BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider
Streamlining Interconnection of Distributed
Energy Resources and Improvements to Rule 21.

Rulemaking 17-07-007
(Filed July 13, 2017)

JOINT RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
AND PACIFIC GAS AND ELECTRIC COMPANY (U 39-E) TO ASSIGNED
COMMISSIONER’S AMENDED SCOPING MEMO AND JOINT ADMINISTRATIVE
LAW JUDGE RULING

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Dated: December 3, 2018
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STATE OF CALIFORNIA

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INTRODUCTION

Pursuant to the Assigned Commissioner’s Amended Scoping Memo and Joint Administrative Law Judge Ruling,¹ Southern California Edison Company (“SCE”) and Pacific Gas and Electric Company ("PG&E") respectfully submit these responses² to the questions raised therein.

RESPONSES TO QUESTIONS

Question One: In your opinion, what is the most efficient and appropriate way for the Commission to timely resolve the issues in the scope of this proceeding while ensuring that new issues are not ignored?

SCE and PG&E appreciate the Commission’s efforts to move forward with the important interconnection issues presented within this proceeding, and to provide stakeholders additional

² Counsel for PG&E have authorized counsel for SCE to file and serve this joint response on their behalf.
time to address these complex issues by, among other things, setting certain issues for resolution in the Interconnection Discussion Forum ("IDF").³

SCE and PG&E believe that the Commission should remain focused on resolving the issues that are currently within the scope of this proceeding, as determined by the Amended Scoping Memo dated November 16, 2018, which set the proceeding to be resolved by mid-2020.⁴ Doing so will provide the most efficient and appropriate way for the Commission to timely resolve the complex issues already in the scope of this proceeding. As the Commission itself has recognized, “a changing scope may waste resources and create uncertainty.”⁵ For these reasons, SCE and PG&E recommend both that no further issues be added to the scope of this proceeding, and that going forward, any issues outside the current scope be scoped in a future proceeding.

Declining to add new issues to the scope of this proceeding does not mean that new issues will be ignored. Instead, SCE and PG&E recognize that technologies are continuously changing, which could require evaluation of whether these technologies should be integrated into existing processes. Accordingly, SCE and PG&E believe that the Commission should have a separate venue, such as the IDF, where new issues can be discussed, and stakeholders can determine whether they should: (i) make minor modification(s) to the process via advice letters (if required), or (ii) propose that an issue be considered as a candidate for a future Rule 21 OIR.

The IDF was developed to “provide an informal, recurring venue for stakeholders to explore a wide variety of issues related to interconnection practices and policies,”⁶ including, for example, issues relating to utility implementation of Commission orders or related items. The IDF thus provides a useful forum to work through emerging implementation matters, along with a venue for discussion to assist with stakeholder questions and common understanding. The IDF does not, however, provide an avenue for stakeholders to “develop or submit formal

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³ Issues 14, 17, 21, 25, 26, and C will be resolved in the IDF because these issues are “out of the scope of this proceeding as the resolution of these issues do not require a Commission decision.” See Amended Scoping Memo, at p. 9.

⁴ See Amended Scoping Memo, at p. 14.

⁵ Amended Scoping Memo at p. 12.

recommendations for tariff changes to an open Commission proceeding[.]” nor does the IDF “have the authority to alter or require new interconnection policies, practices or requirements that are not otherwise established by a Commission decision or resolution via a public proceeding.”

SCE believes that new issues could be evaluated in the IDF, and a process to resolve the issues could be established in that forum.

In sum, while SCE and PG&E do not recommend that new issues be added to the scope of this proceeding, SCE and PG&E believe that the IDF may be an appropriate forum to discuss new issues and determine the best process to resolve the issue(s).

Question Two: How can the Interconnection Discussion Forum be better utilized to address arising issues during the life of this proceeding and afterwards?

As discussed within the response to Question One, the IDF could provide a venue to resolve appropriate procedural issues and/or address questions regarding utility practices in a timely manner. Furthermore, the IDF could also be used as a platform to discuss new issues and work towards mutual stakeholder understanding of the new issue presented, how to best solve it, and suggestions for a proposed procedural path to resolve the new issue. This process will assist in allowing proper scoping related to the current rulemaking proceeding and expected future rulemakings.

