

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6888E
As of April 4, 2024

Subject: Notification-Only Approach Pilot Pursuant to Decision 21 06 002

Division Assigned: Energy

Date Filed: 03-20-2023

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Signed

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
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The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

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March 20, 2023

ADVICE 4992-E
(Southern California Edison Company U 338-E)

ADVICE 4175-E
(San Diego Gas & Electric Company U 902 E)

ADVICE 6888-E
(Pacific Gas and Electric Company ID U 39 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Notification-Only Approach Pilot Pursuant to Decision
21-06-002

PURPOSE

In accordance with Ordering Paragraph (OP) 5 of Decision (D.)21-06-002 (or the Decision), Southern California Edison Company (SCE), on behalf of itself, Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) (collectively, “the Joint Utilities”), submits this advice letter to provide the California Public Utilities Commission (Commission) required data from the first 18 months of the Notification-Only Approach Pilot that either supports a request to continue the notification approach on a permanent basis as adopted in the Decision, continue the pilot with modifications, or discontinue the notification approach. Based on the Joint Utilities’ 18 months of utility-specific compiled data on the pilot, efforts to establish the pilot, and stakeholder feedback on the pilot provided in this advice letter, the Joint Utilities recommend discontinuation of the Notification-Only Approach.

BACKGROUND

On June 4, 2021, the Commission issued the Decision to address the remaining Rulemaking (R.)17-07-007 Phase 1 issues to streamline the interconnection application process for distributed energy resources. The Decision, among other things, adopted a Notification-Only interconnection application approach and directed SCE, PG&E, and SDG&E to conduct a two-year pilot of the approach beginning 45 days from the issuance of the Decision (the Notification-Only Approach Pilot).

On June 21, 2021, in accordance with OP 2 of the Decision, SCE submitted Advice 4526-E, PG&E submitted Advice 6233-E, and SDG&E submitted Advice 3791-E to provide a website location where interested developers could find instructions regarding how to request eligibility for participating in the Notification-Only Approach Pilot. Advice 4526-E, 6233-E and 3791-E further provided that the pilot would commence July 19, 2021, and that interested developers could submit eligibility requests on that date. To date, the Joint Utilities have not received any submissions or eligibility requests for the Notification-Only Approach Pilot.

OP 4 of the Decision required the Joint Utilities to host a workshop to solicit recommendations on the data to be collected during the pilot 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 advice letter (AL), no later than 90 days from the issuance of the Decision, to indicate to the Commission the data the Utilities had agreed to collect and the method they proposed 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 the Decision to identify the data they will collect to study the impacts of the Notification-Only Approach Pilot.

In October 2021, the Joint Utilities met with Commission Energy Division staff to discuss their Data Collection Plan for the Notification-Only Approach Pilot per OP 4, during which Energy Division staff recommended changes to Attachment A.

On November 19, 2021, the Joint Utilities submitted Joint Advice Letter SDG&E 3843-E-A, PG&E 6315-E-A, and SCE 4582-E-A, which supplemented previously submitted Joint Advice 3843-E et. al., in its entirety.

Per OP 5 of the Decision, the Joint Utilities are required to submit this AL providing data from the first 18 months of the Notification-Only Approach Pilot and, based on the data, a recommendation regarding continuation (or not) of the notification approach, as well as a proposal for the Notification-Only Approach application fee. OP 6 required the Joint Utilities to host a workshop no later than 30 days prior to submitting the AL required in OP 5 and to provide and discuss a draft of the required AL. The Joint Utilities provided a draft of this AL on February 14, 2023. Subsequently, the Joint Utilities hosted the required workshop on February 14, 2023.

DISCUSSION

2/14/23 Workshop Recap

The Joint Utilities participated in a workshop on February 14, 2023, per D.21-06-002, OP 6, in which they presented their data from the first 18 months of the Notification-Only Approach pilot. The goal of this workshop was for the Joint Utilities to make a data-based recommendation on whether to continue the notification approach on a permanent basis, continue the pilot with modifications, or discontinue the notification approach. Attachment D contains the Joint Utilities' slides that were presented at the workshop. Key takeaways from the Workshop included:

- Due to lack of participation, much of the Notification-Only Data to identify impacts of the Notification-Only Approach Pilot was unavailable.
- The Joint Utilities provided a recommendation not to continue the Notification-Only Approach Pilot, consistent with the Decision (see Recommendation and Points 1-3 below).
- The Joint Utilities each presented their populated Notification-Only Data Collection Templates (see Attachments A-C).
- The Joint Utilities presented a draft of the Tier 3 Advice letter, per D.21-06-002, OP 5.

Stakeholders voiced concern over the eligibility criteria of the notification approach as it currently stands as being too restrictive and stated (paraphrasing) 'that there is a distinction between the success of the pilot as implemented vs. how the notification process should work to make it successful.' Further, stakeholders requested the Joint Utilities to reconsider how the "Joint-IOU Comment" column in Table 2 is framed. The Joint Utilities opined that they have implemented the Notification-Only Approach process consistent with the mandates of the Decision.

The Joint Utilities did not receive any written feedback following the February 14, 2023 Workshop.

Due to the absence of a recording for the February 14, 2023 Workshop, the Joint Utilities circulated the "2/14/23 Workshop Recap" section of this Tier 3 Advice Letter on March 7, 2023, to allow stakeholders time to review and recommend any changes. The Joint Utilities did not receive responses to this request.

