

148 FERC ¶ 61,247
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Chairman;
Philip D. Moeller, Tony Clark,
and Norman C. Bay.

Pacific Gas and Electric Company

Docket No. ER14-2575-000

ORDER ON COMPLIANCE FILING

(Issued September 30, 2014)

	<u>Paragraph Numbers</u>
I. Background	<u>2.</u>
II. Compliance Filing.....	<u>5.</u>
III. Notice of Filing and Responsive Pleadings.....	<u>9.</u>
IV. Discussion	<u>10.</u>
A. Procedural Matters	<u>10.</u>
B. Substantive Matters	<u>11.</u>
1. Pre-Application Report.....	<u>12.</u>
a. Compliance Filing	<u>16.</u>
b. Commission Determination	<u>17.</u>
2. Fast Track Threshold	<u>18.</u>
a. Compliance Filing	<u>20.</u>
b. Commission Determination	<u>21.</u>
3. Fast Track Customer Options Meeting and Supplemental Review.....	<u>23.</u>
a. Compliance Filing	<u>29.</u>
b. Commission Determination	<u>31.</u>
4. Review of Required Upgrades.....	<u>32.</u>
a. Compliance Filing	<u>35.</u>
b. Commission Determination	<u>36.</u>
5. Interconnection of Storage Devices.....	<u>37.</u>
a. Compliance Filing	<u>41.</u>
b. Commission Determination	<u>42.</u>
6. Network Resource Interconnection Service	<u>43.</u>

a. Compliance Filing	45.
b. Commission Determination	46.
7. Additional Deviations Requested	47.

1. On August 1, 2014, Pacific Gas and Electric Company (PG&E) submitted, pursuant to sections 205 and 206 of the Federal Power Act (FPA),¹ revisions to its Generator Interconnection Procedures (GIP)² and Small Generator Interconnection Agreement (SGIA) to comply with the requirements of Order No. 792.³ In this order, we conditionally accept the compliance filing, subject to a further compliance filing, to become effective October 1, 2014, as discussed below. We direct PG&E to submit a further compliance filing within 30 days of the date of this order.

I. Background

2. In Order No. 2006,⁴ the Commission established *pro forma* Small Generator Interconnection Procedures (SGIP) and a *pro forma* Small Generator Interconnection Agreement (SGIA) for the interconnection of small generation resources no larger than 20 megawatts (MW). The *pro forma* SGIP describes how an interconnection customer's interconnection request (application) should be evaluated, and includes three alternative procedures for evaluating an interconnection request. These procedures include the Study Process, which can be used by any generating facility, and two procedures that use certain technical screens to quickly identify any safety or reliability issues associated with proposed interconnections: (1) the Fast Track Process for certified small generating facilities no larger than 2 MW; and (2) the 10 kilowatt (kW) Inverter Process for certified inverter-based small generating facilities no larger than 10 kW.

¹ 16 U.S.C. §§ 824d, 824e (2012).

² PG&E's GIP, located in Attachment I, combines its former Small Generator Interconnection Procedures (SGIP), Attachment E, and its former Large Generator Interconnection Procedures (LGIP), Attachment G to the Wholesale Distribution Tariff.

³ *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 78 Fed. Reg. 73,240 (Nov. 22, 2013), 145 FERC ¶ 61,159 (2013), *clarifying*, Order No. 792-A, 146 FERC ¶ 61,214 (2014).

⁴ *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, FERC Stats. & Regs. ¶ 31,180, *order on reh'g*, Order No. 2006-A, FERC Stats. & Regs. ¶ 31,196 (2005), *order granting clarification*, Order No. 2006-B, FERC Stats. & Regs. ¶ 31,221 (2006) (Order No. 2006).

