



Rule 21 Working Group Four
Working Group Call Notes, 4/8/2020

Agenda

Time	Duration	Item
1:30-1:45	15 min	Introductions, agenda, regulatory updates, use of Zoom
1:45-2:00	15 min	CALSSA revised Issue 19 proposal -- results of discussions with IOUs
2:00-2:15	15 min	SDG&E Issue 19 counterproposal and convergence with CALSSA proposal
2:15-2:45	30 min	GPI Issue 19 proposal -- clarifications of proposal and discussion
2:45-3:15	30 min	Clean Coalition Issue 19 proposal -- further SLD discussions with SCE
3:15-3:30	15 min	IOU updates provided to Working Group -- PG&E ZNE and SCE GIPT

Action Items: This call was focused on issue 19.

Issue #	Action Items
Issue 19	<p>4/14: All parties come prepared to the meeting with any further comments on Issue 19 proposals by CALSSA, GPI, and Clean Coalition, based on 4/8 call discussions</p> <p>4/13: CALSSA (Brad Heavner) to modify proposal based on one or two points from 4/8 call discussion</p> <p>4/13: GPI (Tam Hunt) to re-write proposal to be specific to ZNE or withdraw it</p> <p>4/13: Clean Coalition (Sahm White) to revise proposal for clarity about what is being proposed, and to consider alternative (threshold) criteria</p> <p>4/13: Any party invited to propose any (threshold) criteria for triggering SLDs specific to ZNE, beyond SLDs already covered by the micro-grid proceeding, in relation to the proposals by CALSSA and Clean Coalition</p>



4/08 Call Notes

1:30-1:45	Introductions, agenda, regulatory updates, use of Zoom
<p>Gridworks (Eric Martinot) has discussed the call agenda with and updates on Zoom issues with the utilities. The next meeting on 4/14 will not be on Zoom and Gridworks will share the alternate meeting information to all parties.</p> <p>Comments from all parties:</p> <p>Tesla (Annie Cwiklinski) mentioned that Tesla participants won't be able to access zoom as well.</p> <p>Regulatory Updates:</p> <p>CPUC (Brian): Appreciated the effort of working group progress and shared the general guidance that the proposals, especially on issue 19 should be specific to ZNE concerns. And issues that are already under consideration shouldn't be discussed here.</p> <p>GPI (Tam Hunt): ZNE was one of those for later discussions from the previous working groups.</p> <p>Tesla (Andy): Any update in terms of the status of the proposed decision on the recommendation on IDF and on WG2 and WG3 expected sometime on Q2, if still stands?</p> <p>CPUC (Sophie Meyer): Those decision are on track as previously announced, the microgrids website report that remains the case in terms of those points on IDF, WG2 and WG3 are on track.</p>	
1:45-2:00	CALSSA revised Issue 19 proposal -- results of discussions with IOUs
<p>CALSSA (Brad Heavner) summarized the CALSSA Revised Issue 19 proposal and shared results and off line discussions with IOUs.</p> <ul style="list-style-type: none"> • CALSSA presented 3 proposals on Issue 19 as previous 2 proposals (proposal 1 and proposal 2) are merged to 1 proposal (Proposal 1) to avoid duplication. The proposal 1 suggests application from the builder using address. SDG&E has already built a two-step process using account IDs with a reasonable way to get account IDs based on addresses, but PG&E is yet to be implemented based on the address. If the customer moves in and set-up service account that shouldn't disrupt the pending application, that utility continues to process the existing application by the builders. SCE and SDG&E are already compliant. The biggest thing to do is setting a schedule for PG&E to implement it. CALSSA suggested 4 months after the final decision. • Proposal 2 is for community applications, it is consistent with the way we discussed previously, in cases where home buyers can change the number up and down, we need to think how to process that. If we provide utilities with information near the beginning of the construction process that is useful to their planning. • Proposal 3 is what the Clean Coalition said about templates. It seems that all utilities are on board and using templates for a) small solar; b) small solar-plus-storage; c) small storage and also under discussion in the microgrid proceeding. If that does, then we don't necessarily need 	



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to discuss it here. [What aspects of ZNE buildings are covered or not covered by existing proceedings?] Since we are thinking about it here, it would be smart to include templates for non-residential systems.

- **Previous proposal 4** is no longer here, we still think that API is a smart idea and that's how modern businesses are done but we set that aside.

Comments on CALSSA Proposal by all parties:

GPI (Tam Hunt): Suggesting that SLDs shouldn't be a size-based limit, instead of configuration-based limit. We had worked with Clean Coalition about ZNE and microgrid proceedings and chart has already been shared with the working group.

CALSSA (Brad Heavner): SDG&E opinion is that their counter proposal is in line with CALSSA proposal 1. But the proposals suggest taking no action. In the case of SDG&E and SCE, that could be the outcome as they are already in compliance, it doesn't mean that we shouldn't adopt proposals for all utilities.