RECOMMENDATION: The Joint Utilities Recommend Discontinuing the Notification-Only Approach Pilot.

Based on the lack data collected from the 18-month pilot, the extensive efforts made by the Joint Utilities to establish the pilot and good faith effort to obtain feedback from stakeholders, it is unclear whether any modifications to the pilot to continue it will bring success. The Notification-Only Approach Pilot process was not tested by anyone and thus future success, even if with some modification, is unfounded and speculative. Without testing the process as intended by the pilot, it is not known what part of the process should be modified to warrant continuation of the pilot. The Joint Utilities have recently tried to collect feedback via survey, and lack of participation in the survey further indicates there is limited to no interest in the pilot.

Point 1: The Joint Utilities have made a good faith effort on the record to both establish the pilot and gain stakeholder feedback.

The Joint Utilities have collaborated with stakeholders in an effort to establish the technical requirements for eligible projects. These efforts are demonstrated through several stakeholder working groups conducted through the process:

- 3/15/18 [Working Group One Report](#) (see p. 61 on “no notification” in Use Case 4 in the Working Group Proposals Addressing Modifications to Existing Facilities and history in PG&E Advice Letter 6243-E)
- 10/31/18 [Working Group Two Report](#) (see “Issue 11 Proposal” beginning on p.138)
- 6/14/19 [Working Group Three Report](#) (see p.48 and p.57 subproposal 12)
- 1/19/23 Smart Inverter Working Group (SIWG) Meeting to Discuss Survey

The Joint Utilities established public-facing processes via website for interested parties to use the Notification-Only approach (See Table 1 Joint Utilities’ NOA AL Matrix Lines 1-8). The Joint Utilities developed an audit process to validate a sample size of Notification-Only projects received. (See Table 1 Joint Utilities’ NOA AL Matrix Lines 9-11). The Joint Utilities created a Notification-Only Pilot Tracking and Reporting template with tracking attributes. (See Table 1 Joint Utilities’ NOA AL Matrix Lines 12-14). The Joint Utilities also facilitated a survey to gather feedback on the Notification-Only Approach. (See Attachment D, Slides 12, 25-30 from February 14, 2023 Workshop).

Table 1- Joint Utilities' NOA AL Matrix

Line	Joint/Individual	Utility	AL	AL Supp	AL Supp	Tier	Ref	AL Filed Supp(s) Filed	AL Effective	Notes
1	Individuals	SCE	AL 4526-E			Tier 1	D.21-06-002, OP2	6/21/2021	6/21/2021	Website Location
2		PG&E	AL 6233-E	AL 6233-E-A		Tier 1	D.21-06-002, OP2	6/21/2021 8/3/2021	6/21/2021	Website Location
3		SDG&E	AL 3791-E	AL 3791-E-A		Tier 1	D.21-06-002, OP2	6/21/2021 7/15/2021	6/21/2021	Website Location
5	Individuals	SCE	AL 4534-E			Tier 1	D.21-06-002, OP1g	7/6/2021	7/6/2021	Like-for-like equipment replacement/material modification notification pursuant to D.19-03-013
6		PG&E	AL 6243-E			Tier 1	D.21-06-002, OP1g	7/6/2021	7/6/2021	Like-for-like equipment replacement/material modification notification pursuant to D.19-03-013
7		PG&E	AL 6249-E	AL 6249-E-A	AL 6249-E-B	Tier 2	D.21-06-002, OP20	7/6/2021 7/23/2021 8/10/2021	7/19/2021	Modified Forms
8		SDG&E	AL 3800-E			Tier 1	D.21-06-002, OP1g	7/6/2021	7/6/2021	Like-for-like equipment replacement/material modification notification pursuant to D.19-03-013
9	Individuals	SCE	AL 4535-E			Tier 2	D.21-06-002, OP3	7/6/2021	8/5/2021	Audits
10		PG&E	AL 6244-E			Tier 2	D.21-06-002, OP1 &	7/6/2021	8/5/2021	Audits
11		SDG&E	AL 3799-E			Tier 2	D.21-06-002, OP3	7/6/2021	8/5/2021	Audits
12	Joint	SCE	AL 4582-E	AL 4582-E-A		Tier 1	D.21-06-002, OP4	9/2/2021 11/19/2021	11/19/2021	Collection of Data
13		PG&E	AL 6315-E	AL 6315-E-A		Tier 1	D.21-06-002, OP4	9/2/2021 11/19/2021	11/19/2021	Collection of Data
14		SDG&E	AL 3843-E	AL 3843-E-A		Tier 1	D.21-06-002, OP4	9/2/2021 11/19/2021	11/19/2021	Collection of Data

Point 2: No Participation in Pilot Process.

Despite the Joint Utilities’ efforts described above, the process did not attract participation in the pilot. There have been no submissions for Pre-Approved Developer Status. There have been no Notification-Only Approach application submissions to participate in the pilot. There has been minimal stakeholder feedback to the Joint Utilities’ surveys regarding the pilot. The survey process entailed the following:

- Survey Distribution
 - 1/17/23: Survey sent to Service List of R.17-07-007
 - 1/17/23 – 1/31/23: Survey run period
 - 1/19/23: Presentation at SIWG
 - 1/24/23: Service List Reminder email
 - 1/24/23: Targeted Email from SCE on behalf of the Joint Utilities
 - See Table 2 below

Telsa was the only stakeholder that provided feedback to the Workshop on July 6, 2021 (See SDGE AL 3843-E, PG&E AL 6315-E, and SCE AL 4582-E, pp. 2-3).