3. Order No. 792 amends the Commission's *pro forma* SGIP and *pro forma* SGIA⁵ adopted in Order No. 2006 as follows: (1) incorporating provisions in the *pro forma* SGIP that provide an interconnection customer with the option of requesting from the transmission provider a pre-application report providing existing information about system conditions at a possible point of interconnection;⁶ (2) revising the 2 MW threshold for participation in the Fast Track Process included in section 2 of the *pro forma* SGIP;⁷ (3) revising the *pro forma* SGIP customer options meeting and the supplemental review following failure of the Fast Track screens so that supplemental review is performed at the discretion of the interconnection customer and includes minimum load and other screens to determine if a small generating facility may be interconnected safely and reliably;⁸ (4) revising the *pro forma* SGIP facilities study agreement to allow the interconnection customer the opportunity to provide written comments to the transmission provider on the upgrades required for interconnection;⁹ (5) revising the *pro forma* SGIP and the *pro forma* SGIA to specifically include energy storage devices;¹⁰ and (6) clarifying certain sections of the *pro forma* SGIP and the *pro forma* SGIA.¹¹ The reforms were adopted to ensure that interconnection time and costs for interconnection customers and transmission providers are just and reasonable and to help remedy undue discrimination, while continuing to ensure safety and reliability.

4. Order No. 792 requires each public utility transmission provider to submit a compliance filing within six months of the effective date of Order No. 792 to demonstrate that it meets the requirements of the Final Rule.¹² Filings adopting the revised SGIP and SGIA without variation are to be filed under section 206 of the Federal Power Act (FPA).¹³ The Commission stated that it would consider variations from the Final Rule.¹⁴

⁵ See 18 C.F.R. § 35.28(f) (2014).

⁶ Order No. 792, 145 FERC ¶ 61,159 at PP 37-40.

⁷ *Id.* PP 102-110.

⁸ *Id.* PP 117, 141-148, 156-161.

⁹ *Id.* PP 203-209.

¹⁰ *Id.* PP 227-231.

¹¹ *Id.* PP 235-236, 260-261.

¹² *Id.* P 269.

¹³ Order No. 792-A, 146 FERC ¶ 61,214 at P 2.

In Order No. 792-A, the Commission clarified that a public utility transmission provider may submit a filing under FPA section 205¹⁵ demonstrating “that either a variation that has not been previously approved by the Commission, or a previously-approved variation from the [Order No. 2006] *pro forma* language that has been substantively affected by the reforms adopted in the Final Rule, meets one of the standards for variance provided for in the Final Rule, including independent entity variations, regional reliability variations, and variations that are ‘consistent with or superior to’ the Final Rule.”¹⁶

II. Compliance Filing

5. PG&E currently provides open access distribution level services, including generator interconnection service pursuant to Order No. 2006, under its Wholesale Distribution Tariff. PG&E has explained in earlier filings that Wholesale Distribution Tariff interconnection requests can and do have network impacts affecting the CAISO controlled grid. As a result, the study processes for interconnection requests to its distribution system must be coordinated with requests to interconnect to the CAISO grid in order to achieve the greatest level of efficiency in interconnection to both systems.¹⁷

6. PG&E states that in 2011, it modified its existing processes for generator interconnections in its Wholesale Distribution Tariff. Specifically, PG&E states that it combined its SGIP and LGIP into its GIP in order to expand the interconnection processes offered and provide certainty and timeliness in processing interconnection requests. PG&E states that the Commission accepted its proposed GIP revisions.¹⁸

7. PG&E states that in 2012, it further revised its GIP to more closely align its process with the California Public Utilities Commission’s (CPUC) rules and regulations addressing the interconnection of generation and storage.¹⁹ The Commission accepted these further revisions effective December 4, 2012.²⁰

¹⁴ Order No. 792, 145 FERC ¶ 61,159 at P 270.

¹⁵ 16 U.S.C. § 824d (2012).

¹⁶ Order No. 792-A, 146 FERC ¶ 61,214 at P 3. *See also* Order No. 792, 145 FERC ¶ 61,159 at PP 273-274.

¹⁷ *See Pacific Gas and Elec. Co.*, 135 FERC ¶ 61,094, at P 2 (2011).

