

PG&E Advice Letter Draft 2011-02-14  
Re: (D.) 10-12-035 &  
AB 1613 Program - Advice 3696-E-A: Purchase of  
Excess Electricity from Eligible Small Combined Heat  
and Power Facilities

## Clean Coalition comments on PG&E QF Interconnection Proposal

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March 31, 2011

## **Introduction**

The Clean Coalition (formerly The FIT Coalition) is a California-based advocacy group focused on timely and cost effective renewable energy policy for the public good, particularly in relation to feed-in tariffs and “wholesale distributed generation” (WDG). The Clean Coalition is part of Natural Capitalism Solutions, a 501(c)(3) based in Longmont, Colorado. Our members are active in proceedings at the Public Utilities Commission, Air Resources Board, Energy Commission, California ISO, the California Legislature, Congress, the Federal Energy Regulatory Commission, and in various local governments around California. We have been intimately involved with CAISO’s and PG&E’s interconnection reform procedures for the last year.

## **Summary:**

1. Suspending use of Rule 21 as proposed by PG&E is both unnecessary and unwarranted.
2. The programs cited by PG&E are not yet eligible for contracts. (Decision 10-12-055 implementing AB 1613 is under FERC challenge by the IOUs and is not final, and the CHP/QF settlement is under appeal and also not final.) As such, candidate projects are currently seeking information only, not interconnection.
3. Rule 21 update is already planned for the coming months and should proceed, accommodating the requirements of the cited programs earlier than the Wholesale Distribution Tariff (WDT) would.
4. CPUC has authority to modify Rule 21 and address stakeholder concerns.
5. The existing WDT has serious flaws. The proposed changes in WDT address some issues while introducing others of equal or greater consequence. These issues cannot be addressed under CPUC authority.
6. WDT is currently under FERC review for IOU proposed changes, and the status of current and proposed WDT processes for the coming months is not certain.
7. The next WDT cluster study will not even begin for 12 months, by which time full Rule 21 revision will already be completed. Since few if any interconnection requests related to forthcoming AB 1613 and CHP/QF would qualify outside the cluster study, use of WDT provides no earlier process.

We therefore recommend:

1. Not suspending Rule 21 as proposed.
2. Implementing interim Rule 21 modifications where possible.
3. Allowing but not requiring CPUC jurisdiction WDG generators to have the option of interconnection through WDT if qualified for any study beginning prior to the Rule 21 update Decision, including any able to participate in the current cluster study.
4. Proceeding with Rule 21 reform this Quarter per the Scoping Memo of Rulemaking 10-05-004, toward a Proposed Decision within six months, in support of RAM, SB 32, and AB 1613 programs. This proceeding will finish **six months before** the next WDT cluster study even begins.
5. Ensuring continued CPUC oversight of CPUC jurisdictional interconnection to identify problems, rapidly implement solutions, and enforce performance standards when necessary.
6. Conducting an Independent Process Audit of interconnection procedures.
7. Release of information on the effectiveness of WDT Fast Track and Independent Study Procedure (ISP) processes.
8. Coordination of Rule 21 and WDT Fast Track and ISP technical requirements where conflicting.
9. Application of improved interconnection queuing information and mapping standards as required under RAM and recommended by the Clean Coalition for SB 32.

**Discussion:**

There is broad agreement and support for review and updating of the Rule 21 interconnection tariff, and we are pleased that the Commission plans to address this update in the coming months.

Interconnection has become a central bottleneck through out the wholesale generation sector in California. This market segment, eager to respond to the demand for renewable energy and the economic opportunities created by a number of programs implemented to deliver that energy supply, has overwhelmed procedures designed for smaller numbers of interconnection requests.

CAISO and the utilities have made sincere efforts to address the new volume of interconnection requests in FERC jurisdictional interconnections, and we also

recognize a number of benefits from shifting to a cluster study process instead of the serial process found in the current WDT SGIP, including: increasing cost certainty; eliminating the need for re-studies; sharing upgrade costs with other interconnection customers in the same cluster; and allowing for full capacity deliverability for all interconnection customers. While these improvements are laudable, the proposed cluster study process results in timelines of one and a half to two and a half years depending on the date of application, as detailed below in appendix A.

