



# Rule 21 Working Group 2

WEEKLY CALL

---

SEPTEMBER 12, 2018

REMOTE ACCESS:

[HTTP://WWW.UBERCONFERENCE.COM/GRIDWORKS/](http://www.uberconference.com/gridworks/)

# Agenda

---

Intro and overview

Scoping/Scheduling Motion

Issue 10

- Open to stakeholders for discussion.

Issue 11

- Updates on non-exporting pilots (IOUs to present summaries of Advice Letters)
- Draft proposal to be discussed 9/19

Next Steps

# Introduction

---

CPUC

# Scoping/Scheduling Motion

---

CALSSA proposed motion

# Issue 9

---

What conditions of operations should the Commission adopt in interconnection applications and agreements to allow distributed energy resources to perform within existing hosting capacity constraints and avoid triggering upgrades

## [Issue 9 Proposal](#)

Three comments received:

1. [CALSSA](#)
2. [TURN](#)
3. [Public Advocates Office of the Public Utilities Commission](#)

# Issue 10

---

How can the Commission coordinate the Integration Capacity Analysis and each Utility's Rule 21 processes with the Rule 2, Rule 15, and Rule 16 processes in order to improve efficiency of the overall interconnection process? This is a coordination issue at this time. However, modifications to Rules 2, 15, or 16 will be addressed if necessary

**Open to stakeholders for discussion.**

# 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?

# Expedite NonExport Storage Pilot Results

## Working Group 2

September 12, 2018



Together, Building  
a Better California



- [AL 5371-E](#) (8/31/2018) Information-Only Report on Rule 21 Expedited Non-Export Storage Pilot
- Reports on a one-year pilot proposed to develop experience with, and monitor results of PG&E's expedited interconnection review expedited interconnection process modifications described in AL 4941-E (10/26/2016) & AL 4941-E-A (2/1/2017).
- The pilot period was from July 1, 2017 to June 30, 2018.
- PG&E agreed to provide a status report via submittal of a future Advice Letter on or before September 1, 2018 to share its findings.
- This topic Working Group 4. in the R.17-07-007
  - Item 25: "Should the Commission make any revisions to the expedited process for eligible non-exporting storage facilities in response to pilot program data collected by the Utilities between July 1, 2017 and June 30, 2018, in order to support tariff principles of technological neutrality and consistency across the Utilities?"



# Goal of Pilot

“PG&E’s focus in making this proposal is to continue to build on significant process improvements underway, specifically the building of the modular tool to streamline interconnection application submission.

As noted, the scope of the software platform effort embraces everything from collecting equipment descriptions from Applicants to acceptance of online payments and leveraging other PG&E databases.

In this way PG&E anticipates that the average timeline a given applicant experiences for a storage interconnection will continue to decrease as each new component comes online.

**PG&E believes that this approach will have a more positive impact than prescribing a new, technology specific compliance requirement.** Allowing PG&E to pursue this streamlining approach should enable PG&E to show real progress in decreasing the overall average interconnection times for non-exporting storage.

