



# Rule 21 Working Group 2

IN-PERSON WORKSHOP

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SEPTEMBER 19, 2018

CPUC GOLDEN GATE ROOM

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

# Agenda

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10:00 – 10:30: Introduction

10:30 – 12:00: Issue 11

12:00 – 1:00: Lunch

1:00 – 3:00: Issue 11 (continued)

# Introduction

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Roll call

WG update CPUC

# Issue 11

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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?

[Gridworks scoping document](#)

# Rule 21 Working Group 2: Issue 11

Starting Proposal Outline

# Issue 11

## Question:

*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?*

## Proposal:

The Commission should not adopt a notification-based approach in lieu of an interconnection application at this time. Instead, the Working Group recommends the following

- A) The Commission adopt the Lightning Review process described in this proposal
- B) The Commission directs Working Group 3 to
  - research other instances where notification-based interconnection has been implemented
  - report what lessons and changes would need to be adopted in Rule 21 to effectuate a notification-based approach.

# Conversation Scope

*This is a conversation about what's possible...*

Resulting in

- A vision for an ideal future
- An analysis of the gaps between now and then
- A roadmap to address those gaps

**This conversation does not include:**

- Debate on whether costs are justified / “worth it”
- Discussion on resource prioritization
- Debate on cost responsibility for non-exporting systems and/or applicability of screens beyond Screen I
- Resistance to transparency

# Lightning Review Proposal

Today's discussion: How much can be drawn from current standard NEM process?

- Sub-question: Can the thresholds be raised for non-exporting storage?

Criteria:

- Non-exporting (inadvertent export is allowed?); Located on "Lightning eligible" circuit
- Location screens (e.g. primary vs secondary network)
- Technical screen thresholds

Four main streamlining categories:

- Application submittal to Deemed Complete
- Fully frontloading executable IA
- Technical review by checkbox/lookup with intake/non-technical staff
- Simplifying/eliminating on-site inspection



## Application to Complete

### Concepts:

- Criteria thresholds provided in online maps (screen thresholds, primary vs secondary network, etc)
  - Any necessary criteria not available on maps can be easily accessed online
- Form-based online submission automatically checks for required information
- Forms require all info for Lightning Review **and nothing more**
- Common mistakes are flagged up front before submission
- Applicant provides fee electronically with application (no longer requires waiting for an invoice from utility)

# Frontloading IA

## Concepts:

- Application form requires applicant to fill in necessary fields in the IA template
- Form clearly specifies level of authority at customer org that needs to sign the IA
- IA assumes projects matching criteria will pass Fast Track technical screens
- Common mistakes are flagged up front (e.g. customer business name matches name on retail bill – if not, provide form for applicant to sign to resolve the issue)
- Online portal provides executable IA
- Customer signs the IA as part of submitting application
- At any point, if IA information needs to change, initial signed IA is deleted and new one is issued back to the customer

# Technical Review

| Screen | Screen Name                     | Review method                            | Pre-App Info              |
|--------|---------------------------------|--|---------------------------|
| A      | Network Secondary               | Database lookup?                         | Colored on Map            |
| B      | Certified Equipment             | Certified equipment list                 | List available online     |
| C      | Voltage Drop                    | ??                                       | Available online?         |
| D      | Transformer & Conductor Ratings |  |                           |
| E      | Single-phase generator          | N/A?                                     | N/A?                      |
| F      | Short circuit contribution      | Pre-studied values or general threshold? | Pre-studied values on map |
| G      | Short circuit interrupting      | Pre-studied values or general threshold? | Pre-studied values on map |
| H      | Line Configuration              | Simple comparison?                       |                           |
| I      | Export across PCC               | Varies by Option?                        | N/A?                      |

# Inspection for PTO

## Concepts:

- SCE has done remote inspection successfully for qualifying non-exporting storage projects. Can the criteria be formalized and adopted by other IOUs?
- Can non-technical staff be trained to verify qualifying criteria and examine submitted photos?
- Utility executes the IA and delivery of the IA to the customer serves as the PTO letter. Delivery includes boilerplate language that IA qualifies as a PTO letter for the purposes of financing or other program rules (e.g. SGIP incentive milestones)

# Schedule

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## Upcoming milestones:

- 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<br>Specific action items reflected in Notes on 8.21 Call |
| 8/29: In-person   | 1. Draft Issue 9 Proposal (Gridworks)<br>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)<br>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)<br>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.)<br>2. Clean Up | This will be the final discussion of Issues 6/10/11                      |
| 10/31: Final Report Filed   |   | Led by Energy Division   |