

**Part I:**

**Pre-Application Reports Reporting:**

|  |   |
|--|---|
| <b>a- Total since Rule 21 Revision in<br/>September 2012 (9/13/12 – 9/30/14)</b><br><br><b>134</b> | <b>b- Total for Third Quarter of 2014<br/>(7/1/14 - 9/30/14):</b><br><br><b>6</b> |
|--|---|

- i. Number requested: 134
- ii. Number issued: 132
- iii. Number currently in process: 0
- iv. Number withdrawn (if any): 2

**Rule 21 Fast Track Reporting:**

|   |  |
|---|--|
| <b>Rule 21 Fast Track applications<br/>received since 9/13/2012 – 9/30/14</b> | <b>Rule 21 Fast Track applications for First<br/>Quarter 2014 (7/1/14 - 9/30/14)</b> |
|---|--|

**Initial Review**

- a. Number of Fast Track Applications received for **all** types of generating facilities:

|                                |                       |
|--------------------------------|-----------------------|
| <b>187*<sup>1</sup></b>        | <b>19<sup>2</sup></b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014               |

\*Note: In the 2014 Q2 update, SCE stated that 183 projects were received through 6/30/2014. Pursuant to D14-05-033, some “paired” storage projects (those that have a battery and a solar component) are now being processed under the NEM process. SCE removed those projects from the non-NEM project database, thus they will be excluded from this and future quarterly updates.

<sup>1</sup> For purposes of this compliance update and going forward, SCE is now including Rule 21 applications that indicate a customer is seeking a Non-Export, Inadvertent Export or Multiple Tariff agreements operating in “Parallel Mode” as part of this total.

<sup>2</sup> For purposes of this compliance update and going forward, SCE is now including Rule 21 applications that indicate a customer is seeking a Non-Export, Inadvertent Export or Multiple Tariff agreements operating in “Parallel Mode” as part of this total.

- b. Number of Fast Track applications received for exporting generating facilities only (excluding Net Energy Metering and non-export):

**100\*** **3**  
From Rule 21 Reform to 9/30/14 3Q 2014

\*Note: In the 2014 Q2 updated, SCE stated that 93 projects were received through 6/30/2014. 4 additional projects originally submitted as “non-export” were reclassified as “export” projects (operating in “parallel mode”). Thus the total through 9/30/14 is now 100.

- c. Number of Fast Track applications for exporting generating facilities that successfully passed Initial Review, where success is defined by passing all Initial Review screens:

**17\*** **0**  
From Rule 21 Reform to 9/30/14 3Q 2014

\*Note: The total “From Rule 21 Reform to 6/30/14” reported in last quarter’s data report was 15. Two projects that were reported as failing Initial Review (failed Screen M) in last quarter’s data report were subsequently revised by their Applicant. These project modifications enabled the projects to pass Initial Review. Thus, the new total “From Rule 21 Reform to 9/30/14” is now 17.

- d. Number of Fast Track Applications for exporting generating facilities currently being evaluated in Initial Review.

**0**  
3Q 2014

Note: One of the 3 projects received in 3Q (9/17/2014) has not been deemed complete yet, so Fast Track Initial Review has not started for that project.

- e. Number of Fast Track applications for exporting generating facilities that failed Initial Review:  
i. If the total set out in B does not equal the totals set out in C + E, please explain why:

**42\*** **1**  
From Rule 21 Reform to 9/30/14 3Q 2014

\*Note: One project reported in last quarter’s data report converted to the NEM process and is thus no longer included in this quarter’s data report.

**For the 9/13/2012 to 9/30/2014 period:** From the **100** Fast Track requests received since 9/13/2012, **17** passed the Initial Review Screens, **29** projects withdrew prior to completing the Initial Review, **53** failed the Initial Review Screens, **1** is still in application review.

**For the 7/1/2014 to 9/30/2014 period:** 3 Fast Track requests for exporting projects were received during Q3-2014, 1 failed the Initial Review Screens, 1 withdrew prior to completing the Initial Review, 1 is still in the application review. Note: 1 was moved out.

