

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



January 11, 2022

Advice Letter 6315-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Supplemental: Joint Utilities Information Update on the Collection of Data to be used to Study the Impacts of the Notification-Only Approach Pilot Pursuant to Decision 21-06-002.

Dear Mr. Jacobson:

Advice Letter 6315-E-A is effective as of November 19, 2021.

Sincerely,

A handwritten signature in black ink, appearing to read "SB".

Simon Baker
Interim Deputy Executive Director for Energy & Climate Policy / Interim Director, Energy Division



Clay Faber
Director – Regulatory Affairs
8330 Century Park Court
San Diego, CA 92123

cfaber@sdge.com

November 19, 2021

Advice 3843-E-A
(San Diego Gas & Electric Company U 902 E)

Advice 6315-E-A
(Pacific Gas and Electric Company ID U 39 E)

Advice 4582-E-A
(Southern California Edison Company U 338 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: SUPPLEMENTAL: JOINT UTILITIES INFORMATION UPDATE ON THE COLLECTION OF DATA TO BE USED TO STUDY THE IMPACTS OF THE NOTIFICATION-ONLY APPROACH PILOT PURSUANT TO DECISION 21-06-002

PURPOSE

Pursuant to Ordering Paragraph (“OP”) 4 of Decision (“D.”) 21-06-002 issued on June 4, 2021, San Diego Gas & Electric Company (“SDG&E”), Pacific Gas & Electric Company (“PG&E”) and Southern California Edison Company (“SCE”) (collectively, “the Joint Utilities”) submit this Tier 1 Supplemental Advice Letter (“AL”) to revise the data, shown in Attachment A, the Joint Utilities will collect to study the impacts of the Notification-Only Approach pilot. This AL replaces previously submitted ALs 3843-E, 6315-E and 4582-E in its entirety.

BACKGROUND

On June 4, 2021, the California Public Utilities Commission (Commission) issued D.21-06-002 to address the remaining Rulemaking (R.) 17-07-007 Phase 1 issues to streamline the interconnection application process for distributed energy resources. D.21-06-002, among other things, in OP 4 requires the Joint Utilities to host a workshop to solicit recommendations on the data to be collected to measure the impacts from the Notification-Only Approach Pilot and to inform proposals for an interconnection fee for the notification-only approach that is commensurate with the costs to administer the approach. The Joint Utilities hosted the workshop on July 6, 2021.

Moreover, the Joint Utilities, with the input from the Commission's Energy Division, were required to jointly submit a Tier 1 AL, no later than 90 days from the issuance of D.21-06-002, to indicate to the Commission the data the Joint Utilities have agreed to collect and the method they propose to study the notification-only approach. The Joint Utilities consulted with Energy Division on August 24, 2021.

On September 2, 2021, the Joint Utilities submitted Joint Advice Letter SDG&E 3843-E, PG&E 6315-E, and SCE 4582-E with Attachment A, the Notification-Only Data Collection Template, in compliance with OP 4 of D.21-06-002 to identify the data they will collect to study the impacts of the Notification-Only Approach Pilot. (Please see below, "Prior Discussion" for more information.)

In October, the Joint Utilities met with Commission Energy Division staff to discuss the joint IOUs' Data Collection Plan for the Notification Only Pilot per D.21-06-002, OP 4, during which Energy Division staff recommended changes to Attachment A. The Joint Utilities agreed to revisions from the Energy Division staff as described below.

Scope of this Advice Letter

The Joint Utilities agree to the following suggested revisions to Attachment A:

Intake Process Tracking and Reporting		
Tracking Activity	Description	Tracking Attribute
15	Count of total non-program projects (Note 4)	Numeric
Impact Study Tracking and Reporting		
2	Number of circuits exceeding 10 non-program projects (Note 4)- Number of circuits where the number of program + non-program projects (Note 4) exceeds 10	Text
5	Percentage of (1+2)/(number of customers in the circuit)- On a per circuit basis, for the circuits identified in (2), [summation of program and non-program projects on the circuit] / [number of customers on the circuit]	Percentage
Impact Study Costs (Average \$/Application)		
3	Audit costs (office audits) (If no office audits were conducted, provide an estimate)	\$

Note 1: Safety Evaluations List

Project gross nameplate capacity \geq >30 kVA

Project paired with other generation ~~(solar)~~, unless total project is non-export

