

151 FERC ¶ 61,267  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

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

Southern California Edison Company

Docket No. ER14-2626-001

ORDER ON COMPLIANCE FILING

(Issued June 29, 2015)

1. On November 10, 2014, in Docket No. ER14-2626-001, Southern California Edison Company (SoCal Edison) submitted a filing to comply with the Commission's October 10, 2014 order<sup>1</sup> in this proceeding, which accepted in part and rejected in part SoCal Edison's August 4, 2014 filing to comply with Order No. 792.<sup>2</sup> SoCal Edison's compliance filing proposes to incorporate required Order No. 792 revisions into the Generator Interconnection Procedures (GIP), Generator Interconnection Agreements (GIA), and Small Generator Interconnection Agreements (SGIA) appended to SoCal Edison's Wholesale Distribution Access Tariff (WDAT).<sup>3</sup> In this order, the Commission

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<sup>1</sup>See *Southern California Edison Co.*, 149 FERC ¶ 61,026 (2014) (October 2014 Order). The Commission conditionally accepted SoCal Edison's proposed revisions required by Order No. 792 along with additional revisions to the GIP that were not required by Order No. 792.

<sup>2</sup> *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 78 Fed. Reg. 73,240 (Nov. 22, 2013), 145 FERC ¶ 61,159 (2013), *clarified*, Order No. 792-A, 146 FERC ¶ 61,214 (2014) (Order No. 792 or Final Rule).

<sup>3</sup> See October 2014 Order, 149 FERC ¶ 61,026 at P 5. SoCal Edison explained that its Small Generator Interconnection Procedures are no longer utilized for new interconnection customers, and are operational solely for projects that were initiated prior to Commission acceptance of SoCal Edison's GIP in 2011.

conditionally accepts SoCal Edison's November 10, 2014 compliance filing revisions,<sup>4</sup> subject to a further compliance filing due within 30 days of the date of this order.

## **I. Background**

2. In Order No. 2006,<sup>5</sup> the Commission established a *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). Order No. 792 revised the *pro forma* SGIP and *pro forma* SGIA<sup>6</sup> as adopted in Order No. 2006 to ensure that 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.<sup>7</sup>

3. Relevant here, Order No. 792 revised the *pro forma* SGIP facilities study agreement to: (1) allow interconnection customers to provide written comments to the transmission provider on upgrades identified in the interconnection facilities study;<sup>8</sup> and (2) require the transmission provider to include the interconnection customer's written comments in the final facilities study report.<sup>9</sup>

## **II. October 10, 2014 Order on Compliance Filing**

4. In its August 4, 2014 compliance filing, SoCal Edison requested continued use of certain existing GIP provisions, arguing they are consistent with or superior to the

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<sup>4</sup> In its first round of Order No. 792 compliance filings, SoCal Edison submitted both a compliance filing which implemented changes to its tariff as required by Order No. 792 (Docket No. ER14-2582-000) and a Federal Power Act section 205 filing (Docket No. ER14-2626-000). *See* Docket No. ER 14-2626-000 Transmittal Letter at 1-2. As the most recent version of its GIP is filed and accepted in Docket No. ER14-2626-000, SoCal Edison proposes to modify its GIP in only that docket.

<sup>5</sup> *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).

<sup>6</sup> *See* 18 C.F.R. § 35.28(f) (2014).

<sup>7</sup> Order No. 792, 145 FERC ¶ 61,159 at PP 235-236, 260-261.

<sup>8</sup> *Id.* PP 203-209.

<sup>9</sup> *See* section 9.0 of the *pro forma* SGIP facilities study agreement.

Commission's Order No. 792 *pro forma* language. However, in the October 2014 Order, the Commission found that SoCal Edison's GIP section 4 cluster study process did not provide for inclusion of the interconnection customer's written comments in the study report, and, therefore, it is not consistent with or superior to the Order No. 792 reforms.<sup>10</sup> The Commission directed SoCal Edison to either explain how its existing cluster study process provisions are consistent with or superior to Order No. 792 reforms or to submit revisions that are consistent with or superior to Order No. 792.

