

Decision 21-01-027 January 20, 2021

**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

**ORDER CORRECTING ERRORS IN DECISION 20-09-035**

Pursuant to Commission Rules of Practice and Procedure, Rule 16.5, this order corrects several obvious errors in Decision (D.) 20-09-035, *Decision Adopting Recommendations from Working Groups Two, Three, and Subgroup*. As described below, the proposed decision contained an ordering paragraph that was deleted in the final decision, which changed the numbering sequence of all subsequent ordering paragraphs. References to ordering paragraphs made within ordering paragraphs were not updated to reflect the new numbering sequence.

Accordingly, we correct D.20-09-035 Ordering Paragraphs 26, 27, 28, 29, 35, 37, 42, 43, 44, 46 and 55 to align the referenced ordering paragraphs with the final numbering sequence of the ordering paragraphs.

The proposed decision, issued on August 31, 2020, contained the following proposed Ordering Paragraph 22:

*Following submission of the Tier 3 Advice Letter directed in Ordering Paragraph 21, the Director of the Commission's Energy Division is authorized to hold a workshop to provide Pacific Gas and Electric Company, San Diego Gas & Electric Company, and*

*Southern California Edison Company (Utilities) an opportunity to describe the Lightning Review Process implementation proposal as submitted in the Advice Letter and allow proceeding parties and other stakeholders to ask questions and provide feedback to the Utilities and Energy Division.*

D.20-09-035 required the aforementioned implementation proposal to be submitted through testimony, which negated the need for the proposed workshop and the associated proposed ordering paragraph. The deletion of proposed ordering paragraph 22 led to the renumbering of all subsequent ordering paragraphs in D.20-09-035. As provided in Table 1 below, ten of those subsequent ordering paragraphs contain references to other ordering paragraphs; the references were inadvertently not revised to align with the final numbering sequence of the ordering paragraphs. These incorrect ordering paragraph references are obvious errors and should be corrected.

<b>Table 1 Ordering Paragraph Corrections</b>		
<b>Decision 20-09-035 Ordering Paragraph Number</b>	<b>References Proposed Decision Ordering Paragraph Number(s)</b>	<b>Should Reference Decision 20-09-035 Ordering Paragraph Number(s)</b>
26	26, 23	25, 22
27	26, 27	25, 26
28	23	22
29	29	28
35	35	34
37	56	55
42	42	41
43	35, 36	34, 35
44	43	42
46	56	55

In addition, Ordering Paragraph 55 of D.20-09-035 includes a table of ordering paragraphs that require advice letters. The table indicates whether the

advice letter associated with the ordering paragraph is required to be Tier 1 or Tier 2 and provides the advice letter submission date. As stated above, the deletion of proposed Ordering Paragraph 22 led to the renumbering of all subsequent ordering paragraphs in D.20-09-035. As a result, the table in Ordering Paragraph 55 references ordering paragraph numbers that do not align with the final numbering sequence of the ordering paragraphs in D.20-09-035. The errors in the table in Ordering Paragraph 55 are obvious errors and should be corrected.

Appendix A of this decision provides the revised ordering paragraphs with the corrected ordering paragraph references.

Pursuant to Commission Resolution A-4661 and Rule 16.5 of the Commission's Rules of Practice and Procedure, the Commission's Executive Director is authorized to sign, on behalf of the Commission, orders involving the correction of clerical and other obvious inadvertent errors and omissions in Commission decisions. Accordingly, the corrections to D.20-09-035 should be adopted pursuant to Commission Resolution A-4661 and Rule 16.5 of the Commission's Rules of Practice and Procedure.

The Commission has not resolved the issues being addressed by Working Group 4 in this proceeding. Accordingly, Rulemaking 17-07-007 should remain open.

### **Findings of Fact**

1. The proposed decision, *Decision Adopting Recommendations from Working Groups Two, Three, and Subgroup*, issued on August 31, 2020 contained a proposed ordering paragraph, originally numbered 22, which was ultimately deleted from Decision 20-09-035.

