

Decision 22-04-003 April 7, 2022

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

**DECISION EXEMPTING SMALL MULTI-JURISDICTIONAL UTILITIES FROM
APPLYING RULE 21 REQUIREMENTS ADOPTED IN
EARLIER DECISIONS IN THIS RULEMAKING**

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**DECISION EXEMPTING SMALL AND MULTI-JURISDICTIONAL UTILITIES
FROM APPLYING RULE 21 REQUIREMENTS ADOPTED IN
EARLIER DECISIONS IN THIS RULEMAKING**

Summary

The three small and multi-jurisdictional utilities (SMJUs), Bear Valley Electric Service (Bear Valley), Liberty Utilities (CalPeco Electric) LLC, (Liberty) and PacifiCorp, d.b.a. Pacific Power (PacifiCorp) initiated “Working Group 8” to develop proposals to address the 22 interconnection issues previously resolved in this proceeding but related to large investor-owned utilities. This decision adopts the recommendation to not make any changes to the interconnection processes for SMJUs, with three minor modifications involving cost itemization, itemized billing processes, and participation in the Unintentional Islanding Working Group. Further, this decision directs SMJUs to hold a workshop, within 90 days of the adoption of this decision, to discuss interconnection portal improvements. Given the SMJUs’ small customer base size and their low distributed energy resources interconnection rates, as compared to the larger investor-owned utilities, it is reasonable to not require changes to their interconnection processes.

1. Background

The Commission initiated Rulemaking (R.) 17-07-007 on July 13, 2017 to consider a variety of refinements to the interconnection of distributed energy resources under Electric Tariff Rule 21 of Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) (i.e., the investor-owned utilities) and the equivalent tariff rules of the small and multi-jurisdictional electric utilities (SMJUs). The Rule 21 tariff describes the interconnection, operating, and metering requirements for certain generating and storage facilities seeking to connect to

the electric distribution system. Rule 21 provides customers access to the electric grid to install generating or storage facilities while protecting the safety and reliability of the distribution and transmission systems at the local and system levels.¹

The October 2, 2017 *Scoping Memo of Assigned Commissioner and Administrative Law Judge* (Scoping Memo) established a working group process in the proceeding whereby resolution of the issues of the proceeding would be proposed by eight working groups. Pertinent to this decision, Working Group Eight was assigned one issue: What revisions to Rule 21 and equivalent tariffs are required for SMJUs? The schedule set forth in the Scoping Memo established three phases, where Phases Two and Three occurred simultaneously following the resolution of all Phase One issues. The Scoping Memo indicated that the resolution of Working Group 8 would occur in Phase Three.²

Over the course of the past four years, the Commission addressed 22 issues in this proceeding with respect to investor-owned utilities, through adoption of Decision (D.) 19-03-013, D.20-09-035, and D.21-06-002.³ As directed in the Scoping Memo, 30 days after the adoption of all Phase One issues, SMJUs contacted parties to determine interest in participating in Working Group 8 (regarding small and multi-jurisdictional utility rules). The Scoping Memo further required SMJUs to file, on behalf of Working Group 8, proposals

¹ Order Instituting Rulemaking 17-07-007 at 2.

² The November 16, 2018 *Assigned Commissioner's Amended Scoping Memo and Administrative Law Judge Ruling* revised the scope of Phase One and reduced the number of working groups in Phase One from six to four but did not change the scope or working groups in Phases Two or Three.

³ D.19-03-013 addressed Working Group 1 issues, D.20-09-035 addressed Working Groups 2 and 3 and the Vehicle-to-Grid Alternating Current Subgroup issues, and D.21-06-002 addressed Working Group 4 and all remaining Phase I issues.

addressing the Working Group 8 issue no later than 120 days after the Phase One decision is adopted.

Pursuant to the Scoping Memo, California Association of Small and Multi-Jurisdictional Utilities (CASMU) filed its Working Group 8 Final Report (Report) on October 4, 2021. (See section 2 below.) CASMU represents the following SMJUs: Bear Valley Electric Service (Bear Valley), Liberty Utilities (CalPeco Electric) LLC, (Liberty) and PacifiCorp, d.b.a. Pacific Power (PacifiCorp). The Report states that Working Group 8 discussed whether revisions to the investor-owned utilities' Rule 21 and equivalent tariffs that were adopted previously in R.17-07-007 should also be required for the SMJUs.

On October 21, 2021, the Administrative Law Judge issued a Ruling seeking comment on the Report. Opening Comments were due on November 12, 2021 and reply comments were due on November 19, 2021. No party filed comments. The record was submitted on November 19, 2021.

Phase Three is closed. R.17-07-007 remains open to address the issues of Phase Two.

2. Working Group 8 Final Report

The Report laid out the procedural background and scope of Working Group 8, and the process used by the working group. Noting that the group met once on September 15, 2021, the Report identified the participants as representatives of the following entities: Bear Valley, Clean Coalition, the Commission, Ellison Schneider Harris & Donlan,⁴ Liberty, PacifiCorp, PG&E, and Public Advocates Office of the Public Utilities Commission.⁵ The Report

⁴ Ellison Schneider Harris & Donlan is the law firm that represents CASMU.

⁵ Report at 2.

explained that at the September 15, 2021 meeting, Liberty and Bear Valley presented the proposals identified in the Report (and discussed in Section 3 below), and PacifiCorp discussed the characteristics of their service territories and current interconnection processes. The Report stated that a draft report was provided to the participants and comments were incorporated into the final report.⁶

Following a brief overview of Bear Valley, Liberty, and PacifiCorp, the Report discusses the 22 interconnection scoping issues addressed by Working Groups 1 through 4. For each of the 22 issues, the Report presents the issue and the recommended proposal. For each issue, there is a space to identify party comment, which nearly uniformly states “no comment from parties.” As noted in the Report, Working Group 8 had little public participation and no opposition to the proposals. The Report states that it “is assumed that all the proposals are consensus proposals.”⁷

3. Issues Before the Commission

As previously described, SMJUs and other members of Working Group 8 were tasked with i) considering what revisions to Rule 21 and equivalent tariffs are required for SMJUs and then ii) filing a report on the proposals. As noted in the Report, SMJUs looked at the issues addressed by Working Groups 1 through 4 and developed proposals addressing each issue. This decision considers whether the proposals in the Report should be adopted by the Commission.

4. Consideration of SMJUs’ Proposals

As discussed below, this decision adopts the Report proposals, which generally recommend the Commission adopt no changes to the SMJUs’

⁶ Report at 2.

