

149 FERC ¶ 61,128
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

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

San Diego Gas and Electric Company

Docket Nos. ER14-2584-000
ER14-2584-001

ORDER ON COMPLIANCE FILING

(Issued November 18, 2014)

1. On August 4, 2014, as amended on September 19, 2014, San Diego Gas and Electric Company (SDG&E) submitted for filing, pursuant to sections 205 and 206 of the Federal Power Act (FPA),¹ revisions to its Small Generator Interconnection Agreement and Generator Interconnection Procedures (GIP) of its Wholesale Distribution Open Access Tariff (WDAT) to comply with the Commission's revisions to the *pro forma* Small Generator Interconnection Procedures and Small Generator Interconnection Agreement in Order No. 792.² In this order, we conditionally accept the compliance filing, subject to a further compliance filing, to become effective October 3, 2014. We direct SDG&E to submit a further compliance filing within 30 days of the date of this order.

I. Background

2. In Order No. 2006,³ 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

¹ 16 U.S.C. §§ 824d, 824e (2012).

² *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).

³ *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).

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* SGIA⁴ 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;⁵ (2) revising the 2 MW threshold for participation in the Fast Track Process included in section 2 of the *pro forma* SGIP;⁶ (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;⁷ (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;⁸ (5) revising the *pro forma* SGIP and the *pro forma* SGIA to specifically include energy storage devices;⁹ and (6) clarifying certain sections of the *pro forma* SGIP and the *pro forma* SGIA.¹⁰ 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 See 18 C.F.R. § 35.28(f) (2014).

⁵ Order No. 792, 145 FERC ¶ 61,159 at PP 37-40.

⁶ *Id.* PP 102-110.

⁷ *Id.* PP 117, 141-148, 156-161.

⁸ *Id.* PP 203-209.

⁹ *Id.* PP 227-231.

¹⁰ *Id.* PP 235-236, 260-261.

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.¹¹ Filings adopting the revised SGIP and SGIA without variation are to be filed under section 206 of the FPA.¹² The Commission stated that it would consider variations from the Final Rule.¹³ In Order No. 792-A, the Commission clarified that a public utility transmission provider may submit a filing under FPA section 205¹⁴ 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.”¹⁵

II. Compliance Filing

5. By way of background, SDG&E states that on March 7, 2014, it proposed modifications to its existing processes for generator interconnections in its WDAT. Specifically, SDG&E states that it consolidated its SGIP and LGIP into its GIP in order to harmonize its distribution interconnection procedures with the procedures that the Commission approved for the California Independent System Operator Corporation (CAISO), Southern California Edison Company, and Pacific Gas and Electric Company.¹⁶ SDG&E states that it also submitted modifications that aligned its interconnection procedures with the California Public Utilities Commission’s (CPUC)

¹¹ *Id.* P 269.

¹² Order No. 792-A, 146 FERC ¶ 61,214 at P 2.

¹³ Order No. 792, 145 FERC ¶ 61,159 at P 270.

¹⁴ 16 U.S.C. § 824d (2012).

¹⁵ Order No. 792-A, 146 FERC ¶ 61,214 at P 3. *See also* Order No. 792, 145 FERC ¶ 61,159 at PP 273-274.

¹⁶ August 4 Transmittal Letter at 1 (citing *California Independent System Operator Corp.*, 133 FERC ¶ 61,223 (2010); *California Independent System Operator Corp.*, 138 FERC ¶ 61,060 (2012); *California Independent System Operator Corp.*, 140 FERC ¶ 61,070 (2012); *Southern California Edison Co.*, 135 FERC ¶ 61,093 (2011); *Pacific Gas and Elec. Co.*, 135 FERC ¶ 61,094 (2011)).

rules and regulations addressing the interconnection of generation and storage.¹⁷ SDG&E states that the Commission accepted its proposed GIP revisions.¹⁸

6. In the instant filing, SDG&E proposes to implement the applicable Commission *pro forma* SGIP revisions resulting from Order No. 792 in its consolidated GIP rather than in its superseded SGIP. SDG&E states that most of the changes made in the instant filing are to conform its GIP to the changes the Commission made to the *pro forma* SGIP.¹⁹