- f. Number of Fast Track Applications for exporting generating facilities for which a Results Meeting following Initial Review has taken place:

|                                |          |
|--------------------------------|----------|
| <b>33</b>                      | <b>1</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- g. Please indicate the top three most frequently failed Initial Review screens in descending order.

1. Screen M (Aggregate generation 15% larger than line section peak load)
2. Screen N (Penetration Test)
3. Screen F (Short Circuit Current Contribution)

- h. If possible, please write three recommendations describing how an interconnection customer might apply for Fast Track in a way that would avoid failing the top three most frequently failed screens:

1. Use SCE's Interconnection maps and locate projects in green zones and in accordance with the available capacity as identified in the green zone;
2. Submit a Pre-Application Report Request for the proposed generator project;
3. Interconnect via non-export with certified technology.

### Supplemental Review

- i. Number of Fast Track Applications for exporting generating facilities that have requested Supplemental Review after failing Initial Review.

|                                |          |
|--------------------------------|----------|
| <b>15</b>                      | <b>1</b> |
| From Rule 21 Reform to 6/30/14 | 3Q 2014  |

- j. Number of Fast Track Applications for exporting generating facilities currently being evaluated in Supplemental Review.

|          |
|----------|
| <b>0</b> |
| 3Q 2014  |

- k. Number of Fast Track Applications that have successfully passed Supplemental Review, where success is defined as passing all screens:

|                                |          |
|--------------------------------|----------|
| <b>11</b>                      | <b>0</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- l. Number of Fast Track applications that successfully passed Supplemental Review and received a GIA<sup>3</sup>:

---

<sup>3</sup> For purposes of this compliance response and going forward, SCE assumes that "receiving a GIA" should be interpreted as SCE tendering an interconnection agreement to the customer for their review.

**11** **0**  
From Rule 21 Reform to 9/30/14 3Q 2014

Note: All 11 projects have passed Supplemental Review were tendered a draft Generator Interconnection Agreement. Of those 11 projects, 3 are In-Service, 2 are in construction, 2 executed the Interconnection Agreement but then terminated the IA, 1 is still negotiating the IA, and 3 withdrew from the queue.

- m. Number of Fast Track Applications that withdrew before supplemental review began:

**25** **2**  
From Rule 21 Reform to 9/30/14 3Q 2014

- n. Number of Fast Track projects that withdrew after supplemental review began:

**2** **1**  
From Rule 21 Reform to 9/30/14 3Q 2014

- o. Please indicate the two most frequently failed Supplemental review screens:

Answer provided applies to both quarter review and from Rule 21 reform to 9/30/14

1. Screen M (Aggregate generation 15% larger than line section peak load);
2. Screen N (Penetration Test).

- p. If possible, please indicate 2 recommendations describing how a developer might request a fast track interconnection that would avoid failing the two most frequently failed supplemental review screens.

Please refer to answer provided for Part (h).

- q. Number of Fast Track projects that signed GIAs:

**13\*** **2**  
From Rule 21 Reform to 9 /30/14 3Q 2014

\*Note: One project that had an executed a Rule 21 GIA converted to NEM and was removed from this reporting.

\*\*Note: 6 projects that signed IAs have terminated their IA. The remaining 7 are In-Service or in construction.