⁷ Report at 2.

interconnection rules. There are three minor modifications. For Issue 15, SMJUs are required to adhere to a similar directive provided to the large investor-owned utilities in D.20-09-035. This includes: i) to do what is immediately possible to provide cost itemization based on existing system capabilities and ii) to strive to improve itemized billing processes. For Issue 18, the decision adopts no changes to the interconnection rules for SMJUs but requires them to actively participate in the Unintentional Islanding Working Group. Additionally, this decision agrees with the proposal to identify interconnection portal improvements through a workshop and directs SMJUs to host such workshop. The adopted proposals are reasonable given the SMJUs' customer base size and their interconnection rates, as compared to the larger investor-owned utilities, *i.e.*, PG&E, SDG&E, and SCE.

Aside from the SMJUs' small customer base, the Report highlights other aspects of the SMJUs' interconnection processes that are relevant to the consideration of the proposals.

- While Bear Valley has a comprehensive Rule 21 interconnection process, no customer has used this process; customer net energy metering facilities interconnecting to Bear Valley have used "a relatively simple process set forth in [its net energy metering] tariffs and forms."⁸ Further, Bear Valley is connected to SCE at two points but is not connected to transmission lines operated by the California Independent System Operator (CAISO).⁹
- Liberty also does not own transmission lines and is not part of the CAISO balancing authority.¹⁰ Through its own Rule 21, Liberty has interconnected 268 residential

⁸ Report at 3.

⁹ Report at 3.

¹⁰ Report at 4.

distributed energy resources customers and 23 commercial customers.¹¹

- Like Bear Valley and Liberty, PacifiCorp is not interconnected to the CAISO but instead operates two balancing authority areas in its six-state service territory.¹² While PacifiCorp serves approximately 1.9 million customers in those six states, its California territory only serves approximately 34,000 residential and 12,000 commercial customers. PacifiCorp has 631 customer-sited generating systems and nine customer-sited storage projects.¹³ Notably, instead of Rule 21 PacifiCorp relies upon interconnection processes under its Open Access Transmission Tariff (OATT), consistent with Federal Energy Regulatory Commission (FERC) requirements.¹⁴ In D.07-07-027, the Commission required PacifiCorp to “follow the principles of timely review and disposition of interconnection requests as in Rule 21 for other utilities” but did not require PacifiCorp to implement a Rule 21.¹⁵

In the subsections below, this decision describes each issue, the proposal to resolve the issue, justification for the proposal, and the Commission’s determination.

4.1. Issue 1: Transmission Cluster Studies

Issue 1 asks whether SMJUs should modify their interconnection processes to minimize the number of distributed energy resource projects subjected to

¹¹ Report at 4.

¹² Report at 5.

¹³ Report at 5.

¹⁴ Report at 6.

¹⁵ Report at 6.

transmission cluster studies and, if so, how.¹⁶ Noting that neither Liberty nor Bear Valley own transmission facilities, SMJUs contend the issue is solely applicable to PacifiCorp.¹⁷ SMJUs propose that no change to the PacifiCorp interconnection is necessary, as transmission studies have never created a barrier to connecting to PacifiCorp's system.¹⁸ No party commented on the proposal.

First, this decision agrees this issue is not applicable to Bear Valley or Liberty due to the absence of transmission lines within their operational grid. The Report notes that interconnection requests from projects larger than two megawatts requires project participation in the annual cluster process. PacifiCorp submits it has had very few interconnection requests for generation over one megawatt. In the Report, PacifiCorp states that it averages a total of six interconnection applications per month in its California territories.¹⁹ The Commission finds six monthly interconnection applications to be a modest number of applications, which PacifiCorp should continue to be able to process, especially since most utilize the Fast Track process. This decision finds revisions to the PacifiCorp interconnection process are unnecessary at this time. Accordingly, the Commission should adopt the SMJU proposal to not make any modification to the PacifiCorp interconnection process to minimize transmission cluster studies.

¹⁶ In D.19-03-013, the Commission found that transmission cluster studies can be lengthy (potentially extending project development timelines by 1-2 years) and may increase project costs. D.19-03-013 at 12 and Finding of Fact 1.

¹⁷ Report at 2, 4, and 7.

¹⁸ Report at 7-8.

¹⁹ Report at 6.

4.2. Issue 2: Illustrative Metering Configurations.

Issue 2 asks whether the Commission should require SMJUs to develop illustrative metering configurations and cost tables to provide more transparency in the application of complex metering solutions. SMJUs propose illustrative metering configurations and cost tables are not feasible with available resources.²⁰ No party commented on this proposal.

SMJUs explain that the purpose of requiring investor-owned utilities to develop the illustrative metering configurations and cost tables was to clarify the definition of complex metering solutions for storage facilities.²¹ SMJUs have shown in the Report that they have few distributed energy resources connected to their systems.²² This decision agrees that, given the SMJUs' small customer base and the small number of interconnections they experience, requiring the development of illustrative metering configurations and cost tables is neither necessary nor feasible. Accordingly, the proposal to not require SMJUs to develop the illustrative metering configurations and cost tables should be adopted.

4.3. Issue 3: Addressing Material Modifications

Issue 3 asks whether the Commission should require SMJUs to address material modifications, which requires creating distinct and separate processes based on the type of modification. SMJUs propose no modifications to current interconnection processes as they contend it is unlikely amendments would

²⁰ Report at 8.

²¹ Report at 8.

²² See, for example, Report at 2 indicating Bear Valley only has had 446 interconnections, Report at 4 indicating Liberty has interconnected 268 residential distributed energy resources customers and 23 commercial distributed energy resources customers, and Report at 5 indicating PacifiCorp has 631 customer-sited generating systems, 9 customer-sited storage projects and 5 interconnected quality facilities.

minimize cost or timing impacts that modifications to an interconnection request may have. No party commented on this proposal.

SMJUs assert that Rule 21 processes for both Liberty and Bear Valley account for modifications to interconnection related systems, explaining that Rule 21 allows them “to review, request, and conduct modifications to interconnection facilities or the distribution system to meet operation standards.”²³ With respect to PacifiCorp, SMJUs state the OATT allows for “like for like” equipment replacement with notification.²⁴ PacifiCorp states it could consider an age modifier for facilities less than five years old but notes that modifying older facilities would require study to address “changing system conditions and regulatory requirements.”²⁵

Here again, SMJUs have indicated a small number of distributed energy resources connected to their systems. This decision finds that, given the modest number of interconnections, revising current processes to account for different types of modifications would most likely not minimize the cost or timing impacts of the modification. Accordingly, the Commission should adopt the SMJU proposal to maintain current interconnection processes and not address the matter of material modifications.