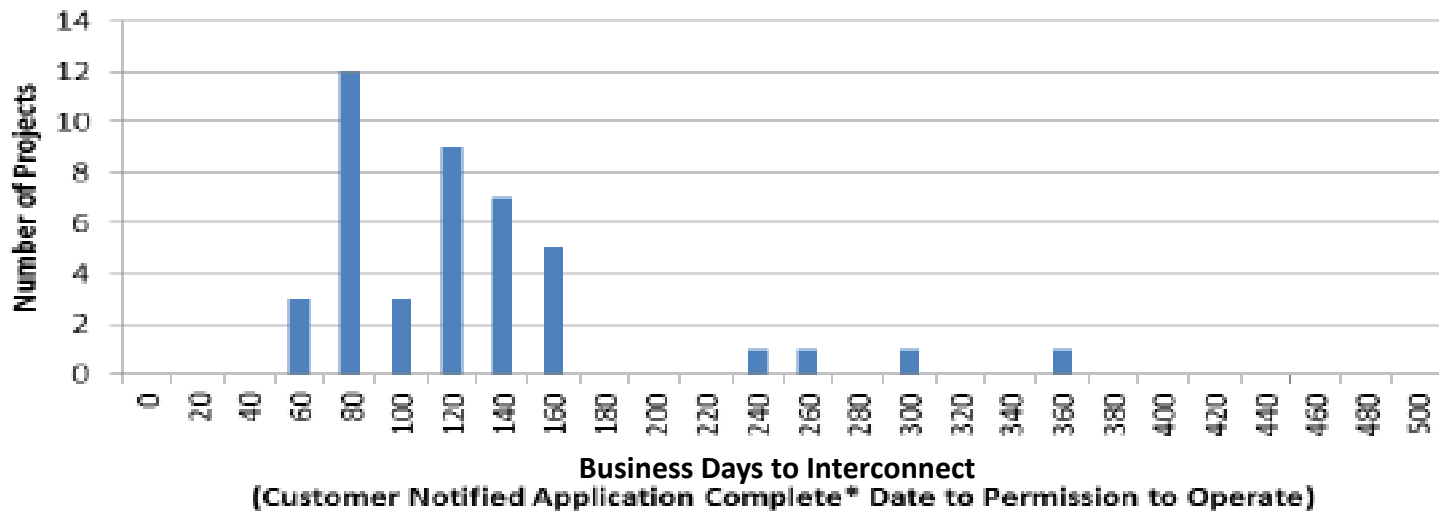
For this reason PG&E requests that existing Rule 21 timelines remain intact so that PG&E can focus on implementing these improvements rather than diverting resources to support an additional and overlapping technology specific compliance timeline.”

0 kw - 500 kw Nonexport Storage Applications (Business Days)	Customer Notified Application Complete to Commercial Online Date			Application Received to Commercial Online Date		
	Count	Average	Median	Count	Average	Median
<b>Interconnected 2015 &amp; 2016</b>	43	117.4	106	43	131.8	117
<b>Interconnected 6/30/2017 - 06/30/2018</b>	79	67.2	46	79	87.2	67
<b>Percent time reduction</b>		42.8%	56.4%		33.8%	42.7%