Table 2 provides Telsa’s survey feedback with the Joint Utilities’ comments in response to Tesla’s feedback. While the Joint Utilities appreciate Tesla’s comments, the Joint Utilities continue to recommend that the Notification-Only Approach pilot be discontinued.

Table 2- Tesla Survey Response Summary

Tesla Remarks	Previous Position on Record	Joint Utilities’ Comment
Eligibility should be modified to allow non-exporting storage systems that are being retrofit to existing NEM solar to participate in the pilot. As it currently stands, NEM customers would have to agree to make their entire system, including the NEM solar, non-exporting in order for a storage deployment to be eligible, a choice that few, if any, economically rational customers would make.	Tesla made this argument after the July 2021 Workshop (reference SDGE AL 3843-E, PG&E AL 6315-E, and SCE AL 4582-E, pp. 2-3) “This cuts out a very large cohort of customers whose interests in obtaining robust back-up power are just as legitimate as those of customers that are either retrofitting a storage system to an existing solar system, or those that are interested in deploying standalone storage.” –Tesla Opening Comments on PD (p. 4). Status: Not incorporated in Final Decision.	The Joint Utilities disagree that Tesla’s proposed changes would increase participation in this Pilot. Moreover, the Joint Utilities have had no experience with Notification-Only Approach projects through the pilot that would justify changing the safety requirements adopted in the Decision.
The upfront requirements that a developer needs to meet, specifically the need to have	Not found.	Agree with D.21-06-002 Finding of Fact 18- If a developer has successfully deployed 20

<p>completed at least 20 projects that meet the eligibility requirements under the status quo interconnection process in order to be eligible should be reduced or eliminated.</p>		<p>projects meeting the pilot eligibility requirements, that developer has demonstrated an understanding of the laws, regulations, rules, and processes necessary to safely deploy a system. (See Final Decision at p. 75). Additionally, the Joint Utilities are unaware of any developers who are interested in participating but were unable to meet this requirement.</p>
<p>The limitation of 10 notification-only projects allowed per circuit per developers should be eliminated. If maintained, then there needs to be an easily accessible means for a developer to track this as it may not always be clear what circuit different projects are connected to.</p>	<p>Tesla made this argument after the July 2021 Workshop (reference SDGE AL 3843-E, PG&E AL 6315-E, and SCE AL 4582-E, pp. 2-3) Status: Limiting each developer to 10 non-export projects for each distribution circuit for the pilot will ensure a level playing field across developers. (See Final Decision at pp.15-16)</p>	<p>Agree with D.21-06-002 limiting each developer to 10 non-export projects for each distribution circuit for the pilot will ensure a level playing field across developers. (See Final Decision at pp.15-16). Additionally, the Joint Utilities do not think this was an obstacle to participation because there were no applications received, let alone 10 per circuit.</p>
<p>The % of projects that can be audited should be reduced to a more reasonable amount, e.g. 5% of projects.</p>	<p>The proposed level of auditing appears excessive and should be scaled back to 10% of systems that utilize the notification-only process...and then 5% upon successful completion of 300 notification-only projects...” –Tesla Opening Comments on PD (pp. 7-8) Status: 20% (See Final Decision at p. 24)</p>	<p>This has been discussed at length during the Working Group. Up to 20% is a reasonable percentage and the Joint Utilities see no reason to change due to lack of participation The Joint Utilities did not receive any projects, so the audit requirement did not impose a burden. Nor are the Joint Utilities aware of any developers who did not participate due to the audit requirement. See SCE AL 4535--E (at p.2), SDG&E AL 3799-E (at p.3), PG&E AL 6244-E (at p.3)</p>

Point 3: CPUC directed the decision to be based on data.

The Joint Utilities applied the “Attachment A Data Collection Template,” which revealed two buckets of data:

- Available
 - Indicated in green overlay within Workshop slides 14-19 (see Attachment D)
- Unavailable (due to zero project submissions)
 - Indicated in red overlay within Workshop slide 14-19 (see Attachment D)

Additional data collected per D. 21-06-002 includes:

- Per OP 5, “a proposal for the notification-only approach application fee to cover the costs of administering the approach post-pilot phase”
 - **Joint Utilities’ Position:** Due to lack of participation, the Joint Utilities recommend discontinuing the Notification-Only Approach, which negates the need for a proposal for a specific Notification-Only Approach application fee. If the Notification-Only Approach program is continued, the Joint Utilities recommend the existing interconnection fee continue to apply as there is no information available to support a lower fee. The applicable interconnection request fees are set forth below.
 - SCE’s Rule 21 Non-Export Fee¹ (standalone storage ≤30kVA) or non-export storage plus existing non-export gen ≤30kVA) is \$800
 - PG&E’s same
 - SDG&E’s same

¹ See Rule 21, Table E.1 *Summary of Interconnection Request Fees, Deposits and Exemptions.*

- At page 15, “Furthermore, as part of the pilot, the utilities should study the impacts of the notification-only approach on the distribution grid and include the results in their data collection advice letter submittal below”
 - **Joint Utilities’ Position:** Since zero projects were received, Notification-Only Approach (i.e., program projects) impacts cannot be studied. For non-program projects, utilities are allowed the opportunity to review project impacts during application process and mitigation issues (e.g., transformer loading; equipment sizing issues) would have been addressed.