4.4. Issue 4: Telemetry Requirements

Issue 4 asks whether SMJUs should adopt or change current telemetry requirements. SMJUs propose no telemetry requirements as they contend such requirements would be unduly burdensome. No party commented on this proposal.

²³ Report at 8 citing Liberty’s and Bear Valley’s Rule 21 at Section C.1.e.

²⁴ Report at 8.

²⁵ Report at 9.

SMJUs state that neither the Liberty nor the Bear Valley Rule 21 tariff provides for behind-the-meter telemetry due to a lack of demand.²⁶ PacifiCorp requires systems with capacity greater than 3 megawatts to have data collection ability but has exemptions for behind-the-meter systems.²⁷

Given the SMJUs' customer base size, the modest number of interconnections, and certain operational circumstances of each SMJU, requiring additional telemetry requirements of distributed energy resources would be unduly burdensome. For example, the Report notes that Bear Valley has not utilized its Rule 21 process for net energy metering facility interconnection but instead uses a simple process set forth in its net energy metering tariff.²⁸ Further, Liberty submits that because it does not have advanced metering infrastructure implemented, any data management process would be manual and require additional resources.²⁹ Finally, PacifiCorp requires data collection only for systems with a capacity greater than 3 megawatts. Accordingly, the Commission should adopt the SMJU proposal to maintain current interconnection processes and not establish telemetry requirements.

4.5. Issue 5: Inverter Advanced Functionality

Issue 5 asks whether the Commission should require SMJUs to activate advanced functionality in Phase One-compliant inverters installed before September 9, 2017. Explaining that the Commission found it to be not cost-effective to require such activation for the investor-owned utilities, SMJUs

²⁶ Report at 9.

²⁷ Report at 9 citing its distributed energy resources Interconnection Policy (Policy 138) at section 3.6.

²⁸ Report at 9.

²⁹ Report at 9.

state they agree with the Commission's determination to encourage but not require replacing existing inverters with smart inverters. As such, SMJUs propose no changes in the current inverter requirements. No party commented on this proposal.

The Commission declined to adopt a requirement for investor-owned utilities to ensure the activation of advanced functionality in Phase One-compliant inverters installed before September 9, 2017.³⁰ There is nothing in the record of this proceeding that would cause the Commission to deviate from this determination. Hence it is reasonable to not adopt any such requirement for the SMJUs. Accordingly, the proposal to maintain current inverter requirements should be adopted.

4.6. Issue 8: Integrated Capacity Analysis (ICA)

Issue 8 asks whether the Commission should require SMJUs to adopt an ICA for incorporation into each of their Rule 21 tariffs. Explaining that the Commission determined in Rulemaking 14-08-013 that SMJUs are not required to perform their own ICA, SMJUs contend the ICA is overly burdensome and would provide little benefit to distribution grid interconnection customers. As such, SMJUs propose the Commission maintain this prior determination and not require them to amend their interconnection processes to conform to an ICA. No party commented on this proposal.

As indicated in the Report, the Commission established the Distribution Resource Plan requirements for SMJUs with respect to Public Utilities Code

³⁰ D.19-03-13 at 41.

Section 769; the requirements do not include an ICA.³¹ There is nothing in the record of this proceeding that would cause the Commission to deviate from this prior determination. Further, SMJUs contend they do not have the same hosting capacity issues or incentives for interconnecting at specific locations as compared to the large investor-owned utilities. The Commission agrees with SMJUs that given the small number of interconnections they experience, SMJUs do not have the same capacity concerns as the investor-owned utilities. Further, given the operational size of SMJUs, the small number of interconnections (as already determined in this decision) and the minimal capacity concerns, requiring SMJUs to develop an ICA and conform their interconnection processes to the ICA could be administratively burdensome and unnecessary. Accordingly, the Commission should adopt the SMJU proposal to maintain current interconnection processes and not require an ICA.

4.7. Issue 9: Conditions of Operations in Applications

Issue 9 asks whether SMJUs should modify their interconnection tariff to include conditions of operations. SMJUs contend the purpose of Issue 9 is to incorporate ICA results into Rule 21.³² As such, SMJUs propose to maintain the Commission's prior determination that SMJUs are not required to develop ICAs and, thus, not required to amend their interconnection processes to conform to an ICA. No party commented on this proposal.

SMJUs assert this issue is intertwined with the ICA, referencing D.21-09-005. In that decision, the Commission states that "the purpose of

³¹ Report at 10-11 citing the February 6, 2015 *Assigned Commissioner's Ruling on Guidance for Public Utilities Code Section 769 – Distribution Resource Planning* at 13-14. See also the decision adopting the SMJU Distribution Resource Plans, D.21-09-005 at 22-25.

³² Report at 12 citing D.20-09-035 at 55.

resolving Issue 9...is to utilize the [ICA] data to allow modern inverters, storage, and other technologies to confidently respond to grid conditions while ensuring safety and reliability.”³³ Further, SMJUs contend they do not have the same hosting capacity issues or incentives for interconnecting at specific locations as compared to the investor-owned utilities. Given the small number of interconnections they experience, SMJUs do not have the same capacity concerns as the investor-owned utilities. In resolving Issue 8 above, the Commission determined that, given the operational size of the SMJUs, the small number of interconnections already determined in this decision, and the minimal capacity concerns, requiring SMJUs to develop an ICA and conform their interconnection processes to the ICA could be administratively burdensome and unnecessary. As the heart of Issue 9 is the ICA, requiring conditions of operations would likewise be administratively burdensome and unnecessary. Accordingly, the Commission should adopt the SMJU proposal to maintain current interconnection processes and not require conditions of operations in interconnection applications.

4.8. Issue 10: Coordination Between ICA and Rule 21

Issue 10 asks how the Commission can coordinate the ICA and each of the SMJUs’ Rule 21 processes with Rules 2, 15, and 16 from each of the SMJUs. SMJUs contend the application of Rules 2, 15, and 16 are clear.³⁴ As such, SMJUs propose that no modification to Rule 21 is necessary. No party commented on

³³ D.20-09-035 at 51 and 55.

³⁴ Report at 12 citing D.20-09-035 at 55.

this proposal, except that Energy Division requested links to the SMJUs' Rules 2, 15, and 16.³⁵

The Report does not provide any additional detail regarding this issue and the reasoning behind the proposal. Hence, this decision reviews the Issue 10 proposals adopted by the Commission for the large investor-owned utilities, as shown in Table 1 below.

