

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking on the)	
Commission's own motion to improve)	Rulemaking 11-09-011
distribution level interconnection rules and)	(Filed September 22, 2011)
regulations for certain classes of electric)	
generators and electric storage resources.)	

**MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), SAN DIEGO GAS &
ELECTRIC COMPANY (U 902-E), PACIFIC GAS AND ELECTRIC COMPANY (U 39-E),
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOCIATION, CLEAN COALITION, CODA
ENERGY, AND INTERSTATE RENEWABLE ENERGY COUNCIL, INC., PROPOSING PRE-
APPLICATION REPORT ENHANCEMENTS AND DEVELOPMENT OF A UNIT COST
GUIDE**

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Pursuant to Rule the 11.1 of the California Public Utilities Commission’s (“Commission’s”) Rules of Practice and Procedure and ALJ Bushey’s August 19, 2015 *Administrative Law Judge’s Ruling Setting Dates for Filing Motions and Granting Motions for Party Status* (“August Ruling”), Southern California Edison Company (“SCE”), San Diego Gas and Electric (“SDG&E”), Pacific Gas and Electric Company (“PG&E”), California Solar Energy Industries Association (“CALSEIA”), Clean Coalition, CODA Energy (“CODA”) and Interstate Renewable Energy Council, Inc. (“IREC”) (together, “Joint Parties”), respectfully submit this joint motion proposing Pre-Application Report Enhancements and the development of a Unit Cost Guide (“Joint Motion”).

I. BACKGROUND AND PROCEDURAL HISTORY

On July 13, 2015, the California Public Utilities Commission (“Commission or CPUC”) issued the *Ruling of the Assigned Commissioner and Administrative Law Judge Scheduling Status Conference and Ordering Parties to Meet and Confer* (“July Ruling”). The July Ruling directed parties to meet and

confer on the topic of interconnection cost certainty to discuss “enhanced pre-application technical information and publicly available interconnection cost guidelines,” and to present a status report at the scheduled August 6, 2015 Status Conference.¹ During the August 6, 2015 Status Conference, Clean Coalition, on behalf of active parties, presented a recommendation for the Commission’s Energy Division to facilitate a series of workshops to discuss these issues, and a deadline to submit motions on these topics in November 2015 to Administrative Law Judge (“ALJ”) Bushey. Therefore, parties participated in active workshops scheduled throughout September 2015 and October 2015 to further develop proposals and seek consensus where available.

On August 19, 2015, ALJ Bushey issued the August Ruling. In the August Ruling, ALJ Bushey established the following procedural schedule for these two cost certainty issues: (1) Clean Coalition to distribute to the service list a Cost Guide Proposal by August 24, 2015; (2) SolarCity Corporation and CALSEIA to distribute to the service list a Pre-Application Report Expansion Proposal by August 31, 2015; (3) Energy Division to facilitate workshops on these issues during September/October 2015; and (4) parties to file a joint motion requesting Commission action on Cost Certainty Issues, as well as any alternative motions, by November 9, 2015. Clean Coalition, SolarCity and CALSEIA distributed their proposals as directed. In compliance with the August Ruling, the Energy Division hosted a Workshop on the two cost certainty issues on October 2, 2015. Subsequently, on October 20, 2015, the Energy Division facilitated a second, follow-up workshop on the Cost Certainty Issues.

Joint Parties have worked diligently to seek to reach consensus on a joint motion and proposal for these two issues. The Joint Parties believe this Joint Motion represents consensus and support for valuable reforms to Rule 21 that will support interconnection efficiency and transparency via the development of the Unit Cost Guide described below along with an enhanced Rule 21 Pre-Application Report.

¹ See July Ruling; *see also* August Ruling.