2. The deletion of proposed Ordering Paragraph 22 led to the renumbering of all subsequent ordering paragraphs in Decision 20-09-035.

3. Ordering Paragraphs 26, 27, 28, 29, 35, 37, 42, 43, 44, and 46 of Decision 20-09-035 contain references to other ordering paragraphs, which were not revised to align with the final numbering sequence of the ordering paragraphs of D.20-09-035.

4. The incorrect ordering paragraph references in Ordering Paragraphs 26, 27, 28, 29, 35, 37, 42, 43, 44, and 46 of Decision 20-09-035 are obvious errors.

5. The table in Ordering Paragraph 55 of Decision 20-09-035 references ordering paragraph numbers that were not revised to align with the final numbering sequence of the ordering paragraphs in D.20-09-035.

6. The errors contained in the table in Ordering Paragraph 55 are obvious errors.

7. Issues in Working Group 4 in Rulemaking 17-07-007 have not been resolved.

### **Conclusions of Law**

1. The incorrect ordering paragraph references in Ordering Paragraphs 26, 27, 28, 29, 35, 37, 42, 43, 44, 46, and 55 of Decision 20-09-035 should be corrected.

2. Commission Resolution A-4661 and Rule 16.5 of the Commission's Rules of Practice and Process authorizes the Commission's Executive Director to sign orders involving the correction of clerical and other obvious inadvertent errors and omissions in Commission decisions.

3. Rulemaking 17-07-007 should remain open.

### **IT IS ORDERED** that

1. Decision 20-09-035 is corrected by revising the ordering paragraph number references as indicated in the table below. Appendix A of this decision provides

the revised ordering paragraphs with the corrected ordering paragraph references.

<b>Decision 20-09-035 Ordering Paragraph Corrections</b>		
<b>Final Decision Ordering Paragraph Number</b>	<b>Contains Reference to Proposed Decision Ordering Paragraph Number(s)</b>	<b>Should Reference Final Decision Ordering Paragraph Number(s)</b>
26	26, 23	25, 22
27	26, 27	25, 26
28	23	22
29	29	28
35	35	34
37	56	55
42	42	41
43	35, 36	34, 35
44	43	42
46	56	55
55	24, 25, 31, 33, 34, 38, 39, 41, 47, 50, 51, 53	23, 24, 30, 32, 33, 37, 38, 40, 46, 49, 50, 52

2. Rulemaking 17-07-007 remains open.

This order is effective today.

Dated January 20, 2021, at San Francisco, California.

/s/ RACHEL PETERSON

Rachel Peterson  
Executive Director

**Appendix A**  
**Corrected Ordering Paragraphs**

## Appendix A

The following ordering paragraphs from Decision 20-09-035 are revised to indicate the corrected ordering paragraph references within the ordering paragraph.

26. As part of Proposal 12e adopted in Ordering Paragraph 25, no later than nine months from the issuance of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall include with the reports directed in Ordering Paragraph 22, a quarterly tally of customer notifications when timelines have not been met or were at risk of not being met. The quarterly tally shall include the category of delay, reason for delay, and new expected date.

27. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) shall meet with stakeholders to develop a standard set of categories of delay, needed to implement Ordering Paragraphs 25 and 26. No later than six months from the issuance of this decision, Utilities shall provide a set of agreed-upon delay categories to the Director of the Commission's Energy Division.

28. Proposals 12f and 12h are adopted. Within two years of the commencement of tracking required by Ordering Paragraph 22, no less than 95 percent of non-net energy metering projects and net energy metering projects greater than 30 kilowatts shall meet all timelines listed in Ordering Paragraph 22, except (f), (j), (l), and (s), which are not stipulated in Rule 21.

29. Proposal 12i is adopted with modification. No later than 30 months following the commencement of timeline tracking, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, with oversight by the Commission's Energy Division, shall organize

and host a workshop to discuss whether timelines have been met for at least 95 percent of the applicable interconnection projects, as required by Ordering Paragraph 28, and the steps necessary to make the 95 percent benchmark. The workshop discussion shall also include a discussion of a sunset date for the timeline tracking if the benchmark has been met.