Table 1 Proposals Adopted in D.20-09-035 to Resolve Issue 10 with respect to the Large Investor-Owned Utilities	
Proposal Description	Justification for Proposal
Use of a single project identifier number	Makes the interconnection process easier to navigate for developers and easier to manage for utilities. ³⁶
Notification by utility of study start date for projects studied under these rules	Provides developers with more visibility and transparency into the interconnection process. ³⁷
Invoicing of engineering advance by the utility within five business days	Provides certainty to the customer and improves transparency of the interconnection process. ³⁸
Scheduling of a mitigation work scoping meeting	Increases efficiency and improves transparency. ³⁹
Delivery of a detailed reconciliation of the costs within 12 months	Provides certainty and transparency to the customer. ⁴⁰

³⁵ Report at 13. *See also* Report at Footnotes 21 through 23 providing links to Rules 2, 15, and 16 for Bear Valley, Liberty, and PacifiCorp.

³⁶ D.20-09-035 at 65-66.

³⁷ *Id.* at 66.

³⁸ *Id.* at 67.

³⁹ *Id.* at 68.

⁴⁰ *Id.* at 68-69.

The justification for the modifications listed in Table 1 centers on efficiency, transparency, and certainty, all of which lead to a more streamlined process. Streamlining is necessary with the investor-owned utilities, given the large customer base and large number of interconnections. However, this decision has already determined that SMJUs are differently situated than the investor-owned utilities, with smaller customer bases and lower numbers of interconnections. Furthermore, this decision previously determined that SMJUs should not be required to develop an ICA and conform their interconnection processes to the ICA. Hence, this decision finds it unnecessary for SMJUs to coordinate an ICA and each SMJU's Rule 21 processes with Rules 2, 15, and 16. Accordingly, the SMJU proposal to maintain current interconnection processes and not require coordination between Rule 21 and Rules 2, 15, and 16 should be adopted.

4.9. Issue 11: Notification-Only Approach

Issue 11 asks whether SMJUs should be required to adopt a notification-based approach in lieu of an interconnection application for non-exporting storage systems that have a negligible impact on the distribution system. SMJUs argue neither Liberty nor Bear Valley have the volume to justify modifications to their interconnection process.⁴¹ Noting their support of non-exporting storage system interconnection without review of the surrounding distribution grid, PacifiCorp contends a change in its system is unnecessary. PacifiCorp proposes to use its PowerClerk application process for non-export storage facilities, with an additional review to ensure customer-side installation of equipment sufficient to prohibit export. No party commented on this proposal.

⁴¹ Report at 12 citing D.20-09-035 at 55.

Liberty and Bear Valley both provide data indicating a low volume of applications for non-exporting storage systems.⁴² Hence, this decision finds it unnecessary to require Liberty and Bear Valley to implement a notification-only approach for non-export systems. With respect to its proposal, PacifiCorp asserts that a non-export storage facility project, applying through the PowerClerk process, would be reviewed to ensure equipment to prohibit export is installed on the customer side of the meter and that the system provides for safe islanding⁴³ of the facility during an outage. For streamlining purposes, PacifiCorp would not “review the surrounding distribution grid to ensure that the local grid could safely accept export from the facility.”⁴⁴ Further, location and capacity would be tracked. Given the size of PacifiCorp and its limited number of interconnections, this proposal allows for additional streamlining to the interconnection process without undue administrative burden. Accordingly, the Commission should adopt the SMJU proposal that PacifiCorp modify its interconnection of non-export storage facilities process by ensuring installation of equipment sufficient to prohibit export.

4.10. Issue 12: Distribution Upgrade Planning Timelines

Issue 12 asks whether SMJUs should be required to adopt timelines for distribution upgrade planning, cost estimation, and construction. SMJUs

⁴² Report at 2-4.

⁴³ Islanding occurs when a portion of the distribution grid remains energized during a fault occurrence on the distribution system, which causes protection equipment to disconnect that section of the grid from the rest of the grid. While intentional islanding is a beneficial aspect in many applications, such as microgrids, here we consider islanding in an unintended context. Unintentional islanding is an unplanned island that persists for a time period of more than two seconds. Unintentional islanding can result in safety hazards, transient voltages, and frequencies to customer equipment, or subsequent uncleared or delayed clearing faults.

⁴⁴ Report at 13.

contend they each offer “as much transparency and communication with interconnecting parties as possible considering the uncertainty of distribution upgrade planning.”⁴⁵ SMJUs propose that no requirement be adopted as interconnection portals serve as a communication platform.⁴⁶ No party commented on this proposal.

SMJUs assert they currently provide estimates of the timing and contend specific timelines would be difficult.⁴⁷ SMJUs highlight that the interconnection portals serve as a method to “to keep interconnection customers updated on the status of their interconnection.”⁴⁸ In consideration of this issue, the Commission reviewed the background of each SMJU as provided in the Report. As has been reiterated throughout this decision, SMJUs have a low enrollment of projects that interconnect through the Rule 21 process. Bear Valley reports it could find no record in its files of ever using Rule 21 but instead interconnects projects using a relatively simple process.⁴⁹ While Liberty states it has interconnected a total of 268 residential distributed energy resources customers and 23 commercial distributed energy resources customers, in 2021, only 21 customers navigated the interconnection process.⁵⁰ PacifiCorp submits it has processed 235 interconnection applications for private generation in its California territory since 2019, asserting an average application approval time of 20 days. SMJUs further contend there is

⁴⁵ Report at 14.

⁴⁶ Report at 14.

⁴⁷ Report at 14.

⁴⁸ Report at 14.

⁴⁹ Report at 3.

⁵⁰ Report at 4.

an infrequency of distribution upgrades necessitated by interconnection requests.⁵¹ Given the number of interconnections SMJUs experience, in combination with their small customer base size, this decision finds requiring the adoption of timelines for distribution upgrade planning, cost estimation, and construction to be unnecessary for SMJUs. Further, the small overall customer base size and number of interconnections, along with interconnection portals, should allow SMJUs to provide timely communication with interconnection customers. Accordingly, the Commission should adopt the SMJU proposal to not require timelines for distribution upgrade planning, cost estimation, and construction.

4.11. Issue 13: Distribution Upgrade Cost Sharing

Issue 13 asks whether the SMJUs should adopt a process for distribution upgrade cost sharing among developers. SMJUs contend that due to the infrequency of distribution upgrades necessitated by interconnection requests, estimating benefits to future interconnection customers is challenging.⁵² As such, SMJUs propose to maintain their current cost allocation practices for distribution upgrades. No party commented on this proposal.

