

Rule 21 Working Group 4
Workshop 1 – Follow up Call
February 26th, 2020
Call Notes

Call Agenda:

Time	Duration	Item
1:30-1:50	20 min	Introductions, agenda, regulatory updates, revised schedule
1:50-2:40	50 min	Issue 18 —Submitted questions from parties to IOUs and answers from IOUs —Problem statements
2:40 -3:10	30 min	Issue 19 —Feedback from parties on initial “solutions” that were discussed during 2/12 kick-off meeting —Status of proposals development for 3/11 in-person meeting —Problem statements
3:10 - 3:30	20 min	Issue F —Preliminary comments from parties

Action Items

Issue 18	2/26 XUtility, GPI, CALSSA, IREC to provide follow-up of any unanswered or unclear questions/answers 2/27 Gridworks to forward all questions to IOUs (by 9am) 3/10 IOUs to respond to follow-up questions
Issue 19	2/27 Gridworks to consult with PUC and provide any further guidance to Clean Coalition on its scoping comments 3/6 Issue proponents provide issue proposals (Current proponents: CALSSA/SunStreet/SunPower, GPI, possible Clean Coalition) 3/11 During in-person meeting, reconsider time needed for issue (currently finalizing by 4/14)
Issue F	3/9 All parties provide any initial comments on scope, positions, or background



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1:30-1:50	Introductions, agenda, regulatory updates, revised schedule
<p>No regulatory updates</p> <p>Revised Schedule presented by Gridworks:</p> <ol style="list-style-type: none"> 1. Calls shifted from Wednesday (original schedule) to Tuesday starting with the 4/14 in-person meeting 2. Based on last in person meeting, more time will be given to issue 18 and less time for issue 19 and get started with issue F in this call. <p>Comments on Revised Schedule:</p> <ol style="list-style-type: none"> 1. Sahm White (Clean Coalition) suggested to determine timelines for finalizing issue 19 in next meeting on 3/11. Tam Hunt (GPI) supported the point 	
1:50-2:40	<p>Issue 18</p> <ul style="list-style-type: none"> —Submitted questions from parties to IOUs and answers from IOUs —Problem statements
<p>Answers to submitted stakeholder questions from XUtility, GPI, CALSSA, and IREC were given and discussed by all three IOUs. Additional clarifications were made and these four stakeholders were given the opportunity submit follow-up questions or re-iterate questions for which answers were still forthcoming or missing. From these exchanges, some discussion issues arose that the Working Group we may want to keep on the table:</p> <ol style="list-style-type: none"> 1. “First-come first-served” in terms of paying for mitigation and who adds first (i.e., generator vs. inverter) 2. Are there any common practices that one IOU could adopt from another IOU (i.e., PG&E from SCE), or are practices entirely unique to each IOU? Or at least, explaining the differences among IOUs clearly. 3. Other utilities in other states may use a lower threshold than 40% (of machine generation on a circuit), such as 25%. There was a historical option offered by one utility to do a “risk of islanding study” but this was discontinued. 4. We are concerned in Issue 18 with interconnection of not just solar, but also biomass generators on farms. 	



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5. CALSSA Question #10 regarding the use of SEL-651R relay, would require an individual study for each and every system. There were additional technical details and discussion that parties wanted to offer but the discussion was tabled in the interest of time.

6. CALSSA Questions #12 & 13, accounting for 0.99 power factor, the issue of reactive power matching needs further attention and discussion (“as a last resort”); EPRI said no one has been doing this but there is a 2017 study about it that EPRI doesn’t seem to know about, said parties.

2:40-3:10	<p>Issue 19</p> <ul style="list-style-type: none"> —Feedback from parties on initial “solutions” that were discussed during 2/12 kick-off meeting —Status of proposals development for 3/11 in-person meeting —Problem statements
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1. The session started with a [presentation by SDG&E on new construction applications](#)
2. Briefing note scope item #6 on concurrent studies of solar generation and load for a subdivision is not necessarily true for SCE and PG&E, which already do this, or it’s not a significant issue.
3. We need to look at the issue of “community solar” as part of our scope (non-rooftop, different topic from community-level or subdivision-level studies/planning of both generation and load). Is this a wholesale market or retail market issue?
4. SDG&E said it will research and report back about the requirements for field visits for net metering applications on new construction

3:10-3:30	Issue F preliminary comments from parties
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Operational Requirements of Smart Inverters:

Eric Martinot from Gridworks introduced a [preliminary briefing note](#) and then called for any initial party comments on Issue F scope and process. There was only a few minutes to discuss, so the discussion was deferred to the next in-person meeting. A few party comments were made.

1. CALSSA: there is one issue at the center of Issue F, interconnection use cases to deal with operational flexibility concerns. Can we all agree on those use cases and the limits Rule 21 would



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put on them, such as number of times per year or requirements for notices. And time frame, is it 2 years or 10 years? And what other interconnection use cases should we look at beyond operational flexibility?

2. Roger Salas (SCE): It's too early to discuss this at this point. This is going to happen in future, we need to figure out if we want to get into this discussion now. We are not even close to this point
3. Jason Bobruk (SolarEdge): "aggregators" are mentioned explicitly in the PUC question and should be considered to be in scope. DERMS already exist for smaller systems and it is assumed that they will be necessary for larger aggregated DERs.

Zoom Call Participants: 60 participants

Name & Organization

- Adeel Ahmad, CEC
- Alan Fields, ForeFront Power
- Andrew Salazar, CPUC
- Annie Cwiklinski, Tesla
- Brad Heavner, CALSSA
- Brian Lockett, SunPower
- Brian McCollough, CPUC
- Catarino Vargas, CEC
- Danielle Weizman, SDG&E
- Davis Erwin, PG&E
- Derek Pearson, Artwel-Electric
- Garry Stern, SCE
- Gary Holdsworth, SCE
- Jacqueline Piero, Nuvve
- Jason Bobruk, SolarEdge
- John Berdner, Enphase Energy



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- Josh Gerber, 33 North Energy
- Julian Rojas, SCE
- Lee Trevino, PG&E
- Marc Hutton, 33 North Energy
- Mary Brown, SCE
- Matt Gonzales, PG&E
- Max Ernst, PG&E
- Mazyar Zeinali, XUtility
- Melissa Reed, SDG&E
- Mike Jensen, PG&E
- Nick Lensen, Bear Peak Energy Consulting
- Pat Saxton, CPUC
- Rebecca Davis, Lozeau /Dury LLP
- Roger Salas, SCE
- Rustom Dessai, PG&E
- Steven Sherr, Foundation Windpower
- Sahm White, Clean Coalition
- Sky C. Stanfield, SMW Law
- Sophie Meyer, CPUC
- Steven Rymsha, Sunrun
- Tam Hunt, GPI
- Ted Howard, Utility Advocate
- Tim McDuffie, CalCom Energy
- Todd Farhat, SunStreet
- Travis Snyder, Snyder