TIER DESIGNATION

Pursuant to OP 5 of Decision 21-06-002, this advice letter is submitted with a Tier 3 designation.

EFFECTIVE DATE

This advice letter will become effective upon Commission approval.

NOTICE

Anyone wishing to protest this advice letter may do so only electronically. Protests must be received no later than 20 days after the date of this advice letter. Protests should be submitted to the CPUC Energy Division at:

E-mail: EDTariffUnit@cpuc.ca.gov

In addition, protests and all other correspondence regarding this advice letter should also be sent electronically to the attention of:

FOR SCE:

Connor Flanigan
Managing Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

and

Tara S. Kaushik
Managing Director, Regulatory Relations
Southern California Edison Company
c/o Karyn Gansecki
E-mail: Karyn.Gansecki@sce.com

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
E-mail: PGETariffs@pge.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B, R.19-09-009 and R.17-07-007 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-6838. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

All questions concerning this advice letter should be directed to Barbara Cadena at (626) 633-3369 or by electronic mail at Barbara.Cadena@sce.com.

Southern California Edison Company

/s/ Connor Flanigan
Connor Flanigan

CF:bc:lp
Enclosures

Attachment A Data Collection (SCE)

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	39
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
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]	1.61% (average) ²

Impact Study Costs (Average \$/Application) ³		
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)	\$200
4	Audit costs (field audits)	\$
5	Technology costs (costs spread over two years)	\$50,000

Note 1: Safety Evaluations List

- Connection within secondary networks
- Connecting on line-side taps
- Not using approved controls systems

² See Table 3 for full circuit list.

³ Populated tracking attributes are consistent with SCE AL 4981-E

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

Exceedance of 10 projects per circuit

General application 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 existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

CIRCUIT_NAME	Percentage
ATENTO	0.99%
BELPAC	1.51%
BLACKBURN	1.36%
BRENNAN	1.18%
BURLESON	2.00%
CALIFORNIA	1.75%
CANTINA	1.94%
CONIFER	1.24%
COVENTRY	1.42%
CROWNHILL	2.42%
CYCLONE	1.60%
DEL CARBON	1.43%
DRISKILL	2.56%
ENERGY	1.86%
ESTABAN	2.02%
FEY	1.13%
FLAGSTAFF	4.80%
GABBERT	1.99%
GILLIBRAND	2.15%
HANDY	1.59%
HOOLIGAN	1.37%
HOSS	1.53%
INTREPID	1.01%
LA GRANDE	1.28%
LANGER	1.83%
LAZARO	0.94%
MARX	1.34%
MAXIMUS	0.99%
MEMPHIS	1.52%
MORELAND	1.30%
MORGANSTEIN	2.42%
MUNICH	0.79%
NICHOLAS	1.67%
PARKMORE	1.58%
ROSA	0.91%
SAND CANYON	1.20%
SEXTON	1.39%
SINALOA	1.43%
STORKE	1.29%

Table 3- SCE Impact Study Tracking and Reporting, Tracking Activity 5, Tracking Attribute Details (per circuit)

Attachment B Data Collection (PG&E)

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	0
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
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]	0

Impact Study Costs (Average \$/Application) ⁴		
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) ⁵	\$200
4	Audit costs (field audits)	\$
5	Technology costs (costs spread over two years)	\$340,000

Note 1: Safety Evaluations List

Connection within secondary networks

Connecting on line-side taps

⁴ Populated tracking attributes are consistent with PG&E AL 6875-E

⁵ PG&E does not plan to perform office audits, but per the guidance we are providing a cost estimate as part of the order

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
Exceedance of 10 projects per circuit
General application 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 existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

Attachment C Data Collection (SDG&E)

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	26
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
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]	1.044% (average) [Ⓔ]

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)	\$200
4	Audit costs (field audits)	\$
5	Technology costs (costs spread over two years)	\$50,000

Note 1: Safety Evaluations List

[Ⓔ] See Table 4 for full circuit list.

[Ⓩ] Populated tracking attributes are consistent with SDG&E AL 4172-E.

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
Exceedance of 10 projects per circuit
General application 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 existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

CIRCUIT_NUMBER	Percentage
288	0.35%
500	0.39%
61	0.41%
520	0.46%
1118	0.47%
233	0.49%
433	0.52%
972	0.52%
476	0.62%
908	0.74%
68	0.78%
182	0.79%
597	0.84%
971	0.86%
237	1.08%
1030	1.11%
1235	1.22%
907	1.33%
175	1.34%
176	1.36%
524	1.67%
357	1.67%
1001	1.77%
67	1.98%
353	2.06%
215	2.34%

Table 4- SDG&E Impact Study Tracking and Reporting, Tracking Activity 5, Tracking Attribute Details (per circuit)

Attachment D Joint-IOU Notification Only Workshop Slides

Notification-Only Workshop

D.21-06-002, Ordering Paragraph 6

February 14th, 2023

Energy for What's Ahead®



Notification-Only Workshop Agenda

Item	Topic	Sub-topics	Presenter	Start Time	End Time	Duration (min)
1	Introduction	<ul style="list-style-type: none"> Welcome Logistics Goals 	Energy Division	1:00 PM	1:15 PM	15
2	Joint-IOU Presentation	a. Agenda	PG&E/SDG&E/SCE	1:15 PM	1:20 PM	5
		b. Recommendations and Observations Regarding the Pilot		1:20 PM	2:30 PM	70
		c. Data Collection Findings				
		d. Stakeholder Survey Feedback				
		e. Draft Advice Letter with language describing the proposal for the notification-only approach application fee				
3	Stakeholder Q&A		All	2:30 PM	3:00 PM	30

