On March 30, 2018, pursuant to section 205 of the Federal Power Act (FPA), Southern California Edison Company (SoCal Edison) filed proposed revisions to its Wholesale Distribution Access Tariff (WDAT) to: (1) facilitate the interconnection of energy storage devices to SoCal Edison’s distribution system; and (2) conform certain generator interconnection procedures with those of the California Independent System Operator Corporation’s (CAISO) Tariff. As discussed below, we accept in part, and reject in part, SoCal Edison’s filing, to become effective May 30, 2018, as requested. Specifically, we accept SoCal Edison’s proposed revisions to its WDAT to conform certain generator interconnection procedures therein with those in the CAISO Tariff. However, we reject SoCal Edison’s proposed revisions to its WDAT regarding energy storage devices. As discussed further below, we direct SoCal Edison to submit a compliance filing within 30 days of the date of this order to remove the rejected language from the tariff records.

I. SoCal Edison’s Filing

SoCal Edison proposes two sets of revisions to its WDAT and certain attachments to: (1) facilitate the interconnection of energy storage devices to SoCal Edison’s system; and (2) correct, add, update, and conform terms of its Generator Interconnection Procedures (GIP) to be consistent with CAISO’s Tariff.


1. **Energy Storage Device-Related Revisions**

3. SoCal Edison asserts that its proposed energy storage-related revisions are intended to better accommodate the interconnection of energy storage devices and will (1) provide greater transparency to interconnection customers with respect to both the interconnection process and the costs associated with that process; (2) provide for greater speed and efficiency in performing studies and developing interconnection agreements; (3) allow SoCal Edison to provide services to interconnecting generators in a more cost-effective manner; and (4) reduce the number of interconnection agreement filings made with the Commission.²

4. SoCal Edison states that the proposed revisions will accommodate interconnection of energy storage devices, including the bi-directional characteristics of such devices. To provide context for its proposed energy storage device-related WDAT revisions, SoCal Edison describes the current process through which it studies requests to interconnect energy storage devices to its distribution system. SoCal Edison explains that, when it receives such a request, it studies the discharge (or injection) of energy from the energy storage device onto the distribution system like it does the injection of energy from any generator. Like an interconnecting generator, an interconnection customer seeking to interconnect an energy storage device is responsible for the costs of any identified distribution system upgrades needed to accommodate its injection of energy to the distribution system.

5. For an energy storage device’s withdrawal of energy for charging purposes (i.e., Charging Demand),³ SoCal Edison states that it does not currently conduct studies to determine whether distribution upgrades are needed to support an energy storage device’s Charging Demand because study methodologies, guidelines, and interaction with the distribution planning for retail and wholesale load have not been established.⁴ Instead, SoCal Edison explains that it provides interconnecting storage resources with a

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² SoCal Edison Transmittal at 2.

³ SoCal Edison defines Charging Demand as the flow of wholesale electric energy from the distribution system solely to charge an energy storage device for later redelivery of such energy, net of losses, to the distribution system. Charging Demand does not include the delivery of energy for purposes that are subject to the SoCal Edison’s retail tariff. See id. at 5 (defining Charging Demand).

⁴ SoCal Edion notes that distribution upgrades made to accommodate an energy storage device’s injection of energy onto the distribution system may not improve the system’s ability to serve the Charging Demand of that same energy storage device. Id. at 4.
nonbinding preliminary analysis of the distribution system’s ability to accommodate the Charging Demand of the energy storage device. Specifically, the preliminary analysis provides hourly and monthly estimates of charging opportunities that may be available for the energy storage device over a 12 month period utilizing SoCal Edison’s existing distribution system (i.e., without any incremental upgrades).

SoCal Edison contends that it does not assess any additional distribution rate for the as-available energy storage device charging service that it provides. Finally, SoCal Edison explains that the terms of the pro forma Generator Interconnection Agreement (GIA) do not account for an energy storage device’s charging activities; thus, for energy storage devices interconnected through the WDAT interconnection process, SoCal Edison includes terms to address the unique issues that these devices present in the appendices of the executed GIA, which is filed with the Commission.

