

August 18, 2024

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *San Diego Gas & Electric Company*, Docket No. ER10-1391-003

Dear Ms. Reese,

According to this letter, please find for electronic filing in the above-referenced docketed case the **“ANSWER OF THE CLEAN COALITION TO MOTION FOR EXPEDITED CONSIDERATION OF SAN DIEGO COMMUNITY POWER AND CLEAN ENERGY ALLIANCE,”** I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Commission’s Rules of Practice and Procedure.

Thank you for your cooperation in this matter, and please do not hesitate to contact me at (626) 232-7573 or ben@clean-coalition.org if you have any questions or concerns regarding the foregoing.

Sincerely,

/s/ BEN SCHWARTZ

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**UNITED STATE OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

San Diego Gas & Electric Company

Docket No. ER10-1391-003

**ANSWER OF THE CLEAN COALITION TO MOTION FOR EXPEDITED
CONSIDERATION OF SAN DIEGO COMMUNITY POWER AND CLEAN ENERGY
ALLIANCE**

I. INTRODUCTION

Pursuant to 213(a)(3) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“the Commission”),¹ the Clean Coalition submits this Answer to the *San Diego Community Power (“SDCP”) and Clean Energy Alliance (“CEA”) Motion for Expedited Consideration*, filed on August 1, 2025.

In the Motion, SDCP/CEA (“the Joint Parties”), request that the Commission take expedited action to rule on the Order 2023 compliance filing of San Diego Gas & Electric (“SDG&E”). SDG&E’s initial proposal was submitted in August 2024 and was protested by the California Energy Storage Alliance (“CESA”), the Clean Coalition, and the Joint Parties. SDG&E is unique for its consolidated Generator Interconnection Procedures (“GIP”). Its filing proposes to eliminate the Independent Study Process (“ISP”), reducing the WDAT to a Fast Track process for Energy Only projects under 5 MW and a Group Study process that mirrors the timeline of the California Independent System Operator’s (“CAISO”) cluster study. Since the tariff amendments were filed by SDG&E in August 2024, the ISP has been closed to new applicants and existing applicants that had not reached certain milestones were removed from the queue.

In the Motion for Expedited Consideration, the Joint Parties argue that the absence of a ruling has led to the premature closing of the Independent Study Process (“ISP”) of SDG&E’s Wholesale Distribution Access Tariff (“WDAT”), impacting small generators that become uneconomical when forced to interconnect via a group study designed primarily for larger generators. The Clean Coalition strongly supports the Joint Parties’ Motion and urges the Commission to swiftly reject SDG&E’s compliance filing and require the reopening of the WDAT ISP, which is needed to procure sufficient capacity to meet Local Resource Adequacy

¹ 18 C.F.R. § 385.213(a)(3)

(“RA”) requirements. The Clean Coalition offers the following comments in support of the Motion:

- The Joint Parties clearly demonstrates urgency and the need for an expedient ruling.
- The premature closing of SDG&E’s WDAT Independent Study Process perpetuates an existing local resource adequacy shortfall that has resulted in inflated prices for load serving entities in the region.
- SDG&E’s unique consolidated GIP merits a direct ruling from the Commission.
- The Commission has adopted already issued a decision on the 2023 compliance filings of the California Independent System Operator, and numerous load serving entities and regional transmission organizations (“RTOs”) across the country.

II. COMMENTS

A. The Joint Parties clearly demonstrates urgency and the need for an expedient ruling

The Motion of the Joint Parties draw logical economic and policy conclusions that clearly expresses why an expedient ruling from the Commission on SDG&E’s compliance filing is needed. The filing includes evidence of real economic damage in the form of rejected WDAT Fast Track interconnection applications that were resolvable in the WDAT process prior to SDG&E’s August 2024, tariff change. The Joint Parties conclude that three out of four Fast Track applications submitted by a company that were rejected by SDG&E could have easily transferred to the ISP and been successfully modified to include mitigation measures. These rejected applications demonstrate the broader economic harm that is occurring due to the unnecessary barriers caused by SDG&E’s premature closure of the ISP.²

From a policy perspective, the Motion also demonstrates that inconsistent with Commission precedent to facilitate the interconnection of small generators, especially renewable resources that promotes reliability and resilience. The Joint Parties argue that:

