

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's
own motion to improve distribution level
interconnection rules and regulations for certain classes
of electric generators and electric storage resources.

Rulemaking 11-09-011
(Filed September 22, 2011)

**PACIFIC GAS AND ELECTRIC COMPANY NOTICE OF COMMUNICATION
WITH DIRECTOR OF ENERGY DIVISION
[CONFIDENTIAL ATTACHMENT NOT INCLUDED]**

Pursuant to D.14-11-041, Pacific Gas and Electric Company (PG&E) hereby gives notice of the following communication. The communication occurred on Monday, February 2, 2015 at approximately 3:14 p.m., by email to the offices of the California Public Utilities Commission (CPUC).

Caitlin S. Henig, Senior Case Manager, Regulatory Affairs, PG&E, submitted the *Pacific Gas and Electric Company Interconnection Data Quarterly Report Submitted February 2, 2015* (Q4 Report), to Edward Randolph, Director, Energy Division, as required by D. 14-04-003, Ordering Paragraph 3. The communication included 1) a public version that is intended to be posted publically, 2) a non-public version that is identical to the public version except that it references the confidential attachment and, 3) a confidential attachment to the non-public version providing customer specific interconnection data. Both public and non-public versions of the report are attached. The confidential attachment is not included with this notice.

PG&E is concurrently filing a motion for leave to file the confidential attachment under

seal.

This notice is concurrently being provided to Edward Randolph, Director, Energy
Division.

Respectfully submitted,

/s/ Meredith E. Allen

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Attachments

Dated: February 5, 2015

Public Version of
Pacific Gas and Electric Company Interconnection
Data Quarterly Report Submitted February 2, 2015

Part I:

Pre-Application Reports Reporting:

a- Total since Rule 21 Revision in September 2012 (9/13/12-12/31/14)	b- Total for Fourth Quarter 2014 (10/1/14-12/31/14):
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	9/13/12-12/31/14	10/1/14-12/31/14
Number requested:	203	36
Number issued:	185	32
Number currently in process:	3	3
Number withdrawn (if any):	13	0

Rule 21 Fast Track Reporting:

Rule 21 Fast Track applications received (9/21/2012 -12/31/14)	Rule 21 Fast Track applications for Fourth Quarter 2014 (10/1/14-12/31/14)
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Initial Review

- a. Number of Fast Track Applications received for **all** types of generating facilities:

Non-Queued: 84,576	15,598
Queued: 338	59
From Rule 21 Reform to 4Q 2014	4Q 2014

Queued projects represent non-NEM Interconnection Requests that would be placed on the PG&E Public Queue upon being deemed complete and receipt of a queue position.

- b. Number of Fast Track applications received for exporting generating facilities only (excluding Net Energy Metering and non-export):

144¹	8
From Rule 21 Reform to 4Q 2014	4Q 2014

- c. Number of Fast Track applications for exporting generating facilities that successfully passed Initial Review, where success is defined by passing all Initial Review screens:

3	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- d. Number of Fast Track Applications for exporting generating facilities currently being evaluated in Initial Review.

1

- e. Number of Fast Track applications for exporting generating facilities that failed Initial Review:

- i. If the total set out in B does not equal the totals set out in C + E, please explain why:

107	4
From Rule 21 Reform to 4Q 2014	4Q 2014

There was 1 project which was a reapplication and requested to go straight to Supplemental Review and did not go through the Initial Review Process.

There were 31 projects that applied but withdrew prior to completing the application process and as such were not given queue number or Initial Review Results.

Additionally, 1 project is going through the Application Review process for Fast Track and has not yet been assigned a queue number to begin the study process.

- f. Number of Fast Track Applications for exporting generating facilities for which a Results Meeting following Initial Review has taken place:

38	0
From Rule 21 Reform to 4Q 2014	4Q 2014

¹ An additional 3 projects that applied and were withdrawn before completing the application portion of Rule 21 were not correctly identified as Export applications. These projects are now accurately represented in the project counts.

- g. Please indicate the top three most frequently failed Initial Review screens in descending order.
1. Screen J: Is the Generating Facility \leq 11kVA?
 2. Screen M: 15% line section peak load check
 3. Screen I: Will power be exported across the PCC?
- h. If possible, please write three recommendations describing how an interconnection customer might apply for Fast Track in a way that would avoid failing the top three most frequently failed screens:
1. Screen J (Is the Generating Facility \leq 11kVA?): The Generating Facility will have a minimal impact on fault current levels and any potential line over-voltages from loss of Distribution Provider's Distribution System neutral grounding if it is \leq 11kVA. However, no action is needed because we can proceed and complete the IR even if this screen fails.
 2. Screen M (15% line section peak load check): Is the aggregate Generating Facility capacity on the Line Section less than 15% of Line Section peak load for all line sections bounded by automatic sectionalizing devices?
 - a. Utilize the Pre-Application report to determine the location of the project in order to avoid other queued/existing generators.
 - b. Reduce the generation size
 - c. Proceed to Supplemental Review because this project may still pass the Fast Track process.
 3. Screen I (Will power be exported across the PCC?): If it can be assured that the Generating Facility will not export power, Distribution Provider's Distribution or Transmission System does not need to be studied for load-carrying capability or Generating Facility power flow effects on Distribution Provider voltage regulators. It is important to note that the customer can choose to apply as Non-Export. However, it is not needed because we can proceed and complete the IR even if this screen fails.
 - a. Proceed to Supplemental Review because this project may still pass the Fast Track process.

