

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the  
Commission's own motion to improve  
distribution level interconnection rules  
and regulations for certain classes or  
electric generators and electric storage  
resources.

Rulemaking 11-09-011  
(Filed September 22, 2011)

CLEAN COALITION REPLY COMMENTS ON IOU PROPOSED DISTRIBUTION  
GROUP STUDY PROCESS

Tam Hunt  
Attorney for:  
Clean Coalition

Kenneth Sahm White  
Director, Policy & Economics  
Clean Coalition

2 Palo Alto Square  
3000 El Camino Real, Suite 500  
Palo Alto, CA 94306  
(805) 705-1352

March 22, 2013

## CLEAN COALITION REPLY COMMENTS ON IOU PROPOSED DISTRIBUTION GROUP STUDY PROCESS

The Clean Coalition respectfully submits these reply comments on the utility proposals – a joint proposal by PG&E and SDG&E and a second proposal by SCE – for a new Distribution Group Study Process.

The Clean Coalition is a California-based nonprofit organization whose mission is to accelerate the transition to cost-effective local renewable energy that strengthens local economies, minimizes environmental impacts, and enhances energy security.

To achieve this mission, the Clean Coalition promotes proven best practices, including the vigorous expansion of Wholesale Distributed Generation (WDG) connected to the distribution grid and serving local load. The Clean Coalition drives policy innovation to remove major barriers to the procurement, interconnection, and financing of WDG projects and supports complementary Intelligent Grid (IG) market solutions such as demand response, energy storage, forecasting, and communications. The Clean Coalition is active in numerous proceedings before the California Public Utilities Commission and other state and federal agencies throughout the United States in addition to work in the design and implementation of WDG and IG programs for local utilities and governments.

The Clean Coalition responds below to IREC and DRA opening comments. IREC and DRA were the only parties other than the Clean Coalition (joined in part by Sierra Club) to submit opening comments.

### **I. Response to IREC opening comments**

#### **a. Tariffs should be harmonized across IOUs**

The Clean Coalition agrees with IREC's comments regarding harmonization of tariffs (IREC opening comments, pp. 2-3):

IREC appreciates that the anticipated volume of applicants likely to qualify for a DGS varies across these systems and is not opposed to two different approaches being implemented if truly warranted. However, there is considerable value in maintaining consistency across Rule 21, and IREC would like to see the integration of the DGS support this goal to the greatest extent possible. If tariffs are consistent across the three IOU territories it significantly reduces the opportunity for developer confusion and minimizes the number of disputes that may arise as a result. In addition, it enables the Commission to more reasonably evaluate the effect different factors may have on the interconnection process if it functions relatively similarly across the State.

IREC accepts, however, that SCE's different circumstances may warrant the substantial tariff difference of starting Distribution Group Studies on a rolling basis, as warranted for each electrical area – differing greatly from the two annual group studies per year that PG&E and SDG&E propose.

The Clean Coalition understands IREC's reasoning here but we again urge the Commission to require SCE to emulate the PG&E/SDG&E proposal to have two group studies per year, with defined windows. As described in our opening comments, we are very concerned that SCE's history of missing deadlines<sup>1</sup> in interconnection studies will introduce from the outset far too much uncertainty with respect to their DGSP. Accordingly, we urge that SCE adopt the PG&E/SDG&E approach of defined windows and two group studies per year.

IREC also states (p. 3): “once the studies have begun, there does not appear to be a strong reason to apply different procedures and policies to them.” The Clean Coalition agrees fully with this statement.

---

<sup>1</sup> IREC acknowledges this history at p. 3 of its opening comments: “The ongoing proceeding to reform Rule 21 was initiated partly due to a significant increase in the volume of interconnection applications in California and the resulting backlog in the study process for applicants in certain IOU territories. In many cases projects were experiencing significant delays in obtaining study results and were often uncertain when they would receive final results.”

**b. Clear timelines are needed for the re-study process**

IREC states (p. 5):

In SCE's tariff the provision regarding withdrawal and reallocation of cost are in section F.3.b.xii, and the provision on restudy is in the following section F.3.b.xiii. In PG&E and SDG&E's tariff, the provisions are in sections F.3.b.xi and F.3.b.xii. These provisions do not set out clear timeframes for when the utility will respond to the notice of withdrawal nor is it clear when and how they will notify the other members of the group about the decision to re-study or the re-apportionment of costs. In order to ensure that this decision moves along in an expedited manner and that developers are informed of any delays, these timeframes and specific points of contact should be identified.

The Clean Coalition agrees that additional detail, and harmonization, is required for the re-study process, in both of the DGSP proposals.

**c. IOUs should further justify the need for automatic timing extensions**

The IOUs proposed automatic timing extensions for situations where applications increased by a certain amount from previous time periods. IREC makes a very good point (p. 6) regarding the lack of any comparable automatic timing extensions, which all three utilities have proposed for the DGSP, in other interconnection tariffs. While the Clean Coalition did not object to the automatic timing extension language in principle, we did in opening comments make recommendations for tightening the criteria for triggering extensions, and also recommended specific reduced extension durations. We agree, however, with IREC's recommendation that "the Commission should require thorough justification for such an automatic extension and should consider whether there are alternative approaches that can be taken."

**d. More clarity is needed with respect to entry into, and commencement of, the group study process**

IREC writes (pp. 8-9):

[C]urrently the tariff's description of this transition from the Detailed Study

Screen results to the initiation of the DGS process is in need of clarification. As written, it appears that the applicant could have the screens run more than once, and there are conflicting timeframes for when those results would be provided and subsequent action taken. It also is not clear how applications will be "held" until the next DGS starts if the applications are submitted outside the window.

The Clean Coalition fully agrees with this statement. We also agree with IREC's recommendation (p. 9) that a deadline, rather than a window, should be used to commence each PG&E/SDG&E group study.

## **II. Response to DRA comments**

The Clean Coalition is in full agreement with DRA's opening comments.

## **III. Conclusion.**

In order further streamline interconnection procedures the Clean Coalition urges the Commission and the utilities to accept the changes proposed above.

Respectfully submitted,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized name or set of initials.

Attorney for:  
Clean Coalition  
2 Palo Alto Square  
3000 El Camino Real, Suite 500  
Palo Alto, CA 94306  
(805) 705-1352

Dated: March 22, 2013