PURPOSE

Energy for What's Ahead®





- Fulfill [D.21-06-002](#), Ordering Paragraphs 5 & 6

5. No later than 20 months from the implementation of the Notification-Only Approach Pilot adopted in Ordering Paragraph 1, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall submit a Tier 3 Advice Letter providing the data from the first 18 months of the Notification-Only Approach pilot and, based on the data, a request to continue the notification approach on a permanent basis as adopted herein, continue the pilot with modifications, or discontinue the notification approach. This advice letter shall contain a proposal for the notification-only approach application fee to cover the costs of administering the approach post-pilot phase.

6. Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company shall host a workshop no later than 30 days prior to submitting the Tier 3 Advice Letter required in Ordering Paragraph 5. Utilities shall provide and discuss a draft of the required Tier 3 Advice Letter.

The presentation is structured to follow the outline of the Advice Letter.

BACKGROUND

Energy for What's Ahead®





- On June 3, 2021, the California Public Utilities Commission issued Decision D.21-06-002, which, among other things, adopted a two-year pilot program that permits certain small non-export Generating Facilities to interconnect and operate in parallel with PG&E's/SCE's/SDG&E's Distribution Systems under a Notification-Only Process in lieu of the standard interconnection application process.
- The 8 Eligibility Criteria
 - #1 Size (OP.1b)
 - #2 Certified UL PCS (OP.1b)
 - #3 Voltage Limitations (OP.1b)
 - #4 Location (OP.1b)
 - #5 Storage charging does not increase host customer's monthly peak demand (OP.1b)
 - #6 Must use pre-approved inverters – Currently drawn from CEC website (OP.1b)
 - #7 Installer is responsible for proper balancing to meet Screen E. Attestation to be provided as part of the Notification-Only Package (OP.1c and OP.1d)
 - #8 Only Pre-approved developers are allowed to use the notification-only process (OP.1b)

DISCUSSION

Energy for What's Ahead®



High Level Timeline of Deliverables



NOA = Notification-Only Approach
 For a comprehensive record of Advice Letters, please see "Joint-IOU NOA AL Matrix"



Joint-IOU NOA AL Matrix

Line	Joint/Individual	Utility	AL	AL Supp	AL Supp	Tier	Ref	AL Filed Supp(s) Filed	AL Effective	Notes
1	Individual	SCE	AL 4526-E			Tier 1	D.21-06-002, OP2	6/21/2021	6/21/2021	Website Location
2		PG&E	AL 6233-E	AL 6233-E-A		Tier 1	D.21-06-002, OP2	6/21/2021 8/3/2021	6/21/2021	Website Location
3		SDG&E	AL 3791-E	AL 3791-E-A		Tier 1	D.21-06-002, OP2	6/21/2021 7/15/2021	6/21/2021	Website Location
5	Individual	SCE	AL 4534-E			Tier 1	D.21-06-002, OP1g	7/6/2021	7/6/2021	Like-for-like equipment replacement/material modification notification pursuant to D.19-03-013
6		PG&E	AL 6243-E			Tier 1	D.21-06-002, OP1g	7/6/2021	7/6/2021	Like-for-like equipment replacement/material modification notification pursuant to D.19-03-013
7		PG&E	AL 6249-E	AL 6249-E-A	AL 6249-E-B	Tier 2	D.21-06-002, OP20	7/6/2021 7/23/2021 8/10/2021	7/19/2021	Modified Forms
8		SDG&E	AL 3800-E			Tier 1	D.21-06-002, OP1g	7/6/2021	7/6/2021	Like-for-like equipment replacement/material modification notification pursuant to D.19-03-013
9	Individual	SCE	AL 4535-E			Tier 2	D.21-06-002, OP3	7/6/2021	8/5/2021	Audits
10		PG&E	AL 6244-E			Tier 2	D.21-06-002, OP1 & OP3	7/6/2021	8/5/2021	Audits
11		SDG&E	AL 3799-E			Tier 2	D.21-06-002, OP3	7/6/2021	8/5/2021	Audits
12	Joint	SCE	AL 4582-E	AL 4582-E-A		Tier 1	D.21-06-002, OP4	9/2/2021 11/19/2021	11/19/2021	Collection of Data
13		PG&E	AL 6315-E	AL 6315-E-A		Tier 1	D.21-06-002, OP4	9/2/2021 11/19/2021	11/19/2021	Collection of Data
14		SDG&E	AL 3843-E	AL 3843-E-A		Tier 1	D.21-06-002, OP4	9/2/2021 11/19/2021	11/19/2021	Collection of Data

PURPOSE

BACKGROUND

DISCUSSION

TIER
DESIGNATION

- **RECOMMENDATION: The Joint-IOU position is to discontinue the notification approach.**
 - It is unclear if any modifications to the pilot will bring success
 - This process was not tested by anyone and thus speculation of future success (if some things are modified) are unfounded
 - Without testing the process as intended by the pilot, it is not known what part of the process should be modified
 - The Joint-IOUs have most recently tried to collect feedback via survey (see Slide 12), and its lack of participation indicates there is no interest in the pilot



