

2020 Q-4 Interconnection Discussion Forum

MEETING LOGISTICS:

Wednesday October 14, 2020, 1:00pm – 3:00pm

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AGENDA

1:00 - 1:05 p.m. – Welcome and Introduction (Energy Division)

1:05 - 1:35 p.m. – Power Control Systems

- **1:05 - 1:20 p.m. – Power Control System Information on CEC Solar Equipment Lists (Presentation by the California Energy Commission)**

The California Energy Commission is adding Inverter and Energy Storage Systems-based Power Control System (PCS) data into its solar equipment lists. This PCS information will be detailed in a supplemental listing to the Inverter and Energy Storage Systems lists.

The PCS supplemental listing template, the listing request form, and instructions are accessible from the Grid Support Inverters and from the Energy Storage Systems sections identified on the Solar Equipment Lists webpage at <https://www.energy.ca.gov/programs-and-topics/topics/renewable-energy/solar-equipment-lists>.

- **1:20 - 1:35 p.m. – Clarification on How to Get Power Control Systems Listed on CEC List (Proposed and Presented by CALSSA)**

The California Energy Commission is adding Inverter and Energy Storage Systems-based Power Control System (PCS) data into its solar equipment lists. Clarity is needed (from both the IOUs and the CEC) on the requirements and process to get a PCSs listed, and it is essential to discuss any challenges that have been encountered in the process. Contractors also need to know if there are any installation specifications.

Contractors are increasingly submitting applications for solar plus storage installations that include PCSs. In some cases, project developers are working directly with manufacturers with expectations that a product will be listed soon. Manufacturers and developers have been facing two buckets of challenges. First, small, residential systems are getting certified but then aren't able to get approved. Second, the certification process isn't well defined for larger systems where multiple devices are interacting. In particular, certification for small residential systems should be straightforward, but for larger systems there will be a learning curve for all involved.

1:35 p.m. - 1:55 p.m. – Double Jeopardy (Proposed and Presented by CALSSA)

Rule 21 Working Group Three took up the issue of whether utilities can change a determination that no mitigations are required for a specific project. CALSSA had recommended the topic after hearing of several cases in which a customer built a system after the utility told them no mitigations were required, only to have the utility come back later and require mitigations. By the time the working group discussion had started, however, the utility had resolved all of the cases to the customer's satisfaction. During the discussion, the utilities agreed this should never happen. Based on that, the working group decided not to make any policy recommendations.

Since that time, CALSSA knows of at least one case in which a utility violated this principle. They informed the customer "This project passed Engineering and does not require mitigation work." The customer installed the system based on this information. Later, the utility informed the customer, "Upon re-reviewing the project, it was determined that a transformer upgrade would be required." The assessed cost was \$65,000. When the customer spoke the utility, the utility told them to pay for the upgrade and then file a claim to get reimbursed.

1:55 p.m. – 2:15 p.m. – Timeline for Rate Changes (Proposed and Presented by CALSSA)

Rate change requests can take a long time to process. Utilities receive rate change request through online customer accounts and on the phone, but they do not confirm that a change has been approved or will be implemented on a certain date. Customers have to wait for the change to show up on a bill after the fact. This causes multiple problems, such as:

- Customers get frustrated not knowing if they have been switched to the new rates.
- SGIP rebates cannot be requested for residential customers until they can verify they are on certain rates.
- Customers may not know when they will be able to reach PTO. They do not want to go on a different rate far before being able to generate power if that rate would cause their bills to increase in the period before they begin generating.

Reforms are needed, such as:

- Allow submittal of request with a form sent to a dedicated email address rather than requiring that requests be made by phone.
- Should be able to sign the interconnection agreement with the intended rate to be confirmed during final review.
- When the call center is involved, they should be able to access interconnection materials to document compliance.

2:15 p.m. – 2:30 p.m. – Wrap Up & Next Steps

~~**2:20 p.m. – 2:40 p.m. – Problems with IOU Requirement for Fast Track Interconnection Milestones (Proposed and Presented by Community Renewable Solutions LLC (CRS))**~~

~~This discussion will center on IOU perceptions of the purpose of Fast Track, and appropriate milestones. SCE has stated its view that Fast Track development milestones (negotiated as part of the Generator Interconnection Agreement, GIA) must be “months, not years.” This can cause problems because the ReMAT development process is different than a typical NEM development process. ReMAT requires, as a stated eligibility criterion, that projects have completed Fast Track studies before they can get in the queue for a Power Purchase Agreement (PPA). This issue is now ripe for discussion with the revival of ReMAT (a proposed decision is pending approval by the Commission in R.18-07-003).~~

~~**2:40 p.m. – 3:00 p.m. – Wrap Up & Next Steps**~~