¹⁸ *See id.*; *see also Pacific Gas and Elec. Co.*, Docket No. ER11-3004-002 (July 18, 2011) (delegated letter order).

¹⁹ PG&E states that California’s “Rule 21 Tariff” rules address CPUC-
(continued ...)

8. PG&E proposes to implement the tariff changes adopted in Order No. 792 through its GIP. Additionally, PG&E states that as a result of aligning its GIP with certain rules and regulations required by the CPUC, certain of its proposed tariff changes differ from the Commission's *pro forma* language. PG&E states, however, that the revisions submitted are consistent with or superior to the Commission's Order No. 792 *pro forma* language. PG&E also proposes to revise its SGIA to reflect Commission-ordered changes. PG&E seeks an effective date for its compliance filing of October 1, 2014.²¹

III. Notice of Filing and Responsive Pleadings

9. Notice of the compliance filing was published in the *Federal Register*, 79 Fed. Reg. 46,788 (2014), with interventions and protests due on or before August 22, 2014. On August 25, 2014, San Diego Gas & Electric Company (SDG&E) filed a motion to intervene out-of-time.

IV. Discussion

A. Procedural Matters

10. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214(d) (2014), the Commission will grant SDG&E's late-filed motion to intervene, given its interest in the proceeding, the early stage of the proceeding, and the absence of undue prejudice or delay.

B. Substantive Matters

11. We find that PG&E's compliance filing, with certain modifications, complies with the requirements adopted in Order No. 792. Accordingly, we will conditionally accept PG&E's compliance filing, subject to a further compliance filing, to become effective October 1, 2014, as discussed below. We will direct PG&E to submit a further compliance filing within 30 days of the date of this order.

jurisdictional interconnection of generation and storage, which typically include Net-Energy Metered customers, Qualifying Facilities, and generators utilizing solar photovoltaic and other renewable-resource technologies. PG&E Transmittal Letter at 2.

²⁰ *Pacific Gas and Elec. Co.*, 142 FERC ¶ 61,082 (2013).

²¹ PG&E Transmittal Letter at 2-3.

1. Pre-Application Report

12. In Order No. 792, the Commission required each public utility transmission provider to provide interconnection customers the option to request a pre-application report that would contain readily available information about system conditions at a point of interconnection in order to help that customer select the best site for its small generating facility.²²

13. To the extent readily available, the pre-application report must include, among other items: (1) total capacity (in MW) of substation/area bus, bank or circuit based on normal or operating ratings likely to serve the proposed point of interconnection; (2) existing aggregate generation capacity (in MW) interconnected to a substation/area bus, bank or circuit (i.e., amount of generation online) likely to serve the proposed point of interconnection; and (3) aggregate queued generation capacity (in MW) for a substation/area bus, bank or circuit (i.e., amount of generation in the queue) likely to serve the proposed point of interconnection.²³

14. In order to resolve uncertainty about the precise location of the point of interconnection and expedite the pre-application report process, the Commission required interconnection customers requesting a pre-application report to submit a written request form that includes, among other items, project contact information, project location, and generator type and size.²⁴ Customers are required to submit a non-refundable fee along with the written request form to compensate the transmission provider for the cost of compiling the pre-application report. Transmission providers are required to provide the pre-application report within 20 business days of receiving the completed request form and payment of the fee.²⁵

15. The Commission adopted a \$300 fee as the default pre-application report fee in the *pro forma* SGIP. Order No. 792 allows transmission providers to propose a different

²² Order No. 792, 145 FERC ¶ 61,159 at P 37.

²³ See SGIP section 1.2.3 for the complete list of items in the pre-application report.

²⁴ Order No. 792, 145 FERC ¶ 61,159 at P 56. See SGIP section 1.2.2 for the complete list of items in the pre-application report request form.