**Table 1**

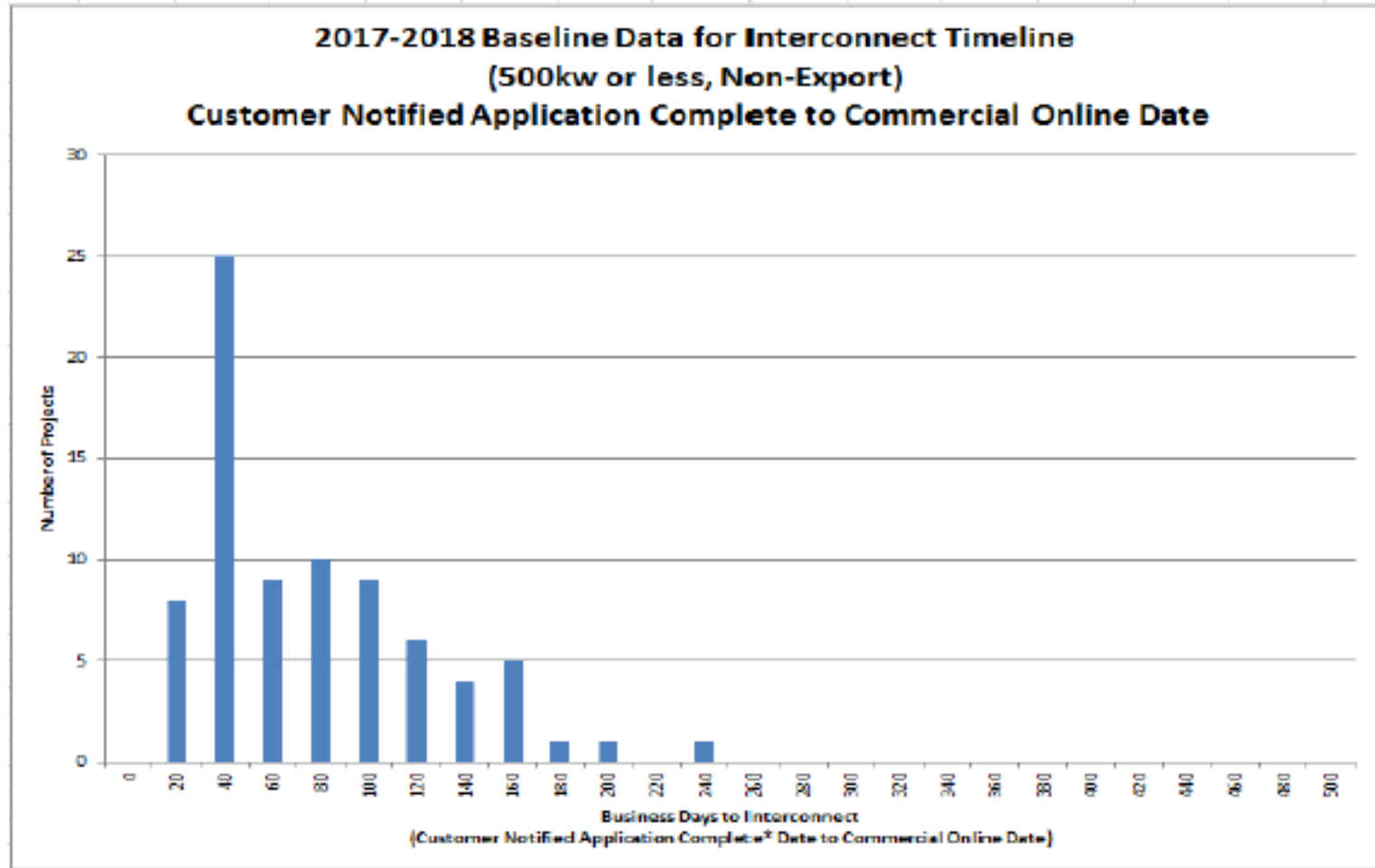
Table 1 includes the average and median times (in Business Days) for the two types of project timelines.

**2015-2016 Baseline Data for Interconnect  
Timeline  
(500kw or less, Non-Export)  
Customer Notified Application Complete to  
Commercial Online Date**