7. However, SDG&E notes that there are a few instances in which SDG&E's GIP contains provisions that the Commission accepted and found to be consistent with or superior to the *pro forma* SGIP, but have since been modified by Order No. 792.²⁰ SDG&E states that the compliance matrix included in its filing explains why previously-approved revisions continue to be consistent with or superior to the *pro forma* SGIP, as modified by Order No. 792.²¹

8. Additionally, SDG&E notes that it inadvertently omitted from its interconnection facilities study agreement (Appendix 8 to the GIP) Sections 13.0 through 21.0 from the corresponding *pro forma* Facilities Study Agreement (Attachment 8 to the *pro forma* SGIP). SDG&E proposes to correct this omission in the instant filing.²²

9. On September 19, 2014, SDG&E amended its compliance filing to propose three additional ministerial modifications to its GIP.

10. SDG&E seeks an effective date for its compliance filing of October 3, 2014.²³

¹⁷ SDG&E states that California's "Rule 21 Tariff" allows electrically interdependent generators, regardless of the jurisdiction of their interconnection agreement, to be studied together in a unified manner that would give CAISO and SDG&E the ability to determine the impacts to the electric grid in a single cluster study. August 4 Transmittal Letter at 2, note 3.

¹⁸ *San Diego Gas and Elec. Co.*, 147 FERC ¶ 61,093, at P 9 (2014); *see also San Diego Gas and Elec. Co.*, Docket No. ER14-1455-001 (July 30, 2014) (delegated letter order).

¹⁹ August 4 Transmittal Letter at 3.

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Id.*

III. Notice of Filing and Responsive Pleadings

11. Notice of SDG&E's August 4, 2014 compliance filing was published in the *Federal Register*, 79 Fed. Reg. 46,788 (2014), with interventions and protests due on or before August 25, 2014. None was filed. Notice of SDG&E's September 19, 2014 amendment was published in the *Federal Register*, 79 Fed. Reg. 58,763 (2014), with interventions and protests due on or before October 10, 2014. None was filed.

IV. Discussion

A. Substantive Matters

12. We find that SDG&E's compliance filing, with certain modifications, complies with the requirements adopted in Order No. 792. Accordingly, we will conditionally accept SDG&E's compliance filing, to become effective October 3, 2014, as discussed below. We will direct SDG&E to submit a further compliance filing within 30 days of the date of this order.

1. Pre-Application Report

13. 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.²⁴

14. 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; (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; and (4) available capacity (in MW) of substation/area bus or bank and circuit likely to serve the proposed point of interconnection (i.e., total capacity less the sum of existing aggregate generation capacity and aggregate queued generation capacity).²⁵

²⁴ Order No. 792, 145 FERC ¶ 61,159 at P 37.

²⁵ See section 1.2.3 of the *pro forma* SGIP for the complete list of items in the pre-application report.

15. 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.²⁶ 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.²⁷

16. 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.²⁸

a. Compliance Filing

17. SDG&E proposes to revise its GIP to reflect the Commission's *pro forma* language in SGIP section 1.2.²⁹ In reflecting the Commission's *pro forma* revisions throughout its GIP, SDG&E substitutes the term "Distribution Provider" in place of "Transmission Provider," and the term "Generating Facility" in place of "Small Generating Facility."³⁰

b. Commission Determination

18. We find SDG&E's revised pre-application process reflected in its GIP, and modified to incorporate the reference to "Distribution Provider" and "Generating Facility," is consistent with the *pro forma* tariff revisions required by Order No. 792.

2. Fast Track Threshold

19. 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

²⁶ Order No. 792, 145 FERC ¶ 61,159 at P 56. See section 1.2.2 of the *pro forma* SGIP for the complete list of items in the pre-application report request form.

²⁷ *Id.* P 51. See also section 1.2.2 of the *pro forma* SGIP.

²⁸ *Id.* PP 45-46.

²⁹ See August 4 Filing Attachment 1, see also GIP sections 1.2 through 1.2.4.

³⁰ August 4 Filing Attachment 1, GIP section 1.1.1.

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.³¹

Table 1: Fast Track Eligibility for Inverter-Based Systems

Line Voltage	Fast Track Eligibility Regardless of Location	Fast Track Eligibility on a Mainline ³² and ≤ 2.5 Electrical Circuit Miles from Substation ³³
< 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

20. The Commission maintained the Fast Track eligibility threshold for synchronous and induction machines at 2 MW.³⁴ Additionally, Fast Track eligibility is limited to those projects connecting to lines at 69 kV and below.³⁵

a. Compliance Filing

21. SDG&E proposes to revise its GIP to incorporate the Commission's *pro forma* SGIP section 2.1.³⁶

³¹ Order No. 792, 145 FERC ¶ 61,159 at PP 103-104.