Such timelines are particularly difficult for smaller projects that require firm interconnection costs and commitments early in the development path to determine viability and secure funding. With the WDT application window for 2011 having just closed, there will be no opportunity to even enter a study process until March 2012 if Rule 21 is not available, except for the small number of projects that may or may not qualify for Fast Track or ISP (We note that no historical information has been shared on the number of applications, out comes, or time in process for either of these programs).

We believe that interconnection is a vital element to any distributed generation program and support the opportunity to use Rule 21 where applicable. Not only is Rule 21 intended specifically to facilitate the interconnection of smaller projects to the distribution grid, but also, critically, to allow CPUC oversight over such procedures.

CPUC oversight of jurisdictional interconnection must be ensured in order to identify problems, rapidly implement solutions, and enforce performance standards when necessary. Each of these have proven elusive under FERC jurisdictional procedures and such challenges should not be extended unnecessarily in additional programs. This is particularly relevant given the current issues with the CAISO Generator Interconnection Procedures (GIP) and its problematic reform process that carries over into WDT standards and proceedings. The CPUC should work strenuously to ensure that Rule 21 remains as a viable interconnection procedure and is expanded in practice to all WDG interconnection over time.

#### The Existing WDT has Serious Flaws

Streamlining interconnection for 20 megawatt and smaller renewable energy projects is vitally important, and we support PG&E's proposed WDT adjustments in some key areas, including changing the mandatory Fast Track 2 MW limit to an advisory limit up to 5 MW;

dramatically improving interconnection data maps, allowing for elimination of the feasibility study; changing ISP from a once a year option to a year-round option; and elimination of any screens for the Independent Study Procedure other than electrical independence.

However, PG&E's proposed WDT would also impose additional obstacles to interconnection by increasing, potentially dramatically, the time and expense required for interconnecting 20 megawatt and smaller renewable energy projects. Moreover, the Clean Coalition fears that the supplemental interconnection procedures (Fast Track and ISP) offered by PG&E to ameliorate the impacts of eliminating the WDT SGIP represent little more than "false hopes" because they will not be viable and accessible to most developers. The Clean Coalition was optimistic that we would be able to overall support PG&E's proposed amendment; however, upon reviewing the final filings, we noted major changes since the stakeholder process and decided that we could not support the proposal as submitted to FERC.

Serious issues in PG&E's proposed WDT are discussed in detail in the attached Clean Coalition Protest To PG&E WDT Amendment, including in particular:

- PG&E's proposed Fast Track procedure is likely unusable due to the eligibility limitations inherent in screen 10, the highly conservative formulation of screen 2, uncapped future cost liabilities, and the lack of defined costs and timelines in the proposed tariff as actually submitted, if accepted without modification.
- PG&E's Proposed ISP, the other potential expedited study option, lacks objective criteria for determining electrical independence, making access to the ISP option highly uncertain.
- As a result, almost all projects will be subject to impractical cluster study completion time frames ranging from a minimum of 450 days to a maximum of 840 days.

Detailed recommendations to address these issues were offered by stakeholders during the review process, and we include our submissions below in Appendix B. In contrast to these limitations and timeframes, SMUD received and completed studies on twenty 5 MW WDG interconnection requests within a single 60 day period, half within 30 days. This was accomplished despite facilities siting outside of SMUD preferred zones, and in locations and sizes that would not meet the proposed Fast Track or ISP requirements. This feat required the attention of two staff members.

The Clean Coalition has been actively involved in the utilities WDT proceedings and believes that the proposed procedures will result in longer interconnection timelines that, if adopted, would further delay, and could threaten the success of, AB 1613 and other

programs. There are projects that must be processed through WDT, but where preferable alternatives such as Rule 21 exist, generators should be allowed the option. At the same time, there are many features of the current and proposed WDT that we believe should be incorporated into Rule 21. Until Rule 21 is updated, we support allowing generators the opportunity to determine for themselves the most appropriate interconnection process.