II. UNIT COST GUIDE DEVELOPMENT AND RELATED SUPPORTING DETAILS

As previously stated within the Utilities' June 8, 2015 reply comments, the Utilities along with other parties support the development of a Unit Cost Guide ("Cost Guide") and recognize the value of additional cost transparency in support of generation interconnection.² Based upon the numerous discussions and workshops that included the Joint Parties, the Joint Parties request that the Commission direct the Utilities to prepare and issue an annual Cost Guide pursuant to the principles as outlined below.³

The following implementation principles are proposed to support Cost Guide development:

1. **Initial Development Timing** – The Cost Guide will be developed within 90 Calendar Days of the issuance date of the Commission's decision on the instant Motion.⁴ The initial review of the Cost Guide will incorporate steps as described within the Annual Stakeholder process as described below.⁵
2. **Cost Guide Scoping Principles** – The following principles stated below will be incorporated within the Cost Guide development process and supporting tariff requirements (as necessary):
 - a. Each Utility shall publish a Cost Guide for facilities generally required to interconnect generation to their respective Distribution systems.⁶ The Utilities will coordinate to develop a consistent Cost Guide format;

² See Reply Comments (June 8, 2015) of Southern California Edison Company (U 338-E), San Diego Gas and Electric Company (U 902-E) and Pacific Gas and Electric Company (U-39E) to Motion Proposing Rule 21 Tariff Language Implementing Joint Cost Certainty Proposal, at p. 7; *see also* Clean Coalition Comments on Joint Motion of Southern California Edison Company, San Diego Gas and Electric Company, and Pacific Gas and Electric Company on Language Implementing Joint Cost Certainty Proposal and Revisions to Streamline Rule 21 for Behind-the-Meter Non-Exporting Storage Devices, filed May 22, 2015, at p. 2; Comments of the California Solar Energy Industries Association on Interconnection Cost Certainty, filed May, 22, 2015, at p. 8.

³ The Utilities propose that that proposed tariff language memorializing the Cost Guide requirement as described above be filed within 15 (fifteen) Calendar Days after the issuance date of the instant Motion.

⁴ See *supra* fn. 1.

⁵ For the initial cost guide development, the Utilities anticipate an approximate 30-45 calendar day stakeholder process utilizing the review guidelines as outlined within Section 5(h) below. Upon conclusion of the stakeholder process, an Advice Letter will be filed as discussed within Section 2(h)(vi).

⁶ Distribution voltages are defined under Rule 2, Section B.

- b. The Cost Guide is not binding for actual facility costs and is provided only for additional cost transparency and developer reference availability;
- c. The Cost Guide will include the anticipated cost of procuring and installing such facilities during the current year and may vary among the Utilities and within an individual Utility's service territory⁷;
- d. An annual adjustment will be performed within the Cost Guide for 5 (five) years to account for the anticipated timing of procurement to accommodate a potential range of commercial operation dates;
- e. The Cost Guide will be consulted as part of the Utilities' study estimate;
- f. The Utilities will work with stakeholders after issuance of the initial Cost Guide and review whether a proposed narrative explanation regarding cost deviation between the Cost Guide estimate and system study facility proposed estimate should be prepared and under what threshold conditions the narrative explanation would apply;
- g. The Guide will include illustrative scenarios reflecting stakeholder input to assist in understanding and readability of the guide, and will describe various requirements for interconnection facilities and distribution upgrades⁸; the annual proposed stakeholder review process can act as a forum to discuss the usefulness of such scenarios; and
- h. A proposed annual update of the Cost Guide would be performed in accordance with the following process⁹:
 - i. During the first quarter (January to March) of the year each Utility will post to their Open Access public web page the proposed Cost Guide; the posting would be made no later than March 31 of each year¹⁰

⁷ The Cost Guide will also include an "assumptions" sheet/tab akin in detail to what is currently provided within the California Independent System Operator (CAISO) Cost Guide. In particular, the assumptions tab would provide utility operation and maintenance along with recovery cost calculation method calculations as currently approved by each Utility along with other relevant information to support the cost estimates provided (ex: commentary regarding the unit cost guide elements based on utility reviews). The cost additions as described above would be incorporated into proposed project examples as described in Section 2(g) consistent with a total project cost amount as calculated within a Generator Interconnection Agreement. Please note that as consistent with the current CAISO guide, confidential proprietary vendor information will not be disclosed within the Cost Guide.

