#### Part I:

#### **Pre-Application Reports Reporting:**

a) Total since Rule 21 Revision in September 2012 b) Total for 4th Quarter 2018:

26

414

i. Number requested: 414

ii. Number issued: 406

iii. Number currently in process: 3

iv. Number withdrawn (if any): 5

## **Rule 21 Fast Track Reporting:**

a) Rule 21 Fast Track applications received since 9/13/2012

Queued: 1026

b) Rule 21 Fast Track applications for 4Q

Queued: 28

#### **Initial Review**

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

**1026\***<sup>1</sup> **28**<sup>2</sup> From Rule 21 Reform Through 4Q 4Q 2018

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

<sup>&</sup>lt;sup>1</sup> This number includes Rule 21 applications that indicate a customer is seeking an Export, Non-Export, Inadvertent Export or Multiple Tariff agreements operating in parallel.

<sup>&</sup>lt;sup>2</sup> Of the 28 incremental from Q3, four (4) projects are listed in previous quarters that were not reported due to changes in process or administrative data entry errors.

<sup>&</sup>lt;sup>3</sup>Three (3) of the projects in footnote 2 were export requests, and are being added to the 2018 incremental count.

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:

**26**From Rule 21 Reform Through 4Q 4Q 2018

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

0 4Q 2018

- 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:

**146**<sup>4</sup> **3** From Rule 21 Reform Through 4Q 4Q 2018

For the period from 9/13/2012 to 12/31/2018: From the **224** Exporting Fast Track requests received since 9/13/2012, **26** passed the Initial Review screens, **50** projects withdrew prior to completing the Initial Review or were not deemed eligible (due to size), **146** failed the Initial Review screens, **1** is in Initial Review, **1** record from 2016 was duplicated in the count due to the agreement being renegotiated.

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

**70 0** From Rule 21 Reform to 4Q 4Q 2018

- g. Please indicate the top three most frequently failed Initial Review screens<sup>5</sup> in descending order.
  - 1. Screen M (Aggregate generation 15% larger than line section peak load)
  - 2. Screen N (Penetration Test)
  - 3. Screen F (Short Circuit Current Contribution)
- 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. Use SCE's Interconnection maps and locate projects in green zones and in accordance with the available capacity as identified in the green zone;

<sup>&</sup>lt;sup>4</sup> Of the 146, three (3) of the projects are reported in footnotes 2 & 3 and have date stamps from previous quarters.

<sup>&</sup>lt;sup>5</sup> "Initial Review" screens include screens reviewed as part of the Rule 21 Supplemental Review process.

3

- 2. Submit a Pre-Application Report Request for the proposed generator project;
- 3. Interconnect via non-export with certified technology.

## **Supplemental Review**

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

**69 4**<sup>6</sup> From Rule 21 Reform Through 4Q 4Q 2018

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

2 4Q 2018

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

**47 0** From Rule 21 Reform Through 4Q 4Q 2018

1. Number of Fast Track applications that successfully passed Supplemental Review and received a GIA<sup>7</sup>:

**23**From Rule 21 Reform Through 4Q 4Q 2018

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

**59 0** From Rule 21 Reform Through 4Q 4Q 2018

n. Number of Fast Track projects that withdrew after supplemental review began<sup>8</sup>:

16 Trom Rule 21 Reform Through 4Q 4Q 2018

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

<sup>&</sup>lt;sup>6</sup> Of the 4 incremental, 2 were impacted by the items described in footnotes 2 & 3

<sup>&</sup>lt;sup>7</sup> For purposes of this compliance response and going forward, SCE assumes that "receiving a GIA" should be interpreted as SCE tendering an interconnection agreement to the customer for their review.

<sup>&</sup>lt;sup>8</sup>For purposes of this response and going forward, it is assumed that such projects did not go to the Interconnection Agreement phase. In addition, for purposes of this report and going forward, projects that passed Supplemental Review and received a draft Generator Interconnection Agreement and projects that moved into Detailed Study prior to withdrawing are not included in totals.

Answer provided applies to both quarter review and from Rule 21 reform to 3/31/15:

- 1. Screen M (Aggregate generation 15% larger than line section peak load);
- 2. Screen N (Penetration Test).
- 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.

Please refer to answer provided for Part (h).

q. Number of Fast Track projects that signed GIAs:

**34**<sup>9</sup> **0** From Rule 21 Through 4Q 4Q 2018

### **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):

**83 6** From Rule 21 Through 4Q 4Q 2018

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

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)

**72 4** From Rule 21 Through 4Q 4Q 2018

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

**17 0** From Rule 21 Through 4Q 4Q 2018

<sup>&</sup>lt;sup>9</sup> For purposes of this report, SCE is excluding from this total Generator Interconnection Agreements that have been drafted but are still in negotiation.

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

**10 0** From Rule 21 Reform Through 4Q 4Q 2018

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

**4 0** From Rule 21 Reform Through 4Q 4Q 2018

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

2 From Rule 21 Reform Through 4Q 4Q 2018

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

**0** From Rule 21 Reform Through 4Q 4Q 2018

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

2 0 From Rule 21 Reform Through 4Q 4Q 2018

# 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. Reporting is provided in accordance with Commission decisions representing socialized NEM costs.

Please refer to reporting made in accordance with 12-11-005 for NEM related fees.