### **Ombudsman Role and Dispute Resolution Reporting:**

- a. Number of phone calls that the Ombudsman has received from September 2012 to date (calls related to Rule 21 issues that were within the Ombudsman's responsibilities or function):

**0** **0**  
From Rule 21 Reform to 9/30/14 3Q 2014

- b. Number of emails the Ombudsman has received from September 2012 to date:

|                                |          |
|--------------------------------|----------|
| <b>61</b>                      | <b>0</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- c. Number of cases that the Ombudsman took an active role in handling: (“active role” means the Ombudsman sought out information from another source to provide that information to an interconnection customer or other third party)

|                                |          |
|--------------------------------|----------|
| <b>10</b>                      | <b>0</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- d. Number of disputes initiated in writing by a Party that invokes Rule 21, Section K.2 Dispute Resolution Procedures (DRP).

|                                |          |
|--------------------------------|----------|
| <b>16</b>                      | <b>1</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- e. Number of disputes resolved within 45 calendar days of the original notice.

|                                |          |
|--------------------------------|----------|
| <b>10</b>                      | <b>1</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- f. Number of disputes where an additional 45 days was sought for resolution (second part of original question e).

|                                |           |
|--------------------------------|-----------|
| <b>4</b>                       | <b>1*</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014   |

*\*Note: This dispute has not been resolved. Mediation by a member of the CPUC’s ALJ Division has been requested by the parties, but that mediation has not yet occurred.*

- g. Number of disputes mediated by a member of the CPUC’s ALJ Division:

|                                |          |
|--------------------------------|----------|
| <b>0</b>                       | <b>0</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- h. Number of disputes mediated by an outside third-party mediator:

|                                |          |
|--------------------------------|----------|
| <b>0</b>                       | <b>0</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

- i. Number of disputes in which a Formal Complaint has been filed at the CPUC and served on the IOU:

|                                |          |
|--------------------------------|----------|
| <b>2</b>                       | <b>0</b> |
| From Rule 21 Reform to 9/30/14 | 3Q 2014  |

**Accounting of Exemptions from Rule 21 Interconnection Fees, Including the Value of Those Exemptions:**

In accordance with the Public Utilities Code Section 2827 and D.02-03-057, NEM customer generators are exempt from interconnection application fees, supplemental review fees, costs for distribution upgrades and standby charges. The accounting of NEM interconnection exemptions, starting in November 2013, was reported to the Commission and the service list of R.12-11-005 proceeding pursuant to the Commission's Resolution E-4610 and Decision (D.) 14-05-033 on September 19, 2014. A supplemental report was submitted on October 17, 2014. The report will be updated on June 30, 2015.<sup>4</sup>

### Cost Analysis:

For the five third-party owned, exporting generating facilities that have most recently completed the interconnection process under Rule 21 and have all of the following data points known: (If the data does not exist for five recently completed interconnection applications, please complete as many cells as possible with data from interconnection applications soon to be completed to reach a total of five.)

- a. Project size; project technology; and date that interconnection evaluation was completed, defined as the day that the project file was closed.
- b. Preliminary interconnection upgrade cost estimate provided to the interconnection customer and title of the document on which the information was transmitted:
- c. First revised interconnection upgrade cost estimate and title of the document on which the information was transmitted (if any):
  - i. What are the three most significant drivers or triggers of changes in the cost estimate from B to C?
- d. Second revised interconnection upgrade cost estimate & the title of the document on which the information was transmitted (if any):
  - i. What are the three most significant drivers or triggers of in the cost estimate from C to D?
- e. Interconnection upgrade cost estimate provided on GIA documentation:
- f. Actual interconnection upgrade cost & the title of the document on which the information was transmitted:
  - i. What are the three most significant drivers or triggers of between the GIA estimate and the actual upgrade costs?
- g. Amount of true-up either returned to interconnection customer OR billed to interconnection customer:
  - i. Date of commencement of true-up process and mailing date of true-up document:
- h. If possible, please indicate top issue, in project manager's opinion, for the overall length of the project's lifespan:
- i. Please fill out the table below for the 5 most recently completed 3<sup>rd</sup> party owned projects:

**There are no additional third-party owned Rule 21 exporting projects that have completed final accounting during this compliance period. Please refer to confidential attachment provided on January 31, 2014 for prior project reporting submitted in response to this request.**

---

<sup>4</sup> Please note, the IOUs filed an Advice Letter on June 23, 2014, in compliance with D.14-05-033 which outlines the NEM cost categories currently being tracked and will be reported.