149 FERC ¶ 61,026
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

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

Southern California Edison Company — Docket Nos. ER14-2582-000
ER14-2626-000
(not consolidated)

ORDER ON COMPLIANCE FILING

(Issued October 10, 2014)

1. On August 4, 2014 in Docket No. ER14-2582-000, Southern California Edison Company (SoCal Edison) filed, pursuant to section 206 of the Federal Power Act (FPA),[1] a request for Commission approval to incorporate revisions required by Order No. 792[2] into the Generator Interconnection Procedures (GIP) and various Generator Interconnection Agreements (GIAs) and Small Generator Interconnection Agreements (SGIAs) that are appended to SoCal Edison's Wholesale Distribution Access Tariff (WDAT).[3] In addition, on August 11, 2014 in Docket No. ER14-2626-000, SoCal Edison filed, pursuant to section 205 of the FPA,[4] additional revisions to its GIP and GIAs that were not required by Order No. 792. In this order, we conditionally accept each filing, subject to a further compliance filing, effective October 1, 2014, as discussed

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[1] 16 U.S.C. § 824e (2012).

[2] *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 78 Fed. Reg. 73,240 (Dec. 5, 2013), 145 FERC ¶ 61,159 (2013), *clarified*, Order No. 792-A, 146 FERC ¶ 61,214 (2014) (Order No. 792 or Final Rule).

[3] In *Southern California Edison Company*, 135 FERC ¶ 61,093 (2011) (SoCal Edison 2011 GIP Order), the Commission found SoCal Edison's consolidation of small and large generator interconnection procedures into an integrated GIP to be consistent with or superior to the SoCal Edison SGIP and Large Generator Interconnection Procedures (LGIP). *See* Transmittal Letter at pp. 2-5 in Docket No. ER14-2582-000 and Transmittal Letter at pp. 3-5 in Docket No. ER14-2626-000 describing SoCal Edison's consolidated WDAT Attachment I GIP.

[4] 16 U.S.C. § 824d (2012).

below. We direct SoCal Edison to submit a further compliance filing within 30 days of the date of this order.

I. Background

2. In Order No. 2006,[5] the Commission established *pro forma* Small Generator Interconnection Procedures (SGIP) and a *pro forma* 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.

3. Order No. 792 amends the Commission's *pro forma* SGIP and *pro forma* SGIA[6] 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;[7] (2) revising the 2 MW threshold for participation in the Fast Track Process included in section 2 of the *pro forma* SGIP;[8] (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;[9] (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;[10]

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[5] *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).

[6] *See* 18 C.F.R. § 35.28(f) (2014).

[7] Order No. 792, 145 FERC ¶ 61,159 at PP 37-40.

[8] *Id*. PP 102-110.

[9] *Id*. PP 117, 141-148,156-161.

[10] *Id*. PP 203-209.

(5) revising the *pro forma* SGIP and the *pro forma* SGIA to specifically include energy storage devices;[11] and (6) clarifying certain sections of the *pro forma* SGIP and the *pro forma* SGIA.[12] 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.[13] Filings adopting the revised SGIP and SGIA without variation are to be filed under section 206 of the Federal Power Act (FPA).[14] The Commission stated that it would consider variations from the Final Rule.[15] In Order No. 792-A, the Commission clarified that a public utility transmission provider may submit a filing under FPA section 205[16] 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."[17]

II. <u>Compliance Filing (Docket No. ER14-2582-000)</u>

5. SoCal Edison states that the vast majority of its compliance filing in Docket No. ER14-2582-000 includes the Order No. 792 *pro forma* language without variation. However, SoCal Edison requests authorization to utilize its GIP as the basis in which to incorporate the Order No. 792 reforms, instead of its SGIP. SoCal Edison states that its SGIP is now largely obsolete because it is no longer utilized for new interconnection

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[11] *Id*. PP 227-231.

[12] *Id*. PP 235-236, 260-261.

[13] *Id.* P 269.

[14] Order No. 792-A, 146 FERC ¶ 61,214 at P 2.

[15] Order No. 792, 145 FERC ¶ 61,159 at P 270.

[16] 16 U.S.C. § 824d (2012).

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

customers, and is operational solely for projects that were initiated prior to Commission acceptance of SoCal Edison's GIP in 2011.[18]

6. SoCal Edison explains that the GIP created four separate tracks for interconnecting a generating facility. The first track is the cluster study process modified to include both small and large generating facilities.[19] The second track is the independent study process modified from the original serial study process to include both small and large generating facilities.[20] The third and fourth tracks are the fast track process and the under 10 kW inverter process that were contained in SoCal Edison's SGIP.[21] In addition, SoCal Edison's GIP provides for an option of a generating facility previously studied as "Energy Only" to obtain partial or full deliverability status.[22] SoCal Edison's GIP also currently includes appendices with study process agreements and generator interconnection agreements for each of the four tracks to process interconnection requests.