Question Three: What is an appropriate amount of time for technical issues to be vetted by the Interconnection Discussion Forum in order to determine whether they should be resolved with Commission intervention?

SCE and PG&E believe that there are several technical issues that can be resolved by discussion in the IDF, and as necessary, referral to the Smart Inverter Working Group (“SIWG”) and related member technical expertise. SCE and PG&E, however, recommend that if such discussions extend more than two IDF meetings (assuming such meetings remain on a quarterly basis), with the first meeting to discuss questions regarding the issue presented and the second meeting to resolve and/or propose a procedural regulatory path forward as discussed in the response to Question Two, then, if there is not resolution after the second meeting, stakeholders would be permitted to seek Commission interaction to resolve the impasse.

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2 Id. at Exhibit A, p. 25.
Question Four: What parameters should the Commission adopt for determining when the Commission should weigh in on technical issues?

The Commission should allow technical stakeholders from various venues—including, for example, the IDF and the SIWG—to determine when Commission intervention to technical issues is needed, and to request such intervention. The Commission should then use all of the technical information from the various technical discussion(s) to weigh in on the technical process.

Question Five: Should the Commission consider implementing a recurring, cyclical review process via a formal rulemaking proceeding for evaluating emerging or ongoing concerns regarding interconnection rules, policies, and procedures that are not resolved via the Interconnection Discussion Forum or the Expedited Interconnection Dispute Resolution process?

SCE and PG&E are open to discussing whether the Commission should implement a recurring, cyclical review process to consider refinements to the Rule 21 interconnection process. In particular, SCE and PG&E would welcome discussing whether practices that have been utilized in other Commission proceedings or utilized by the California Independent System Operator⁸ should be implemented in a future interconnection rulemaking. SCE and PG&E are cognizant, however, of the fact that IOUs and other stakeholders will need adequate time to implement Commission-ordered processes, programs, and changes that result from a formal rulemaking. Before the Commission implements any such recurring, cyclical review process, additional discussions should take place, including discussions about the need for a process to ensure that only a limited number of prioritized issues are considered in scope for each cycle. These additional discussions must be conducted before SCE and PG&E can support the implementation of a recurring, cyclical review process for Rule 21 interconnection issues.

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⁸ See e.g., R. 17-09-020, Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years, issued October 4, 2017, at pp. 4-5 (“limit[ing] the number of refinements to be considered in this proceeding” “[i]n order to provide focus on the highest priority refinements,” and requesting that stakeholders “identify and prioritize no more than ten issues … [to] be addressed in this proceeding”); http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.asp (setting forth the CAISO’s Interconnection Process Enhancements).
CONCLUSION

SCE and PG&E appreciate the opportunity to provide these responses to the questions raised in the Amended Scoping Memo.

Respectfully submitted,

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/s/ Alexa J. Mullarky
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On Behalf of: Southern California Edison Company (U 338-E) and Pacific Gas and Electric Company (U 39-E)

Dated: December 3, 2018
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this
day served a true copy of the JOINT RESPONSE OF SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E) AND PACIFIC GAS AND ELECTRIC COMPANY (U 39-E) TO
ASSIGNED COMMISSIONER'S AMENDED SCOPING MEMO AND JOINT
ADMINISTRATIVE LAW JUDGE RULING on all parties identified on the attached service list for
R.17-07-007. Service was effected by transmitting copies via e-mail to all parties who have provided an
e-mail address and by placing a copy in a sealed envelope and causing such envelope to be delivered via
United States mail with first-class postage prepaid to the offices of the ALJ.

ALJ Kelly A. Hymes
California Public Utilities Commission
Division of Administrative Law Judges
505 Van Ness Avenue
San Francisco, CA 94102-3214

Executed on December 3, 2018, at Rosemead, California.

/s/ Jorge Martinez
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<th>State Service</th>
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<td><strong>CHRISTOPHER PARKES</strong></td>
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<td><strong>KELLY A. HYMES</strong></td>
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**FOR:** [Pacificorp](#)
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