SDG&E (Danielle): we can strike the SDG&E proposal.

SDG&E (Jim Spurgeon): Generally, our comments on proposal 2 doesn't really change as we are not seeing the value in that, 680 application out of 33000. System redesign doesn't make any sense, as our system is working well, and we don't think this would benefit our customers

GPI (Tam Hunt): Our mission here is to open up the field for all types of DERs to meet the state's ambitious goal.

CALSSA (Brad Heavner): There is a misunderstanding, it's not necessarily our position that we think that submission of the information is to be consolidated between load and generation. In general, its one benefit but in proposal, utilities would have information about both load and generation to begin the process. CALSSA is not suggesting combining their systems either in the analysis on their side or in the application submission on our side, both in the beginning of the process. It's not that the entire management of information needs to be reconsidered.

PG&E (Lee Trevino): PG&E agreed with item#1 and mentioned it's already in the scope of work and they are undertaking an IT project. In terms of the timeline suggested as 4 months after the decision would be difficult, knowing the fact that Working Group 1 took one year from final report to decision and Working Group 2 took over 15 months and no decision has yet been made. Using that as a baseline, currently they are looking at the delivery by the end of year 2021, Lee Trevino needs this to review with the IT team to comment further on it. On No # 2: The two steps will continue for SDG&E but should not be replicated for PG&E and we would probably want to consider that might be an interim until we get our final solution by the end of 2021.

Action Item: Lee Trevino to confirm from the IT project team and share the timeline

SunStreet (Todd Farhat): What are you looking/planning to do with the portal?



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PG&E (Lee Trevino): The scope is the ability for developers to submit an application by address, no longer needing to have account number and meter number at the time of the application. Also, the developer will have the ability to submit project based one application instead of multiple applications. And it's not in scope of proposal to combine load and generation, we are planning to include that in the 2021 release, the ability for developers to submit both in one application. We are going to facilitate multiple parties contributing to that application and developers may submit and subset the application; the load section is assigned to another user and generation can be filled out by even a third user.

SunStreet (Todd Farhat): Its substantial investment in the IT and does it include integration of API access?

Lee: Not within this particular scope

SCE (Roger Salas): Proposal 1: More clarification is required on the item mentioned in proposal 1 about extraordinary circumstances "Utilities should issue permission to operate before the homebuyer moves in except in extraordinary circumstances".

CALSSA (Brad Heavner): It's under discussion, whether that is a generally stated goal or any tracking to that, I am open for a discussion.

SCE (Roger Salas): As we are already doing that don't want to add more work to that process. On proposal # 2 about small increase to be allowed – that has already discussed in Working Group 1 Issue # 3. We may not want to go back and change the decision that a new application is required.

CALSSA (Brad Heavner): It's about new construction, the question is if there is a new subdivision, a transformer is installed and later need to change it at rate payer expenses in case of any change, because that wasn't clear at the start.

CALSSA (Brad Heavner): It sounds in case of any change in the system size, you pull up the application of that specific resident and start it all over again?

SCE (Roger): We have various scenarios on scenario on increasing capacity that should be a new application

CALSSA (Brad Heavner): if community level application, any individual application with specific addresses and designs associated with that addresses, would have to be plugged out.

SCE (Roger): if a particular application decides to change the size, then would request modification in the application and go through the application process.

PG&E (Lee): At a production sub divisions if you have x different models for the customers to choose from, then we would design our facility with that plan and on the sub division if there is need of some sort of individual modification, that's not of a big deal to address

CALSSA (Brad Heavner): Proposal 1 is the more immediate and proposal 2: we are comfortable being in entirely different time frames, but it should be done here instead of bringing back again.



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Clean Coalition (Sahm White): In case of any change in one house, is it the case that the entire group doesn't need to change and just that one application will be processed?

PG&E (Lee Trevino)- In case of PG&E, there is no need to withdraw the entire project .

SCE (Jennifer): We currently don't have an application process for multiple units, so no comments.

2:15-2:45 | GPI Issue 19 proposal -- clarifications of proposal and discussion

Tam Hunt (GPI) summarized all 4 points from the [GPI proposal](#)

Question/Comments on GPI Proposal by all parties:

SCE (Roger Salas): All of these issues (automation screening and fast track)were discussed in issue 11, Working group 2, its a duplicate effort and potentially have different resolution, It looks is out of scope, I don't see difference between ZNE/Non ZNE they are all DER s, they are all connected to the same grid and follow the same automation and interconnection process.

GPI (Tam Hunt): WG report says specifically that these issues were introduced for later discussions. GPI believes that this is a part of later discussion.

SCE (Roger Salas): Follow up discussion is fine, but we will be looking for automation for all projects, not just ZNE.

CPUC (Sophie Meyer): Suggest discussing ZNE specific issues, only those will be considered. The additional discussion does not necessarily mean to discuss under issue 19. The 5 points in the GPI proposal seem to be out of the scope to me and CALSSA proposal seems ZNE specific.

