

**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
(Filed July 13, 2017)

**RESPONSE OF THE CLEAN COALITION TO THE JOINT MOTION OF
SOUTHERN CALIFORNIA EDISON COMPANY, SAN DIEGO GAS &
ELECTRIC COMPANY, AND PACIFIC GAS AND ELECTRIC COMPANY TO
REVISE THE RULE 21 WORKING GROUPS SCOPE AND SCHEDULE**

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October 8, 2018

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I. INTRODUCTION

Pursuant to Rule 11.1(e) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Clean Coalition submits this response to the joint motion (“Motion”) of Southern California Edison company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company (“IOUs”) to revise the Rule 21 working groups scope and schedule file September 21, 2018.

Summary

- All new issues raised by stakeholders, in addition to all unresolved issues from the prior proceeding, should be reviewed for scheduling based on multiple factors including potential significance, critical dependencies and timing, and ease of resolution.
- Pilot or limited early trial implementation of interconnection streamlining methods should be considered to speed development and refinement of practices.

II. DESCRIPTION OF THE PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise.

III. COMMENTS

Issue Scope, Grouping, and Prioritization

Clean Coalition agrees that modifications to the schedule are needed to address all issues pertaining to this proceeding.

The Clean Coalition supports the division of topics into multiple tracks while urging clarification regarding the sequencing and interdependence of tracks and topics. We also acknowledge that additional issues have been identified by parties, and will continue to arise in this regulatory area. A revised scoping hearing or comments may clarify the need to address this and the schedule for doing so.

We note that the scoping for this proceeding already includes a Phase Two for issue 30 and Phase Three for issue 31. Not all issues will be addressed by Q2 2019.

It is reasonable to consider if some topics may be addressed outside of the working group process. However, in many of the cases proposed in the Motion, the most efficient process appears to be to first hold a workshop to clarify the issues stakeholders are seeking to address and preliminary proposals, solicit relevant information or feedback from utilities and other parties, and discuss potential solutions. This may be followed with a second meeting to present utility proposals and seek feedback from stakeholders for refinement and areas of consensus.

Such interaction is well suited to in person meetings, and although each issue may require only one or two half or full day meetings rather than an "extended discussion/proposal" format, an established working group may be the most efficient method to organize this process and resolve issues expeditiously. Drafting, reviewing, replying to, and aggregating written comments from multiple stakeholders without first bringing them together can be considerably more burdensome than having parties refine issues of consensus and contention in discussion.

Under this approach, the Working Group Report will clearly identify the specific issues upon which general consensus is not readily available and lay out alternatives that may be appropriated addressed through a written comment process.

We do agree that remaining issues may be reviewed for higher priority or urgency. Some issues may warrant attention but are less urgent and may be address later next year to avoid overburdening parties in the working group process. These are briefly addressed below:

Issue 13 - Cost Sharing, is not urgent. It is too complex to develop through comments, but comments may clarify the need and address the schedule.

Issue 14 - tree mortality - comments may clarify the need and address the schedule.

Issue 15 - Itemized billing - an initial response or proposal from utilities may be offered for comment on degree of agreement and next steps - working group, or formal comment. However, utilities previously unsuccessfully argued to have this item removed from the scoping in this proceeding and parties and the Commission should be wary of repeated efforts to effectively achieve the same result.

Issues 17, 21, 25, and 26 have significant potential overlap and multiple issues have been raised in Working Group 1, Working Group 2, the Commission's Interconnection Discussion Forum, and other contexts related to these. Comments may clarify the opportunity to combine these issues and the scheduling priority. Utilities may put forward information or proposals indicating that these issues are resolved pending stakeholder response.

Issue 17 - Interconnection Facilities, Issue 20 - Coordination of Rule 21 and WDT/WDAT, and Issue 21 - Metering of Storage facilities to enable multi-use applications:

Utilities may clarify whether they allow wholesale applicants to utilize pre-existing customer interconnection facilities to the extent that these are electrically adequate (ex: new 100 kW full export PV utilizing existing customer facilities serving 100 kW load) or under what conditions this would not be allowed. Likewise, utilities may clarify allowing a commercial scale customer to utilize on site energy storage for

demand charge management (the primary value) under NEM Multiple Tariff (because the storage is not a NEM eligible resource), however the storage capacity would be available during most hours to offer other grid services participating in the CAISO markets (alone or as part of an aggregated resource) without requiring a separate physical interconnection. If allowed with clear and undisputed requirements, no further action may be required.

Issue 25 - Expedited non-exporting Storage application processes - this issue is also related to Issue 19 - Standard configurations for expedited review

Issue 22 - Application Portals. Utilities can provide visibility of improvement efforts, however a process for integrating user feedback and prioritizing improvements may be warranted. Workshop comments may clarify the issues and best method to address this and the schedule.

Issue 24 - Cost of Ownership. As outlined in scoping comments, this is not a subject simply requiring information but review of the formula and its application to customer interconnection charges. The issue of whether customer charges should reflect costs based on the term of service defined in the Interconnection Agreement is a relatively narrow question that should be easily resolved in Rule 21.

IV. CONCLUSION

We appreciate the Commission's attention and parties' history of diligent work in addressing the issues associated with interconnection and offer these comments to further those ends.

Respectfully submitted,



Kenneth Sahm White
Director, Economic and Policy Analysis
Clean Coalition

Dated: October 8, 2018

VERIFICATION

I, Kenneth Sahm White am the representative for the Clean Coalition for this proceeding. I am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true of my own knowledge, except for those matters that are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 8, 2018, at Santa Cruz, California



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