection with Distribution Provider's Transmission systems to apply to the California Independent System Operator (CAISO) for Interconnection. The Ruling explained a growth of distributed energy resources, sized in the tens to hundreds of megawatts for each installation interconnecting to the transmission system and taking service under the net energy metering tariff, has raised grid stability issues. Parties were asked to comment on this issue by responding to several questions.

After review of the comments filed on April 23, 2021 and replies filed on April 30, 2021, I find the record lacking in content needed to address the safety and reliability concerns referenced in the ruling. I further find it necessary to instruct Energy Division to hold a workshop to continue this discussion in order to complete the record. Proposed discussion topics during the workshop include: projects where a transmission interconnection under the CAISO tariff would be cost prohibitive compared to interconnection under Rule 21 as a net energy metering generating system; solutions to allow resources to continue to interconnect under Rule 21 and participate under net energy metering tariffs without risks to transmission grid stability and reliability; rationale for grouping net energy metering and non-export systems under the same structure in Rule 21 Section B.1; rationale for allowing transmission interconnection for Rule 21; and the impact of eliminating this interconnection pathway. A final workshop agenda will be issued in late August/early September.

Accordingly, this Ruling notices a workshop on September 29 at 1:00 p.m. to be facilitated by the Commission's Energy Division. The workshop will be held remotely using the WebEx platform and can be accessed through the following link:

<https://cpuc.webex.com/cpuc/j.php?MTID=m7437dfcbab7aa63aba714247f65c8276>

Wednesday, Sep 29, 2021 1:00 pm | 3 hours | (UTC-07:00) Pacific Time (US & Canada)

Meeting number: 146 266 4453

Password: releven

Join by video system

Dial [1462664453@cpuc.webex.com](tel:1462664453)

You can also dial 173.243.2.68 and enter your meeting number.

Join by phone

1-855-282-6330 United States Toll Free

+1-415-655-0002 United States Toll

Access code: 146 266 4453

Questions regarding the workshop should be addressed to James "Jimmy" Mahady at James.Mahady@cpuc.ca.gov.

IT IS SO RULED.

The Docket Office shall formally file this Email Ruling. Due to the size of the service list, this Email Ruling is being sent in batches

Kelly A. Hymes (she)
Administrative Law Judge
California Public Utilities Commission
kelly.hymes@cpuc.ca.gov