Supplemental Review

- i. Number of Fast Track Applications for exporting generating facilities that have requested Supplemental Review after failing Initial Review.

93

From Rule 21 Reform to 4Q 2014

4

4Q 2014

An additional customer skipped Initial Review and went straight to Supplemental Review upon being deemed complete and being assigned a queue position since it was a resubmittal. This would bring the total number of requested Supplemental Reviews to 94.

- j. Number of Fast Track Applications for exporting generating facilities currently being evaluated in Supplemental Review.

2

- k. Number of Fast Track Applications that have successfully passed Supplemental Review, where success is defined as passing all screens:

45	1
From Rule 21 Reform to 4Q 2014	4Q 2014

- l. Number of Fast Track applications that successfully passed Supplemental Review and received a GIA:

41	2
From Rule 21 Reform to 4Q 2014	4Q 2014

The number may differ from part K because the timing is based on the delivery of the Interconnection Agreement to the Customer and not the date of study delivery.

- m. Number of Fast Track Applications that withdrew before supplemental review began:

26	3
From Rule 21 Reform to 4Q 2014	4Q 2014

- n. Number of Fast Track projects withdrew after supplemental review began:

38²	6
From Rule 21 Reform to 4Q 2014	4Q 2014

These numbers represent projects that withdrew after beginning the supplemental review. This includes projects that withdrew after completing the supplemental review as well.

Two projects that are not included in the total count withdrew after completing the supplemental review and transitioning to FERC jurisdiction in the Interconnection Agreement phase of the projects.

- o. Please indicate the two most frequently failed Supplemental review screens:

Answer provided applies to both quarter review and from Rule 21 reform to EOY 2013

1. Screen N: Penetration Test
2. Screen P: Safety and Reliability Tests

² One project withdrew at the end of the 3rd Quarter 2014 that was not included in the count for the 3rd Quarter report. The total count now includes that project.

- p. If possible, please indicate 2 recommendations describing how a developer might request a fast track interconnection that would avoid failing the two most frequently failed supplemental review screens.

For both failed screens, the following is recommended:

1. Use the Pre-Application report to determine load levels of the line section as well as capacity to determine generating facility size.
2. Connect as close to the substation as possible
3. Design the generating facility site such that the point of interconnection is on the main line and not on a tap line extension.

- q. Number of Fast Track projects that signed GIAs:

35³	2
From Rule 21 Reform to 4Q 2014	4Q 2014

These numbers reflect the number of Fast Track projects where the customer has signed the GIA and has not converted to a FERC jurisdictional Interconnection Agreement.

Additionally, 10 projects (4 of which are Fast Track) have transitioned from CPUC to FERC jurisdiction and have converted from Rule 21 to Wholesale Distribution.

Distribution Group Study Detailed Study Process

A distribution group study is appropriate in certain situations, such as when multiple projects apply to interconnect within close proximity. A group study allows the projects to be studied together in order to equitably allocate distribution upgrade costs.

Q4, 2014 - There are no active groups at this time. The next Distribution Group Study Window is scheduled to open on March 1, 2015.

Accounting of Exemptions from Rule 21 Interconnection Fees, Including the Value of Those Exemptions

In accordance with the Public Utilities Code Section 2827 and D.02-03-057, NEM customer generators are exempt from interconnection application fees, supplemental review fees, costs for distribution upgrades and standby charges. The accounting of NEM interconnection exemptions, starting in November 2013, will be reported to the Commission and the service list of the R.12-11-005 proceeding pursuant to the Commission’s Resolution E-4610 and Decision (D.) 14-05-033 on September 19, 2014 and will be updated on June 30, 2015.

The report can be found at:
http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_4498-E.pdf

³ A FERC project was incorrectly included in the total count for 3rd Quarter 2014 and has now been removed from the total count.

Ombudsman Role and Dispute Resolution Reporting:

- a. Number of phone calls that the Ombudsman has received from September 2012 to date (calls related to Rule 21 issues that were within the Ombudsman’s responsibilities or function):

3	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- b. Number of emails the Ombudsman has received from September 2012 to date:

9	2
From Rule 21 Reform to 4Q 2014	4Q 2014

- c. Number of cases that the Ombudsman took an active role in handling: (“active role” means the Ombudsman sought out information from another source to provide that information to an interconnection customer or other third party)

4	2
From Rule 21 Reform to 4Q 2014	4Q 2014

- d. Number of disputes initiated in writing by a Party that invokes Rule 21, Section K.2 Dispute Resolution Procedures (DRP).

1	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- e. Number of disputes resolved within 45 calendar days of the original notice.

1	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- f. Number of disputes where an additional 45 days was sought for resolution (second part of original question e).

0	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- g. Number of disputes mediated by a member of the CPUC’s ALJ Division:

0	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- h. Number of disputes mediated by an outside third-party mediator:

0	0
From Rule 21 Reform to 4Q 2014	4Q 2014

- i. Number of disputes in which a Formal Complaint has been filed at the CPUC and served on the IOU:

0

From Rule 21 Reform to 4Q 2014

0

4Q 2014

Confidential Attachment to
Pacific Gas and Electric Company Interconnection
Data Quarterly Report Submitted February 2, 2015
[Not Included]