Clean Coalition (Sahm White): Agree that scoping requires specify related to ZNE. The changes should be implemented within this topic and commission should determine if they should be applied more broadly. The discussion should be on ZNE instead of whether changes made for ZNE would be applied broadly. Suggested recognizing the issues now when the IT systems are updating instead of later where IT systems are already modified.

Sophie: In terms of the next step with these proposals, suggested to redraft the way that they apply to ZNE applications. The written guidance from commission is the memo and it's clear that it's related to ZNE applications and the automation roadmap is not within the scope.

GPI (Tam Hunt): issue 19 scope of streamline interconnection of ZNE, and GPI takes as automation as part of streamlining.

SCE (Roger Salas): on point 4, this has already addressed in the previous issue to combine initial review and supplementary review.

2:45-3:15 | Clean Coalition Issue 19 proposal -- further SLD discussions with SCE

Sahm White (Clean Coalition) presented a revised [Clean Coalition Proposal on issue 19](#)

On the configuration template, to avoid duplications with microgrid proceeding, we identified the gaps between ZNE and microgrid proceedings. Our goal here is to establish the criteria to



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offer additional template., if we establish the criteria, in a year or two we will come up with a template. We don't need to consider every possible configuration today.

Summary of gap analysis: As discussed with Roger the standard template would not be useful for permitting application, as they need more detail design than we have here, however it may serve a foundation. not supplement, nonetheless interconnection process. Currently PG&E already deploys a standard single line diagram for NEM Photovoltaic (PV) applications less than or equal to 30 kW. SDG&E also uses single line diagram templates for stand-alone PV systems applying for interconnection. Neither PG&E nor SDG&E provide this for NEM-paired storage (DC or AC coupled) or for Rule 21 non-export storage. SCE currently does not use a template diagram for any scenario; consequently, all projects require a custom diagram to be submitted.

A list of applications was shared by Sahm that are fully and partially covered in microgrid proceedings and also the applications that are not addressed. The main issue he suggested is to develop a criterion about when the additional templates are required in order to streamline the process. Also specify a threshold of applications related to ZNE applications in a year that would require the application of standard design.

Comments on Clean Coalition Proposal by all parties:

SCE (Gary): Past performance does not guarantee future performance. Suggested to consider volume plus standardized generating facilities / storage facilities as a threshold than a number-based criteria any given year.

SCE (Roger): Suggested that these proposals don't really address ZNE and avoid repetitions. We proposed SLD Templates that would address about 95% of applications. More complex applications, especially larger applications, each SLD is different. We already have sufficient SLD templates at the moment for smaller projects.

Clean Coalition (Sahm White): We have to identify the threshold and figure out how much effort and benefit we get out of those standard templates.

GPI (Tam Hunt): Standard SLD is a major cost saving step in a wholesale context, rare in ZNE context, Regarding the %age numbers mentioned by Roger, in policy perspective it's the size that matters more than number. I believe that the existing projects are heavily dominated by small projects

SDG&D (Danielle): Having a standard template won't make it easier for developers. We have to be clear that in order to get an electrical permit, a developer has to develop a set of plans including SLDs. There is a difference between uploading what you are already paid to develop and clicking on a box. We support that and we have standardized SLDs, however the concern is our customer generation team sees in the field, where developers who are constructing these facilities have installations done in wrong locations so they end up failing the inspection.

Clean Coalition (Sahm White): Submit interconnection application earlier than permit application comes later. Therefore, those SLDs would allow the parties to avoid some part of the expense.

CALSSA (Brad Heavner): we have no objection to what Clean Coalition is proposing, and we welcome a duplication.



Meeting total Participants: 47+ participants (list below is missing some participants)

Adeel Ahmad, CEC	Jin Noh, CESA	Rainier Solanzo, Bloom Energy
Abtin Mehrshahi CEC	John Berdner, Enphase Energy	Rebecca Davis, GPI
Andy Schwartz, Tesla	Kathryn Enright, SCE	Rehana Aziz, Gridworks
Annie Cwiklinski, Tesla	Katie Wu, Gridworks	Roger Salas, SCE
Brad Heavner, CALSSA	Lee Trevino, PG&E	Rustom Dessai, PG&E
Brian Lucket	Marc Hutton, Public Advocates Office	Sahm White, Clean Coalition
Brian McCollough , CPUC	Max Ernst, PG&E	Sophie Meyer, CPUC
Danielle Weizman, SDG&E	Mazyar Zeinali, XUtility	Steve Sherr, Foundation Windpower
Eric Martinot, Gridworks	Nick Lenssen, Bear Peak Energy Consulting	Tam Hunt, GPI
Gary Stern, SCE	Patrick Saxton, CPUC	Ted Howard, Small Business Utility Advocate
James Mater		Todd Farhat, SunStreet
Jim Spurgeon, SDG&E		Travis Snyder