35. No later than 45 days after the Interconnection Portals Workshop required by Ordering Paragraph 34, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall submit testimony addressing Issue 22, to include a set of portal improvement proposals, improvement costs, and cost recovery proposals. The proposals contained in the testimony shall adhere to two policies: i) the Commission encourages the growth of the use of distributed energy resources, and ii) costs for implementing a subproposal should be recovered from the set of customers who benefit from the subproposal. The testimony will be addressed in the second phase of this proceeding.

36. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) shall meet and discuss the need for Rule 21 language changes to implement Proposal 23a. Utilities shall include any necessary language changes in the Tier 2 Advice Letter required by Ordering Paragraph 55 below.

42. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) shall meet and confer to develop a consistent, to the extent possible, set of implementation steps for Proposal 23e, as required by Ordering Paragraph 41. No later than six months from the issuance of this decision, Utilities shall present and discuss the proposed implementation at a Vehicle-to-Grid workshop, facilitated by Utilities.



If Commission approval is needed for the implementation steps, Utilities shall request approval in a Tier 3 Advice Letter submitted no later than 60 days following the workshop.

43. Proposal 23f is approved, in concept. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) shall develop the timeline, costs, and cost recovery method to implement Proposal 23f, which would modify interconnection portals to enable simple tracking of vehicle-to-grid projects. Utilities shall discuss these elements during the Interconnection Portals Workshop, as directed in Ordering Paragraph 34 above. Utilities shall include the details of these elements in the submitted testimony required by Ordering Paragraph 35.

44. Proposal 23i is adopted. Vehicle to Grid Alternating Current (V2G AC) system pilots are exempt, temporarily, from Rule 21 smart inverter requirements. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) shall host a series of meetings with stakeholders to develop a temporary interconnection pathway for pilots seeking V2G AC interconnection that will ensure the necessary safety precautions. The first of these meetings shall begin no later than 30 days from the issuance of this decision. Following these meetings, Utilities shall propose a temporary pathway in the same Vehicle-to-Grid Workshop directed in Ordering Paragraph 42. Utilities shall request approval of the pathway in the Tier 3 Advice Letter submitted no later than 60 days following the workshop.

46. Proposal 27a is adopted. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) shall revise Rule 21 to: i) specifically allow smart inverter default settings to be changed; ii) account for IEEE 1547 and IEEE 1547.1 updates being developed by

the Smart Inverter Working Group; and iii) establish a process for requesting and approving non default inverter settings. Utilities shall include Rule 21 language changes necessary to implement Proposals 27a.i) and 27a.iii) as directed in Ordering Paragraph 55 below.

55. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall update their respective Electric Rule 21 Tariff and, where necessary, Rules 2, 15, and 16 Tariffs, in compliance with the Ordering Paragraphs of this decision by submitting three advice letters pursuant to the table below. The table provides the list of the ordering paragraphs (OP) in this decision requiring changes to Rule 21. The table also indicates whether the advice letter associated with each ordering paragraph is required to be Tier 1 or Tier 2 and provides the deadline for submitting the Advice Letter.

<u>OP</u>	<b>Tier 1 Submit 30 days after issuance of decision</b>	<b>Tier 2 Submit 60 days after issuance of decision</b>	<b>Tier 2 Submit 120 days after issuance of decision</b>
1		X	
2		X	
3		X (if tariff changes are needed)	
4		X (if tariff changes are needed)	
5			X
6			X
7	X		
8			X
11			X

<b>OP</b>	<b>Tier 1 Submit 30 days after issuance of decision</b>	<b>Tier 2 Submit 60 days after issuance of decision</b>	<b>Tier 2 Submit 120 days after issuance of decision</b>
12		X	
13	X		
14	X		
17		X	
18		X	
23		X (if tariff changes needed)	
24		X (if tariff changes needed)	
30		X	
32		X	
33		X	
37		X	
38		X	
40		X	
46	X (for 27a.i)	X (for 27a.iii)	
49	X		
50	X		
52	X		

(END OF APPENDIX A)