7. SoCal Edison asserts that interconnection requests still being processed under its SGIP will not be impacted by the reforms of Order No. 792 because the projects are too far along in the interconnection process.[23] SoCal Edison maintains that in order to avoid interconnection customer confusion by reinstituting use of the obsolete SGIP, incorporating the Order No. 792 reforms into SoCal Edison's GIP is consistent with or superior to the Commission's Order No. 792 *pro forma* language.

8. To align SoCal Edison's existing GIP with Order No. 792, SoCal Edison proposes to add certain variations, as well as ministerial edits to its GIP.[24] The proposed variations include proposals to: (1) substitute the terms "distribution provider" and "distribution system" for "transmission provider" and "transmission system" throughout the GIP to

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[18] *See* Docket No. ER14-2582-000 Transmittal Letter at p. 7 (citing Exhibit SCE-1 (Declaration of Edyung Castano), at 3:15-19).

[19] *See* WDAT Attachment I, GIP section 4, Cluster Study Process.

[20] *See* GIP section 5, Independent Study Process.

[21] *See* GIP sections 6 and 7, the Fast Track and Under 10 kW Inverter Processes, respectively.

[22] *See* GIP section 4.7.1, Annual Full Capacity Deliverability Option.

[23] *Id.* at 4:20-5:4.

[24] As noted above, the Commission accepted SoCal Edison's consolidation of its SGIP and LGIP into an integrated GIP in the SoCal Edison 2011 GIP Order. *See supra* note 3.

more accurately describe the system configuration in California, where CAISO as transmission provider exercises operational control of the transmission grid while SoCal Edison owns and operates its distribution system;[25] (2) utilize SoCal Edison's GIP section numbers in place of the Order No. 792 *pro forma* SGIP section numbers in its incorporation of the Order No. 792 revisions into the previously approved GIP;[26] (3) exclude *pro forma* language that distinguishes between large and small generating facilities since the GIP only differentiates between the size of projects to be interconnected insofar as the type of services necessary for interconnection;[27] and (4) exclude the terms "Network Resource" and "Network Resource Interconnection Service," because they do not relate to services that SoCal Edison offers. [28]

9. SoCal Edison requests that the Commission accept its proposed revisions to the WDAT GIP, GIAs, and SGIAs in compliance with Order No. 792, and grant an effective date of October 1, 2014.

III. Notice of Filing and Responsive Pleadings

10. Notice of the compliance filing in Docket No. ER14-2582-000 was published in the *Federal Register*, 79 Fed. Reg. 46,789 (2014), with interventions and protests due on or before August 25, 2014. Notice of the filing in Docket No. ER14-2626-000 was published in the *Federal Register*, 79 Fed. Reg. 49,299 (2014), with interventions and protests due on or before September 2, 2014.

11. The Cities of Anaheim, Azusa, Banning, Colton, Pasadena and Riverside, California (Six Cities), the California Department of Water Resources State Water Project (SWP), and E.ON Climate & Renewables LLC filed timely motions to intervene in Docket No. ER14-2582-000. Six Cities, SWP, and San Diego Gas & Electric Company filed timely motions to intervene in Docket No. ER14-2626-000. No comments or protests were filed.

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[25] *See* Docket No. ER14-2582-000 Transmittal Letter at pp. 2-3, 8.

[26] *See id.* p. 8.

[27] *See id.* pp. 4, 9.

[28] *See id.*

IV. Discussion

A. Procedural Matters

12. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2014), the notices of intervention and timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

B. Substantive Matters

13. We find that SoCal Edison's compliance filing, with certain modifications, as further discussed in this order, complies with the requirements adopted in Order No. 792. Accordingly, we conditionally accept the compliance filing to be effective October 1, 2014, subject to a further compliance filing as discussed below. In addition, we find it reasonable to incorporate the Order No. 792 revisions into SoCal Edison's most current procedures for interconnection requests, i.e., the GIP, since its SGIP is no longer utilized for new interconnection customers, is operational solely for active projects initiated prior to the Commission's acceptance of SoCal Edison's GIP in 2011, and only includes projects that are too far along to be affected by Order No. 792's reforms. We also find that incorporating the Order No. 792 reforms into SoCal Edison's GIP is consistent with or superior to the Commission's Order No. 792 *pro forma* language.

1. Pre-Application Report

14. 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.[29]

15. 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.[30]

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[29] Order No. 792, 145 FERC ¶ 61,159 at P 37.

[30] *See* SGIP section 1.2.3 for the complete list of items in the pre-application report.

