Rule 21 Working Group Meeting #34 - Agenda
June 19, 2002

Southern California Edison's Fontana Office
7951 Redwood Avenue
Fontana, CA 92335
Meeting Agenda
9:30 am – 4:00 pm

Combined Group Discussion 9:30 am to 10:30 am

- Introductions & Next Meeting Location – July 31, 2002 in San Diego
- Municipal Interconnection Rule Activity -- Riverside adopted its Rule 21 called Rule 22; approval came June 4, 2002.
- Utility DG Activity Sheets – Sheets were provided by each of the 3 utilities, but these hadn't changed substantially since the previous meeting.
- P1547 update: Chuck W attended a P1547 working group meeting in Vail; earliest realistic date for adoption: end of the year if there is no reballoting necessary; there is an editorial process that takes 3-4 months + scheduling for a board meeting; a balloting committee, made up of any IEEE members who qualify themselves; Three levels of standard: 1. Standard "must document"; 2. best practices "should document"; and 3. guide "may document". P1608 is a "may document"; P1547 is a "must document" for generators <10MVa; P1589 is a testing procedures document to be a standard. How to incorporate into Rule 21: put R21 & P1547 side-by-side and compare; some numbers will have to change; Question whether to inc P1547 into R21 or to change R21 to include P1547. Suggestion by Tom D. to refer to P1547 to save space; concern from Ed G. that P1547 is a minimum standard; Chuck W said that is a part of a legal argument about what is "minimum". A document to handle network distribution systems will follow.
- FERC NOPR: How should R21 deal with it? Comments to go in this week. Tenor of the document to date: that few restrictions will be applied to interconnection – so that utilities are wary and believe the issue should be left to discretion of the states, not a federal issue. Generator developers, on the other hand, like the FERC direction.
- Status of Utility Advice Letter Filings: SCE & SDG&E have filed. PG&E to file after working through discrepancies with other utilities.
- Status of Standard Interconnection Agreements: SCE & SDGE & PG&E have all filed Agreements. Agreements are "pretty much conforming" according to Tom, though there are some bin list items. Those are primarily in the application form. CPUC to send a letter confirming receipt.
- Development and Review of Equipment Certification Language -- Question: what language would need to be added [to CEC's website] to make clear that Certification is not to be construed to mean endorsement of equipment by utilities. Language as-is is okay with the group. Following website was the subject of this discussion: www.energy.ca.gov/distgen/interconnection/certification.html.

Non-Technical Breakout (Rest of the Day with a Lunch Break)

- Rule 21 Bin List – History: SCE filed tariff in March, based on Compilation-v28d; Werner Blumer commented to all 3 utilities on the SCE filing; Conf. calls followed; based on SCE, comments, discussions SDG&E filed; Werner B. then commented on SDG&E's filing; his comments on SDG&E became the basis of this bin list. SCE filed on June 11, with cleanup on SDG&E's filing (1630-E), which is the basis of the discussion today. SDG&E will do a cleanup filing based on SCE. PG&E will file a Petition to Modify 00-012-037 the original CPUC Rule 21, rather than an advice letter, since the changes contemplated go beyond rule cleanup. Further changes, PG&E atty Peter Ouborg believes, require a Petition to Modify. Question: Would a letter from ALJ Cook endorsing use of advice letter change PG&E's legal stand? No answer yet. Scott T. to discuss with ALJ Cook. Dylan S. to discuss subsequently with Peter O.

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Werner B. has issues with SCE's filing 1630-E. Examples: C.1.a should say "Sample Agreements" [it does say it in SDG&E 1409 & in compilation –v28d]; but it says "Agreements"; C.1.d "The Initial and Supplemental Review shall" in SCE should say "...Supplemental Review fee shall..."; C.1.c: 5th line: "for a simple interconnection" should say Simplified..." ; C.1.d several corrections on SCE's slip sheeted page; C.1.d: "system" should be capitalized "System"...

SCE agreed to send Werner an editable version of their filing. Werner will mark up the SCE 1630-E with bin list issues. If there are issues that would keep the filing from being approved, Werner B. will report on those items. Werner will send the markup to the whole group. SDG&E & SCE will meet to go over the bin list items and will either incorporate them into a single unified document or exclude them from this filing and put them into an updated bin list, which they agreed to send out.

- IOU Cost Accounting:
  - Update – time frames for tracking are different for each IOU: July through November for SCE (though SCE intends to continue to collect data) if some requirement were made, future reports might be possible; SDG&E collection timeframe: April 1 – December 31 (report January 2003, so data in report is pro bably Nov1). No project-by-project reporting now; PG&E timeframe: full data collection by mid-July through December 31; Question whether tracking should include items that are not relevant to Rule 21; can utility collect? How?
  - Interface with FOCUS 2 Interconnection Metrics – FOCUS-II team has contractual requirement to collect quantitative & qualitative data on interconnection cost & ease pre- and post-Rule 21. IOUs will be a primary source of information for the study, which is set to begin in January. The original plan was to gather customer information on interconnection cost & time; another interesting data point would be utility cost to process interconnection

pre- and post-Rule 21. IOUs say there isn't existing (baseline) data for utility cost, but they said there is likely a cost increase post-Rule 21 because the programs are gearing up. PG&E for example has a new 15-person staff to handle interconnection. However IOUs said the Rule 21 promotes standardization and clarification which makes the process simpler and (hopefully) less expensive in the future. IOUs will be primary info sources; developers will be secondary.

- Rule 21 Language Update: Section F (Telemetry, Metering, el al) – Question whether to extend the Sunset provision of F.6. (The sunset provision is for sections F.3 [Net Generation Metering] and F.5 [Telemetering], which were temporary provisions.) The sunset is Dec 31, 2002 and there is some concern that advice letter filings could be complete by then; other discussion whether this would need to be a Petition to Modify; discussed making this a joint filing by all the IOUs.
- Tariff matrix – Mike Mazur: Mike M. is awaiting comments from SDG&E. He gave a summary of the effort. There are many changes in process, but the matrix is supposed to be a snapshot. Suggestion that utilities maintain a calculator on their websites. No commitment made to do so.
- Update from the field: Developers say that the "tranparency" of interconnection under Rule 21 makes putting DG in to CA IOU territories is much easier than in some CA muni areas or New York's Consolidated Edison.

Technical Breakout (Rest of the Day with a Lunch Break)

For each of the four Supplemental Review Topics:

- Export (Screen 2) Subcommittee
  Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review

- 15% Line Segment (Screen 4) Subcommittee
  Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review

- Non-certified Equipment (Screen 3) Subcommittee
  Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review

- SCCR requirements (Screen 7) Subcommittee
  Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review

[Editors Note: Underlined items were added to the agenda at the meeting.]