³² 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.

³³ 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.

³⁴ Order No. 792, 145 FERC ¶ 61,159 at P 106.

³⁵ *Id.* P 107.

b. Commission Determination

22. We find that SDG&E's revised GIP, reflecting the Fast Track applicability provisions, partially complies with the Commission's *pro forma* SGIP revisions. Our review indicates that while SDG&E has modified its GIP to incorporate a table for Fast Track eligibility for inverter-based systems, which is consistent with section 2.1 of the *pro forma* SGIP, it has failed to include the corresponding footnotes in its table as part of its revision. While SDG&E incorporated the correct footnotes in Attachment 3 and Attachment 5 of its August 4 Filing, the footnotes are not reflected within the corresponding electronic tariff record data. Accordingly, in the further compliance filing directed herein, SDG&E must revise its GIP Fast Track Process to include the footnotes within the Commission's electronic tariff record data.³⁷

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.³⁸ 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.³⁹

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 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

³⁶ See August 4 Filing Attachment 1, *see also* GIP section 2.1.

³⁷ See El Paso Electric Company filing in Docket No. ER14-2577-000 (Aug. 4, 2014). In the referenced filing, the aforementioned footnotes are incorporated in a manner that allows them to be properly reflected within the Commission's electronic tariff records.

³⁸ Order No. 792, 145 FERC ¶ 61,159 at P 117.

³⁹ *Id.*

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.⁴⁰

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 2.4.4.⁴¹

a. Compliance Filing

29. SDG&E proposes to revise its GIP to incorporate the relevant sections of the *pro forma* SGIP as described above.⁴² SDG&E also proposed to delete current

⁴⁰ See IEEE Standard 519, IEEE Recommended Practices and Requirements for Harmonic Control in Electrical Power Systems.

⁴¹ Order No. 792, 145 FERC ¶ 61,159 at P 164.

⁴² August 4 Filing Attachment 1, GIP sections 2.6-2.6.2, and 2.7-2.7.5.3.

sections 2.7.1, 2.7.1.1, and 2.7.1.2 of the GIP to avoid redundancy with the new *pro forma* SGIP language.

b. Commission Determination

30. We find SDG&E's proposed revisions to the GIP are consistent with the *pro forma* SGIP provisions for the Fast Track Customer Options Meeting and Supplemental Review set forth in Order No. 792. Therefore, we accept SDG&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

31. 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.⁴³ The Commission required the transmission provider to include the interconnection customer's written comments in the final facilities study report.⁴⁴ 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.⁴⁵

32. 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

33. 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

⁴³ Order No. 792, 145 FERC ¶ 61,159 at P 203.

⁴⁴ See section 9.0 of the *pro forma* SGIP facilities study agreement.

⁴⁵ See section 10.0 of the *pro forma* SGIP facilities study agreement.

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

transmission provider is ultimately responsible for the safety and reliability of its system.⁴⁷

a. Compliance Filing

34. SDG&E proposes revisions to its interconnection facilities study agreement applicable to its independent study process to incorporate the Commission's *pro forma* language.⁴⁸ SDG&E proposes to retain its existing GIP provisions applicable to its cluster study process allowing interconnection customers the opportunity to review and provide written comments on the facilities study reports.⁴⁹ SDG&E notes that its existing GIP interconnection facilities study agreement inadvertently omits sections 13 through 21 of the *pro forma* SGIP (formerly numbered 11 through 19), and SDG&E proposes to correct the error by adding those sections consistent with the *pro forma* SGIP.⁵⁰

b. Commission Determination

35. We find that SDG&E's proposed revisions to its interconnection facilities study agreement applicable to its independent study process do incorporate the Commission's *pro forma* language,⁵¹ and we therefore accept them. However, we find that certain aspects of SDG&E's existing GIP provisions allowing interconnection customers the opportunity to review and provide written comments on the facilities study reports⁵² are not consistent with or superior to the Order No. 792 reforms. Therefore, we direct SDG&E to submit a further compliance filing, as discussed below.