16. 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.[31] 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.[32]

17. 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 fixed cost-based fee for preparing pre-application reports, supported by a cost justification, as part of their compliance filings.[33]

a. Compliance Filing

18. SoCal Edison proposes to revise its GIP to incorporate Order No. 792 *pro forma* language related to the pre-application report, with the exception of the variations to the change in terminology from "transmission system" to "distribution system," as discussed above, and the enumeration change reflecting Order No. 792 *pro forma* section 1.2, Pre-Application to SoCal Edison GIP section 3.1, Pre-Application.

b. Commission Determination

19. We find that SoCal Edison's pre-application report process as revised in its GIP to incorporate Order No. 792's *pro forma* language, along with the variations discussed above, are consistent with or superior to the *pro forma* tariff revisions required by Order No. 792. As noted above, those variations relate to necessary distinctions between the *pro forma* language and SoCal Edison's GIP.

2. Fast Track Threshold

20. 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

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[31] 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.

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

[33] Order No. 792, 145 FERC ¶ 61,159 at PP 45-46.

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.[34]

Table 1: Fast Track Eligibility for Inverter-Based Systems

Line Voltage	Fast Track Eligibility Regardless of Location	Fast Track Eligibility on a Mainline[35] and ≤ 2.5 Electrical Circuit Miles from Substation[36]
< 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

21. The Commission maintained the Fast Track eligibility threshold for synchronous and induction machines at 2 MW.[37] Additionally, Fast Track eligibility is limited to those projects connecting to lines at 69 kV and below.[38]

a. <u>Compliance Filing</u>

22. SoCal Edison proposes to revise its GIP to incorporate the Commission's *pro forma* SGIP section 2.1. [39]

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[34] Order No. 792, 145 FERC ¶ 61,159 at PP 103-104.

[35] 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.

[36] 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.

[37] *Id.* P 106.

[38] *Id.* P 107.

[39] *See* GIP section 6. *See also* Docket No. ER14-2582-000 Transmittal Letter at p. 12-13.

b. Commission Determination

23. We find that SoCal Edison's revised GIP, reflecting the Fast Track Threshold provision, complies with the Commission's *pro forma* SGIP revisions.

3. Fast Track Customer Options Meeting and Supplemental Review

24. 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.[40] 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.

25. 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.[41]

26. 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 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.

27. 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;

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[40] Order No. 792, 145 FERC ¶ 61,159 at P 117.

[41] *Id.*

(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.[42]

28. 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.

29. 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.[43]

a. Compliance Filing

30. SoCal Edison proposes to revise its GIP to incorporate the relevant sections of the *pro forma* SGIP, as described above, with no further modifications.[44]

b. Commission Determination

31. We find SoCal Edison's proposed revisions to its GIP, reflecting the Fast Track Customer Options Meeting and Supplemental Review, complies with the Commission's *pro forma* SGIP revisions.

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

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[42] *See* IEEE Standard 519, IEEE Recommended Practices and Requirements for Harmonic Control in Electrical Power Systems.

[43] Order No. 792, 145 FERC ¶ 61,159 at P 164.

[44] *See* GIP section 2.2.1; *see also* Docket No. ER14-2582-000 Transmittal Letter at p. 10; *see supra* note 42 and accompanying text.

would have a meaningful opportunity to review upgrades associated with their projects and engage in a meaningful dialogue with the transmission provider.[45] The Commission required the transmission provider to include the interconnection customer's written comments in the final facilities study report.[46] The Commission also revised the *pro forma* SGIP facilities study agreement to include a meeting between the transmission provider and the interconnection customer within 10 business days of the interconnection customer receiving the draft interconnection facilities study report to discuss the results of the interconnection facilities study.[47]

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.[48]

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.[49]

a. Compliance Filing

35. SoCal Edison asserts that its existing GIP provides interconnection customers with a virtually identical opportunity to provide written comments to interconnection facilities study reports as compared to the requirements of Order No. 792.[50] SoCal Edison therefore requests continued use of its existing GIP provisions as consistent with or superior to the Commission's Order No. 792 *pro forma* language.

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[45] Order No. 792, 145 FERC ¶ 61,159 at P 203.

[46] *See* section 9.0 of the *pro forma* SGIP facilities study agreement.

[47] *See* section 10.0 of the *pro forma* SGIP facilities study agreement.

[48] Order No. 792, 145 FERC ¶ 61,159 at P 204.

[49] *Id.* P 207.