### RULE 21

While there is broad agreement that Rule 21, as currently drafted, is not adequate for all interconnection of generation planned under AB 1613, Rule 21 has recently been successfully used in SCE territory for similar wholesale purposes related to AB 1969.

In the immediate future, consideration of Rule 21 process improvements is included in the Scoping Memo of Rulemaking 10-05-004. Such proceedings are scheduled to occur and a decision proposed in Phase II during the second or third quarter of 2011.<sup>1</sup> We strongly encourage initiating a Rule 21 reform proceeding in support of RAM, SB 32, and AB 1613 at the earliest opportunity, as each of these programs would benefit greatly from expedited interconnection procedures. We specifically requested in our Opening Brief in the SB 32 implementation portion of R.08-08-009 that the Commission include consideration of interconnection issues.

Meanwhile, we believe that working together, the Commission and PG&E can implement significant interim modifications to PG&E's Rule 21 prior to the next Decision, as required to accommodate imminent program needs.

These may include:

- Allowing wholesale energy export to the host utility
- Adopting updated forms
- Application of improved interconnection queuing information and mapping standards required under RAM and recommended by Clean Coalition for SB 32
- Allowing application submission prior to electric service and account establishment for "Greenfield" development
- Upgrades in the scope of study
- Supplemental review fee increases (not greater than \$2000) to discourage excess study requests
- Institution of nonrefundable deposit requirements for each six month extension of queue position to discourage queue hogging

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<sup>1</sup> See pp. 7 & 9, <http://docs.cpuc.ca.gov/efile/RULC/126217.pdf>.

- Coordination of Rule 21 and WDT Fast Track and ISP technical requirements

In addition, we believe that PG&E and the other IOUs should retain an Independent Evaluator similar to that used in SCE's SPVP program. We believe that the presence of an Independent Evaluator in the interconnection process could substantially ease the concerns of smaller developers and ensure that the WDAT process is: 1) constantly evaluated for adherence to stated procedures; 2) assessed for incremental improvements; and 3) is communicated clearly to all stakeholders.

Respectfully,

-/s/-

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***Appendix A:***

The Proposed WDT Cluster Study Schedule Is Not Practical

***Appendix B:***

Clean Coalition (formerly FIT Coalition) comments on PG&E GIP draft tariff [WDT]

***Attachment:***

Clean Coalition Protest to PG&E WDT Amendment, March 23, 2011

***Appendix A:***

The Proposed WDT Cluster Study Schedule Is Not Practical

Rob Longnecker

Tam Hunt

For smaller projects interconnection costs are often a major issue and interconnection analysis must be conducted at the beginning of the development cycle. If interconnection costs are significant, the project will generally not be economically viable, so this must be known as early in the process as possible.

Unfortunately, the draft PG&E tariff envisions a cluster study process that could take up to 840 days, assuming suggested time lines are met, as follows:

- November 15: close of first cluster window
- March 31: close of second cluster window (which will be the first window in 2011 only)
- June 1: Phase I study commences, to be completed within 134 days. Study results meeting to be held within 30 days of study conclusion.
- January 15: Phase II study commences, to be completed within 196 days. Study results meeting to be held within 30 days of study conclusion.
- Total study time: about 450 days
- BUT: the total interconnection study process time, as an AVERAGE will be 180 days (from 0 to 365 days, for an average of about 180 days) waiting for Phase I to begin, depending on the time of year the application is submitted, plus 420 days study plus 30 days waiting for a meeting to discuss results. Total AVERAGE time: 630 days.
- IN ADDITION: if the second cluster window is missed, the applicant must enter the next first cluster window and wait until June 1 of the following year for Phase I to begin. So if a party is ready to go on April 1 (the worst case scenario), it must wait until Oct. 15 to submit its application in the first cluster window and then until June 1 of the next year for Phase I to start, January 15 of the following year for Phase II to start, and then 226 days for the meeting to discuss Phase II results. Total WORST CASE duration is 28 months or about 840 days.

And this does not include time negotiating the Generator Interconnection Agreement or the time required to construct any necessary upgrades.