SDG&E’s elimination of the Independent Study Process for small generators is at odds with the objectives of Order No. 2023 and the Commission’s policy to facilitate the interconnection of distributed generating resources, as articulated in Order No. 2222. SDG&E’s Compliance Filing fails to advance a compelling justification for creating

² *Ibid*, at p. 8-9.

obstacles to the interconnection of electrically independent small generating resources. Nor could it.³

The evidence that the Joint Parties' conclusion is correct is evident in the number of WDAT applications in SDG&E's queue. From August 15, when SDG&E closed the ISP, until the date that the most recent queue information was published, June 10, 2025, only 14 new applications were submitted. *See the table below.*

Timeline of SDG&E WDAT Applications in 2024 and 2025⁴	
Number of applications submitted	Date (8-month range)
14	August 2024 – April 2025
17	December 2023 – August 2024
55	March 2023 – October 2023

In comparison, 17 applications were submitted in the previous eight months, from December 2023 – August 2024, and 55 applications were submitted in the eight months before that from March 2023 – October 2023. None of the applications since SDG&E's WDAT amendment have included a request for Full Capacity Deliverability. As a result, even if the applications receive permission to operate, the projects will be unable to reduce the shortage of local RA.

The reduction in WDAT applications can be partially attributed to the elimination of the ISP, as well as the fact that the next cluster study is set to begin in October 2026. Throughout the history of SDG&E's WDAT queue there have been periods with low application rates; however, the evidence suggests that the last year (once SDG&E posts updated queue information later this month) is the new normal rather than a blip on the record if the Commission continues to defer a ruling on SDG&E's compliance filing. Fewer applicants, applications for smaller projects, and Energy Only projects seeking a Fast Track interconnection that are unable to sign a Local RA will perpetuate a capacity shortage and reduce the number of dispatchable resources available to promote reliability.

³ Motion for Expedited Consideration of the Joint Parties, at p. 3.

⁴ Figure is based on the most recent available [SDG&E WDAT queue](#) information, from June 2025. An updated version should be available in August but does not appear to have been released as of the date of this filing.

B. The premature closing of SDG&E’s WDAT Independent Study Process perpetuates an existing local resource adequacy shortfall that has resulted in inflated prices for load serving entities in the region

In California, PG&E and SCE are responsible for procuring local RA for all LSEs that fall the bounds of their service territories. In contrast, each LSE in SDG&E’s service territory is responsible for meeting its own local RA requirement. To qualify for local RA, a project must be located in the CAISO reliability area. Distribution projects can avoid the high cost and lengthy interconnection of transmission-level projects, if a WDAT pathway is available. Since the WDAT cluster study mirrors the CAISO cluster study process (and is set to begin in 2026) and Fast Track projects are “Energy Only”, the premature closure of the ISP means that no timely process to procure local RA exists in SDG&E’s service territory. A shortfall exists, making this an issue of immediate concern for LSEs in the region, but should also be viewed as a long-term concern as well. Following past instances of low reliability in California—typically caused by extreme weather or natural disasters—the California Public Utilities Commission has responded by ordering the procurement of additional capacity and/or raised the RA Planning Reserve Margin. Leaving SDG&E’s filing unanswered and permitting the closure of the ISP sets the region up for a future shortfall, leaving the ratepayers to shoulder millions of dollars from exorbitantly high-priced capacity contracts.

C. SDG&E’s unique consolidated GIP merits a direct ruling from the Commission

The Commission has ruled on the compliance filings for other IOUs, RTOs—such as MISO and SPP that have unified GIPs—but SDG&E is unique due to its consolidated GIP. Moreover, CAISO’s removal of the ISP is different than SDG&E, a fact to which SDG&E openly admits in the original compliance filing, stating, “Like CAISO, SDG&E’s proposed tariff revisions reflect the removal of the Independent Study Process track. This removal, however, had a number of cascading revisions in multiple sections of the GIP.”⁵ The cascading impacts through SDG&E’s WDAT makes it dissimilar to CAISO’s tariff and necessitates direct action from the Commission.