[50] *See* GIP section 4.6.10, Results Meeting with Distribution Provider and ISO for the Cluster Study Process; *see also* section 5.8.1.3, Revisions and Addenda to Final Interconnection Study Reports for the Independent Study Process; *see also* Order No. 792 *pro forma* SGIP, Attachment 8, Sections 8.0, 9.0 and 10.0.

b. Commission Determination

36. We find that certain aspects of SoCal Edison's existing GIP provisions allowing interconnection customers the opportunity to review and provide written comments on the facilities study reports[51] are not consistent with or superior to the Order No. 792 reforms. Therefore, we direct SoCal Edison to submit a further compliance filing, as discussed below.

37. First, the Order No. 792 revisions allow the interconnection customer to provide written comments within 30 calendar days after receipt of the draft report, require the transmission provider to include the comments in the final report, and provide for a meeting between the transmission provider and the interconnection customer within 10 business days of the interconnection customer receiving the draft interconnection facilities study report to discuss the results of the interconnection facilities study. In contrast, SoCal Edison's GIP section 4 cluster study process provides for a meeting (the study results meeting) to review the final Phase II interconnection study report within 30 calendar days of providing the report to the interconnection customer and allows the interconnection customer to provide written comments on the report up to three business days following the meeting. If the interconnection customer submits written comments within 10 business days of receipt of the report, but in no case less than three business days before the study results meeting, whichever is sooner, then the written comments will be addressed in the study results meeting. Further, SoCal Edison's GIP section 4 cluster study process does not provide for inclusion of the interconnection customer's written comments in the study report.

38. We find that SoCal Edison has provided no explanation as to how its existing study results meeting and study comment provisions are consistent with or superior to the provisions set out in the Order No. 792 *pro forma* language. Further, SoCal Edison does not provide for inclusion of interconnection customer written comments in the final study report. Therefore, we direct SoCal Edison to either explain how its existing cluster study process provisions are consistent with or superior to Order No. 792 or to submit revisions to its GIP cluster study process that are consistent with Order No. 792.

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[51] *See* GIP section 4 cluster study process at sections 4.5.7.4, Revisions and Addenda to Final Interconnection Study Reports, 4.6.4, Phase II Interconnection Study Procedures, and 4.6.10, Results Meeting with Distribution Provider and ISO, and GIP section 5 independent study process at section 5.8.1.3, Revisions and Addenda to Final Interconnection Study Reports. *See also* Docket No. ER14-2582-000 at Transmittal Letter p. 11-12.

39. Second, SoCal Edison's GIP section 5 independent study process provides for a meeting (the study results meeting) between SoCal Edison, the interconnection customer, and CAISO (if applicable) to discuss the interconnection facilities study report, if such a meeting is requested by the interconnection customer within 10 business days of the date of issuance of the final interconnection facilities study report. The study results meeting is to be held within 20 business days of the date that the interconnection customer receives the interconnection facilities study report. In contrast, under section 10 of the *pro forma* facilities study agreement, within 10 business days of providing the draft interconnection facilities study report to the interconnection customer, the transmission provider and the interconnection customer meet to discuss the interconnection facilities study results.

40. We find that SoCal Edison has provided no explanation as to how its existing independent study process study results meeting is consistent with or superior to the provisions set out in the Order No. 792 *pro forma* language and direct SoCal Edison to either explain how its existing independent study process study results meeting is consistent with or superior to Order No. 792, or to submit revisions to its GIP independent study process that are consistent with Order No. 792.

41. Third, SoCal Edison's GIP section 5 independent study process does not specifically provide an opportunity for the interconnection customer to provide written comments on the interconnection facilities study report, except in the case of an error or omission in the report.[52] We find SoCal Edison's provisions in GIP section 5.8.1.3 related to providing comments on the interconnection facilities study report do not meet the requirements of Order No. 792 because they only apply to the case of an error or omission in the interconnection facilities study report, and they do not require inclusion of the written comments in the final interconnection facilities study report. We therefore require SoCal Edison to submit a compliance filing, within 30 days of the date of this order, with revisions to its GIP independent study process allowing interconnection customers to provide written comments on the interconnection facilities study report. The revisions must require such written comments to be included in the final interconnection facilities study report, consistent with the requirements of Order No. 792.

42. Finally, Order No. 792 also requires, upon request by the interconnection customer, the transmission provider to provide "supporting documentation, workpapers, and databases or data developed in the preparation of the Interconnection Facilities Study."[53] Similar language is included in SoCal Edison GIP section 4.6.4 for the cluster study process. However, the SoCal Edison GIP does not include such language for the GIP section 5 independent study process facilities study. We find that section 4.6.4 is

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[52] GIP section 5.8.1.3.

[53] Section 9.0 of the *pro forma* SGIP facilities study agreement.

consistent with or superior to the Order No. 792 requirement to provide supporting documentation for the cluster study process, but because no such provision is included for the independent study process facilities study, we direct SoCal Edison to revise its GIP independent study process in the further compliance filing directed herein to include such a provision.