²⁵ Order No. 792, 145 FERC ¶ 61,159 at P 51; SGIP section 1.2.2.

fixed cost-based fee for preparing pre-application reports, supported by a cost justification, as part of their compliance filings.²⁶

a. Compliance Filing

16. PG&E proposes to revise its GIP to reflect the Commission's *pro forma* language; however, PG&E explains that in reflecting the Commission's *pro forma* revisions throughout its GIP, the term Distribution Provider has been substituted in place of Transmission Provider.²⁷

b. Commission Determination

17. We find PG&E's revised pre-application process reflected in its GIP, and modified to incorporate the reference to Distribution Provider, is consistent with the *pro forma* tariff revisions required by Order No. 792, with one exception. We note that some of the *pro forma* language appears to have been inadvertently omitted. Specifically, PG&E's GIP at section 1.2.2 provides that "In addition to the information described in section 1.2.1, which may be provided in response to [*an informal request, an Interconnection Customer may submit*] a formal written request form along with a non-refundable fee of \$300 for a pre-application report on a proposed project at a specific site...." The phrase in brackets does not appear in section 1.2.2 of the GIP. Accordingly, we will direct PG&E to submit a further compliance filing within 30 days of the date of this order, with tariff revisions reflecting the omitted phrase.

2. Fast Track Threshold

18. In Order No. 792, the Commission modified section 2.1 of the *pro forma* SGIP to adopt revised eligibility thresholds for participation in the Fast Track Process. The new criteria are based on individual system and generator characteristics. Specifically, the Fast Track eligibility threshold for inverter-based machines that are either certified or have been reviewed or tested by the transmission provider and are determined to be safe to operate will be based on Table 1 below.²⁸

Table 1: Fast Track Eligibility for Inverter-Based Systems

²⁶ Order No. 792, 145 FERC ¶ 61,159 at PP 45-46.

²⁷ PG&E Attachment 1, GIP section 1.2.2.

²⁸ *Id.* PP 103-104.

Line Voltage	Fast Track Eligibility Regardless of Location	Fast Track Eligibility on a Mainline ²⁹ and ≤ 2.5 Electrical Circuit Miles from Substation ³⁰
< 5 kilovolt (kV)	≤ 500 kW	≤ 500 kW
≥ 5 kV and < 15 kV	≤ 2 MW	≤ 3 MW
≥ 15 kV and < 30 kV	≤ 3 MW	≤ 4 MW
≥ 30 kV and ≤ 69 kV	≤ 4 MW	≤ 5 MW

19. The Commission maintained the Fast Track eligibility threshold for synchronous and induction machines at 2 MW.³¹ Additionally, Fast Track eligibility is limited to those projects connecting to lines at 69 kV and below.³²

a. Compliance Filing

20. PG&E proposes to revise its GIP to incorporate the Commission's *pro forma* SGIP section 2.1.³³

b. Commission Determination

21. We find that PG&E's revised GIP, reflecting the Fast Track Threshold provision, partially complies with the Commission's *pro forma* SGIP revisions. First, we find PG&E has revised its GIP to incorporate some of the Commission's *pro forma* SGIP

²⁹ For purposes of this table, a mainline is the three-phase backbone of a circuit. It will typically constitute lines with wire sizes of 4/0 American wire gauge, 336.4 kcmil, 397.5 kcmil, 477 kcmil and 795 kcmil. One circular mil (cmil) is the area of a circle with a diameter of one mil (one mil is one-thousandth of an inch). Conductor sizes are often given in thousands of circular mils (kcmil). One kcmil = 1,000 cmil.

³⁰ An interconnection customer can determine this information about its proposed interconnection location in advance by requesting a pre-application report pursuant to section 1.2 of the *pro forma* SGIP.

³¹ Order No. 792, 145 FERC ¶ 61,159 at P 106.

³² *Id.* P 107.