An average timeline of nearly two years just to get to the point of negotiating an interconnection agreement is far too long for small or new developers to hang on to projects without knowing if the chosen site is economically viable because options must be paid to landowners, at the least, and the biological study and permitting process is unlikely

to start in earnest until the full costs of interconnection are learned in the cluster study process due to the possibility that such activities would be mooted if the project could not be interconnected at a reasonable cost.

***Appendix B:***

Clean Coalition (formerly FIT Coalition) comments on PG&E GIP draft tariff [WDT]

Rob Longnecker  
Tam Hunt

March 23, 2011

II. SOLUTIONS

We suggest a number of solutions, both immediate and mid-term, below, including the following priority highlights:

1. Modify section 2.2.10 so that it may be passed if only interconnection facilities are required, because almost all projects will require new interconnection facilities
2. Add objective criteria in each reference in the draft tariff to “engineering judgment,” in order to add transparency and predictability to what would otherwise be opaque aspects of the interconnection process
3. Examine the feasibility of IREC’s suggested approach of using minimum circuit loads for Fast Track’s screen 2, where data is available, and examine the costs of adding SCADA to all circuits
4. Improve pre-application exchange of information through a for-fee feasibility study
5. Improve queue transparency to provide more data and deadline tracking, ensuring that the process is transparent and deadlines are being met
6. Retain an Independent Evaluator to review interconnection processes.

A. Flow Charts

We request that PG&E include flow charts, with timelines and explanations of abbreviations, akin to, but expanded from, the charts included as an Appendix to the Jan. 25, 2011, PG&E presentation, for the following: 1) An overview of the entire interconnection study procedure, encompassing the cluster study process, ISP and Fast Track; 2) the cluster study process; 3) ISP; 4) Fast Track. Flow charts will make understanding PG&E’s procedures far easier and save both developers and PG&E a lot of

time. The Appendix contains just timelines and we urge PG&E to expand these basic timelines to flow charts with relevant data summarized in each chart.

## B. Tariff Title

The Clean Coalition also requests that PG&E entitle the GIP tariff the “Distribution Grid GIP,” in order to distinguish it from the CAISO GIP.

## C. Data Transparency and Process Improvements

While we acknowledge that the current serial process is flawed, very little “behind the scenes” data has been provided to help understand where the problems lie, how those problems can be addressed and what areas exist for future improvement, despite our numerous requests for more data. For example, would software and modeling improvements fix much of the delay? How about additional staff? (We note that a PG&E representative stated on PG&E’s January, 2011, conference call: “We have a backlog that we’re addressing with additional staff.” As such, it is clear, as the Clean Coalition has been suggesting for many months now, that additional staff will indeed improve at least part of the backlog issue). Could improved software, with more staff and a cluster process dramatically improve the proposed reforms and allow studies to be completed in far less than 420 days? At this point, we can’t say because we have so little information.

Here is a list of the kinds of information we feel should be available to all stakeholders before major changes are made to WDAT:

- I. Number of WDAT applications in the PG&E queue, with dates of entry
- II. Number successfully processed, time for processing and costs of studies
- III. Number of Rule 21 applications in the PG&E queue, with dates of entry
- IV. Number successfully processed, time for processing, and costs of studies
- V. Number of Fast Track applications in the PG&E queue, with dates of entry
- VI. Number successfully processed in Fast Track, time for processing and costs of studies. Information on rejected Fast Track applications, including specific screen that was failed (if relevant).
- VII. Number of PG&E staff working on interconnection issues, staff added in the last two years, planned staff additions over the next two years
- VIII. Actual cost to PG&E of feasibility studies, system impact studies and facilities studies for all interconnection queues, with methodology for determining actual costs
- IX. Cost of required upgrades for each project or cluster (PacifiCorp, for example, posts all of this information online as soon as it is completed)

If this information becomes publicly available, it would be possible to have a robust stakeholder process whereby participants could analyze data and suggest far more informed solutions. Given that other, similar information requests from the Clean Coalition have been gone unanswered in both this and the ISO process, we can only assume that this request too will also go unanswered. However, at a minimum, we ask PG&E, and the ISO and other IOUs, to conduct a thorough outside review of its interconnection procedures in order to identify areas for improvement.