5. Interconnection of Storage Devices

43. 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.[54] Specifically, the Commission revised the definition of small generating facility to explicitly include storage devices.[55]

44. 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.[56] 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.[57]

45. 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

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[54] Order No. 792, 145 FERC ¶ 61,159 at P 227.

[55] *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 <u>and/or storage for later injection</u> of electricity identified in the Interconnection Request, but shall not include the Interconnection Customer's Interconnection Facilities."

[56] *Id*. P 229. *E.g.*, 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.

[57] *Id.* P 229.

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.[58] 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.[59]

46. 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.[60] 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.[61]

a. <u>Compliance Filing</u>

47. SoCal Edison requests that it be permitted to expand applicability of storage for later injection to apply to any generating facility, and not simply small generating facilities. SoCal Edison proposes to add "and/or storage for later injection" to its GIP definition of generating facility and to the definition of generating facility in its GIAs.[62] SoCal Edison reasons that this variation is necessary to conform the Commission-required term to SoCal Edison's GIP which does not use the term small generating facility but instead uses the term generating facility. SoCal Edison points out that the Commission previously accepted an explanation for the term generating facility in the SoCal Edison 2011 GIP Order and argues that continued use of the term generating facility with the inclusion of the Order No. 792 insertion, "and/or storage for later

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[58] *Id.* P 230.

[59] *Id.*

[60] *Id.*

[61] *Id.*

[62] *See* GIP section 2, Definitions; GIP Appendices 5.1, 5.2, 6.1, and 6.2, article 1, Definitions; and GIP Appendix 7, Attachment 1, Glossary of Terms.

injection," would not be substantively affected by and would be consistent with or superior to the Order No. 792 *pro forma* language regarding storage devices.[63]

48. In addition, SoCal Edison adds GIP section 3.8, which includes the Order No. 792 revisions in section 4.10.3 of the *pro forma* SGIP related to the capacity of a small generating facility, with the exception of the variations to the changes in terminology from "small generating facility" to "generating facility" and "transmission provider" to "distribution provider," as discussed above.[64]

b. Commission Determination

49. We find that SoCal Edison's revisions to its GIP and GIA definitions of Generating Facility to include the Order No. 792 reference to storage for later injection of electricity are consistent with or superior to the *pro forma* SGIP under Order No. 792 and we therefore accept them. We also find that SoCal Edison's addition of GIP section 3.8, Capacity of the Generating Facility, with the variations to the changes in terminology from "small generating facility" to "generating facility" and "transmission provider" to "distribution provider," as discussed above, is consistent with or superior to Order No. 792.

6. Network Resource Interconnection Service

50. 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.[65] The Commission explained that this requirement was included in Order No. 2006[66] 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.[67]

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[63] *See* Docket No. ER14-2582-000 Transmittal Letter at pp. 13 and 15-16.

[64] *See* GIP section 3.8, Capacity of the Generating Facility.

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

[66] Order No. 2006, FERC Stats. & Regs. ¶ 31,180 at P 140.

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

51. 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.[68]

a. Compliance Filing

52. SoCal Edison requests approval to exclude definitions for "Network Resource" and "Network Resource Interconnection Service" from its GIP. SoCal Edison explains that it does not provide these services, thus obviating the need for use of terminology that could potentially cause confusion.[69]

b. Commission Determination

53. We find that it is appropriate for SoCal Edison to exclude these definitions from its GIP, given that its GIP provides for interconnection to SoCal Edison's distribution system, and not its transmission system, which is under CAISO operational control. We therefore accept SoCal Edison's proposal.

V. Proposed Substantive Revisions – Docket No. ER14-2626-000

54. SoCal Edison states that, consistent with Order No. 792-A and the Commission's past precedent, its section 205 filing proposes revisions to its GIP that have not been previously accepted by the Commission, and that are consistent with or superior to Order No. 792's reforms. In this filing, SoCal Edison proposes a number of revisions that it describes as being ministerial to various sections of its GIP and GIAs.

55. SoCal Edison explains that the starting point used for proposed tariff revisions in Docket No. ER14-2626-000 is the version of the GIP it proposed in its Order No. 792 compliance filing in Docket No. ER14-2582-000.

56. In addition to the revisions characterized as ministerial, SoCal Edison requests approval of certain revisions to its GIP that SoCal Edison asserts are consistent with or superior to the *pro forma* SGIP and SGIA, as modified by Order No. 792.

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[68] *Id.* P 236. *See also id.* PP 273, 274.

[69] *See* Docket No. ER14-2582-000 Transmittal Letter at pp. 9-10.