Note 3: Operational Issues

Unexpected ~~load~~ system load flows caused by (1)+(2)

Note 4: Non-Program Projects

Non-program projects are those project which add storage capacity to existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing ~~solar~~ NEM + new storage

PRIOR DISCUSSION

Stakeholder Recommendations

The Joint Utilities hosted a workshop on July 6, 2021, in which they presented their initial proposal regarding the data to be collected to measure the impacts from the notification-only approach. The goal of the workshop was to solicit recommendations from stakeholders. Key takeaways from the workshop included:

- The Joint Utilities identified how data will be collected and discussed how this data is needed to understand whether there are grid impacts.
- Stakeholders voiced concerns around the auditing process and resulting data needs.
- There is a distinction between two types of PTO removal: 1) PTO suspension (for administrative reasons); and 2) PTO revocation (for significant infractions). The Joint Utilities should provide a clear list of examples for the latter.
- Monitoring capabilities are necessary, in addition to data reporting, to determine if systems are exporting.
- The Joint Utilities should compare virtual vs. field inspection costs.

Following the workshop, the Joint Utilities received written feedback from only one stakeholder, Tesla, Inc. Tesla encouraged the Joint Utilities to collect/assess the following information to help the Commission and stakeholders better understand the validity and/or extent of certain concerns that informed the limitations the Commission established as part of this pilot:

- To address the question of whether or not the notification-only process should be expanded to include small, non-exporting storage devices that are being added to an existing NEM system (these are currently not eligible unless the customer gives up NEM and the ability to export from the solar system), Tesla recommended that the Joint Utilities identify during the pilot period how many such systems were deployed in their respective service territories; of those, how many failed any of the review screens; and how many of those then triggered upgrades, along with information regarding which screens were failed and the nature of any required mitigations/upgrades.
- Tesla continues to have concerns about the limit of 10 projects per developer per circuit as further limiting the ability to utilize the notification-only process. As this was adopted in direct response to the utilities' concerns about grid saturation and adverse impacts, Tesla recommended that the Joint Utilities document those instances where the deployment of a small non-exporting system resulted in aggregate impacts given existing generation on the same circuit such that mitigation was required. As with the first suggestion above, this data should include information related to projects that are not part of the pilot, given the very

real possibility that participation in the pilot will be extremely low given the limited scope of eligible projects.

Proposed Data Collection

Attachment A provides a template that the Joint Utilities proposed to utilize for data collection, which incorporates the recommendations from Tesla described above.

- *Intake Process Tracking and Reporting:* The Joint Utilities will assess the application volume and developer engagement. Furthermore, the Joint Utilities will examine application deficiencies, including types of deficiencies (subdivided into safety or efficiency issues) and how long it took for customers to resolve deficiencies. The Joint Utilities will also consider how often deficiencies resulted in Joint Utilities revoking Permission to Operate and the number of pre-approved developers who were removed from the pre-approved developer list.
- *Impact Study Tracking and Reporting:* The Joint Utilities will review engineering issues, such as the number of circuits reaching or exceeding program limits (10 projects per approved developer), and numbers of resulting operational or equipment failures.
- *Impact Study Costs (Average Cost per Application):* The Joint Utilities will assess costs of application processing, engineering review, auditing, and technological upgrades.

EFFECTIVE DATE

The Joint Utilities believes this submission is subject to Energy Division disposition pursuant to GO 96-B and should be classified as Tier 1 (effective pending disposition) pursuant to OP 4. Since this submission is being made in compliance with D.21-06-002, the Joint Utilities therefore respectfully requests that it become effective on November 19, 2021, which is the date submitted.

PROTEST

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than December 9, 2021, which is 20 days after the date this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue

San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

For SDG&E: Attn: Greg Anderson
Regulatory Tariff Manager
8330 Century Park Court, CP31F
San Diego, CA 92123-1548
E-Mail: GAnderson@sdge.com and SDGETariffs@sdge.com

For PG&E: Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

For SCE: Shinjini C. Menon
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-3377
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

NOTICE

A copy of this submittal has been served on the utilities and interested parties shown on the attached list, including interested parties in R.17-07-007, by providing them a copy

hereof either electronically or via the U.S. mail, properly stamped and addressed. Address changes should be directed by email to SDGETariffs@sdge.com.

