

## RULE 21 WORKING GROUP 2

### SCOPING MEMO – ISSUE 8

The purpose of this scoping memo is to delineate what questions are in and out of scope for discussion through the Working Group’s consideration of Issue 8. The scope was created by Gridworks with input from Working Group stakeholders.

The CPUC delineates Issue 8 as follows:

*Issue 8: How should the Commission incorporate the results of the Integration Capacity Analysis into Rule 21 to inform interconnection siting decisions, streamline the Fast Track process for projects that are proposed below the integration capacity at a particular point on the system, and facilitate interconnection process automation?*

#### IN SCOPE

##### Overarching Questions:

- What are modifications to Rule 21 that can be made in the short, medium, and long term?
- What Rule 21 related studies can be streamlined or replaced using Integration Capacity Analysis results to streamline interconnection?
- What is the difference between “streamline” and “automation”? What aspects of each can be adopted to address Issue 8?
- How will operational flexibility be treated?
- What changes will be needed for exporting vs. non-exporting resources?
- What costs may result from Rule 21 changes and require subsequent detailed consideration by the Commission?
- If the Working Group cannot determine changes to the tariff, what are proposed pathways to get there?

##### Rule 21 Screen Changes:

*This category of questions reflects changes that may be made to the Rule 21 Screens as a result of the ICA.*

- How do the ICA results compare to the existing Rule 21 interconnection study requirements?
  - o Initial review (Screens A-L): How can the Initial Review Screens (Screens A-L) be informed or replaced by ICA? Which screens are directly addressed by ICA results, which may be further streamlined? How is each screen used? What is the revised process and timeline?
  - o Supplemental review (Screens N-P): Do any of the screens need to be updated or revised? What is the revised process and timeline?
  - o Detailed study: Can the ICA simplify any aspects of detailed study?
- Are there screens that will still require engineering analysis? What risks are there that projects designed to be below ICA values will fail Fast Track review?

##### Rule 21 Process Changes:

*This category of questions reflects changes that may be made to interconnection review processes pursuant to a Rule 21 application.*

- Based on understanding of tariff adjustments based on the ICA results, do the Fast Track eligibility limits or fees need to change (i.e., what is considered a Fast Track project)? Do Fast Track timelines need to be modified?



- Will there be a Fast Track process for projects that exceed ICA limits? What is the role of Supplemental Review? Does a zero value for ICA truly mean no systems, no matter how small, can pass Fast Track?
- What level of information needs to be provided in both the developer's application, and in the IOU study results?
- ICAWNOF: How are projects which fall under the ICA with no-operational flexibility limit reviewed? What are necessary forms and agreements?
- How can the ICA accurately reflect line capacity with regards to queued projects, as the ICA map is updated monthly?
- Mitigation: What operational agreements, communications, etc. need to be considered for projects proposing "mitigation"? What information needs to be provided in the application regarding these design details? How does this fit into a proposed revised process?
- How is a proposed system's impact on voltage measured if the system will have Volt-Var with reactive power priority?
- What parts of the interconnection process can be automated? What are the necessary IT requirements to automate certain processes? (e.g., automating pre-application reports, interconnection application submittals, fee payments, studies, Generation Interconnection Agreements, service planning, construction schedules, billing, reconciliation)
- Which of the screens that are not part of ICA already have automation on the back end such that the application portal could flag likely screen failures?
- What information will customers input into the application portal?
- For the screens that are part of ICA (e.g, F, G, N, M, O), will the application portal have a warning indication if the proposed system exceeds any of the limits? Will any analysis be needed to verify the proposed project is within the limits?
- What changes to operations, forms, timelines and agreements may be needed to realize any process changes identified by the Working Group?
- What revisions are needed in Detailed Study?

**Other:**

- Identify future enhancements to the ICA developed for consideration within the DRP process.
- What protections are there to discourage project developers from submitting proposed projects that are still speculative in order to get favorable queue position? Are more protections needed?
- Does the application fee need to be revised?

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**OUT OF SCOPE**

- Requiring modifications of the ICA that are different than the approved methodology currently being implemented pursuant to D.17-09-026.
- Some operational considerations are more in scope for Issue 9. The WG recognizes issue 8 and 9 are closely related. The WG will proceed in fleshing out Issue 8 as a relatively simple first step, while recognizing more sophisticated steps will follow on.