In section 4.10, this decision noted the SMJUs' contention that there is an infrequency of distribution upgrades necessitated by interconnection requests. The size of the customer base and number of interconnections reported by SMJUs support this contention.⁵³ As such, this decision finds no justification for revisions to current cost allocation practices for distribution upgrades. Accordingly, the Commission should adopt the SMJU proposal to retain their current cost allocation practices for distribution upgrades.

⁵¹ Report at 14.

⁵² Report at 14.

⁵³ Report at 2 – 7.

4.12. Issue 15: Distribution Upgrade Itemized Billing

Issue 15 asks whether the Commission should require SMJUs to itemize billing for distribution upgrades to enable customer comparison between estimated and billed costs and verification of billed cost accuracy. SMJUs contend the costs outweigh the benefits.⁵⁴ Thus, SMJUs propose that no requirement be adopted. No party commented on this proposal.

In D.20-09-035, the Commission required the investor-owned utilities to address this issue in three ways: 1) do what is immediately possible to provide cost itemization based on existing system capabilities; 2) strive to improve itemized billing processes for further clarity to the customer and developer or applicant; and 3) prepare and present a “bill on estimate” proposal in a future Interconnection Discussion Forum. In the Report, SMJUs explain that prior to this Rulemaking, the Commission required the investor-owned utilities to develop a Unit Cost Guide that developers can use to estimate customer project costs.⁵⁵ SMJUs assert they do not oppose itemization of actual costs based on existing system capabilities but maintain the development of a Unit Cost Guide is cost prohibitive.⁵⁶ Further, SMJUs contend they may be “restricted in providing cost estimation due to the uncertainty of costs and the confidentiality of particular procurement costs.”⁵⁷

This decision finds the small number of interconnections experienced by SMJUs would make it difficult for SMJUs to cost-effectively develop a Unit Cost

⁵⁴ Report at 14.

⁵⁵ Report at 14. *See also* D.20-09-035 at 98, which describes the Guide, and cites D.16-06-052 at Ordering Paragraph 1, which directs the development of the guide.

⁵⁶ Report at 14.

⁵⁷ Report at 14.

Guide. However, it is reasonable to require SMJUs to do what is possible now within the confines of existing capabilities. Hence, the Commission should require SMJUs to adhere to the similar directive provided to the large investor-owned utilities in D.20-09-035. Accordingly, SMJUs are directed to do what is immediately possible to provide cost itemization based on existing system capabilities and strive to improve itemized billing processes for further clarity to the customer and developer or applicant.

4.13. Issue 16: Third-Party Construction

Issue 16 asks whether SMJUs should modify their interconnection process to encourage third-party construction of upgrades. SMJUs submit that they each allow third-party contractors to perform certain interconnection related work but contend all SMJUs must be able to review the qualifications of the third party as well as the workplans.⁵⁸ As such, SMJUs propose that no modifications to the current process be required at this time. No party commented on this proposal.

D.20-09-035 states that Rule 21 currently permits third-party construction of interconnection facilities, subject to approval by the distribution provider.⁵⁹ That decision noted that supporters of encouraging third-party upgrade construction “assert benefits such as increased competition, improved timelines, and cost certainty.”⁶⁰ The proposals adopted in D.20-09-035 “encourage third party construction of upgrades so as to support timely and more cost-effective

⁵⁸ Report at 15. Bear Valley and Liberty allow third-party installation of interconnection facilities and distribution system improvements (*See* Liberty and Bear Valley Rule 21 at Section E.3.c.) The three SMJUs provide opportunity for applicant construction of line extensions in Rule 15. (*See* Report at 15.)

⁵⁹ D.20-09-035 at 102.

⁶⁰ *Ibid.*

interconnection.”⁶¹ However, given the small number of interconnections SMJUs experience, the Commission is not persuaded that more third-party construction would provide the same level of improved timelines and cost certainty as it would with the larger number of interconnections experienced by the large investor-owned utilities. Accordingly, the proposal to maintain current interconnection processes should be adopted.

4.14. Issue 18: Anti-Islanding Screen Parameters

Issue 18 asks whether SMJUs should be required to adopt changes to anti-islanding screen parameters to reflect research on islanding risks when using UL 1741-certified inverters. SMJUs state support for the creation of a working group to study unintentional island formation concerns.⁶² As such, SMJUs propose that no changes to the interconnection tariff be made at this time.⁶³ No party commented on this proposal.

In D.21-06-002, the Commission determined that unintentional islanding should be considered a distribution system issue.⁶⁴ In that decision, the Commission adopted several proposals to resolve this issue for the investor-owned utilities; one proposal establishes the Unintentional Islanding Working Group to review, discuss, evaluate, and recommend distribution system level solutions to island formation arising from increased distributed energy resources penetration.⁶⁵ The Report states that SMJUs are interested in increasing functionality of their distribution systems through smart inverters

⁶¹ *Ibid.*

⁶² Report at 15.

⁶³ Report at 15.

⁶⁴ D.21-06-002 at 44.

⁶⁵ D.21-06-002 at 43-44.

and, thus, support the working group to study unintentional island formation.⁶⁶ Further, SMJUs assert they will “continue to monitor technical developments in addressing unintentional islanding.”⁶⁷

The Commission established the Unintentional Islanding Working Group and authorized the Energy Division to commence the working group no later than 180 days from the issuance of D.20-09-035. Hence this working group has begun. SMJUs expressed support for this group and stated they will monitor technical developments, which should lead to increased functionality of the SMJUs’ distribution systems. Accordingly, the proposal to require no modification to interconnection tariffs at this time is reasonable and should be adopted. However, SMJUs should not just monitor technical developments but actively participate to ensure that safety concerns specific to SMJUs are reviewed so that increased functionality may occur. Hence, this decision directs that a representative of the SMJUs begin to actively participate in the Unintentional Islanding Working Group to ensure SMJU-related safety concerns are addressed.

4.15. Issue 19: Streamlining

Issue 19 asks whether the Commission should require SMJUs to streamline their interconnection procedures to facilitate implementation of California Zero Net Energy building codes, including allowing applications based on street address rather than service account and allowing batched or multiple-unit applications. SMJUs contend these specific changes may not be feasible nor cost

⁶⁶ Report at 15.

⁶⁷ Report at 15.

justified.⁶⁸ As such, SMJUs propose to maintain current interconnection processes.⁶⁹ No party commented on this proposal.