³³ PG&E Attachment 1, GIP section 2.1.

revisions by adding language reminding generators that Fast Track eligibility is distinct from the Fast Track Process itself, and that eligibility does not imply or indicate that a Generating Facility will pass the Fast Track screens or the Supplemental Review Screens.³⁴ Although PG&E states that it has adopted the *pro forma* SGIP language, we note that the *pro forma* SGIP also provides that “Certified inverter-based Small Generating Facilities located within 2.5 electrical circuit miles of a substation and on a mainline (as defined in the table below) are eligible for the Fast Track Process under the higher thresholds according to the table below.”³⁵ PG&E’s revised GIP does not include that provision. We will therefore direct PG&E to include the missing language as part of the further compliance filing directed herein.

22. In addition, our review indicates that while PG&E has modified its GIP to incorporate a table for Fast Track eligibility for inverter-based systems, which is consistent with the Commission’s *pro forma* SGIP Table 1, it has failed to include the corresponding footnotes in its table as part of its revision. Accordingly, in the further compliance filing directed herein, PG&E must also revise its GIP Fast Track Process to include the correct footnotes and the additional language as described above.

3. Fast Track Customer Options Meeting and Supplemental Review

23. In Order No. 792, the Commission adopted modifications in section 2.3 of the *pro forma* SGIP to the customer options meeting to be held following the failure of any of the Fast Track screens.³⁶ In particular, the Commission required the transmission provider to offer to perform a supplemental review of the proposed interconnection without condition, whereas prior to Order No. 792, the determination of whether to offer to perform the supplemental review was at the discretion of the transmission provider.

24. In Order No. 792, the Commission modified the supplemental review by including three screens: (1) the minimum load screen; (2) the voltage and power quality screen; and (3) the safety and reliability screen.³⁷

25. The minimum load screen adopted in section 2.4.4.1 of the *pro forma* SGIP examines whether the aggregate generating capacity, including the proposed small

³⁴ PG&E GIP section 2.1.

³⁵ SGIP section 2.1.

³⁶ Order No. 792, 145 FERC ¶ 61,159 at P 117.

³⁷ *Id.*

generating facility capacity, is less than 100 percent of the minimum load within the line sections bounded by automatic sectionalizing devices upstream of the proposed small generating facility. The Commission found that, with respect to solar photovoltaic generation systems with no battery storage, the relevant minimum load value to be used in the minimum load screen is the daytime minimum load. For all other types of generation, the relevant minimum load value is the absolute minimum load. In the event that a transmission provider is unable to perform the minimum load screen because minimum load data are not available, or cannot be calculated, estimated, or determined, the Commission required the transmission provider to provide the reason(s) it is unable to perform the screen.

26. The voltage and power quality screen adopted in section 2.4.4.2 of the *pro forma* SGIP examines three things: (1) whether the voltage regulation on the line section can be maintained in compliance with relevant requirements under all system conditions; (2) whether voltage fluctuation is within acceptable limits; and (3) whether the harmonic levels meet Institute of Electrical and Electronics Engineers (IEEE) Standard 519 limits.³⁸

27. The safety and reliability screen adopted in section 2.4.4.3 of the *pro forma* SGIP examines whether the proposed small generating facility and the aggregate generation capacity on the line section create impacts to safety or reliability that cannot be adequately addressed without application of the Study Process. The Commission required the transmission provider to give due consideration to a number of factors (such as whether operational flexibility is reduced by the proposed small generating facility) in determining potential impacts to safety and reliability in applying the safety and reliability screen.

28. The Commission revised, in sections 2.4.1 through 2.4.4 of the *pro forma* SGIP, the procedures for initiating, processing, and communicating the results of the supplemental review. Among other things, the Commission provided that the interconnection customer may specify the order in which the transmission provider will complete the three supplemental screens in section 2.4.4.³⁹

³⁸ See IEEE Standard 519, IEEE Recommended Practices and Requirements for Harmonic Control in Electrical Power Systems.