A. SoCal Edison's Proposed Ministerial Variations

57. SoCal Edison proposes ministerial revisions to its GIP table of contents, including changing the title of section 4.6.2 and revising the section numbers of certain sections that constitute typographical errors in the GIP. In addition, SoCal Edison proposes to revise a number of provisions in the definitions section of its GIP to correct typographical errors or to clarify certain terms.[70]

58. In addition, SoCal Edison proposes a number of revisions it characterizes as ministerial to section 3 of the GIP (Interconnection Service), section 4 of the GIP (Cluster Study Process), section 5 of the GIP (Independent Study Process), section 6 of the GIP (Fast Track Process) and section 10 of the GIP (Construction of Distribution Providers Interconnection Facilities, Distribution Upgrades, Network Upgrades and Funding of Network Upgrades). Proposed ministerial revisions include typographical corrections, numbering corrections, and minor clarifying wording revisions.[71]

59. Finally, SoCal Edison proposes a number of revisions it characterizes as ministerial to the Independent Study Process Study Agreement, Table of Contents of the *pro forma* Generator Interconnection Agreements in Appendices 5.1, 5.2, 6.1 and 6.2, and the Definitions in Article 1 of the *pro forma* Generator Interconnection Agreements in Appendices 5.1, 5.2, 6.1 and 6.2. Proposed ministerial revisions include numbering corrections, minor clarifying language revisions, and conforming changes to definitions.[72]

B. Proposed Substantive Revisions

60. SoCal Edison proposes revisions to clarify that a scoping meeting will not be required for an interconnection customer seeking to exercise the annual full capacity deliverability option under section 4.7.1 of the GIP, nor will that interconnection customer be required to enter into a generator interconnection study process agreement. SoCal Edison explains that an interconnection customer seeking a deliverability determination in this circumstance has already completed interconnection studies and may already have an interconnection agreement in place and, thus should not require a scoping meeting or a generator interconnection study process agreement.[73]

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[70] SoCal Edison Transmittal Letter at pp. 5-11 in Docket No. ER14-2626-000.

[71] *Id.* at 8-27.

[72] *Id.* at 27-29.

[73] *Id.* at 9-10.

61. Next, SoCal Edison requests approval for its proposal to require a $10,000 deposit for GIP cluster and independent study process service modifications beyond those enumerated in the respective GIP modification provisions.[74]

62. In particular, SoCal Edison proposes to require a $10,000 deposit for a modification assessment. The interconnection customer would be responsible for the actual costs incurred by the distribution provider and, if applicable, CAISO in conducting the modification assessment. The provisions, GIP sections 4.5.7.2.3 and 5.8.1.6, state that the interconnection customer would pay the balance if the actual costs of the modification assessment are greater than the deposit provided by the interconnection customer.[75]

63. SoCal Edison asserts that it expends significant time and effort in evaluating proposed modifications and that it is appropriate for the interconnection customer to be responsible for the cost of such evaluations rather than being accounted for as general SoCal Edison costs to be spread among SoCal Edison's ratepayers. SoCal Edison argues that the principle of requiring an interconnection customer to be responsible for such costs is consistent with its LGIP[76] optional studies provision as well as with those approved by the Commission in CAISO's interconnection procedures, under which interconnection customers cover the actual costs of evaluating whether a requested modification is material.[77]

64. Next, SoCal Edison proposes revisions that are intended to clarify that, for customers seeking full or partial deliverability status, the Phase II Interconnection Study is not complete until CAISO completes the deliverability allocation process; and that for interconnection customers seeking energy-only deliverability status, the Phase II Interconnection Study report is not final until after the results meeting.[78] In each case,

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[74] GIP Cluster and Independent study process modifications currently allowed include: (a) a decrease in the electrical output (MW) of the proposed project; (b) modifying the technical parameters associated with the Generating Facility technology or the Generating Facility step-up transformer impedance characteristics; and (c) modifying the interconnection configuration.

[75] SoCal Edison Transmittal Letter at 10-12 and 16-18.

[76] *See* WDAT Attachment F, Large Generator Interconnection Procedures, at sections 7.6, Interconnection System Impact Study, Re-study; 8.5, Interconnection Facilities Study, Re-study and 10, Optional Interconnection Study

[77] *See Cal. Indep. Sys. Operator Corp.*, 145 FERC ¶ 61,172, at P 18 (2013)

[78] SoCal Edison Transmittal Letter at pp.13-14 and 20 in Docket No. ER14-2626-000.

SoCal Edison argues that its proposed tariff revisions are consistent with or superior to the *pro forma* SGIP because SoCal Edison's proposed revisions recognize that changes to the GIA could be occasioned by changing results of CAISO's deliverability allocation process or discussions between the parties following a results meeting.