36. 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 to discuss the results of the facilities study within 10 business days of the interconnection customer receiving the draft report. In contrast, SDG&E's cluster study process provides for a

⁴⁷ *Id.* P 207.

⁴⁸ August 4 Filing Attachment 1, GIP Appendix 8, sections 9, 10, and 13-21.

⁴⁹ See GIP section 4 Cluster Study Process at section 4.6.10, Results Meeting with Distribution Provider and CAISO.

⁵⁰ *Id.*

⁵¹ August 4 Filing Attachment 1, GIP Appendix 8, sections 9, 10, and 13-21.

⁵² See GIP section 4 Cluster Study Process at section 4.6.10, Results Meeting with Distribution Provider and CAISO.

study results meeting 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. Further, SDG&E's GIP section 4 cluster study process does not provide for inclusion of the interconnection customer's written comments in the study report.

37. We find that SDG&E has provided no explanation as to how its existing GIP section 4 cluster 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. The above-referenced timeline proposed by SDG&E is not consistent with the timeline required by Order No. 792. Further, SDG&E does not provide for inclusion of interconnection customer written comments in the final study report. Therefore, we direct SDG&E 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.

5. Interconnection of Storage Devices

38. 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.⁵³ Specifically, the Commission revised the definition of small generating facility to explicitly include storage devices.⁵⁴

39. 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.⁵⁵ However, the Commission clarified that

⁵³ Order No. 792, 145 FERC ¶ 61,159 at P 227.

⁵⁴ *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."

⁵⁵ *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.

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.⁵⁶

40. 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.⁵⁷ 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.⁵⁸

41. 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.⁵⁹ 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.⁶⁰

⁵⁶ *Id.*

⁵⁷ *Id.* P 230.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

a. **Compliance Filing**

42. SDG&E proposes to incorporate section 4.10.3 of the *pro forma* SGIP, as described above, into its GIP as section 6.16.⁶¹ SDG&E also proposes to revise the definition of “Generating Facility” to incorporate storage devices, as described above.⁶²

b. **Commission Determination**

43. SDG&E has revised its GIP to modify the definition of “Generating Facility” to incorporate storage devices and to adopt the *pro forma* SGIP section 4.10.3 revisions into section 6.16 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**

44. 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.⁶³ The Commission explained that this requirement was included in Order No. 2006⁶⁴ 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.⁶⁵

45. 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.⁶⁶

⁶¹ August 4 Filing Attachment 1, GIP section 6.16.

⁶² GIP Attachment 1, Glossary of Terms.

⁶³ Order No. 792, 145 FERC ¶ 61,159 at PP 232, 235.

⁶⁴ Order No. 2006, FERC Stats. & Regs. ¶ 31,180 at P 140.

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

⁶⁶ *Id.* P 236. *See also id.* PP 273-274.

a. Compliance Filing

46. On compliance, SDG&E explains that, consistent with the Commission's Order No. 792 requirements, SDG&E's GIP addresses applicability and eligibility requirements of the four processes⁶⁷ detailing the processes that interconnection customers must follow. SDG&E states, however, that the definitions of "Network Resource" and "Network Resource Interconnection Service" have not been included as required by Order No. 792, because the terms are not applicable to SDG&E's WDAT.⁶⁸

b. Commission Determination

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

7. Additional Deviations Requested

48. On September 19, 2014, SDG&E amended its compliance filing to propose three additional ministerial modifications to its GIP. Specifically, it proposed to add a missing word in its GIP section 2.7.4.3.2, modified its Attachment 8; Facilities Study Agreement, Section 8 to include the word "draft"; and it modified Section 21 of the same Attachment to include an additional sentence per the direction of Commission staff.⁶⁹

49. We agree that the additional modifications do not substantively impact the compliance filing or the Commission's determination thereon. Therefore, we find SDG&E's GIP as modified in its September 19 Amendment is consistent with the Commission's *pro forma* SGIP, as modified by Order No. 792.

⁶⁷ These processes include: Fast Track Process, Independent Study Process, Cluster Study Process, and 10 kW Inverter Process.

⁶⁸ August 4 Filing Attachment 1.

⁶⁹ September 19 Transmittal Letter at 1-2.

The Commission orders:

(A) SDG&E's compliance filing is hereby conditionally accepted, subject to a further compliance filing, to become effective October 3, 2014, as discussed in the body of this order.

(B) SDG&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)

Kimberly D. Bose,
Secretary.