6. According to SoCal Edison, it has started an internal process to develop a procedure that would allow it to study and account for an energy storage device’s Charging Demand so that Charging Demand would be treated similarly to retail and wholesale load. SoCal Edison explains that, because many of the circuits within its distribution system have extremely limited available capacity, treating an energy storage device’s Charging Demand similarly to retail and wholesale load would require SoCal Edison to study and potentially recommend distribution upgrades.

7. Turning to the proposed energy storage device-related WDAT revisions, SoCal Edison proposes to modify WDAT section 1.2, Applicability, to ensure that the WDAT applies to the transportation of capacity and energy for charging purposes. To this end, SoCal Edison proposes to add the underlined text below:

The tariff is applicable for the transportation of capacity and energy that is (1) generated or purchased by a Distribution Customer at a generation source and transported to the ISO Grid using the Distribution Provider’s Distribution System, or (2) generated or purchased by a Distribution Customer from generation sources and transported from the ISO Grid to the Distribution Customer’s Service Area using the Distribution Provider’s Distribution System, or (3) generated or purchased, by a Distribution Customer from generation sources and transported from the ISO Grid to the Distribution

5 Id. at 3-4.

6 Id.
Customer’s Resource for the Charging Demand, using the Distribution Provider’s Distribution System.\(^7\)

8. SoCal Edison also proposes to revise certain definitions and provisions in the WDAT and the attachments thereto to account for the interconnection and charging of energy storage devices.\(^8\) SoCal Edison also adds two defined terms that are specific to energy storage devices as follows:

**Charging Capacity:** The capacity provided under a Service Agreement to meet the Charging Demand of a Resource that includes storage, subject to available capacity on the Distribution System and any operating conditions and/or limitations as may be set forth in the Service Agreement.\(^9\)

**Charging Demand:** The flow of wholesale electric energy from the Distribution System solely to charge the storage component of the Eligible Customer’s Resource from the Distribution System for later redelivery of such energy, net of Resource losses, to the Distribution System. Charging Demand does not include the delivery of energy for purposes that are subject to the Distribution Provider’s retail tariff.\(^10\)

9. Moreover, SoCal Edison proposes to modify the WDAT to reflect that, if necessary, it will curtail Charging Demand before retail and wholesale distribution load in order to maintain distribution system reliability. The additional language is reflected in the underlined text as follows:

The Distribution Provider shall, on a non-discriminatory basis, curtail the transaction(s) that effectively relieves the constraint. However, to the extent practicable and consistent with Good Utility Practice, any Curtailment will be proportionately shared by the Distribution Provider and Distribution Customer. The Distribution Provider shall not direct the Distribution Customer to Curtail ISO schedules to

\(^7\) Id. at 5.

\(^8\) Id. at 5-6.

\(^9\) Id. at 5.

\(^10\) Id. at 5-6.
an extent greater than the Distribution Provider would curtail the Distribution Provider's ISO schedules under similar circumstances. Notwithstanding the foregoing, the Distribution Service provided for the Charging Demand is based on existing Distribution System capacity and is subject to Curtailment by the Distribution Provider, on an equitable and non-discriminatory basis, but before the Curtailment of Power Customers’ retail load and Wholesale Distribution Load, to the extent practicable and consistent with Good Utility Practice.\footnote{\textit{Id.} at 6-7.}

10. SoCal Edison also proposes to modify the GIAs for generating facilities under the Fast Track Process\footnote{Fast Track Process is the interconnection study process set forth in GIP section 6. The Fast Track Process is available to any interconnection customer proposing to interconnect a proposed Generating Facility that meets the eligibility requirements of GIP Section 6.1.1 and the codes, standards, and certification requirements of Appendices 8 and 9 of these procedures, or for which SoCal Edison has reviewed the design or tested the proposed generating facility and is satisfied that it is safe to operate.} to reflect that it has the right to curtail Charging Demand, in addition to output, if necessary to maintain distribution system reliability.\footnote{\textit{Id.} at 12.} In addition, SoCal Edison proposes to revise the GIAs by adding a new section to the Cluster and Independent Study Process GIAs\footnote{SoCal Edison, WDAT, Attachment I, GIP, apps. 5.2, 6.2.} and in the Fast Track GIA\footnote{\textit{Id.} at app. 7.} to reflect that it will curtail Charging Demand before retail and wholesale load.\footnote{SoCal Edison Transmittal at 12-13.}