SMJUs assert there is not always a way to identify accounts based on street address, stating that premise identifications do not always reflect the street address used by the customer.⁷⁰ SMJUs contend requiring applications based on street address may not be feasible.⁷¹ Further, SMJUs assert the costs of such an interconnection process modification may outweigh the benefits.⁷²

SMJUs do not point to any specific fact to support their claims of feasibility or cost-effectiveness with respect to Issue 19. However, this decision has already determined that SMJUs are differently situated from investor-owned utilities in terms of the volume of interconnection applications. Furthermore, while the Report acknowledged that Issue 19 is specific to Zero Net Energy projects, it did not explain the relevance to the implementation of Title 24 requirements for new construction.⁷³

D.21-06-002 underscores that projects developed to meet Zero Net Energy building codes are no different than any other interconnection project with respect to the application process, engineering requirements, and evaluating potential grid impacts.⁷⁴ Similar to the volume of interconnections, it is reasonable to presume SMJUs will not experience the same volume of new

⁶⁸ Report at 16.

⁶⁹ Report at 16.

⁷⁰ Report at 16.

⁷¹ Report at 16.

⁷² Report at 16.

⁷³ D.21-06-002 at 51.

⁷⁴ D.21-06-002 at 52.

construction that large investor-owned utilities experience. Hence, this decision determines that, currently, SMJUs' interconnection processes do not require the same level of streamlining as that of the large investor-owned utilities for the express purpose of facilitating implementation of Title 24 requirements for Zero Net Energy new construction. Accordingly, the Commission should not require SMJUs to revise interconnection processes to allow applications based on street address.

4.16. Issue 20: Coordination of Interconnection Jurisdiction

Issue 20 asks whether the Commission should require SMJUs to coordinate Commission-jurisdictional and FERC jurisdictional interconnection rules for behind-the-meter distributed energy resources.⁷⁵ SMJUs assert there are no jurisdictional coordination issues within the SMJUs' interconnection processes. As such, SMJUs propose that no action is necessary. No party commented on this proposal.

SMJUs report neither Liberty nor Bear Valley own FERC-jurisdictional transmission.⁷⁶ Further, the Report states that PacifiCorp's interconnection process is a FERC-jurisdictional process.⁷⁷ This decision agrees that there are no jurisdictional coordination issues within the SMJUs' interconnection processes. Accordingly, the Commission should not require SMJUs to implement any coordination measures.

⁷⁵ Report at 12 citing D.20-09-035 at 55.

⁷⁶ Report at 16.

⁷⁷ Report at 16.

4.17. Issue 22: Interconnection Application Portals

Issue 22 asks whether the Commission should require SMJUs to improve interconnection application portals. SMJUs state they are open to portal improvement suggestions through workshops.⁷⁸ As such, SMJUs make no proposal. No party provided comment to this issue.

SMJUs have expressed support for holding a workshop to discuss portal improvement suggestions; this is a reasonable approach. Accordingly, SMJUs should host a workshop inviting their current and prospective interconnection customers or developers. SMJUs shall ensure the attendance of a representative of the Commission's Energy Division. The workshop shall be held no later than 90 days after the issuance of this decision. Bear Valley and Liberty shall submit a Tier 2 Advice Letter to implement any portal improvements as a result of this workshop. PacifiCorp shall submit a letter to Energy Division with a copy to the service list notifying them of any changes to the portal as a result of the workshop.

4.18. Issue 23: Interconnection of Electric Vehicles

Issue 23 asks whether the Commission should consider issues related to the interconnection of electric vehicles and related charging infrastructure and devices.⁷⁹ Due to the low adoption rate of electric vehicles in their territories, SMJUs submit they do not require the interconnection of electric vehicles to follow the distributed energy resources interconnection process.⁸⁰ SMJUs

⁷⁸ Report at 12 citing D.20-09-035 at 55.

⁷⁹ Report at 17.

⁸⁰ Report at 17.

propose to not amend their electric vehicle interconnection processes.⁸¹ No party commented on this proposal.

SMJUs report that in the case of non-exporting electric vehicles, SMJUs treat electric vehicle interconnection as increased load. Pointing to low adoption rates by all three utilities, SMJUs assert that a process similar to distributed energy resources interconnection would be more burdensome and less preferred by electric vehicle adopters.⁸² With respect to exporting electric vehicles, SMJUs report they have not received interconnection applications.⁸³ Furthermore, the Report states that neither Bear Valley nor Liberty have experienced sufficient interest to implement the necessary vehicle-to-grid technology.⁸⁴ Similarly, PacifiCorp asserts there are few electric vehicles in their territory and has no plans to develop a vehicle-to-grid pilot in the near future.⁸⁵ This decision finds the current electric vehicle adoption rates in the SMJUs' territories do not justify changes in their interconnection process. Accordingly, the Commission should not require SMJUs to update their interconnection processes to allow for electric vehicle interconnection.

4.19. Issue A: Non-export and Limited Export Design Approval

Issue A asks whether the Commission should require changes to clarify the parameters for approving the design of systems for non-export and limited

⁸¹ Report at 17

⁸² Report at 17. Electric vehicle adoption is as follows: PacifiCorp has 45 battery electric vehicles, 1 fuel cell electric vehicle, and 26 plug-in hybrid electric vehicles; Liberty has 8 residential projects completed within its territory; and Bear Valley has eight residential customers participating in an electric vehicle charging pilot program.

⁸³ Report at 17.

⁸⁴ Report at 17.

⁸⁵ Report at 18.

export. SMJUs submit they have experienced very few interconnection requests for non-export and limited export facilities and propose no changes to current processes. No party commented on this proposal.

Asserting few requests for non-export and limited export interconnections, SMJUs state that if a request is submitted, they will require the installation of equipment to prevent the export of power that will trip the generation or main breaker.⁸⁶ Further, SMJUs contend the solutions required to prevent export are specific to each request and would be difficult to standardize. Given the low volume of non-export and limited export requests, we agree that standardization would be difficult. This decision concludes the Commission should not require the SMJUs to implement any changes to their interconnection processes for non-export and limited export facilities.

4.20. Issue B: Systems Not Certified Non-Export

Issue B asks whether the Commission should require rules concerning generating capacity for behind-the-meter paired solar and storage that are not certified non-export.⁸⁷ SMJUs contend there is little to no demand for these types of projects sufficient to justify changes to interconnection processes. No party commented on this proposal.