65. Moreover, SoCal Edison proposes revisions that are intended to clarify the timing by which SoCal Edison will provide the interconnection customer a draft GIA after the interconnection customer passes the Fast Track screens and becomes eligible for Fast Track treatment. SoCal Edison states that its proposal would provide the interconnection customer with a draft GIA within 15 business days if the proposed interconnection passes the Fast Track screens and does not trigger the need for installation of new equipment or modification of existing equipment.[79]

66. However, SoCal Edison argues that an interconnection may pass the Fast Track screens, yet still require modifications to SoCal Edison's distribution system, including interconnection facilities and distribution upgrades, in order to interconnect the project safely and reliably. In that situation, SoCal Edison proposes to provide the interconnection customer with the scope, cost, and time to complete the modifications required to interconnect the proposed Generating Facility within 15 business days. SoCal Edison proposes to subsequently provide the interconnection customer with a draft GIA within 15 business days of the date it provided the scope, cost and time to the interconnection customer.[80] SoCal Edison argues that its proposed revisions are consistent with or superior to the *pro forma* SGIP, as modified by Order No. 792.

67. Finally, SoCal Edison proposes revisions that are intended to clarify that an interconnection customer may be entitled to receive congestion revenue rights from CAISO in connection with CAISO's tariff for that portion of reliability network upgrades, local delivery network upgrades or area delivery network upgrades that are not covered by cash repayment.[81] SoCal Edison argues that the current provisions of its GIP would preclude an interconnection customer from receiving congestion revenue rights under these circumstances, even if they were otherwise provided for in the CAISO tariff. SoCal Edison argues that allowing recovery of congestion revenue rights where authorized under the CAISO tariff is consistent with or superior to the *pro forma* SGIP, as modified by Order No. 792.

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[79] *Id.* at 21.

[80] *Id.*

[81] *Id.* at 29-30.

C. Request for Waivers

68. SoCal Edison requests a waiver to submit this section 205 filing out-of-time, explaining that it should have submitted the proposed tariff revisions as of the August 4, 2014 filing date for Order No. 792 compliance, but failed to do so as a result of an administrative error. SoCal Edison also requests waiver of the Commission's 60-day prior notice requirements for good cause shown and to allow an October 1, 2014 effective date for the proposed tariff revisions. SoCal Edison argues that given the benefits that would be provided by the proposed revisions, good cause exists to grant waiver and to allow the revisions to become effective. SoCal Edison requests that the Commission order on its filing in Docket No. ER14-2626-000 be issued concurrently with its Order No. 792 compliance filing in Docket No. ER14-2582-000, to also become effective on October 1, 2014. SoCal Edison asserts that the effect will be that its proposed tariff revisions in Docket No. ER14-2626-000 will supersede the proposed tariff revisions filed in Docket No. ER14-2582-000 and become immediately effective.

D. Commission Determination

69. We find that none of the requested variations that SoCal Edison has characterized as ministerial will have a substantive impact on its GIP or SGIA. Rather, the ministerial variations, which are discussed above, correct or clarify the provisions in SoCal Edison's WDAT. Accordingly, we find SoCal Edison's proposed ministerial variations to be consistent with or superior to the *pro forma* SGIP and SGIA, as revised by Order No. 792 and accept those variations.

70. We find that pursuant to SoCal Edison's proposed revisions to its section 4 cluster study process,[82] if interconnection customers seeking to exercise the annual full capacity deliverability option under SoCal Edison's GIP have already completed interconnection studies and may have a generator interconnection agreement in place, a scoping meeting may not be necessary but could be accommodated should the need arise. We find that this clarification should shorten and facilitate completion of the annual full capacity deliverability option. Therefore, SoCal Edison's proposed tariff revisions are consistent with or superior to the *pro forma* SGIP and SGIA, as revised by Order No. 792, and we therefore accept them.

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[82] *See* WDAT Attachment I, GIP Cluster Study Process at section 4.3, Scoping Meeting. *See also* GIP Independent Study Process section 5 Generator Interconnection Agreement at section 5.10.1 discussing tender of GIA following Results Meeting or final study if results meeting is not held.

71. We find it reasonable for SoCal Edison to require the interconnection customer requesting a modification instead of the ratepayers in general to pay the costs of evaluating a request for project modifications, and consistent with previously accepted GIP procedures, requiring that the interconnection customer be responsible for the actual costs incurred in conducting a modification assessment. Based on SoCal Edison's proposed tariff language and explanation of the provision, we find it similar to procedures for evaluating the impact of a modification in connection with other SoCal Edison interconnection studies which, consistent with the Commission's *pro forma* interconnection procedures, are funded by the interconnection customer in the same manner.[83] In addition, the $10,000 deposit for performing the evaluation is consistent with the deposit already required in SoCal Edison's LGIP for optional interconnection studies.