³⁹ Order No. 792, 145 FERC ¶ 61,159 at P 164.

a. Compliance Filing

29. PG&E proposes to revise its GIP to incorporate the relevant sections of the *pro forma* SGIP as described above, with some minor exceptions.⁴⁰ PG&E explains that section 2.3 of its proposed GIP differs from the Commission's *pro forma* language in SGIP section 2.3 because its tariff provisions are designed to follow the CPUC rules and regulations governing interconnection of generation and storage. PG&E further explains that the key difference between its proposal and the Commission's *pro forma* language is that in its GIP, the interconnection customer can decide whether to move to Supplemental Review or to the Initial Review Results Meeting.⁴¹ PG&E states that it has attempted to comply as closely as possible with the Commission's required timelines in Order No. 792, while keeping this section consistent with CPUC rules and regulations governing interconnection of generation and storage.⁴²

30. PG&E states that its GIP section 2.5 establishes the Optional Supplemental Review Results Meeting. PG&E states that section 2.5 was previously approved by the Commission⁴³ and states that the previously accepted provision is not affected in a substantive manner by the changes adopted in Order No. 792. Therefore, PG&E asserts that the section 2.5 is consistent with the Commission's *pro forma* language.

b. Commission Determination

31. We find PG&E's proposed revisions to the GIP are consistent with the requirements of the Fast Track Customer Options Meeting and Supplemental Review stated in Order No. 792. We also find that the language previously accepted by the Commission continues to comply with the *pro forma* SGIP as revised by Order No. 792. In addition, we find that PG&E's minor revisions to the *pro forma* SGIP language, revised by Order No. 792, are consistent with the Commission's *pro forma* tariff provision addressing the Fast Track Customer Options Meeting and Supplemental

⁴⁰ PG&E Attachment 1, GIP sections 2.3-2.4.

⁴¹ PG&E GIP section 2.3 specifically provides that "for Interconnection Requests that fail Initial Review, the Distribution Provider shall provide the technical reason, data and analysis supporting the Initial Review Results in writing and provide the Interconnection Customer the option to either attend an Initial Review Results Meeting or proceed directly to the Supplemental Review."

⁴² PG&E Attachment 1, GIP section 2.3.

⁴³ See *Pacific Gas and Elec. Co.*, 135 FERC ¶ 61,094 (2011); see also *Pacific Gas and Elec. Co.*, Docket No. ER11-3004-002 (July 18, 2011) (delegated letter order).

Review. Therefore, we will accept PG&E's proposed revisions to its GIP as consistent with the *pro forma* SGIP as modified by Order No. 792.

4. Review of Required Upgrades

32. In Order No. 792, the Commission revised the *pro forma* SGIP facilities study agreement to allow interconnection customers to provide written comments on the required upgrades identified in the facilities study so that interconnection customers would have a meaningful opportunity to review upgrades associated with their projects and engage in a meaningful dialogue with the transmission provider.⁴⁴ The Commission required the transmission provider to include the interconnection customer's written comments in the final facilities study report.⁴⁵

33. In addition, the Commission found that interconnection customers are entitled to review the supporting documentation for the facilities study because the interconnection customer is funding the study. The Commission also found that transmission providers are entitled to collect all just and reasonable costs associated with producing the facilities study, including any reasonable documentation costs.⁴⁶

34. The Commission noted that the transmission provider is not under an obligation to modify the facilities study after receiving the interconnection customer's comments and makes the final decision on upgrades required for interconnection because the transmission provider is ultimately responsible for the safety and reliability of its system.⁴⁷

a. Compliance Filing

35. PG&E proposes revisions to its GIP sections to incorporate the Commission's *pro forma* language.⁴⁸

⁴⁴ Order No. 792, 145 FERC ¶ 61,159 at P 203.

⁴⁵ See section 9.0 of the *pro forma* SGIP facilities study agreement.

⁴⁶ Order No. 792, 145 FERC ¶ 61,159 at P 204.

⁴⁷ *Id.* P 207.