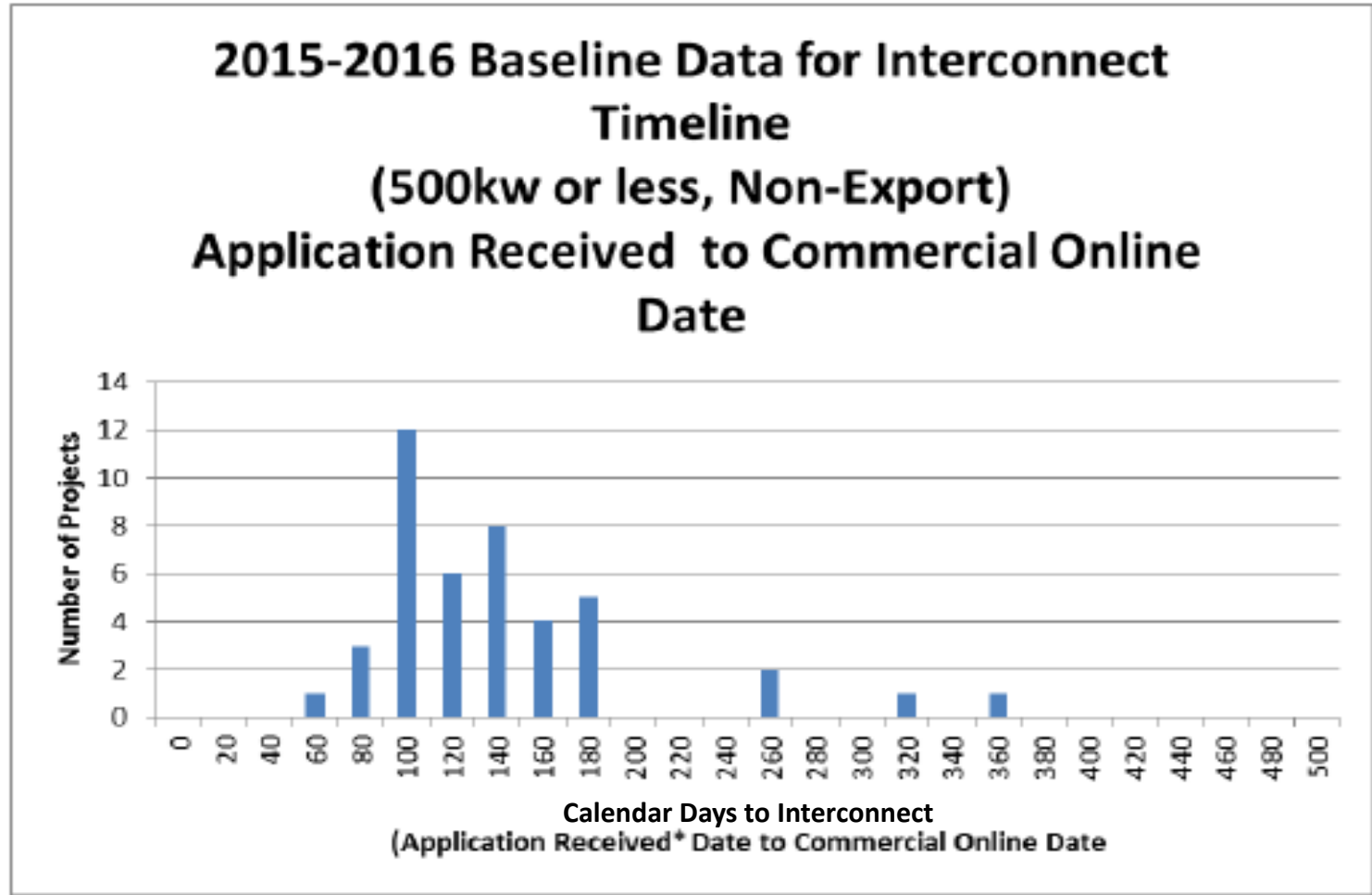


**Chart 1A – pre-pilot**

# Results – from *Customer Notified Application Complete*

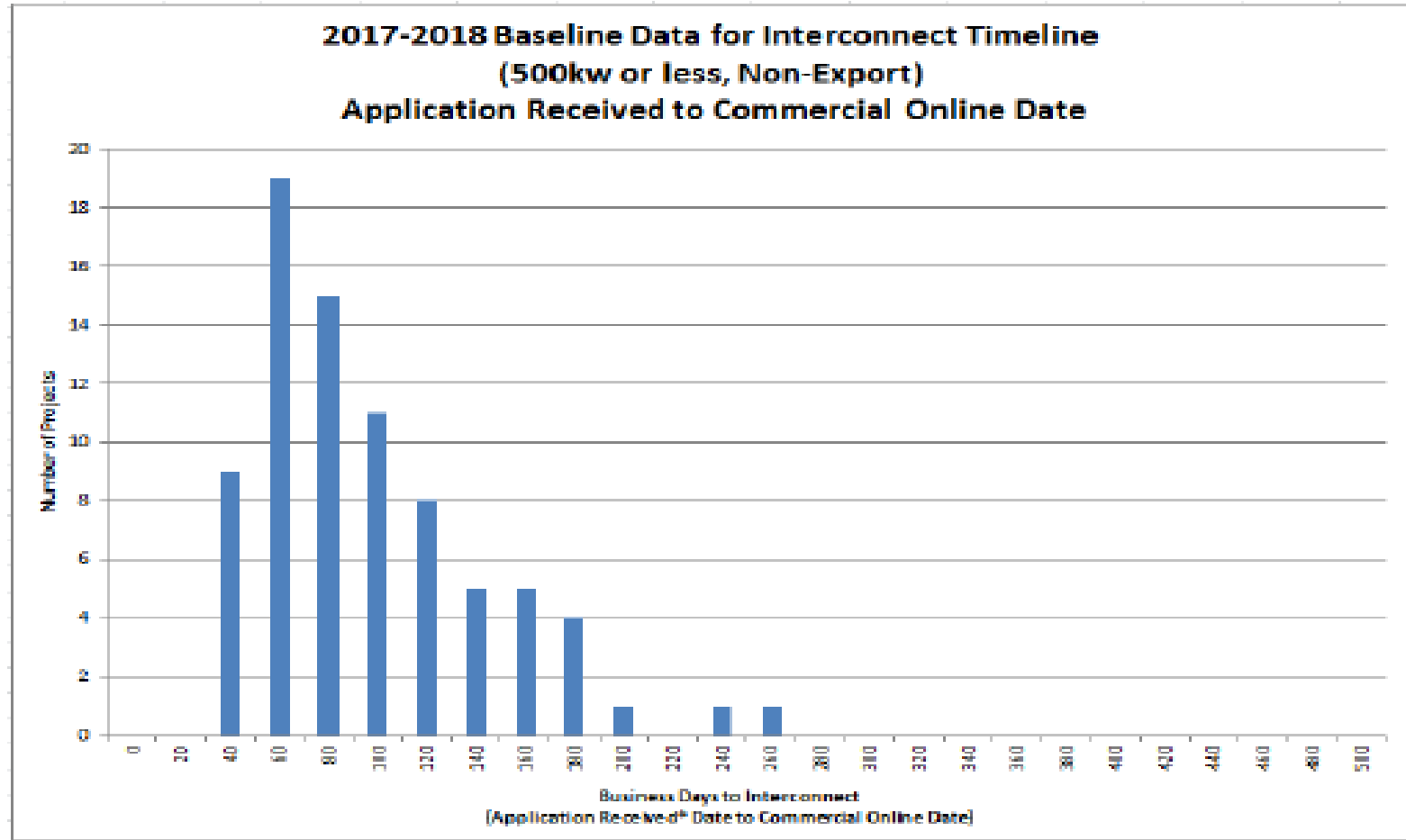


**Chart 1B – post-pilot**



**Chart 2A – pre-pilot**

# Results – from *Application Received*



**Chart 2B – post pilot**

# Schedule

---

## Upcoming milestones:

- 9/17 – Issue 8 V2 comments
- 9/19 – In-person meeting (CPUC Golden Gate room)
- 9/21 – Final Issue 9 proposal & Issue 8 V3
- 9/28 – Issue 8 V3 comments
- 10/1 – Draft Issue 6/10/11 proposals
- 10/4 – Final Issue 8 proposal
- 10/5 – Issue 6/10/11 comments
- 10/8 - Final Issue 6/10/11 proposal
- 10/10 – In-person (CPUC Golden Gate room)
- 10/31 – Final Report filed



# Schedule

Meeting/Deliverable Date	Agenda Items	Notes
8/27: Draft Issue 9 Proposal		Gridworks to WG
8/28: Final WG Input on Issue 8		WG to Gridworks Specific action items reflected in Notes on 8.21 Call
8/29: In-person	1. Draft Issue 9 Proposal (Gridworks) 2. Issue 10 (All)	
8/31: Draft Final Issue 8 Proposal		Gridworks to WG
9/7: WG Comments on Draft Final Issue 8 Proposal and Draft Issue 9 Proposal		WG to Gridworks
9/12: Issue 6 Call (1-2pm) Issue 9/10/11 Call (2-4pm)	TBD	
9/15: Progress Report		PG&E to CPUC
9/19: In Person	Issue 11 Discussion (All)	
9/21: Final Issue 8 and Issue 9 Proposal		Gridworks to WG
10/1: Draft Issue 6/10/11 Proposal		Gridworks to WG
10/3: Issue 6 Call (1-2pm) Issue 10/11 Call (2-4pm)	Draft Issue 6/10/11 Proposal Discussion (Gridworks)	
10/5: WG Comments on Draft Issue 6/10/11 Proposal		WG to Gridworks
10/8: Final Issue 6/10/11 Proposal		Gridworks to WG
10/10: In person	1. Final Issue 10/11 Proposal Discussion (Gridworks, et al.) 2. Clean Up	This will be the final discussion of Issues 6/10/11
10/31: Final Report Filed		Led by Energy Division