Additionally, we believe that PG&E and the other IOUs should retain an Independent Evaluator similar to that used in SCE's SPVP program. We believe that the presence of an Independent Evaluator in the interconnection process could substantially ease the concerns of smaller developers and ensure that the WDAT process is: 1) constantly evaluated for adherence to stated procedures; 2) assessed for incremental improvements; and 3) is communicated clearly to all stakeholders.

#### D. Broader improvements to the current stakeholder process

As described above, PG&E's proposed cluster study has an average timeline of 630 days and is therefore substantially inferior to the current WDAT timelines. Accordingly, the proposed tariff appears to violate FERC requirements that reforms result in a WDAT that is "consistent with or superior to" existing procedures. In order to create a WDAT draft tariff that would be deemed acceptable by FERC, we believe that the following changes must be incorporated:

- Shorten the cluster study process considerably
- Improve Accelerated Options, such as Fast Track or the Independent Study Process (ISP), so they can be accessed by a substantial percentage of smaller developers
- Improve grid transparency to provide more information to developers outside of the cluster study process (this change appears to be in process as PG&E improves its online mapping tools)
- Improve queue transparency to provide more data and deadline tracking, ensuring that the process is transparent and deadlines are being met
- Improve pre-application exchange of information
- Agree to an independent process audit to review in detail PG&E's interconnection study procedures, staffing and software. It is our hope that such a process will eventually allow two full cluster studies to be completed each year, which would allow for all of the benefits of cluster studies to be realized, with none of the downsides.

It is important to note that FERC's standard of review for considering IOU tariff revisions is more stringent than that for ISOs like CAISO. FERC re-confirmed this 37

regulatory point in its recent conditional approval of CAISO's GIP Proposal (133 FERC ¶ 61,223, Dec. 16, 2010, p. 25):

Multiple parties raise concerns that CAISO's GIP proposal could have adverse consequences if adopted by the California IOUs in their WDATs. This order, however, narrowly addresses CAISO's proposal for interconnection procedures for its transmission system and, thus, the IOUs' WDATs are not before the Commission at this time. Therefore, any concerns with the California IOUs' WDATs are outside the scope of this proceeding. Our acceptance of the GIP proposal recognizes the special accommodations we afford independent entities under our interconnection policies, for the reasons summarized above. Any utility proposing to utilize an approach that mirrors the GIP will have to justify its consistency with Order No. 2003 and Order No. 2006 and Commission precedent under the relevant standard, and it will not enjoy an independent entity variation accommodation.

#### Fast Track improvements

As discussed above, we believe that the long timelines associated with PG&E's proposed cluster study process will only be acceptable to FERC if the cluster study process is accelerated and/or the Fast Track and the ISP (Accelerated Options) can be accessed by a substantial percentage of smaller developers. The Clean Coalition appreciates PG&E's decision to expand the Fast Track from the original proposed limit of 2 MW up to 5 MW for some lines. However, we discuss below additional refinements which we believe would further improve the Fast Track process.

#### MW caps as advisory limits

As we noted in PG&E's January, 2011, conference call, we urge PG&E to make the MW cap limits advisory and not mandatory. In other words, rather than limiting applicants to these MW caps for each type of PG&E distribution line, we request that PG&E revise the tariff language to make it clear that these MW caps are only advisory "rules of thumb." As such, they will act as guidance to applicants in setting expectations but won't act as a hard limit beyond the Fast Track screens themselves, which PG&E's engineers have noted on many occasions are the real limiting factors. As advisory limits, the MW caps will still act as a gatekeeper of sorts and limit applicants from submitting projects that clearly won't qualify for Fast Track. Moreover, many developers have interconnection consultants or their own modeling software that provides them with a reasonably accurate idea of how many megawatts can interconnect at each location without upgrades. And PG&E's proposed steps towards increased grid transparency will further increase the quality of Fast Track applications. By making the MW caps advisory only, developers will not be artificially limited and will be incentivized to build out the distribution grid in such a way that maximizes its potential for ratepayers. If developers can find locations that would permit a

5 MW solar project on a 12 kV or 21 kV line without upgrades, an artificial cap should not limit this project from qualifying for Fast Track.