⁸ Scenario description will also provide editorial notes regarding potential items that would cause variability from a Cost Guide derived estimate (for example, construction timelines that would be impacted by traffic control limitations).

⁹ Please see footnote 5 for discussion of initial Cost Guide review timeline. The initial review stakeholder outreach will be governed in accordance with the principals highlighted within 5(ii)-5(vi).

¹⁰ For the case of the initial Cost Guide, the Utilities propose to issue the Cost Guide within 90 calendar days of the issuance date of the Commission's decision on this Motion. As discussed during the Commission sponsored workshops, the Unit Cost Guide would be required to be updated on an annual basis in accordance with tariff requirements, but the Utility may provide interim Cost Guide updates if market conditions warrant such revision.

- ii. At least 15 business days prior to posting, the Utilities will facilitate a Pre-Posting workshop (may be performed via phone or in person) with stakeholders to gather comments on a previously posted Cost Guide or to discuss the initial proposed Cost Guide;
- iii. No less than 10 Business Days prior to the Pre-Posting workshop, the Utilities will notify interested parties;¹¹ and
- iv. Within 10 days of posting the Cost Guide, the Utilities will host a post-posting workshop (may be performed via in person or by phone) to review with stakeholders any changes made to the previous year’s posted Cost Guide data (if any) and to address any outstanding matters raised at the initial Pre-Posting workshop.
- v. Once established, the Utilities will also post dates for Pre-Posting Workshop, Cost Guide posting date and any Post workshop dates on their respective Open Access public site.
- vi. Upon the conclusion of the annual process described above, each Utility will each file a Tier 1 advice letter with the California Public Utilities Commission to formally establish and subsequently update the Cost Guide.

As noted above, the Cost Guides developed by the Utilities will not replace the estimated study costs provided in the Utilities’¹² proposal for the “Fixed Price Option”; rather, it is intended to be used as a point of reference for projects that are considering the existing study processes.

III. PRE-APPLICATION REPORT ENHANCEMENTS AND RELATED IMPLEMENTATION

The Joint Parties support enhancement of the existing Rule 21 Pre-Application Report (“Report”).¹³ The Joint Parties appreciate the extensive and valuable discussions that occurred over the past few months, including the two workshops. The following proposed enhancements to the Pre-Application report, including the creation of a new Enhanced Pre-Application Report, are intended to

¹¹ Interested parties will include, at a minimum, the Service list of R.11-09-011 or a successor proceeding that includes Rule 21 within its scope.

¹² Utilities refers to SCE, PG&E and SDG&E.

¹³ See Reply Comments of Southern California Edison Company (U 338-E), San Diego Gas and Electric Company (U 902-E), and Pacific Gas and Electric Company (U 39-E) to Motion Proposing Rule 21 Tariff Language Implementing Joint Cost Certainty Proposal, filed June 8, 2015, at p. 7; see also Comments of the California Solar Energy Industries Association on Interconnection Cost Certainty (CALSEIA Comments), filed May 22, 2015, at pp. 4-7; Comments of Solar City Corporation regarding the Joint Utilities’ Cost Certainty Proposal, filed May 22, 2015, at pp. 4-8.

address Interconnection Customer data needs while ensuring overall tariff consistency and not undermining the underlying purpose and intent of the existing Pre-Application Report.

To efficiently implement these new data points, the Joint Parties recommend (1) maintaining the current Pre-Application Report, but renaming it the “Standard Pre-Application Report”¹⁴ and (2) establishing a new “Enhanced Pre-Application Report” that permits requests for more detailed data points/packages that can be sought on an individual basis. The Utilities will, however, work towards a single application process for both the Standard and Enhanced Pre-application Reports in order to promote simplicity and streamlined procedures.