⁴⁸ PG&E Attachment 8, Facilities Study Agreement, sections 9-10.

b. Commission Determination

36. Our review indicates that PG&E's proposed revisions to its GIP adopt the Commission's *pro forma* language in sections 9.0 and 10.0 of its Attachment 8, Facilities Study Agreement. Therefore, we find the proposed revisions addressing the Review of Required Upgrades are consistent with the Commission's *pro forma* SGIP, as modified by Order No. 792.

5. Interconnection of Storage Devices

37. In Order No. 792, the Commission revised the *pro forma* SGIP to explicitly account for the interconnection of storage devices in order to ensure that storage devices are interconnected in a just and reasonable and not unduly discriminatory manner.⁴⁹ Specifically, the Commission revised the definition of small generating facility to explicitly include storage devices.⁵⁰

38. The Commission also revised section 4.10.3 of the *pro forma* SGIP to clarify that the term "capacity" of the small generating facility in the *pro forma* SGIP refers to the maximum capacity that a device is capable of injecting into the transmission provider's system for the purpose of determining whether a storage device may interconnect under the SGIP rather than the Large Generator Interconnection Procedures (LGIP) and/or whether it qualifies for the Fast Track Process.⁵¹ However, the Commission clarified that when interconnecting a storage device, a transmission provider is not precluded from studying the effect on its system of the absorption of energy by the storage device and making determinations based on the outcome of these studies.⁵²

⁴⁹ Order No. 792, 145 FERC ¶ 61,159 at P 227.

⁵⁰ *Id.* P 228. The Commission revised the definition in Attachment 1 (Glossary of Terms) of the SGIP and Attachment 1 (Glossary of Terms) of the SGIA as follows: "The Interconnection Customer's device for the production and/or storage for later injection of electricity identified in the Interconnection Request, but shall not include the Interconnection Customer's Interconnection Facilities."

⁵¹ *Id.* P 229. For example, a storage device capable of injecting 500 kW into the grid and absorbing 500 kW from the grid would be evaluated at 500 kW for the purpose of determining if it is a small generating facility or whether it qualifies for the Fast Track Process.

⁵² *Id.*

39. The Commission further revised section 4.10.3 of the *pro forma* SGIP to require the transmission provider to measure the capacity of a small generating facility based on the capacity specified in the interconnection request, which may be less than the maximum capacity that a device is capable of injecting into the transmission provider's system. However, the transmission provider must agree, with such agreement not to be unreasonably withheld, that the manner in which the interconnection customer proposes to limit the maximum capacity that its facility is capable of injecting into the transmission provider's system will not adversely affect the safety and reliability of the transmission provider's system.⁵³ For example, the Commission stated that an interconnection customer with a combined resource (e.g., a variable energy resource combined with a storage device) might propose a control system, power relays, or both for the purpose of limiting its maximum injection amount into the transmission provider's system.⁵⁴

40. Finally, the Commission revised section 4.10.3 of the *pro forma* SGIP to allow the transmission provider to consider an output higher than the limited output, if appropriate, when evaluating system protection impacts. The Commission stated that in the Study Process, the transmission provider has the discretion to study the combined resource using the maximum capacity the small generating facility is capable of injecting into the transmission provider's system and require proper protective equipment to be designed and installed so that the safety and reliability of the transmission provider's system is maintained.⁵⁵ Similarly, the Commission stated that in the Fast Track Process, the transmission provider may apply the Fast Track screens or the supplemental review screens using the maximum capacity the small generating facility is capable of injecting into the transmission provider's system in a manner that ensures that safety and reliability of its system is maintained.⁵⁶

a. Compliance Filing

41. PG&E proposes to incorporate section 4.10.3 of the *pro forma* SGIP as described above, into its GIP as section 5.10.3 without change.⁵⁷ PG&E also proposes to revise the definition of "Generating Facility" to incorporate storage devices, as described above.⁵⁸

⁵³ *Id.* P 230.