5. The Commission further found that because SoCal Edison's GIP section 5 independent study process neither specifically provided 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, nor required inclusion of written comments in the final interconnection facilities study report, the provisions were not consistent with or superior to Order No. 792.<sup>11</sup> The Commission directed SoCal Edison to submit a compliance filing with revisions to its GIP independent study process that would allow interconnection customers to provide written comments on the interconnection facilities study report, and that would provide for such written comments to be included in the final interconnection facilities study report, consistent with the requirements of Order No. 792.<sup>12</sup>

### **III. November 10, 2014 Compliance Filing**

6. In its compliance filing, SoCal Edison argues that its existing practices largely address the need referenced in Order No. 792 for customer input in the study processes in most instances.<sup>13</sup> SoCal Edison contends that the GIP cluster study process provisions, found in sections 4.5.7 and 4.6.10, already provide an opportunity for interconnection customers to submit written comments on both the final Phase I and Phase II interconnection study reports. SoCal Edison explains that those provisions also allow the customer to participate in a results meeting to discuss the interconnection study results and associated cost responsibility.<sup>14</sup>

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<sup>10</sup> October 2014 Order, 149 FERC ¶ 61,026 at PP 36-38.

<sup>11</sup> *Id.* P 41.

<sup>12</sup> *Id.*

<sup>13</sup> Docket No. ER14-2626-001 Transmittal Letter at 2.

<sup>14</sup> *Id.* at 2-3.

7. However, SoCal Edison acknowledges that its existing processes only require it to respond to the interconnection customer's comments in writing if a Phase I or Phase II study report contains a "substantial error or omission."<sup>15</sup> In order to ensure that potential interconnection customer concerns are more fully addressed, SoCal Edison proposes to amend its GIP Phase I and II cluster study procedures, as well as its independent study process procedures, to respond in writing to customer concerns, even if they do not identify a substantial error or omission in the Phase I and Phase II study reports. SoCal Edison argues that these modifications to its cluster and independent study processes render them consistent with or superior to Order No. 792 reforms requiring customer input in connection with interconnection studies.<sup>16</sup>

8. SoCal Edison also proposes to modify its independent study process by providing customers with the ability to comment on the interconnection facilities study report.<sup>17</sup> SoCal Edison states that the proposed tariff revisions allow an interconnection customer to provide comments in a manner that is consistent with the process provided for in the interconnection system impact study report under the independent study process, and with the process for providing comments to the final Phase I and Phase II interconnection study reports under the cluster study process.<sup>18</sup>

#### **IV. Notice of Filing and Responsive Pleadings**

9. Notice of the compliance filing in Docket No. ER14-2626-001 was published in the *Federal Register*, 79 Fed. Reg. 68,675 (2014), with interventions and protests due on or before December 1, 2014. None was filed.

#### **V. Commission Determination**

10. We find that SoCal Edison's proposal to respond in writing to customer comments and to provide customers with the ability to comment on the interconnection facilities study report partially satisfies the requirements of Order No. 792. However, we note that SoCal Edison's compliance filing does not provide for written comments to be included in the final interconnection facilities report in its cluster study process or in its

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<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> See GIP section 5.8.2.4, Interconnection Facility Study Results Meeting.

<sup>18</sup> Docket No. ER14-2626-001 Transmittal Letter at 5.

independent study process.<sup>19</sup> Therefore, we direct SoCal Edison to submit a further compliance filing within 30 days of the date of this order, to revise its GIP to include interconnection customers' written comments in the cluster study process interconnection study report(s) and in the independent study process interconnection facilities study report.

11. We find that the remaining aspects of SoCal Edison's compliance filing are consistent with the requirements set forth in Order No. 792 and therefore accept them for filing, effective November 1, 2014, as requested by SoCal Edison.

The Commission orders:

(A) SoCal Edison's November 10, 2014 compliance filing is hereby conditionally accepted, effective November 1, 2014, as requested, 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 )

Kimberly D. Bose,  
Secretary.

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<sup>19</sup> See October 2014 Order, 149 FERC ¶ 61,026 at PP 37 and 41 (directing SoCal Edison to include in its revisions that written comments will be included in the final interconnection study reports and interconnection facilities study report, consistent with the requirements of Order No. 792).