The Report states that SMJUs have only experienced a limited amount of interconnection requests for solar and storage systems not certified as non-export.⁸⁸ Bear Valley and Liberty contend, while not opposed to amendments to accommodate these systems, there is not a demand to justify

⁸⁶ Report at 18.

⁸⁷ Report at 18.

⁸⁸ Report at 18.

changes to Rule 21.⁸⁹ Similarly, PacifiCorp states that distributed energy resource penetration rates in its California territory are low. Given the low volume of interconnection applications for behind-the-meter paired solar and storage systems not certified non-export, this decision agrees there is no justification for changes in current interconnection processes. Accordingly, the Commission should not require SMJUs to implement any changes to interconnection processes for behind-the-meter paired solar and storage not certified non-export.

4.21. Issue 27: Smart Inverter Operational Requirements

Issue 27 asks whether the Commission should require SMJUs to adopt rules and procedures for adjusting smart inverter functions through communication controls.⁹⁰ SMJUs state they are in the process of exploring the use of smart inverters and, while they will monitor work being conducted by the Commission, they contend the Commission should not adopt smart inverter requirements at this time for SMJUs.⁹¹ No party commented on this proposal.

As we have stated previously in this decision, SMJUs are differently situated in comparison with large investor-owned utilities in terms of customer base size and interconnection volume and rate. Furthermore, SMJUs attest they do not currently use smart inverters, hence there is no need to adopt rules and procedures for adjusting something SMJUs do not have. This decision concludes that, at this time, the Commission should not adopt smart inverter requirements for SMJUs.

⁸⁹ Report at 18.

⁹⁰ Report at 19.

⁹¹ Report at 19.

**4.22. Issue 28: Process Coordination with
R.14-10-003**

Issue 28 asks whether the Commission should require SMJUs to coordinate their interconnection smart inverter processes with R.14-10-003 to ensure operational requirements for smart inverters are aligned with any relevant mechanisms.⁹² SMJUs state they have no suggestions on how they could better coordinate their processes with R.14-10-003 but are open to party suggestions. No party commented on this issue.

As noted in Section 4.21 above, the SMJUs are in the process of exploring the use of smart inverters at this time. Furthermore, in D.20-09-035, the Commission resolved Issue 28 by authorizing Energy Division to reconvene the Smart Inverter Working Group, if and when the Commission adopts a distributed energy resources tariff. As such, Issue 28 has already been resolved for SMJUs as well. Hence, the Commission should not adopt further requirements for the SMJUs, except to encourage participation in the Smart Inverter Working Group if and when it is reconvened.

5. Comments on Proposed Decision

The proposed decision of President Alice Reynolds in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on March 9, 2022 by CASMU. No party filed reply comments. CASMU expressed support for the proposed decision and offered no requests for revisions.

⁹² Report at 19.

6. Assignment of Proceeding

President Alice Reynolds is the assigned Commissioner and Kelly A. Hymes is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. Issue 1, regarding transmission cluster studies is not applicable to Bear Valley or Liberty due to the absence of transmission lines within their operational grid.
2. Six monthly interconnection applications is a modest number of applications.
3. PacifiCorp should continue to be able to process six monthly interconnection applications because most of the applicants utilize the Fast Track process.
4. Revisions to the PacifiCorp interconnection process to address transmission cluster studies are unnecessary at this time.
5. SMJUs have shown in the Report that they have few distributed energy resources connected to their systems.
6. Given the customer base of the SMJUs and the small number of interconnections they experience, requiring the development of illustrative metering configurations and cost tables are neither necessary nor feasible.
7. SMJUs have a small number of distributed energy resources connected to their systems.
8. Revising current processes to account for different types of modifications would most likely not minimize the cost or timing impacts of the modification.
9. Requiring additional telemetry requirements of distributed energy resources would be unduly burdensome for SMJUs.

10. The Commission previously declined to adopt a requirement for investor-owned utilities to ensure the activation of advanced functionality in Phase One-compliant inverters installed before September 9, 2017; there is nothing in the record of this proceeding that would cause the Commission to deviate from its previous determination.

11. It is reasonable to not require SMJUs to ensure the activation of advanced functionality in Phase One compliant inverters installed before September 9, 2017.

12. There is nothing in the record of this proceeding that would cause the Commission to deviate from its prior Distribution Resource Plan requirements for SMJUs.

13. SMJUs do not have the same capacity concerns as the large investor-owned utilities due to the small number of interconnections they experience.

14. Given the operational size of the SMJUs, the small number of interconnections SMJUs experience, and SMJUs' minimal capacity concerns, requiring SMJUs to develop an ICA and conform their interconnection processes to the ICA could be administratively burdensome and unnecessary.

15. The purpose of Issue 9 is to utilize the ICA data to allow modern inverters, storage, and other technologies to confidently respond to grid conditions while ensuring safety and reliability.

16. Issue 9 is related to ICA and Issue 8.

17. Requiring conditions of operations in SMJUs' interconnection processes would be administratively burdensome and unnecessary.

18. With respect to the large investor-owned utilities, the Commission adopted proposals to resolve Issue 10 that focused on a more streamlined process.

19. Streamlining the interconnection process is necessary with the large investor-owned utilities, given the large customer base and large number of interconnections.

20. It is not necessary for SMJUs to coordinate individual ICAs and Rule 21 processes with Rules 2, 15, and 16.

21. Liberty and Bear Valley both provided data indicating a low volume of applications for non-exporting storage systems.

22. It is not necessary to require Liberty and Bear Valley to implement a notification-only approach for non-export systems.

23. PacifiCorp's proposal to address Issue 11 would ensure equipment to prohibit export but provide for safe islanding is installed on the customer side of the meter and track location and capacity but streamline the process by not reviewing the surrounding distribution grid.

24. Given the size of PacifiCorp and its limited number of interconnections, its Issue 11 proposal allows for additional streamlining to the interconnection process without undue administrative burden.

25. Requiring timelines for distribution upgrade planning, cost estimation, and construction is unnecessary given the number of interconnections the SMJUs experience, in combination with the customer base.

26. The small overall customer base, number of interconnections, and use of interconnection portals should allow SMJUs to provide timely communication with interconnection customers.

27. The size of the customer base and number of interconnections reported by SMJUs support the contention that there is an infrequency of distribution upgrades necessitated by interconnections. As such, this decision finds no

justification for revisions to current cost allocation practices for distribution upgrades.

28. The small number of interconnections experienced by the SMJUs would make it difficult for SMJUs to cost-effectively develop a Unit Code Guide.

29. It is reasonable to require SMJUs to do what is possible now for Issue 15 within the confines of existing capabilities.

