

**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
[Public Version]**

Pursuant to D.14-11-041, Pacific Gas and Electric Company (PG&E) hereby gives notice of the following communication. The communication occurred on Friday, July 31, 2015 at approximately 3:43 PM, by email to the offices of the California Public Utilities Commission (CPUC).

Vi Vien Hoang, Senior Case Manager, Regulatory Affairs, PG&E, submitted the *Pacific Gas and Electric Company Interconnection Data Quarterly Report Submitted July 31, 2015* (Q2 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, and, 2) a non-public version that is identical to the public version except that it includes a confidential attachment providing customer specific interconnection data. The transmittal email and public version of the report are attached to this Notice of Communication with Director of Energy Division [Public Version]. The transmittal email and confidential report are attached to the Notice of Communication with Director of Energy Division [Confidential

Version].

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

This Notice and the Attachments are concurrently being provided to Mr. Randolph.

Respectfully submitted,

PACIFIC GAS AND ELECTRIC COMPANY

By: /s/ Erik B. Jacobson
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Dated: August 5, 2015

Public Version of
Pacific Gas and Electric Company Interconnection
Data Quarterly Report Submitted July 31, 2015

Dear Mr. Randolph,

In compliance with Ordering Paragraph 3 of D.14-04-003, PG&E submits the following Interconnection Data Quarterly Reports:

1. 2015 Q2 Interconnection Data Quarterly Report Public Version
2. 2015 Q2 Interconnection Data Quarterly Report – Confidential – Provided per Public Utility Code 583

Please note that previously, the confidential attachment of Interconnection Cost Data was provided as a separate attachment to the Confidential report. For this quarter's report, we have consolidated it and included it as part of the Confidential Report.

These attachments include information through June 30, 2015.

Vi Vien Hoang

PG&E - Senior Case Manager - *Customer Proceedings and Rates*

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Part I:

Pre-Application Reports Reporting:

a- Total since Rule 21 Revision in September 2012 (9/13/12-6/30/15)	b- Total for Second Quarter 2015 (4/1/15-6/30/15):
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	9/13/12-6/30/15	4/1/15-6/30/15
Number requested:	269	36
Number issued:	249	33
Number currently in process:	4	4
Number withdrawn (if any):	16	0

Rule 21 Fast Track Reporting:

Rule 21 Fast Track applications received (9/21/2012 -6/30/15)	Rule 21 Fast Track applications for Second Quarter 2015 (4/1/15-6/30/15)
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Initial Review

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

Non-Queued: 116,208 ¹	17,165
Queued: 420	25
From Rule 21 Reform to 2Q 2015	2Q 2015

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.

¹ PG&E has identified that there is a discrepancy in the count for Non-Queued Projects and is researching the cause.

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

167	7
From Rule 21 Reform to 2Q 2015	2Q 2015

- 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 2Q 2015	2Q 2015

- 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:

117	4
From Rule 21 Reform to 2Q 2015	2Q 2015

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 46 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:

47	3
From Rule 21 Reform to 2Q 2015	2Q 2015

- 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.

Supplemental Review

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

101	3
From Rule 21 Reform to 2Q 2015	2Q 2015

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 102.

- 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:

48²	1
From Rule 21 Reform to 2Q 2015	2Q 2015

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

43	1
From Rule 21 Reform to 2Q 2015	2Q 2015

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:

31	2
From Rule 21 Reform to 2Q 2015	2Q 2015

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

40³	2
From Rule 21 Reform to 2Q 2015	2Q 2015

² An additional project passed Supplemental Review in a previous quarter and is now reflected in this count.

³ Since January 2015's submission two projects have cured their Withdrawn status and have had their queue positions reinstated.

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

- 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:

36⁴	0
From Rule 21 Reform to 2Q 2015	2Q 2015

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, 12 projects (6 of which are Fast Track) have transitioned from CPUC to FERC jurisdiction and have converted from Rule 21 to Wholesale Distribution.

⁴ A FERC project was incorrectly included in the total count for 3rd Quarter 2014 and has now been removed from the total count.

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.

Q2, 2015 - There are no active groups at this time. The next Distribution Group Study Window is scheduled to open on September 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 has been updated on June 30, 2015.

The report can be found at:

http://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_4660-E.pdf

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):

7	2
From Rule 21 Reform to 2Q 2015	2Q 2015

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

24	9
From Rule 21 Reform to 2Q 2015	2Q 2015

- 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)

12	4
From Rule 21 Reform to 2Q 2015	2Q 2015

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

2	0
From Rule 21 Reform to 2Q 2015	2Q 2015

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

2	0
From Rule 21 Reform to 2Q 2015	2Q 2015

- e. 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 2Q 2015	2Q 2015

- f. Number of disputes mediated by a member of the CPUC's ALJ Division:

0	0
From Rule 21 Reform to 2Q 2015	2Q 2015

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

0	0
From Rule 21 Reform to 2Q 2015	2Q 2015

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

0	0
From Rule 21 Reform to 2Q 2015	2Q 2015

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.)

- Project size; project technology; and date that interconnection evaluation was completed, defined as the day that the project file was closed.
- Preliminary interconnection upgrade cost estimate provided to the interconnection customer and title of the document on which the information was transmitted:
- First revised interconnection upgrade cost estimate and title of the document on which the information was transmitted (if any):
 - What are the three most significant drivers or triggers of changes in the cost estimate from B to C?
- Second revised interconnection upgrade cost estimate & the title of the document on which the information was transmitted (if any):
 - What are the three most significant drivers or triggers of in the cost estimate from C to D?
- Interconnection upgrade cost estimate provided on GIA documentation:
- 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:

Confidential attachment provided to the CPUC pursuant to PU Code Section 583 and 8380, Government Code Section 6254 (k), and Civil Code 1798.24

Confidential Version Including Confidential
Attachment to
Pacific Gas and Electric Company Interconnection
Data Quarterly Report Submitted July 31, 2015
[Not Included]