11. Moreover, SoCal Edison proposes to memorialize its current process for studying an interconnecting customer’s energy storage device for as-available charging service in its GIP. Specifically, SoCal Edison proposes to provide interconnection customers with a non-binding preliminary analysis of the ability of SoCal Edison’s existing distribution system to accommodate the Charging Demand of the energy storage device. SoCal Edison states that, as noted above, the analysis will provide hourly and monthly estimates

\begin{itemize}
  \item \footnote{\textit{Id.} at 6-7.}
  \item \footnote{Fast Track Process is the interconnection study process set forth in GIP section 6. The Fast Track Process is available to any interconnection customer proposing to interconnect a proposed Generating Facility that meets the eligibility requirements of GIP Section 6.1.1 and the codes, standards, and certification requirements of Appendices 8 and 9 of these procedures, or for which SoCal Edison has reviewed the design or tested the proposed generating facility and is satisfied that it is safe to operate.}
  \item \footnote{\textit{Id.} at 12.}
  \item \footnote{SoCal Edison, WDAT, Attachment I, GIP, apps. 5.2, 6.2.}
  \item \footnote{\textit{Id.} at app. 7.}
  \item \footnote{SoCal Edison Transmittal at 12-13.}
\end{itemize}
of the charging opportunities that will be available for the device over the next 12 month period.\textsuperscript{17}

12. In addition, SoCal Edison proposes to add a new screen\textsuperscript{18} to the GIP’s Fast Track Process to determine whether an interconnection request will trigger the need for new equipment or modification of existing equipment. SoCal Edison states that the screen will also require that an energy storage device that will charge from the distribution system undergo a Supplemental Review\textsuperscript{19} in order to qualify for Fast Track.\textsuperscript{20} The proposed language is as follows:

\begin{quote}
When the Generating Facility includes storage, the storage device(s) will not be charged from the Distribution System. The Generating Facility must include control limiting devices or other measures as approved by the Distribution Provider to ensure the storage device(s) will not charge from the Distribution System.\textsuperscript{21}
\end{quote}

13. To memorialize the nonbinding preliminary analysis of the distribution system’s ability to accommodate the Charging Demand of the energy storage device, SoCal Edison further proposes a new Supplemental Review screen for a preliminary charging analysis for energy storage devices as part of the Supplemental Review option:

\begin{quote}
Preliminary Storage Charging Analysis: For Generating Facilities with storage which fail the initial review screen set
\end{quote}

\textsuperscript{17} Id. at 9-10.

\textsuperscript{18} SoCal Edison uses screens, identified in GIP section 6.5, to perform an initial review of an interconnection customer’s interconnection request within 15 business days after SoCal Edison notifies the interconnection customer that it has received a complete interconnection request and that the interconnection customer qualifies for evaluation under the Fast Track Process. Id. at 10.

\textsuperscript{19} A Supplemental Review is an option available to the interconnection customer in the event that SoCal Edison determines the it cannot approve the customer’s interconnection request without (1) minor modifications at minimal cost, (2) a supplemental study or other additional studies or actions, or (3) incurring significant cost to address safety, reliability, or power quality problems. SoCal Edison performs the Supplemental Review in accordance with GIP section 6.10.

\textsuperscript{20} Id.