On the specific issue of 12 kV interconnections, PG&E has raised concerns about rural line loads and the need to maintain a 2 MW limit. However, it is our understanding that these concerns are generally only relevant to interconnections far from substations and are less relevant within one mile of a substation. We ask that PG&E address this issue and consider increasing the 12 kV limit to 3 MW for interconnections within one mile of a substation, whether or not the MW caps are mandatory or advisory.

#### Screen 2 improvements

On Screen 2, we remain unclear as to why review of this screen appears to be “off the table” in this reform process. To summarize, we and others have raised various issues around this screen, including:

- Discussion of how a screen based on minimum load may be more accurate and appropriate
- Discussion of how the screen should take into effect the positive attributes of solar generation and other peak renewable energy resources
- Questions about the origins of the 15% screen and how rigorously that standard has been studied and tested

The Clean Coalition supports IREC’s suggestion to use minimum loads for Screen 2, instead of maximum loads. However, we acknowledge that PG&E does not have minimum load data for most circuits, so at this time we encourage PG&E to examine the costs of adding SCADA to all circuits in order to collect more grid information and to permit the change that IREC suggests.

We also recommend that PG&E work with the CPUC and other utilities to analyze changes to Screen 2 more generally. As we’ve mentioned in previous comments, Black & Veatch’s wholesale DG analysis for the CPUC used a 30% peak circuit load limit instead of 15%, after consulting with the utilities, including PG&E, as a way to estimate total resources for solar PV. The rationale is that solar PV is a peak resource so it should be accommodated at far higher percentages than the highly conservative 15% limit because maximum circuit load will often coincide with solar output. PG&E and SCE have, however, indicated no interest in modifying this screen without further study so we urge PG&E to engage in further study with alacrity.

#### Screen 10 improvements

We also appreciate PG&E’s efforts to address the issue of Screen 10, which we believe has been the main factor in making the current Fast Track effectively inaccessible to new

development projects in PG&E territory. Anecdotally, we understand that SCE has been using a similar “modified Fast Track” for some time now, resulting in increased numbers of projects clearing Fast Track in their territory. It seems that PG&E’s approach is more complicated than required, as nearly all projects are likely to fail Screen 10 and be referred to Section 2.3.2. We encourage PG&E to modify the language of Screen 10 in order to address the specific issue of screening out projects that would require Network Upgrades on the ISO Grid or Distribution Upgrades on the Distribution System. In particular, Screen 10 should be clarified such that “interconnection facilities” will not trigger failure of Screen 10. Practically all projects will require interconnection facilities, so it makes little sense to build across-the-board failure into Screen 10 from the outset. We suggest modified language in the redlined draft tariff.

Despite the importance of Screen 2, especially assuming Screen 10 is reformed appropriately, none of these questions have been addressed in a satisfactory manner. We strongly encourage PG&E to take up this issue.

#### Independent Study Process

We agree that ISP should be an additional option for developers, but the lack of objective criteria around what projects will be able to access the ISP make the process highly uncertain. Developers should be able to refer to objective criteria rather than PG&E’s “engineering judgment.” More specifically, two sections are of concern to us:

- Section 3.1.1.1. What does it mean for a project to be “of sufficient MW size to be suspected of having potential impacts to the ISO grid”?
- Section 3.1.1.2 What does it mean that the Distribution Provider will use “engineering judgment to determine whether an Interconnection Request being evaluated for electrical independence on the Distribution System has to wait for the completion of studies of queued Generating Facilities to which the Interconnection Request is electrically related in order to be eligible for the ISP”?

We request that PG&E address these screens in a more objective manner in an effort to remove subjectivity from the interconnection procedures as much as is possible. The grid itself is not a subjective system. It is a physical and objective system and is modeled with software simulations. Accordingly, it seems that any judgments about electrical independence should be made using objective criteria instead of undefined and subjective engineering judgment. This concern is particularly relevant given that the IOUs are increasingly competing with Independent Power Producers for interconnections in programs like the Solar Photovoltaic Programs (SPVP), giving rise to at least the appearance of a conflict of interest that needs to be mitigated.