- **Point 1: Utilities have made a good faith effort on the record to both establish the pilot and gain stakeholder feedback. The Joint-IOUs have:**
 - Collaborated with stakeholders to solidify the technical requirements for eligible projects
 - 3/15/18 Working Group One Report see p. 61 on “no notification” in Use Case 4 in the Working Group Proposals Addressing Modifications to Existing Facilities. (see history in PG&E AL 6243-E)
 - 10/31/18 Working Group Two Report see “Issue 11 Proposal” beginning on p.138
 - 6/14/19 Working Group Three Report see p.48 and p.57 subproposal 12
 - 1/19/23 SIWG Meeting to Discuss Survey
 - Established public facing processes via website for interested parties to use the Notification-Only approach
 - See Joint-IOU NOA AL Matrix Lines 1-8
 - Developed an audit process to validate a sample size of Notification-Only projects received
 - See Joint-IOU NOA AL Matrix Lines 9-11
 - Created a Notification Only Pilot Tracking and Reporting template with tracking attributes
 - See Joint-IOU NOA AL Matrix Lines 12-14
 - Facilitated a survey to gather feedback on the Notification-Only approach
 - See Slides 12, 25-30



Agenda 2b. Recommendations and Observations Regarding the Pilot

- **Point 2: No Participation in Pilot Process.**
 - There have been no submissions for Pre-Approved Developer Status
 - There have been no Notification-Only application submissions
 - Stakeholder feedback has been minimal
 - Survey Distribution
 - 1/17/23: Survey sent to Service List of R.17-07-007
 - 1/17/23 – 1/31/23: Survey run period
 - 1/19/23: Presentation at SIWG
 - 1/24/23: Service List Reminder email
 - 1/24/23: Targeted Email from SCE
 - (see next slide for one received survey response)
 - Previous Workshop on 7/6/21 only Tesla provided feedback
 - (reference Joint AL- SDGE AL 3843-E, PG&E AL 6315-E, and SCE AL 4582-E, pp. 2-3)



• **Response to Stakeholder Survey Feedback***

Agenda 2d. Stakeholder Survey Feedback

Tesla Comment	Joint-IOU Comment
<p>Eligibility should be modified to allow non-exporting storage systems that are being retrofit to existing NEM solar to participate in the pilot. As it currently stands, NEM customers would have to agree to make their entire system, including the NEM solar, non-exporting in order for a storage deployment to be eligible, a choice that few, if any, economically rational customers would make.</p>	<p>The IOUs disagree that Tesla’s proposed changes would increase participation in this Pilot. Moreover, the Joint Utilities have had no experience with notification-only projects through the pilot that would justify changing the safety requirements adopted in the Decision.</p>
<p>The upfront requirements that a developer needs to meet, specifically the need to have completed at least 20 projects that meet the eligibility requirements under the status quo interconnection process in order to be eligible should be reduced or eliminated.</p>	<p>Agree with D.21-06-002 Finding of Fact 18- If a developer has successfully deployed 20 projects meeting the pilot eligibility requirements, that developer has demonstrated an understanding of the laws, regulations, rules, and processes necessary to safely deploy a system. (See Final Decision at p. 75). Additionally, the IOUs are unaware of any developers who are interested in participating but were unable to meet this requirement.</p>
<p>The limitation of 10 notification-only projects allowed per circuit per developers should be eliminated. If maintained, then there needs to be an easily accessible means for a developer to track this as it may not always be clear what circuit different projects are connected to.</p>	<p>Agree with D.21-06-002 limiting each developer to 10 non-export projects for each distribution circuit for the pilot will ensure a level playing field across developers. (See Final Decision at pp.15-16). Additionally, the IOUs do not think this was an obstacle to participation because there were no applications received, let alone 10 per circuit.</p>
<p>The % of projects that can be audited should be reduced to a more reasonable amount, e.g. 5% of projects.</p>	<p>This has been discussed at length during the Working Group. Up to 20% is a reasonable percentage and Joint-IOUs see no reason to change due to lack of participation. See SCE AL 4535-E (at p.2), SDG&E AL 3799-E (at p.3), PG&E AL 6244-E (at p.3). The IOUs did not receive any projects, so the audit requirement did not impose a burden. Nor are we aware of any developers who did not participate due to the audit requirement</p>

*Only received one response, Tesla’s



• **Point 3: CPUC directed the decision to be based on data.**

- By applying the “Attachment A Data Collection Template” (next Slides 15-21), two buckets of data were apparent:
 - Available
 - Unavailable (due to zero project submissions)
- Additional data per the Decision include:
 - Per OP 5, “a proposal for the notification-only approach application fee to cover the costs of administering the approach post-pilot phase”
 - **Joint-IOU Position:** Due to lack of data (zero participation), the Joint Utilities recommend discontinuing the notification approach, which negates the need for a proposal for the notification-only approach application fee. The default fee would then be the current interconnection request fee for this type of project (see sub-bullets). If the notification-only program is continued, the Joint Utilities should have the opportunity to gather data on processing costs before establishing a lower fee. The Joint Utilities have not gathered data on these costs given that there have been no project submissions.
 - SCE’s Rule 21 Non-Export Fee¹ (standalone storage ≤ 30kVA or non-export storage plus existing non-export gen ≤30kVA) is \$800
 - PG&E’s same
 - SDG&E’s same
 - At page 15, “Furthermore, as part of the pilot, the utilities should study the impacts of the notification-only approach on the distribution grid and include the results in their data collection advice letter submittal below”
 - **Joint-IOU Position:** Since zero projects were received, notification-only approach (i.e. program projects) impacts cannot be studied. For non-program projects, utilities are allowed the opportunity to review project impacts during application process and mitigation issues (e.g., transformer loading; equipment sizing issues) would have been addressed. The difference here is being able to study the project under normal circumstance vs. Notification-Only.