\textsuperscript{21} SoCal Edison, WDAT, Attachment I, GIP, § 6.5.11.
forth in GIP Section 6.5.11, the Distribution Provider will perform a non-binding preliminary analysis of the ability of the Distribution System to accommodate the requested Charging Capacity utilizing available capacity on the existing Distribution System subject to limitations and/or restrictions as may be set forth in the GIA.22

14. Additionally, SoCal Edison proposes modifications under the Fast Track Process to allow an interconnection customer flexibility to choose the order in which SoCal Edison conducts the Supplemental Review screens and the preliminary charging analysis,23 as well as modifications to account for the incremental time required to conduct a preliminary charging analysis for energy storage devices in addition to the other pre-existing screens in the Supplemental Review.24

15. Finally, SoCal Edison proposes to modify its WDAT Interconnection Request form, which requests that the interconnection customer provide the type of project and a general description of the equipment configuration, to reflect the addition of energy storage devices as a selection on the form.25 SoCal Edison proposes a new section to the GIP entitled Storage System Information in order to obtain information specific to energy storage devices that includes, e.g., manufacturer and model, total storage capability, rated storage discharging power, and rated storage charging power.26 SoCal Edison states that this information will ensure that it has access to the project specific details necessary to run complete studies and is consistent with existing language in the GIP.27

2. Other Revisions

16. SoCal Edison states that it proposes revisions to its WDAT and Attachments thereto that are unrelated to energy storage devices and that are intended to correct, add, update, and conform terms of its GIP to be consistent with CAISO’s Tariff. SoCal Edison states, as such, these revisions can be read and evaluated independently from the

22 SoCal Edison Transmittal at 10.

23 Id.

24 Id.

25 Id. at 11.

26 Id.

27 Id.
energy storage device-related revisions. For example, SoCal Edison proposes revisions to its WDAT to (1) waive the distribution service deposit for eligible customers that simultaneously submit both a request for interconnection to SoCal Edison’s distribution system and a request for distribution service; (2) modify the definition of Curtailment to clarify that a Curtailment may occur as a result of SoCal Edison’s directive; (3) align the Curtailment language with the “Interruptions of Service” provision of the Cluster and Interconnection Study Process GIAs; (4) modify the “Representations and Covenants” and “Subsequent Taxable Events” provisions of the GIAs to reflect the correct Internal Revenue Service Notice; (5) add a new section – Use of Site Exclusivity Deposit – that would allow interconnection customers using the Independent Study Process to post a Site Exclusivity Deposit in lieu of demonstrating Site Exclusivity through documentation, just as if the interconnection customer was in the Cluster Study process; (6) modify the time allowed under the GIA Fast Track Process for SoCal Edison to provide the interconnection customer with a final accounting report; and (7) resolve conflicting language, correct misspellings, update documents to allow for the use of the DocuSign electronic signature technology, and update and correct contact information in the WDAT.

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28 Id. at 2.

29 Id. at 14.

30 Id. at 15.

31 SoCal Edison, WDAT, Attachment I, GIP, apps. 5.2, 6.2.

32 SoCal Edison, WDAT, Attachment I, GIP, apps. 5.2, 6.2, §§ 5.17.2, 5.17.6.

33 SoCal Edison Transmittal at 14; SoCal Edison, WDAT, Attachment I, GIP, § 5.2.1.2. The Independent Study Process is available to any interconnection customer that is either proposing to interconnect a proposed Generating Facility or is seeking to increase the capacity of a Generating Facility that has achieved commercial operation, and that is electrically independent of interconnection requests from any earlier-queued Generating Facilities. SoCal Edison, WDAT, Attachment I, GIP, § 1.2.

34 SoCal Edison Transmittal at 15.

35 Id. at 16.
II. Notice, Responsive Filings, and Deficiency Letter


A. NextEra April 20 Protest

18. NextEra comments that it appreciates SoCal Edison’s commitment to develop a methodology for studying Charging Demand so that SoCal Edison may offer both firm and non-firm interconnection service. However, NextEra argues that the facilities subject to the WDAT are transmission and, as such, the Commission’s transmission policies should apply. NextEra asserts that SoCal Edison’s proposal to offer only non-firm, as-available charging services to energy storage devices is not just and reasonable. NextEra further asserts that, although the Commission declined to mandate any particular methodology for modeling energy storage devices in Order No. 845, nothing therein implies that transmission providers can offer energy storage devices solely as-available interconnection service for charging energy. NextEra states that SoCal Edison is fulfilling only half the obligation under the Commission’s interconnection policies to study the facility expansions necessary to enable a resource to engage fully in wholesale sales pursuant to transparent and non-discriminatory rules. Moreover, NextEra states, SoCal Edison provides no timetable regarding when its internal process may result in a filing with the Commission. NextEra therefore asserts that the Commission should direct SoCal Edison to commit to a date certain by which SoCal Edison will submit a methodology for studying Charging Demand, so that SoCal Edison can offer comparable interconnection services to energy storage devices.

19. In addition, NextEra asserts that, because SoCal Edison is also proposing to modify the WDAT to reflect that it will curtail Charging Demand before any current or future wholesale or retail distribution load, SoCal Edison’s proposed revisions will apply to all energy storage devices, no matter what stage of development they may be in. NextEra states that for energy storage devices that are interconnected, have executed

36 NextEra April 20 Protest at 4-5 (citing Reform of Generator Interconnection Procedures and Agreements, Order No. 845, 163 FERC ¶ 61,043 (2018)).

37 Id. at 5.

38 Id. at 1, 5.
GIAs, or have executed system impact study agreements, SoCal Edison’s revised WDAT curtailment provision creates a barrier to entry. Moreover, NextEra contends that energy storage devices have relied on the WDAT’s non-discriminatory curtailment provisions in negotiating the terms of power purchase agreements and now may face substantial transmission curtailments from priority given both to existing load and new load that may develop in future years. Thus, NextEra states, SoCal Edison’s proposed revisions effectively modify the commercial expectations of both those energy storage devices that have executed GIAs, as well as those that are working through the interconnection process after executing a system impact study.  

B. **SoCal Edison May 7 Answer**

20. In response, SoCal Edison contends that curtailing the Charging Demand of energy storage devices that have not paid for distribution facilities is not discriminatory and is consistent with the original language of the Allocation of Curtailment provision. Rather, SoCal Edison contends that allowing energy storage devices to reserve capacity on distribution facilities without paying for distribution upgrades would be unjust and unreasonable because SoCal Edison’s distribution system facilities are paid for by retail and wholesale distribution load customers. SoCal Edison explains that, prior to the proposed revisions, the Charging Demand of energy storage devices not paying for distribution facilities would be curtailed prior to other load. Moreover, SoCal Edison explains that, while it has proposed an option for energy storage devices to charge from its distribution system without paying distribution upgrade costs, this does not preclude an interconnection customer from negotiating with SoCal Edison to pay for distribution facilities to allow its energy storage device to be curtailed similarly to retail and wholesale distribution load. SoCal Edison also refutes NextEra’s assertion that the SoCal Edison facilities subject to the WDAT are transmission, instead asserting that they are distribution.

21. SoCal Edison also argues that the Commission should not order SoCal Edison to commit to a date certain for submitting a methodology to study the provision of charging energy on a firm basis. SoCal Edison contends that, to its knowledge, the Commission

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39 *Id.* at 2.

40 SoCal Edison, WDAT, § 12.7.4.

41 SoCal Edison May 7 Answer at 2.

42 *Id.* at 5.

43 *Id.* at 3.
has not required any other distribution provider to establish a tariff for firm use of its distribution system to charge energy storage devices. SoCal states that, instead, the Commission has indicated that utilities seeking payment from energy storage devices for distribution service when they are charging their devices may do so pursuant to a tariff or on a case-by-case basis.\footnote{Id. (citing Elec. Storage Participation in Mkts. Operated by Regional Transmission Orgs. & Indep. Sys. Operators, Order No. 841, FERC Stats. & Regs. ¶ 31,398, at P 296 (2018)).}

22. Finally, SoCal Edison asserts that NextEra and other energy storage developers with executed system impact study agreements were fully aware that, if they did not pay for distribution facilities, they would not receive the same curtailment priority as retail or wholesale load.\footnote{Id. at 4-6.}

C. Commission Staff’s (Staff) May 25 Deficiency Letter


1. SoCal Edison Deficiency Response

24. In its June 25, 2018 response, SoCal Edison acknowledges that it has received requests from interconnection customers to be studied for firm distribution service to accommodate Charging Demand. However, SoCal Edison states that it informs interconnection customers in response to such requests that it only studies Charging Demand on an “as available” basis. With the exception of NextEra, SoCal Edison states that no interconnection customer has continued to request firm distribution service after being informed of that limitation. SoCal Edison further states that its currently effective WDAT does not include an option for firm distribution service for Charging Demand or any curtailment provisions for firm Charging Demand.\footnote{SoCal Edison Deficiency Response at 2.}
25. In response to staff’s question relating to SoCal Edison’s current curtailment policy, SoCal Edison explains that, while the existing WDAT does not explicitly state that parties that do not pay for distribution service shall be curtailed prior to parties that pay for such service, the policy is implied through WDAT section 12.7.4, which states that “[t]he Distribution Provider shall, on a non-discriminatory basis, Curtail the transaction(s) that effectively relieves the constraint.” SoCal Edison reiterates that it would be discriminatory to give energy storage devices that have not paid for distribution service the same curtailment priority as retail and wholesale load that have paid.  

26. In response to staff’s questions relating to the differences between wholesale load and Charging Demand, SoCal Edison explains that the difference lies in how the two are considered in SoCal Edison’s distribution system planning process. Specifically, SoCal Edison explains that it plans for wholesale load on the distribution system just as it would any retail load. SoCal Edison states that, through planning studies, city/county development plans, load trends, and other data sources (such as developers), SoCal Edison plans and designs its distribution system (substations, major distribution source lines, distribution circuits, etc.) so that it is adequate to serve each local area’s electrical needs in time to meet customers’ (retail or wholesale) service needs. SoCal Edison states that developing the infrastructure to meet those needs is time consuming, noting that it may take five to seven years or more to develop, permit, and construct new substations or new distribution source lines due to regulatory and environmental requirements. 

27. SoCal Edison states that, in contrast, it does not account for the Charging Demand of energy storage devices in its distribution system planning and, thus, its distribution system infrastructure may not be capable of meeting such demand along with any future load growth forecasted for that area of the distribution system. SoCal Edison further states that the distribution system must support an individual energy storage device’s entire request for capacity at the time of interconnection, unlike wholesale loads, which tend to gradually increase over time. As a result, SoCal Edison explains that it may not have the opportunity to adjust its distribution system planning to accommodate Charging Demand, threatening service to retail and wholesale loads. SoCal Edison states that exceeding distribution capacity is extremely problematic given the time required to add new substations or distribution facilities to the area and the fact that load forecasting is

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47 Id. at 3.

48 Id. at 4-5.

49 Id. at 5.
dynamic as customers decide to expand, relocate, and make new load service requests without significant notification to SoCal Edison.\textsuperscript{50}

28. As to the interaction between the proposed WDAT curtailment provisions and wholesale market dispatch instructions from CAISO, SoCal Edison states that it must maintain the safety and reliability of its distribution system, even if it means providing operating orders that may conflict with wholesale market dispatch instructions. As an example, SoCal Edison explains that, during periods of severe stress and instability on particular distribution circuits, it may need to curtail the energy storage device’s Charging Demand, which may result in SoCal Edison issuing an instruction to an energy storage device that conflicts with the wholesale market dispatch instructions from CAISO. SoCal Edison states that it protects the functional reliability of its distribution system according to WDAT section 12.7.2.\textsuperscript{51}

29. SoCal Edison further explains that, currently, energy storage devices do not provide retail services that require them to be charged at any time or under any conditions. But, SoCal Edison states that, if and when such service is being provided by a WDAT-connected energy storage device, SoCal Edison may evaluate the relevant WDAT provisions and propose amendments if necessary, or address the issue through a retail service agreement.

30. With regard to SoCal Edison’s use of its distribution system to make wholesale sales and retail sales, SoCal Edison states that not all of its distribution facilities are used to make wholesale sales, noting that it has distribution facilities that are currently used exclusively for retail sales. SoCal Edison states that it has never had a reason to determine which of its facilities are used to make wholesale sales and which are used exclusively to deliver retail sales because the WDAT applies to all wholesale generators that are not qualifying facilities selling all of their output to the host utility.\textsuperscript{52} Moreover, SoCal Edison states that any resource selling at wholesale (or the purchaser of energy

\textsuperscript{50} Id. at 5-6.

\textsuperscript{51} Id. at 6-7. WDAT section 12.7.2 states that “[d]uring any period when the Distribution Provider determines that a constraint exists on all or a portion of its Distribution System, and such constraint may impair the reliability of its Distribution System, the Distribution Provider will take whatever actions, consistent with Good Utility Practice, that are reasonably necessary to maintain the reliability of the Distribution Provider’s Distribution System.” SoCal Edison, WDAT, § 12.7.2.

\textsuperscript{52} SoCal Edison notes that the WDAT predates Order Nos. 2003 and 2006, but has been approved by the Commission after those orders were issued. SoCal Edison Deficiency Response at 8.
from such resource), regardless of whether the resource is interconnected under state (e.g., qualifying facilities) or federal jurisdiction, must use the WDAT to deliver power from the resource to CAISO. Thus, SoCal Edison opines that the use of a single tariff for interconnection and delivery service is a great convenience to customers, as they may apply for wholesale distribution service and interconnection service at the same time under one tariff.  

2. **NextEra July 16 Comments**

31. NextEra clarifies that it did not seek firm distribution service to meet Charging Demand as SoCal Edison asserts. NextEra notes that, following SoCal Edison’s Charging Demand studies for NextEra’s storage project, SoCal Edison recommended that NextEra pay for a Storage Management System, which is designed to automatically curtail the energy storage device under predetermined conditions, akin to a Special Protection System on the transmission system. NextEra states that the Storage Management System is identified as a Distributed Energy Resource System (DERMS) in the GIA that will limit distribution system impacts during charging. NextEra explains that, despite installing the Storage Management System, its concern is that the proposed revisions to WDAT section 12.7.4 will make Charging Demand subject to greater curtailments over time as new retail and wholesale load is incorporated into the distribution system because SoCal Edison only incorporates wholesale and retail load in its local area distribution needs or distribution system infrastructure. Therefore, NextEra argues that, if the Commission accepts the proposal, the Commission should condition its acceptance on SoCal Edison incorporating energy storage devices that have purchased a Storage Management System into their future load growth forecasts used to determine local area distribution needs or system infrastructure.

32. NextEra also opposes SoCal Edison’s characterization of WDAT section 12.7.4 as putting developers on notice that they may be curtailed on a discriminatory basis. NextEra further argues that the proposed revisions to section 12.7.4 implicitly concede that SoCal Edison is changing its non-discriminatory curtailment practices and that the new processes should only be applied on a prospective basis.

53 *Id.* at 8-9.

54 NextEra July 16 Comments at 3.

55 *Id.*

56 *Id.* at 4 (citing SoCal Edison Deficiency Response at 3).

57 *Id.* (citing 18 C.F.R. § 385.205(a) (“A person must make a tariff or rate filing in
3. **SoCal Edison July 31 Answer**

33. SoCal Edison states that, contrary to NextEra’s assertion, a Storage Management System or DERMS is not a Special Protection System. SoCal Edison asserts that a Special Protection System is designed to limit generation output during *abnormal* conditions on the transmission system, whereas DERMS limits Charging Demand during *normal* conditions on the distribution system. SoCal Edison further asserts that the Storage Management System, referred to as DERMS in GIAs, is a distribution system monitoring and alarm system.\(^58\) SoCal Edison states that connection to the Storage Management System or DERMS does not reserve capacity for Charging Demand for future distribution system planning because Charging Demand still does not pay for distribution facilities. SoCal Edison also argues that, although DERMS is labeled as a distribution upgrade, it does not increase the capacity of the existing distribution system.\(^59\)

34. In addition, SoCal Edison argues that its amended WDAT section 12.7.4 is not an admission that equitable and non-discriminatory treatment means that Charging Demand from energy storage devices interconnected under its WDAT that have not paid for distribution facilities should be treated the same as wholesale load that has paid for distribution facilities. SoCal Edison states that clarification of the existing language does not retroactively change its meaning.\(^60\)

35. Finally, SoCal Edison requests that the Commission reject NextEra’s request to make the changes prospective as to certain interconnection customers, set a date certain for when SoCal Edison must submit another WDAT amendment, or incorporate energy storage devices that have the DERMS listed as a distribution upgrade in its GIA in future load growth studies.\(^61\)

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\(^58\) SoCal Edison July 31 Answer at 2.

\(^59\) Id. at 3.

\(^60\) Id. at 3–4.

\(^61\) Id. at 5.
III. Discussion

A. Procedural Matters

36. Pursuant to Rule 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2017), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

37. Rule 213(a)(2) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2017), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We accept SoCal Edison’s May 7 and July 31 Answers because they have provided information that assisted us in our decision-making process.

B. Commission Determination

38. We accept in part and reject in part SoCal Edison’s proposed revisions to its WDAT, and direct SoCal Edison to submit a compliance filing, within 30 days of the date of this order, to remove the rejected language from the tariff records.

39. We reject SoCal Edison’s proposed revisions relating to energy storage devices. SoCal Edison has failed to demonstrate why it is just and reasonable and not unduly discriminatory or preferential to curtail one class of interconnection customer’s load (in this case, an energy storage device’s Charging Demand) without providing an opportunity to have the energy storage device’s load studied and to pay for the system upgrades needed to allow its load to have the same curtailment priority as other wholesale loads. If SoCal Edison were to offer an interconnection customer the opportunity to be studied for potential system upgrades and the customer declines to do so, then it could perhaps be just and reasonable for SoCal Edison to curtail that interconnection customer’s load before other wholesale loads, but SoCal Edison does not propose such an approach here. Instead, SoCal Edison’s primary basis for treating the interconnection customers at issue here differently is because it currently has no process for treating them the same, an explanation that does not satisfy the mandate of the FPA that an applicant support its proposed rate change as just and reasonable and not unduly discriminatory or preferential.62 Having stated the foregoing, we recognize SoCal Edison’s stated intent to facilitate the interconnection of energy storage devices. We encourage SoCal Edison to continue its internal process to develop procedures that would allow it to study and

62 E.g., Duke Energy Carolinas, LLC, 148 FERC ¶ 61,149, at P 7 (2014) (rejecting a proposal where “Applicants have not met their burden of demonstrating that the Capacity Agreement is just and reasonable, and not unduly discriminatory or preferential). See also 16 U.S.C. § 824d (2012) (creating the statutory mandate that rate proposals must be just and reasonable and not unduly discriminatory or preferential).
account for an energy storage device’s Charging Demand such that Charging Demand would be treated in a not unduly discriminatory or preferential manner compared to other wholesale loads.\(^{63}\)

40. We accept SoCal Edison’s second set of proposed revisions that are unrelated to energy storage devices, i.e., those revisions to its WDAT to correct, add, update, and conform terms of its GIP to be consistent with CAISO’s Tariff, to become effective May 30, 2018, as requested. We find that the proposed revisions are just and reasonable, and we note that no party has asserted otherwise.

The Commission orders

(A) SoCal Edison’s proposed revisions to conform its WDAT with the CAISO Tariff are hereby accepted, to become effective May 30, 2018, as discussed in the body of this order.

(B) SoCal Edison’s proposed revisions to its WDAT relating to energy storage devices are hereby rejected, as discussed in the body of this order.

(C) SoCal Edison is directed to make a compliance filing consisting only of the accepted CAISO-conforming revisions, 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.

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\(^{63}\) See SoCal Edison Transmittal at 4 (mentioning that SoCal Edison has begun an internal process to develop study methodologies to allow energy storage devices to be treated similarly to retail and wholesale load).