#### Cluster study process

We urge PG&E to clarify section 4.8.1's suggestion that all distribution grid interconnection requests will "generally" be studied in one cluster due to electrical relatedness, because if this is the case how will any projects qualify for ISP or Fast Track as electrically independent?

Section 4.6 makes reference to Business Days and Section 4.7 refers to Calendar days.

There are other occurrences like this in the tariff and we request that PG&E standardize its "days" as either Calendar days or Business days throughout the document – it's confusing to have different types of days used in 42

different places, with some "days" left unspecified as to whether they are Calendar or Business days. This standardization should be done in a manner that does not extend the existing timelines.

#### Grid transparency

We were greatly encouraged by comments from PG&E employee John Carruthers regarding interconnection data on the Jan 25, 2011, stakeholder call. Mr. Carruthers indicated that PG&E intends to provide the following information via a Google Maps format or equivalent:

- Access to specific circuit voltage, circuit capacity, circuit loading information (including peak load) and the amount of distributed generation already on that circuit
- Access to that same information by substation bank
- Ideally, information on what projects are in queue by circuit or substation

We request that PG&E release this substantially improved online distribution grid map available as soon as possible.

#### Queue Transparency

As the Clean Coalition has mentioned previously, PG&E's reform process has been data-starved, which impairs any stakeholder process and makes it difficult to accurately diagnose the problems and suggest optimal solutions. We request that PG&E proactively provide more data going forward. Additionally, we believe it is vital to understand whether or not the Accelerated Options are working appropriately and this can only be done by rigorously tracking each project and making this data public. Specifically, the online queue information should be expanded dramatically and we request inclusion of these additional items for each project: date application deemed sufficient, date of scoping meeting, date of feasibility study, date of system impact study and date of facilities study. Additionally, information should be provided on each project that fails to clear an Accelerated Option and the specific reason for that failure. This information should also be provided for all IOU-owned projects that participate in projects like the SPVP.

We note that the FERC provided similar commentary in its recent conditional approval of CAISO's GIP Proposal (133 FERC ¶ 61,223, Dec. 16, 2010, p. 31):

In particular, CAISO should include information about the number of projects requesting interconnection through the ISP, the outcome of those requests, the complete length of time for recently completed ISP interconnection studies (from initial application through final approval), and the reason for any rejections of projects requesting ISP treatment. This information will improve the transparency of the ISP, which is in the best interest of all market participants.

We also encourage PG&E to increase the flow of information by posting the results of scoping meetings and system impact and facility studies, with information redacted where necessary. We believe this would cut down on multiple interconnection applications in areas where expensive upgrades would be required. For an example of a utility providing such information, please visit PacifiCorp's interconnection queue:

<http://www.oasis.pacificorp.com/oasis/ppw/lgia/pacificorplgiaq.htm>.

Pacificorp shares a substantial amount of more general interconnection data also, as part of its participation in FERC's OASIS program:

<http://www.oasis.pacificorp.com/oasis/ppw/main.htmlx>.

#### Pre-application exchange of information

In PG&E's Key Reform Principles document circulated on December 13, 2010, PG&E indicated that the long timelines of the proposed cluster study process could be ameliorated by Accelerated Options and "pre-application exchange of information to assist Interconnection Customers in the applications process." We believe this exchange of information should be formalized with a "for fee" feasibility study, available anytime to developers of projects 20 MW and below. This would allow a developer to get an early read on a project and determine whether the project merits entering the proposed WDAT cluster process or a different option. The feasibility study would provide one more level of additional detail, above and beyond what is made publicly available per our previous suggestion. Information provided in the feasibility study would not be definitive, by any means, because cost projections can change dramatically from the feasibility study through the end of the facilities study process. However, having relatively easy access to feasibility studies, combined with ready access to up-to-date online interconnection data, would help developers make decisions about potential projects without wasting a lot of money and time.