

**Part I:**

**Pre-Application Reports Reporting:**

	<b>a- Total since Rule 21 Revision in September 2012 (9/21/12-03/31/2020)</b>	<b>b- Total for First Quarter 2020 (01/01/2020-03/31/2020):</b>
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	<b>9/21/12-03/31/2020<sup>1</sup></b>	<b>01/1/2020-03/31/2020</b>
<b>Number requested:</b>	1273	44
<b>Number issued:</b>	1172	31
<b>Number currently in process:</b>	43	10
<b>Number withdrawn (if any):</b>	55	2

**Rule 21 Fast Track Reporting:**

<b>Rule 21 Fast Track applications received (9/21/12-03/31/2020)</b>	<b>Rule 21 Fast Track applications for First Quarter 2020 (01/01/2020-03/31/2020)</b>
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**Initial Review**

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

<b>Non-Queued:</b> 440,994 <sup>2</sup>	20,408
<b>Queued:</b> 1,412	59
From Rule 21 Reform to Q1 2020	Q1 2020

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.

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<sup>2</sup>Q4 Reporting discrepancy has resulted in a higher number of applications for Q1 Report

<sup>3</sup>PG&E has identified there is a discrepancy in the count, 3 projects unexplained, and is researching the cause.

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

<b>271</b>	<b>5</b>
From Rule 21 Reform to Q1 2020	Q1 2020

- 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:

<b>3</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

**0**

- 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:

<b>163<sup>3</sup></b>	<b>1</b>
From Rule 21 Reform to Q1 2020	Q1 2020

There were **10** Projects that applied but withdrew prior to receiving the Initial Review Results.

There were **92** projects that applied but withdrew prior to either 1) completing the application process and as such were not given queue number or 2) receiving the Initial Review Results.

Additionally, **0** projects are going through the Application Review process for Fast Track and have 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:

<b>76</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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- 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 I: Will power be exported across the PCC?
  3. Screen M: 15% line section peak load check
- 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 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.
  3. 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.

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### Supplemental Review

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

<b>112</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

**1**

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

<b>61</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>54</b>	<b>1</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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:

<b>49</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>67</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

- 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

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- 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:

<b>44</b>	<b>1</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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.

### **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.

### **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 has been updated on June 30, 2015.

Pursuant to D.16-01-044 and after discussion with the Energy Division, it was determined that the IOUs shall continue reporting of the NEM exemption on a yearly basis on September 19. The first yearly report occurred on September 14, 2014 containing data from November 1, 2013 through August 31, 2014. The next report will occur by September 19, 2020 with data from August 2019 through July 2020.

The 2018 report can be found at:

[https://www.pge.com/tariffs/assets/pdf/advicelatter/ELEC\\_5398-E.pdf](https://www.pge.com/tariffs/assets/pdf/advicelatter/ELEC_5398-E.pdf)

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**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):

<b>71</b>	<b>12</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>208</b>	<b>32</b>
From Rule 21 Reform to Q1 2020	Q1 2020

- 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)

<b>283</b>	<b>44</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>5</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>5</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>0</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>0</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>0</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

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

<b>0</b>	<b>0</b>
From Rule 21 Reform to Q1 2020	Q1 2020

### **COST ANALYSIS:**

For the five third-party owned, exporting generating facilities that have most recently completed the interconnection process under Rule 21 and have all of the following data points known: (If the data does not exist for five recently completed interconnection applications, please complete as many cells as possible with data from interconnection applications soon to be completed to reach a total of five.)

- a. Project size; project technology; and date that interconnection evaluation was completed, defined as the day that the project file was closed.
- b. Preliminary interconnection upgrade cost estimate provided to the interconnection customer and title of the document on which the information was transmitted:
- c. First revised interconnection upgrade cost estimate and title of the document on which the information was transmitted (if any):
  - i. What are the three most significant drivers or triggers of changes in the cost estimate from B to C?
- d. Second revised interconnection upgrade cost estimate & the title of the document on which the information was transmitted (if any):
  - i. What are the three most significant drivers or triggers of in the cost estimate from C to D?
- e. Interconnection upgrade cost estimate provided on GIA documentation:
- f. Actual interconnection upgrade cost & the title of the document on which the information was transmitted:
  - i. What are the three most significant drivers or triggers of between the GIA estimate and the actual upgrade costs?
- g. Amount of true-up either returned to interconnection customer OR billed to interconnection customer:
  - i. Date of commencement of true-up process and mailing date of true-up document:
- h. If possible, please indicate top issue, in project manager's opinion, for the overall length of the project's lifespan:

**In response to the Cost Analysis Request for Data Point of Third-Party Owned generators, the Confidential attachment "2. PGE Quarterly Rule 21 Data Report 2020 Q1 Cost Data- CONF" is provided to the CPUC pursuant to the attached Confidentiality Declaration entitled "PGE Quarterly Rule 21 Data Report 2020 Q1 Confidentiality Declaration"**

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