Agenda 2c. Data Collection Findings
Agenda 2e. Notification-Only approach application fee

1-See Rule 21, Table E.1 Summary of Interconnection Request Fees, Deposits and Exemptions

Attachment A Data Collection Template

Reference:
See Joint-IOU NOA AL Matrix, Lines 12-14

SCE

PURPOSE

BACKGROUND

DISCUSSION

TIER DESIGNATION

Attachment A Data Collection (SCE)

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

CIRCUIT_NAME	Percentage
ATENTO	0.99%
BELPAC	1.51%
BLACKBURN	1.36%
BRENNAN	1.18%
BURLESON	2.00%
CALIFORNIA	1.75%
CANTINA	1.94%
CONIFER	1.24%
COVENTRY	1.42%
CROWNHILL	2.42%
CYCLONE	1.60%
DEL CARBON	1.43%
DRISKILL	2.56%

...

indicates a Tracking Activity that had available data
indicates a Tracking Activity with unavailable data

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	39
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
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]	1.61% (average)

Agenda 2c. Data Collection Findings

SCE

Attachment A Data Collection (SCE)

PURPOSE

BACKGROUND

DISCUSSION

TIER DESIGNATION

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)	\$50k

Disclaimer: Uses the Rule 21 Interconnection Timeline Quarterly Reporting previously calculated NEM project estimates and Rule 21 Non-Export estimates. SCE anticipates that if we receive a Notification Only request, the cost would be less due to not running the fast-track screens, however, there would be some additional up-front costs associated with added review by both Advisors and Engineers.

No projects applied so we do not have actual cost data. However, for the purposes of discussion, SCE provides an estimate below using the Quarterly Reporting application cost average:
 \$400- Tracking Activity 1
 \$300- Tracking Activity 2
 \$200- Tracking Activity 3
 \$300- Tracking Activity 4

~\$1200

Agenda 2c. Data Collection Findings

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 application 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 existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

- indicates a Tracking Activity that had available data
- indicates a Tracking Activity with unavailable data





Attachment B Data Collection (PG&E)

Agenda 2c. Data Collection Findings

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	0
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
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]	0

■ indicates a Tracking Activity that had available data
■ indicates a Tracking Activity with unavailable data





Attachment B Data Collection (PG&E)

PURPOSE

BACKGROUND

DISCUSSION

TIER DESIGNATION

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)	\$340k

Disclaimer: Uses the Rule 21 Interconnection Timeline Quarterly Reporting previously calculated NEM project estimates, Rule 21 Non-Export estimates, and PG&E NEM cost tracking report. PG&E anticipates that if we receive a Notification Only request, the cost would be less due to not running the fast-track screens, however, there would be some additional up-front costs associated with added review by both Advisors and Engineers.

No projects applied so we do not have actual cost data. However, for the purposes of discussion, PG&E provides an estimate below using the Quarterly Reporting application cost average:
 \$300- Tracking Activity 1
 \$400- Tracking Activity 2
 \$200- Tracking Activity 3 (PG&E does not anticipate performing office audits, but if we were to then this would be the estimated amount)
 \$200-300- Tracking Activity 4

- ~\$900-1000 without office audit
- ~\$1100-1200 with office audit

Agenda 2c. Data Collection Findings

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 application 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 existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

- indicates a Tracking Activity that had available data
- indicates a Tracking Activity with unavailable data





Attachment C Data Collection (SDG&E)

Agenda 2c. Data Collection Findings

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	26
3	Verified operational issues caused by (1)+(2) (Note 3)	0
4	Verified equipment failures caused by (1)+(2)	0
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]	1.044% (average)

■ indicates a Tracking Activity that had available data
■ indicates a Tracking Activity with unavailable data





Attachment C Data Collection (SDG&E)



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)	\$50,000

Disclaimer: Uses the Rule 21 Interconnection Timeline Quarterly Reporting previously calculated NEM project estimates and Rule 21 Non-Export estimates. SDGE anticipates that if we receive a Notification Only request, the cost would be less due to not running the fast-track screens, however, there would be some additional up-front costs associated with added review by both Advisors and Engineers.

No projects applied so we do not have actual cost data. However, for the purposes of discussion, SDGE provides an estimate below using the Quarterly Reporting application cost average:

- \$100- Tracking Activity 1
- \$150- Tracking Activity 2
- \$200- Tracking Activity 3
- \$100- Tracking Activity 4

~\$550

Agenda 2c. Data Collection Findings

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 application 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 existing approved NEM projects with a total generating facility nameplate capacity less than or equal to 30KVA (existing NEM + new storage)

- indicates a Tracking Activity that had available data
- indicates a Tracking Activity with unavailable data



TIER DESIGNATION

Energy for What's Ahead®





- Pursuant to OP 5 of Decision 21-06-002, this advice letter is submitted with a Tier 3 designation.