Prior to the closure of the WDAT ISP last August, a distribution-level project under 5 MW could choose between three different WDAT different pathways: Fast Track, ISP, and a group

⁵ Order No. 2023 Compliance Filing of SDG&E, Amendments to Wholesale Distribution Access Tariff, FERC Electric Tariff Volume No. 6, at p. 14.

study. The different pathways reflect the increasingly detailed study process that is required for projects as the impact on the grid increases. A Fast Track study or ISP make small projects, especially those under 5 MW, viable. The Commission’s inaction provides tacit approval for SDG&E to close the WDAT ISP despite the major negative consequences for the development of distributed energy resources in the region and the logical inconsistencies contained in SDG&E’s Motion.

In the original compliance filing, SDG&E suggests, “As SDG&E does not use the LGIP or SGIP, but a consolidated GIP, and Order No. 2023 only included the study delay penalty in the LGIP, SDG&E will apply the penalty only to interconnection studies of generating facilities larger than 20 MW in its GIP.”⁶ SDG&E’s proposal assumes that the Commission supports applying late study penalties only to LGIP projects despite using a **consolidated GIP**. However, in the same compliance filing, SDG&E interprets Order 2023 and 2023-A as supporting the elimination of the ISP—only used by SGIP projects—despite the order focusing on LGIP projects and preserving a serial interconnection study option.⁷ An expedient ruling by the Commission is needed to address the inconsistent logic in SDG&E’s attempt to comply with Order 2023. Further inaction is a reward to SDG&E, the effect of which is preventing the development of distributed energy resources capable of meeting local RA needs. The Commission’s ruling in this proceeding will be an important clarification on how investor-owned utilities (“IOUs”) should protect the interests of small generators in the process of complying with Order 2023 and 2023-A. Approving the Motion and ruling in an expedient manner is essential given SDG&E’s consolidated GIP and the differences with the filings of SCE, CAISO, and other RTO.

D. The Commission has adopted already issued a decision on the 2023 compliance filings of the California Independent System Operator, and numerous load serving entities and RTOs across the country

The Commission has already acted on the Order 2023 compliance filings of CAISO, approving tariff revisions to bring CAISO’s GIP into compliance. Beyond CAISO, the

⁶ Order No. 2023 Compliance Filing of San Diego Gas & Electric Company, Amendments to Wholesale Distribution Access Tariff, FERC Electric Tariff Volume No. 6, August 14, 2024, at p. 29

⁷ ER10-1391-003 Clean Coalition Protest of SDG&E WDAT Filing, at p. 3-5.

Commission has issued decisions on the compliance filings of multiple large RTOs such as MISO, SPP, ISO-New England, and NYISO, as well as IOUs such as Florida Power & Light, Arizona Public Service, and Duke Energy. Each of these rulings reflects the Commission's clear intent to establish consistency and predictability in interconnection procedures, with special attention to aligning LGIP processes with the requirements of Order No. 2023 and preserving options SGIP pathways. At the heart of these decisions is the Commission's consistent policy of timely resolving compliance filings in order to promote regulatory certainty and accelerate the implementation of reforms to the generator interconnection process.

In light of this clear track record, avoiding further delay by ruling expediently on SDG&E's compliance filing is critical. The Commission has demonstrated that it can move swiftly to provide clarity for market participants, and SDG&E's stakeholders—including ratepayers and distributed energy developers relying on interconnection reform—are entitled to the same regulatory certainty. Prompt action will ensure consistency with the Commission's national approach, avoid the entrenchment of flawed local interpretations, and maintain a level playing field for all interconnection customers.

III. CONCLUSION

The Clean Coalition appreciates the opportunity to respond to the Motion of the Joint Parties. For the reasons herein, the Commission should grant the Joint Parties' Motion and issue an expedited ruling rejecting SDG&E's compliance filing. SDG&E's unique consolidated GIP does not make eliminating a serial interconnection option for small generators compliant with Order 2023. Prompt action will remedy the ISP closure's adverse effects on small-generator interconnections, providing needed clarity on applying Order No. 2023 within a consolidated framework, and helping to ensure timely deployments of distribution-level resources capable of contributing to Local RA.

Respectfully submitted,

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Dated: August 18, 2024