- 1. Initial Development Timing** – The Joint Parties request that the Utilities be directed to file tariff revisions to implement the described enhancements to the Pre-Application below via an Advice Letter within 15 Calendar Days of the issuance date of the Commission’s decision on this Motion.¹⁵
- 2. Item Request Protocol** – The table below summarizes the anticipated method and pricing for the agreed upon enhanced report data items available within the Enhanced Pre-Application Report. In particular, the Joint Parties believe that the availability of the current (Standard) Pre-Application Report in its current form and pricing should remain an available option for Interconnection Customers, and that Enhanced Pre-Application Report data items will be available to an Interconnection Customer based upon specific cost and timing, reflective of the scope of work required for these new enhanced report data items. Requests that exclude the Standard Pre-Application Report and select only Enhanced Pre-Application Report items will be assessed an additional administrative fee of one hundred dollars to account for the processing, review, and management of the Enhanced Pre-Application Report items. If an interconnection customer requests a combination of reports with varying timeframes for completion (e.g. Standard Pre-Application Report and an Enhanced Pre-Application Report that require 10 BD and 30 BD respective timeframes for completion), the longer timeframe will be applied to all aspects of the request.
- 3. Automation** – The Utilities will automate as much of the Standard and Enhanced Pre-application request form and related process as is feasible and appropriate.

¹⁴ The proposed data item of Nominal Distribution Circuit Voltage and Wiring Configuration will be incorporated within the Standard Pre-Application Report at no additional cost in recognition of streamlining efforts proposed for the processing of the data packages.

¹⁵ See *supra* fn 1.

The table below summarizes the data included in the enhanced pre-application report, the associated costs, and timing involved.

Data Package	Cost	Time	Proposed Report
<p>Primary Service Package: - Nominal Distribution circuit voltage and wiring configuration</p> <ul style="list-style-type: none"> i) Relevant line section(s) absolute minimum load, and minimum load during the 10 AM – 4 PM period (provided when SCADA data is available). ii) Existing upstream protection including: <ul style="list-style-type: none"> (a) Device type (Fuse Breaker, Recloser) (b) Device controller (device make/model ex: 50E/50T) (c) Phase settings [IEEE Curve, Lever, Min Trip (A), Inst Trip(A)] (d) Ground settings [IEEE Curve, Lever, Min Trip (A), Inst Trip(A)] (e) Rated continuous current (f) Short Circuit interrupting capability (g) Confirm if the device is capable of bi-directional operation iii) Provide the Available Fault Current at the proposed point of interconnection including any existing distributed generation fault contribution. 	\$225	10 Business Days (timeline is 30 Business Days if requested with Behind the Meter Interconnection Package)	Enhanced Pre-Application Report
Behind The Meter Interconnection Package (Package does assume a physical verification based on field confirmation):	\$800	30 Business Days	Enhanced Pre-Application Report

<ul style="list-style-type: none"> i) Relevant line section(s) absolute minimum load, and minimum load during the 10 AM – 4 PM period (provided when SCADA data is available) ii) Transformer data <ul style="list-style-type: none"> (a) Existing service transformer kVA rating (b) Primary Voltage and Secondary Voltage rating (c) Configuration on both Primary and Secondary Side (<i>i.e.</i>, Delta, Wye, Grounded Wye, etc.) (d) Characteristic impedance (%Z) (e) Confirm if the transformer is serving only one customer or multiple customers¹⁶ (f) Provide the Available Fault Current on both the Primary and Secondary Side ii) Secondary Service Characteristics <ul style="list-style-type: none"> (a) Conductor type (AL or CU) and size (AWG) (b) Conductor insulation type (c) Number of parallel runs (d) Confirm if the existing secondary service is 3 wire or four wire. iii) Primary Service Characteristics <ul style="list-style-type: none"> (a) Conductor type (AL or CU) and size (AWG) (b) Conductor insulation type (c) Number of parallel runs 			
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¹⁶ As discussed during the workshops, it is expected that customer authorization will be required for release of customer specific information. If customer authorization is required, the Utilities will notify the applicant if additional processing time will be required.

(d) Confirm if the existing primary service is 3 wire or four wire.			
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IV. CONCLUSION

The Joint Parties respectfully request that the Commission adopt the above proposed Pre-Application Report enhancements and development of a Unit Cost Guide.

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Dated: November 9, 2015