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ PG&E Attachment 1, GIP section 5.10.3.

b. Commission Determination

42. Our review indicates that PG&E has revised its GIP to modify the definition for Generating Facility to incorporate storage devices and to adopt the Commission's *pro forma* SGIP revisions into section 5.10.3 of its GIP. Therefore, we find the proposed revisions, addressing the interconnection of storage devices, are consistent with the Commission's *pro forma* SGIP, as modified by Order No. 792.

6. Network Resource Interconnection Service

43. In Order No. 792, the Commission revised section 1.1.1 of the *pro forma* SGIP to require interconnection customers wishing to interconnect a small generating facility using Network Resource Interconnection Service to do so under the LGIP and to execute the large generator interconnection agreement.⁵⁹ The Commission explained that this requirement was included in Order No. 2006⁶⁰ but was not made clear in the *pro forma* SGIP. To facilitate this clarification, the Commission also required the addition of the definitions of Network Resource and Network Resource Interconnection Service to Attachment 1, Glossary of Terms, of the *pro forma* SGIP.⁶¹

44. The Commission stated in Order No. 792 that it did not intend to require revisions to interconnection procedures that have previously been found to be consistent with or superior to the *pro forma* SGIP and *pro forma* SGIA with regard to this Order No. 2006 requirement or permissible under the independent entity variation standard.⁶²

a. Compliance Filing

45. On compliance, PG&E explains that consistent with the Commission's Order No. 792 requirements, PG&E's GIP addresses applicability and eligibility requirements of the four processes⁶³ that interconnection customers must follow. PG&E states,

⁵⁸ PG&E GIP Attachment 1, Glossary of Terms.

⁵⁹ Order No. 792, 145 FERC ¶ 61,159 at PP 232, 235.

⁶⁰ Order No. 2006, FERC Stats. & Regs. ¶ 31,180 at P 140.

⁶¹ Order No. 792, 145 FERC ¶ 61,159 at PP 232, 235.

⁶² *Id.* P 236. *See also id.* PP 273, 274.

⁶³ These processes include: Fast Track Process, Independent Study Process, Cluster Study Process and 10 kW Inverter Process.

however, the Commission's requirement to include definitions of Network Resource and Network Resource Interconnection Service has not been included because the term "Network Resource" in PG&E's Wholesale Distribution Tariff applies solely to transmission-level interconnections.⁶⁴

b. Commission Determination

46. We find that it is appropriate for PG&E to exclude a definition of both Network Resource and Network Resource Interconnection Service from its GIP, given that PG&E's GIP provides for interconnection to PG&E's distribution system, and not its transmission system, which is under CAISO operational control. We find PG&E's GIP as modified is consistent with the Commission's *pro forma* SGIP, as modified by Order No. 792.

7. Additional Deviations Requested

47. We find that PG&E's GIP includes some errors. Specifically, PG&E's GIP at section 1.2.3 includes a typographical error. The term "substation/are bus" should be "substation/area bus." PG&E's GIP at section 1.2.4 is missing the word "be" as in the phrase "may [be] completed..." and the letter "s" in the phrase "many variable[s] studied." PG&E must submit these corrections in its further compliance filing.

48. Further, on September 19, 2014, the Commission issued an Errata Notice, correcting typographical errors and language that was erroneously omitted from Appendix C, Revisions to the Pro Forma SGIP, of Order No. 792.⁶⁵ Paragraph 4 of the Errata Notice indicates that section 2.4.4.3.2 of the SGIP, or 2.4.3.2 of PG&E's GIP, should read "whether the loading along the line section is uniform or even." Accordingly, we direct PG&E to include in its further compliance filing the corrections as noted in the Errata Notice.

The Commission orders:

(A) PG&E's compliance filing is hereby conditionally accepted, subject to a further compliance filing, to become effective October 1, 2014, as discussed in the body of this order.

⁶⁴ PG&E Attachment 1, Compliance Matrix.

⁶⁵ *Small Generator Interconnection Agreements and Procedures*, 148 FERC ¶ 61,215 (2014).

(B) PG&E is hereby directed to submit a further compliance filing within 30 days of the date of this order, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.