

RULE 21 WORKING GROUP 2

SCOPING MEMO – ISSUE 11

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 11. The scope was created by Gridworks with input from Working Group stakeholders.

The CPUC delineates Issue 11 as follows:

Issue 11: Should the Commission adopt a notification-based approach in lieu of an interconnection application for non-exporting storage systems that have a negligible impact on the distribution system? If so, what should the approach entail?

IN SCOPE

Overarching Questions:

- How would the working group define “notification-based”, “non-exporting”, and “negligible”?
- What criteria would be used to determine which projects would be eligible for a notification only or other expedited process for non-exporting systems?
- What are the potential advantages and disadvantages of a notification only system for non-exporting storage projects?
 - o Identify a list of the barriers in the current interconnection application process that proposals to this Issue are intended to address. If no barriers, a list of expected benefits (e.g., reduced processing time).
 - How many projects are likely to benefit from addressing identified barriers?
- To ensure consistency, should additional discussion on the non-exporting storage interconnection process begin after Working group 1 issue 3 decision is made?¹
- How could forthcoming reports from the Non-Exporting Storage Facilities Pilot Programs support the proposal?

Rule 21 Screen and Process changes:

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

- Which Initial Review screens would non-export systems definitely pass and/or which screens are not relevant for non-export systems (possibly below a specific size threshold)? Which would they likely pass? Are there special conditions or caveats to recognize?
- Could we pre-study certain parts of the grid to know ahead of time whether a project would pass F and G?
 - o Would certain conditions be needed? If so, how can those conditions be met?
- Can we set a system wide threshold for F and G? Or set a threshold % of ICA value at the point of interconnection?

¹ See WG 1 Report at page 41

(<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M215/K187/215187299.PDF>)

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GRIDWORKS

- Does the same approach work for “charging” as “discharging”? Charging from the grid vs. on-site generation?
- Building on the WG’s definition of Non-export, what projects would qualify as non-export?
 - o Would any inadvertent export be allowed?
- What timelines and fees would apply to projects eligible for a notification-only interconnection agreement?
- What interconnection agreement or other documents are needed to support this approach?
- How could forthcoming reports from the Non-Exporting Storage Facilities Pilot Programs support the proposal?

OUT OF SCOPE

N/A