Present T3 AL

Energy for What's Ahead®



Stakeholder Q&A

Energy for What's Ahead®



APPENDIX: Tesla Complete Survey Response

Energy for What's Ahead®



Survey Response

1. Please enter your name.

[More Details](#)

1
Responses

Latest Responses

[Redacted]

2. Please enter your full email address.

[More Details](#)

1
Responses

Latest Responses

[Redacted]@tesla.com"

3. Please enter the organization in which you are affiliated.

[More Details](#)

1
Responses

Latest Responses

"Tesla, Inc."

Agenda 2d. Stakeholder Survey Feedback

Survey Response

Agenda 2d. Stakeholder Survey Feedback

4. What service territory would you most likely interconnect your project to/what is your preferred service territory (select all that apply)?

[More Details](#)

- Pacific Gas and Electric (PG&E) 1
- San Diego Gas and Electric (SDG... 1
- Southern California Edison (SCE) 1
- Other 0



5. Are you a part of any of the following CPUC forums (select all that apply)?

[More Details](#)

- DPAG (Distribution Planning Ad... 0
- SIWG (Smart Inverter Working G... 1
- UIWG (Unintentional Islanding ... 0
- Other 0

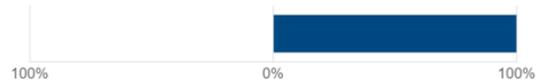


6. How well versed/familiar are you with the Notification-Only Pilot and process?

[More Details](#)

- Not Familiar at All
- Not very Familiar
- Somewhat Familiar
- Familiar
- Very Familiar

Level of Familiarity:



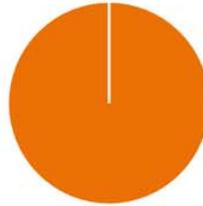
Survey Response

Agenda 2d. Stakeholder Survey Feedback

7. Did you/your customers apply to use the Notification-Only process?

[More Details](#)

- Yes 0
- No 1



8. What changes do you feel need to be made to make the Notification-Only Pilot more attractive for customers?

[More Details](#)

1 Responses

Latest Responses

"- Eligibility should be modified to allow non-exporting storage systems that ..."

Responses

- Eligibility should be modified to allow non-exporting storage systems that are being retrofitted to existing NEM solar to participate in the pilot. As it currently stands, NEM customers would have to agree to make their entire system, including the NEM solar, non-exporting in order for a storage deployment to be eligible, a choice that few, if any, economically rational customers would make. - The upfront requirements that a developer needs to meet, specifically the need to have completed at least 20 projects that meet the eligibility requirements under the status quo interconnection process in order to be eligible should be reduced or eliminated. - The limitation of 10 notification-only projects allowed per circuit per developers should be eliminated. If maintained, then there needs to be an easily accessible means for a developer to track this as it may not always be clear what circuit different projects are connected to. - The % of projects that can be audited should be reduced to a more reasonable amount, e.g. 5% of projects.

9. What is the biggest roadblock in the current Notification-Only Pilot?

[More Details](#)

1 Responses

Latest Responses

"As discussed above, there are multiple issues that make it impractical for de..."

Responses

As discussed above, there are multiple issues that make it impractical for developers to participate in the pilot as currently implemented. In a nutshell, the eligibility limitations coupled with the need to jump through a lot of hoops in order to qualify as a participating developer have made the pilot effectively unappealing.



Survey Response

Agenda 2d. Stakeholder Survey Feedback

10. Has your organization utilized the current/traditional interconnection application approach to submit a project (as defined in D.21-06-22, OP1b) under Rule 21 for a non-exporting system within the past 18 months?

[More Details](#)

- Yes 0
- No 1



11. How likely is it that your organization will utilize the Notification-Only process to submit a project before the pilot cutoff on July 19, 2023?

[More Details](#)

- Very likely
- Somewhat likely
- Neither likely nor unlikely
- Somewhat unlikely
- Very unlikely

Likelihood:



12. In your opinion, with regards to the Notification-Only approach, the Joint-IOUs should request:

[More Details](#)

- to continue the notification app... 0
- continue the pilot with modif... 1
- discontinue the notification app... 0



Survey Response

13. Do you have any additional questions or comments related to this survey?

[More Details](#)

1
Responses

Latest Responses

"As one of the stakeholders that advocated for the creation of a notification-...



Responses

As one of the stakeholders that advocated for the creation of a notification-only pilot, Tesla continues to think that a notification-only approach would be valuable as a means of accelerating the pace of storage deployment in the face of the various resiliency and reliability challenges the state faces. That said, absent pretty substantial changes to address the issues we flagged in response to the questions above, Tesla continues to think the pilot will be doomed for failure.



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Darrah Morgan
 Phone #: (626) 302-2086
 E-mail: AdviceTariffManager@sce.com
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4992-E et al

Tier Designation: 3

Subject of AL: Notification-Only Approach Pilot Pursuant to Decision 21 06 002

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 21-06-002

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

Summarize differences between the AL and the prior withdrawn or rejected AL:

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:

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Connor Flanigan
Title: Managing Director, State Regulatory Operations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: AdviceTariffManager@sce.com

Contact Name: Tara S. Kaushik c/o Karyn Gansecki
Title: Managing Director, Regulatory Relations
Utility/Entity Name: Southern California Edison Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: karyn.gansecki@sce.com

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

**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.
Braun Blaising Smith Wynne, P.C.
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
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
Downey Brand LLP
Dish Wireless L.L.C.

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

GenOn Energy, Inc.
Green Power Institute
Hanna & Morton
ICF

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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
McClintock IP
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.

Resource Innovations

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
Stoel Rives LLP

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