_____/s/ Clay Faber
CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: San Diego Gas & Electric Company (U902-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: ACarrillo@sdge.com

E-mail Disposition Notice to: ACarrillo@sdge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3843-E-A et al

Tier Designation: 1

Subject of AL: Supplemental: Joint Utilities Information Update on the Collection of Data to be used to Study the Impacts of the Notification-Only Approach Pilot Pursuant to Decision 21-06-002

Keywords (choose from CPUC listing): Rule 21

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 11/19/21

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Greg Anderson
Title: Regulatory Tariff Manager
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx: (858) 654-1717
Facsimile (xxx) xxx-xxxx:
Email: GAnderson@sdge.com

Name: SDG&E Tariff Department
Title:
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: SDGETariffs@sdge.com

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission
CA. Public Advocates (CalPA)

R. Pocta
F. Oh

Energy Division

M. Ghadessi
M. Salinas
L. Tan
R. Ciupagea
K. Navis
Tariff Unit

CA Energy Commission

B. Penning
B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade
K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Biofuels Energy, LLC

K. Frisbie

Braun & Blaising, P.C.

S. Blaising
D. Griffiths

Buchalter

K. Cameron
M. Alcantar

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Cameron-Daniel, P.C.

General

City of Poway

Poway City Hall

City of San Diego

L. Azar
J. Cha
D. Heard
F. Ortlieb
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Clean Energy Renewable Fuels, LLC

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Clean Power Research

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Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass
D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen
C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg
J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard
R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson
M. Huffman
Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

SD Community Power

L. Fernandez

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing

Communities Association

S. Dey

Copies to

AddisScott9@aol.com
ckingaei@yahoo.com
clower@earthlink.net
hpayne3@gmail.com
puainc@yahoo.com
AKanzler@anaheim.net

Interested Parties In:

A.17-07-007

Attachment A Data Collection Template

Intake Process Tracking and Reporting		
Tracking activity	Description	Tracking Attribute
1	Count of total projects	Numeric
2	Count of projects per approved developer	Numeric
3	Count of projects with deficiencies	Numeric
4	Deficiency description (Notes 1 and 2)	Text
5	Day when applicant was notified of deficiency	date
6	Day when applicant responded to the deficiency	date
7	Day when IOU cleared deficiency	date
8	Day when IOU issued a suspension	date
9	Day when suspension was cleared	date
10	Day when suspension changed to revocation	date
11	Count of revocation due to inability to clear deficiencies (Note 2)	Numeric
12	Count of revocation due to safety violations (Note 1)	Numeric
13	Count of developers who were approved for the pilot	Numeric
14	Count of developers who were removed from the pilot	Numeric
15	Count of total non-program projects (Note 4)	Numeric

Impact Study Tracking and Reporting		
Tracking activity	Description	Tracking Attribute
1	Number of circuits reaching program limits (10 per approved developer)	Numeric
2	Number of circuits where the number of program + non-program projects (Note 4) exceeds 10	Numeric
3	Verified operational issues caused by (1)+(2) (Note 3)	Text
4	Verified equipment failures caused by (1)+(2)	Text
5	On a per circuit basis, for the circuits identified in (2), [summation of program and non-program projects on the circuit] / [number of customers on the circuit]	Percentage

Attachment A Data Collection Template

Impact Study Costs (Average \$/Application)		
Tracking activity	Description	Tracking Attribute
1	Intake processing costs	\$
2	Engineering review	\$
3	Audit costs (office audits) (If no office audits were conducted, provide an estimate)	\$
4	Audit costs (field audits)	\$
5	Technology costs (costs spread over two years)	\$

Note 1: Safety Evaluations List

- Connection within secondary networks
- Connecting on line-side taps
- Not using approved controls systems
- Not using approved inverters
- Project gross nameplate capacity >30 kVA
- Project paired with other generation, unless total project is non-export
- Project not connected to 120/240-volt service

Note 2: Notification Deficiency Types

- Single-line diagram needs clarification
- Authority having jurisdiction needs clarification
- Excedance of 10 projects per circuit
- General appliction information needs clarification
- Service account (service meter) needs clarification

Note 3: Operational Issues

- Unexpected system load flows caused by (1)+(2)
- Unexpected safety issues caused by (1)+(2)

Note 4: Non-Program Projects

Non-program projects are those project which add storage capacity to exisiting approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy