FERC Technical Conference
(Docket No.RM15-21-000 and other interconnection related items)
May 13, 2016

Speaker:
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Comments for panel titled "The Current State of Generator Interconnection Queues"

My name is David Gabbard. I am the Director of Electric Generation Interconnection for Pacific Gas & Electric Company. My team is responsible for interconnection of all generation to PG&E's transmission and distribution systems.

First, I want to thank the Commission for the opportunity to participate in today's discussion.

Under the direction of the California ISO, PG&E has safely and reliably commissioned more than 6200 MW of new transmission generation over the last 10 years. There is another 7 GW of active generation in the CAISO queue progressing towards interconnect to PG&E's transmission system. In addition, PG&E has interconnected over 400 MW of distributed generation under its Wholesale Distribution Tariff and has an additional 400 MW actively progressing towards commercial operation in its WDT queue.

PG&E has witnessed both the legacy issues impacting the transmission interconnection process and tariff reform led by the CAISO to mitigate these issues. PG&E commends the CAISO for its efforts to lead industry collaboration and a stakeholder process that results in an enhanced interconnection tariff that helps mitigate queue management, backlog, and transmission overbuild challenges. That said, the solutions developed within the CAISO territory are unique to the environment and stakeholders involved in the CAISO interconnection process.

While PG&E supports benchmarking across regions for lessons learned, PG&E does not recommend forcing region specific solutions across other RTOs and stakeholders. Maintaining regional flexibility of the interconnection process will allow the RTO, PTOs, and generator stakeholders to continue to refine processes and tariffs to accommodate transmission generation interconnection in an evolving market landscape.

Thank you.

Comments for panel titled "Interconnection of Electric Storage Resources"

My name is David Gabbard. I am the Director of Electric Generation Interconnection for Pacific Gas & Electric Company. My team's portfolio includes traditional, renewable, and storage generators, interconnecting to PG&E's transmission and distribution systems.

PG&E, in partnership with the California ISO and generator stakeholders, has put a significant amount of effort into accommodating storage generation under its Wholesale Distribution Tariff

(WDT) and the CAISO interconnection processes. To date, PG&E has over 1400MW and 28 MW of active storage interconnections in the CAISO GIDAP and PG&E WDT queues, respectively.

PG&E has progressed customer sited, stand-alone, and renewable paired storage generators through the current interconnection study process. Under the direction of the CAISO, PG&E has also successfully studied the addition of energy storage to existing generation through an accelerated material modification process. CAISO driven collaboration across PTOs and storage stakeholders was fundamental in enhancing the interconnection process to evaluate the impacts of both generation and negative generation on the CAISO controlled grid.

PG&E agrees that the CAISO interconnection process is sufficient to safety and reliably interconnect energy storage to PG&E's transmission system. However, PG&E believes that additional work is needed to establish a process that evaluates the impact of aggregated distribution-level storage participating in the CAISO market. PG&E is concerned that existing distribution interconnection processes may not fully evaluate whether any safety or reliability issues arise when a significant number of DER's respond in an aggregated manner to CAISO market signals and dispatch instruction. PG&E believes that the Distributed Energy Resource Aggregators should be required to complete an interconnection study process before operating as an aggregation of distributed resources in the CAISO market.

Thank you.