72. However, we note that both the SoCal Edison LGIP optional study procedures and the CAISO interconnection procedures for evaluating material modifications provide that if the actual evaluation costs are greater or lesser than the deposit, the interconnection customer will either be billed or refunded. In contrast, under SoCal Edison's proposed GIP section 4.5.7.2.3, the interconnection customer would only be billed if costs are greater than the deposit. The revision does not provide that the customer will be refunded if actual costs are less than the deposit. In order to ensure that the interconnection customer only pays the actual costs of the modification assessment, we require SoCal Edison to submit a further compliance filing, revising its procedures to provide a refund to the interconnection customer if the deposit is higher than actual costs of the modification assessment.[84]

73. We find, pursuant to SoCal Edison's procedures, for interconnection customers seeking full or partial deliverability status, it is appropriate that the Phase II Interconnection Study not be deemed final until CAISO completes the deliverability allocation process; [85] and that for interconnection customers seeking energy-only deliverability status,[86] it is appropriate that the Phase II Interconnection Study not be

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[83] CAISO Tariff, Appendix U, §§ 4.4, 6.4, 7.6, 8.5.

[84] *See* WDAT Attachment F, Large Generator Interconnection Procedures, at section 10, Optional Interconnection Study; *see also* sections 7.6, Interconnection System Impact Study, Re-study; and 8.5, Interconnection Facilities Study, Re-study (wherein interconnection customer being studied is only responsible for actual re-study costs).

[85] *See* GIP Cluster Study Process, section 4.9, Generator Interconnection Agreement at section 4.9.1 Tender.

[86] *See id.*

deemed final until after the results meeting as either could result in changes to the plan of service and related costs or changes that should be reflected in the draft GIA. Therefore, we find SoCal Edison's proposed clarification to its procedures for tendering a draft to be consistent with or superior to the *pro forma* SGIP and SGIA, as revised by Order No. 792.

74. We further find reasonable SoCal Edison's proposed clarification that a draft GIA will be provided within 15 business-days to interconnection customers that pass the Fast Track screens and do not trigger the need for installation of new equipment or modification of existing equipment.[87] In addition, we find it reasonable that, for interconnection customers that pass the Fast Track screens, but require modifications to SoCal Edison's distribution system to be safely and reliably interconnected, SoCal Edison be provided 15 business days within which to provide the customer with the scope, cost and timing to complete the modifications, and an additional 15 business days within which to provide the interconnection customer with a draft GIA.[88] We find that the proposed variations will benefit the interconnection customer by providing transparency and consistency during this process, while allowing the distribution provider the opportunity to fully develop an adequate scope of work to be included in the draft GIA, thus balancing the benefits of a quicker less costly Fast Track Process with the needs of the transmission and distribution providers to protect the safety and reliability of their systems. Therefore, we find that SoCal Edison's proposed tariff revisions for procedures when the proposed interconnection passes the Fast Track screens are consistent with or superior to the *pro forma* SGIP and SGIA, as revised by Order No. 792.

75. Regarding the proposed revisions to the cluster and independent study process GIAs, we find it reasonable and appropriate to provide interconnection customers with the opportunity to receive congestion revenue rights under the CAISO tariff, where those rights are provided by the CAISO tariff for that portion of reliability network upgrades, local delivery network upgrades or area delivery network upgrades that are not covered by cash repayment.[89] Accordingly, we find SoCal Edison's proposed tariff revisions to

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[87] *See* GIP Fast Track Process, section 6.6 procedures when the proposed interconnection passes the screens.

[88] *See id.*

[89] *See* GIP Appendices 5.2 and 6.2, GIA under Queue Cluster 5 and Subsequent Queue Clusters, and GIA under Independent Study Process for Interconnection Requests received on or after 12/1/12, respectively, at GIA Article 11.4.1.

be consistent with or superior to the *pro forma* SGIP and SGIA, as revised by Order No. 792.

76. Finally, we grant the waivers requested by SoCal Edison, including its request for waiver of the Commission's prior notice requirements.[90] In taking this action, we note that no party has contested SoCal Edison's section 205 filing or its requested waivers.

The Commission orders:

(A) SoCal Edison's filings in Docket Nos. ER14-2582-000 and ER14-2626-000 are hereby conditionally accepted, effective October 1, 2014, subject to a further compliance filing, as discussed in the body of this order.

(B) SoCal Edison 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.

[90] 18 C.F.R. § 35.11 (2014). *See Central Hudson Gas and Electric Corp.*, 60 FERC ¶ 61,106, *reh'g denied*, 61 FERC ¶ 61,089 (1993).