

GPI informal comments on Working Group 2 Kickoff and scoping issues

Informal comments by 3/23: We heard a lot of good comments from stakeholders on the phone identifying issues with scope and key points to consider on each Issue. Gridworks has taken notes on stakeholder perspectives for each. If there are additional comments you'd like to share, or would like to reiterate specific comments in writing, please send those to lwang@gridworks.org by 3/23.

These comments should respond to the following questions: 1) what do you see as in or out of scope for each issue? 2) what issues do you see as priority to address. These informal comments are meant to begin the scoping discussion and are not part of the official record.

GPI comments

Question 1. GPI agrees with the scoping presented at the workshop but recommend that Issue 8 be broken into Issue 8a (how to incorporate ICA into Rule 21?) and 8b (how to automate the ICA and Fast Track process?). Sub-groups should be assigned to these two sub-issues because both will likely be substantial efforts.

We recommend the following language:

Issue 8a: How should the ICA results be incorporated into a revised Rule 21?

Issue 8b: How should the IOUs automate the revised Fast Track process in a way that “dramatically streamlines” the interconnection process, as called for by the Commission in the Final DRP Guidance¹ and the OIR² and Scoping Memo (p. 3) in this proceeding?

¹ The Final DRP Guidance states at p. 3:

One integral step in this process is the need to dramatically streamline and simplify processes for interconnecting to the distribution grid to create a system where high penetrations of DER can be integrated seamlessly.

² Footnote 11 in the OIR states:

The Assigned Commissioner's Ruling on Guidance for Public Utilities Code Section 769 – Distribution Resource Planning (R.14-08-013), issued February 6, 2015, calls

Question 2. GPI agrees that Issue 8 should be prioritized since this will be the most substantial issue tackled in WG2. We suggest that Issue 8 should be the focus of this WG initially and once progress is being made on Issue 8, with certain items delegated to a sub-group(s), the WG should then turn to the other issues such that the various issues can be addressed concurrently by sub-groups. This approach will help to ensure that WG2 achieves its objectives in the timeframe allotted.

Gabe Petlin helpfully highlighted in the March 14 workshop the importance of the state's DER Action Plan (May 2017) in this proceeding, and the degree to which ICA and a streamlined Fast Track is a linchpin for achieving the objectives of the DER Action Plan. The OIR in the present proceeding states (p. 5): "The DER Action Plan serves as a guide for decision-makers, staff, and stakeholders to facilitate proactive and forward-thinking DER policy." And (p. 6): "The preliminary scope of this rulemaking, outlined in the following section, is intended to be responsive to the interconnection-related vision and action elements identified in the DER Action Plan."

The OIR proceeds to describe the DER Action Plan in more detail. The Action Plan states in its section 2 "action elements," in part:

- 2.7. By 2017, consider how existing DER sourcing mechanisms (e.g., programs and tariffs) should reflect location value and/or be transitioned to a competitive sourcing mechanism already reflecting locational value.
- 2.8. By 2017, the Commission concludes consideration of an independent distribution planning review process to ensure that DERs are being adequately evaluated in the context of utility distribution planning
- 2.9. By 2017, the Commission will conclude consideration of a grid modernization framework that shall provide guidance regarding the appropriate investments utilities should make to accommodate and facilitate higher penetrations of DERs, which may include required basic functionalities, data transmission and communications capabilities, and interoperability standards.
- 2.10. By 2017, begin to consider the role of Distributed Energy Resource Management Systems to enhance grid management and maximize the value of DER deployment.

for the "dramatic" streamlining and simplifying of distribution interconnection as one of the key purposes of the DRP.

2.11. By 2018, the Commission will consider the use of Integration Capacity Analysis to streamline utility interconnection processes to accelerate DER deployment.

The Commission is delayed in completing some of these action elements (locational value, for example) but it is possible to finish the three targeted for 2017 this year and GPI is optimistic that WG2 will be able to before the end of the year produce recommendations for achieving item 2.11, most relevant to the present Working Group, which would be in keeping with the schedule provided in the Action Plan.

Another relevant guidance document is the DRP proceeding's ICA Working Group Final Report, which highlighted the importance of automation of the Fast Track process, stating (p. 3, emphasis added): "The first and most developed use case for the ICA is to improve interconnection, which includes a more automated and transparent interconnection process ..." And (p. 9, emphasis added): "The ICA shall be updated frequently enough to allow for an eventual automated and transparent interconnection process for projects that are a proposed size below the ICA value at their point of interconnection, taking into account changes in the project queue.

The ICA WG Final Report is the direct precursor to: 1) the current proceeding (since the Commission chose to shift additional interconnection and Rule 21 work from the DRP proceeding to this new proceeding (R.17-07-007) rather than continue that work in the DRP proceeding); as well as 2) the Scoping Memo in terms of the scoping of Issue 8 and its inclusion of an automation focus.

Comments on WG2 schedule by 3/23: Please let me know if the schedule proposed by Gridworks is feasible (in-person workshop every 3 weeks, call or webinar once a week, with a mix of Tuesday and Wednesday dates). If so, Gridworks will send out official meeting dates.

GPI is fine with the proposed schedule.