30. More third-party construction would not necessarily provide the same level of improved timelines and cost certainty for SMJUs as it does with the large investor-owned utilities.

31. The Commission established the Unintentional Islanding Working Group and authorized the Energy Division to commence the working group no later than 180 days from the issuance of D.20-09-035.

32. SMJUs expressed support for this group and stated they will monitor technical developments.

33. Projects developed to meet zero net energy building codes are no different than any other interconnection project with respect to the application process, engineering requirements, and evaluating potential grid impacts.

34. SMJUs will not experience the same volume of new construction as investor-owned utilities experience.

35. The SMJUs' interconnection processes do not require the same level of streamlining as that of the investor-owned utilities for the express purpose of facilitating implementation of Title 24 requirements for zero net energy new construction.

36. Neither Liberty nor Bear Valley own FERC-jurisdictional transmission.

37. PacifiCorp's interconnection process is a FERC-jurisdictional process.

38. There are no jurisdictional coordination issues within the SMJU's interconnection processes.

39. It is reasonable for SMJUs to hold a workshop to discuss interconnection portal improvement suggestions.

40. The current electric vehicle adoption rates in the SMJUs' territories do not justify changes in their interconnection process.

41. Given the low volume of non-export and limited export requests in the SMJUs' service areas, standardization for export prevention would be difficult.

42. There is no justification for changes in current interconnection processes given the low volume of interconnection applications for behind-the-meter paired solar and storage systems not certified non export.

43. SMJUs do not currently use smart inverters.

44. There is no need to adopt rules and procedures for adjusting smart inverters in SMJUs' interconnection processes.

45. The Commission resolved Issue 28 by authorizing Energy Division to reconvene the Smart Inverter Working Group, if and when the Commission adopts a distributed energy resources tariff.

46. Issue 28 has already been resolved for SMJUs as well.

Conclusions of Law

1. The Commission should adopt the Issue 1 proposal to not make any modification to the PacifiCorp interconnection process to address transmission cluster studies.

2. The Commission should adopt the Issue 2 proposal to not require SMJUs to develop illustrative metering configurations and cost tables.

3. The Commission should adopt the Issue 3 proposal to not make changes to current SMJU interconnection processes to account for different types of application modifications.

4. The Commission should adopt the Issue 4 proposal to not require changes to the SMJUs' interconnection processes with respect to distributed energy resources' telemetry requirements.

5. The Commission should adopt the Issue 5 proposal to maintain current inverter requirements in SMJUs' interconnection rules.

6. The Commission should adopt the Issue 8 proposal to maintain current interconnection processes for SMJUs and not require SMJUs to perform an ICA.

7. The Commission should adopt the Issue 9 proposal to not require conditions of operations in SMJU interconnection processes.

8. The Commission should adopt the Issue 10 proposal to maintain current interconnection processes and not require coordination between Rule 21 and Rules 2, 15, and 16.

9. The Commission should adopt the Issue 11 proposal for PacifiCorp to streamline the interconnection of non-export storage facilities by ensuring installation of equipment sufficient to prohibit export.

10. The Commission should adopt the Issue 12 proposal of no timeline requirements for distribution upgrade planning, cost estimation, and construction.

11. The Commission should adopt the Issue 13 proposal to retain SMJUs' current cost allocation practices for distribution upgrades.

12. The Commission should require SMJUs to adhere to the similar directive provided to the large investor-owned utilities in D.20-09-035 for Issue 15: i) do what is immediately possible to provide cost itemization based on existing

system capabilities and ii) strive to improve itemized billing processes for further clarity to the customer and developer or applicant.

13. The Commission should adopt the Issue 16 proposal to maintain current interconnection processes and not order additional requirements for third-party construction.

14. The Commission should adopt the Issue 18 proposal to require no modification to interconnection tariffs at this time, with the caveat that SMJUs actively participate in the Unintentional Islanding Working Group.

15. The Commission should adopt the Issue 19 proposal to not require SMJUs to revise the interconnection processes to allow applications based on street address.

16. The Commission should adopt the Issue 20 proposal to not require SMJUs to implement any coordination measures in their interconnection processes.

17. The Commission should require SMJUs to host a workshop to discuss interconnection portal improvements.

18. The Commission should adopt the Issue 23 proposal to not require SMJUs to update interconnection processes for the inclusion of electric vehicle interconnection.

19. The Commission should adopt the Issue A proposal to not require the SMJUs to implement any changes to their interconnection processes for non-export and limited export facilities.

20. The Commission should adopt the Issue B proposal to not require SMJUs to implement any changes to interconnection processes for behind-the-meter paired solar and storage not certified non export.

21. The Commission should adopt the Issue 27 proposal to not order smart inverter requirements for SMJUs.

22. The Commission should adopt the Issue 28 proposal to not direct further requirements for the SMJUs, except to encourage participation in the Smart Inverter Working Group if and when it is reconvened.

O R D E R

IT IS ORDERED that:

1. The proposals from the Small Multi-Jurisdictional Utilities (SMJUs), encompassing Bear Valley Electric Service, Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp, d.b.a. Pacific Power (PacifiCorp) are adopted with modifications. SMJUs shall make the following revisions to their distributed energy resources interconnection processes:

- (a) PacifiCorp shall streamline the interconnection of non-export storage facilities in its territory by ensuring the installation of equipment sufficient to prohibit export.
- (b) SMJUs shall do what is immediately possible to provide cost itemization based on existing system capabilities and strive to improve itemized billing processes for further clarity to the customer and developer or applicant.
- (c) A representative of the SMJUs shall actively participate in the Unintentional Islanding Working Group to address SMJU-related safety concerns.
- (d) Within 90 days from the adoption of this decision, SMJUs shall host a workshop to discuss interconnection portal improvements. SMJUs shall invite their current and prospective interconnection customers or developers, as well as the Commission's Energy Division. SMJUs shall ensure the attendance of a representative of Energy Division. Bear Valley and Liberty shall submit a Tier 2 Advice Letter to implement any portal improvements as a result of this workshop. PacifiCorp shall submit a letter to Energy Division with a copy to the service list notifying them of any changes to the portal as a result of the workshop.

- (e) SMJUs are encouraged to participate in the Smart Inverter Working Group if and when it is reconvened.
- 2. Rulemaking 17-07-007 remains open to address Phase II issues.

This order is effective today.

Dated April 7, 2022, at San Francisco, California.

ALICE REYNOLDS
President
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
DARCIE L. HOUCK
JOHN R.D. REYNOLDS
Commissioners