

PUBLIC UTILITIES COMMISSION

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January 2, 2019

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Pacific Gas & Electric Company
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Gary A Stern
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, CA 91770

Clay Faber
Director, Federal & CA Regulatory
San Diego Gas & Electric
8330 Century Park Court
San Diego, CA 92123

RE: Request of the California Solar & Storage Association for Extension of Time to Comply with Rule 21 Smart Inverter Communications Requirements

Dear Mr. Jacobson, Mr. Stern, and Mr. Faber:

Under the authority provided for in the Commission's Rules of Practice and Procedure, Section 16.6, the compliance deadline for Smart Inverter Phase II communications requirements, pursuant to Resolution E-4832, OP 2 and 4, and for Phase III Functions 1 and 8, pursuant to Resolution E-4898, OP 2.a, is extended to August 22, 2019.

This deadline extension letter is in response to the letter of November 19, 2018 from the California Solar & Storage Association (CALSSA). CALSSA requested a six-month extension of the deadline to comply with the Smart Inverter Phase II communications requirements ordered in Resolution E-4832 and an equivalent delay in the deadline for compliance with Phase III Functions 1 and 8, as established by Resolution E-4898 (the "deadline extension request" or "CALSSA request"). This request would extend the deadline from February 22, 2019 to August 22, 2019.

CALSSA served its request on the service list of Rulemaking (R.) 11-09-011 and of R.17-07-007. Southern California Edison and Pacific Gas & Electric responded to the CALSSA request affirming their non-opposition to the deadline extension request.

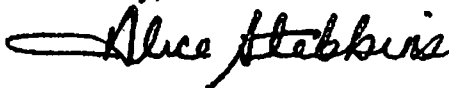
Due to the complex technical and procedural nature of the rollout of Rule 21 smart inverter capabilities, the complete background and discussion of the CALSSA request have been appended to this letter; see Appendix A.

We find that the extension requested by CALSSA is necessary. Additional time will provide both industry and the utilities more opportunity to smoothly roll of this rule change.

This deadline extension request applies only to the Smart Inverter Phase II communications requirements and to Functions 1 and 8 of the Smart Inverter Phase III requirements. It does not affect Smart Inverter Phase III Functions 5 or 6, which, pursuant to Resolution E-4898, OP 2.a, will be required for all inverter-based generating facilities as of February 22, 2019.

In conclusion, the compliance deadline for Smart Inverter Phase II communications requirements, pursuant to Resolution E-4832, OP 2 and 4, and for Phase III Functions 1 and 8, pursuant to Resolution E-4898, OP 2.a, is extended to August 22, 2019.

Sincerely,



Alice Stebbins
Executive Director

cc: Brad Heavner, Policy Director, California Solar & Storage Association
Service Lists of R.17-07-007 and R.11-09-011
Kelly Hymes, Administrative Law Judge
Michael Picker, Commissioner
Forest Kaser, Advisor, Office of President Michael Picker
Geoffrey Dryvynsyde, Assistant Chief Counsel
Elizabeth Dorman, Principal Counsel

APPENDIX A: Background and Discussion of the California Solar & Storage Association's (CALSSA) Request for Extension of Time to Comply with Smart Inverter Phase II Communications Requirements and Phase III Functions 1 and 8

The California Public Utilities Commission (Commission) initiated Rulemaking (R.) 11-09-011 on September 22, 2011 to review and, if necessary, revise the rules and regulations governing the interconnection of generation and storage facilities to the electric distribution systems of the California investor-owned utilities (IOUs). In early 2013, the Smart Inverter Working Group was formed by parties of R.11-09-011 to develop proposals to take advantage of the new, rapidly advancing technical capabilities of inverters. The Smart Inverter Working Group (SIWG) submitted recommendations for Smart Inverter Phase II communications requirements in February 2015 and for Smart Inverter Phase III advanced functions in March 2016.

In June 2016, the Commission incorporated those recommendations into D.16-06-052, which directed the IOUs to file implementing advice letters within six months.

On December 20, 2016, the IOUs proposed Rule 21 revisions to incorporate the Phase II recommendations with a deadline of “nine months after the release of the SunSpec Alliance communication protocol certification test standard or the release of another industry-recognized communication protocol certification test standard.” Resolution E-4832 approved these revisions.

In August 2017, the IOUs proposed Rule 21 revisions to incorporate the Phase III recommendations. Resolution E-4898 approved the proposed revisions and adopted a deadline of the “[l]ater of March 1, 2018 or 9 months after the release of SunSpec Alliance Approved Test Procedure (or another industry-recognized protocol standard).”

The SunSpec Alliance released its Common Smart Inverter Profile (CSIP) on May 22, 2018, which established February 22, 2019 as the compliance date for generating facilities to have the functions described above.

Following the release of the CSIP, the SIWG recognized gaps in the certification regime. For example, while the Rule 21 tariff allows for communications between a generating facility and a utility to be mediated through an aggregator or energy management system (EMS), the CSIP procedures do not provide for end-to-end testing and consider communications between a generating facility and an aggregator or EMS to be out of scope. In August 2018, the SIWG began weekly meetings to address these implementation issues. On October 26, 2018, at the request of the Commission's Energy Division Staff and the parties of the SIWG, the IOUs released implementation plans describing their approaches to meeting the February 22 deadline (“implementation plans”). Subsequent discussion of the implementation plans indicated to Energy Division Staff that the plans needed more work to address the implementation challenges associated with both the deadline and other unforeseeable practical issues.

Given the need to continue discussions and seek greater clarity on how to proceed, the California Solar & Storage Association (CALSSA) determined that a deadline extension would be

beneficial to its members who construct generating facilities. On November 19, 2018, CALSSA requested a six-month extension of the deadline to comply with the Smart Inverter Phase II communications requirements ordered in Resolution E-4832 and an equivalent delay in the deadlines for compliance with Phase III Functions 1 and 8 contained in Resolution E-4898. CALSSA did not request a delay of other deadlines in Resolution E-4898.

On December 6, 2018 and December 10, 2018, respectively, Southern California Edison (SCE) and Pacific Gas & Electric (PG&E) noticed the service lists for R.11-09-011 and R.17-07-007 of their non-opposition to the CALSSA extension request. San Diego Gas & Electric (SDG&E) staff stated in a R.17-07-007 working group meeting on December 12, 2018 that SDG&E also intended to notice the service lists of their non-opposition.

In the same working group meeting, CALSSA stated an intention to submit a Proposal for Modification (PFM) of Resolutions E-4832 and E-4898. According to CALSSA's verbal statement, it plans to request that the Commission address specific implementation parameters of the Phase II and III functions under discussion in the CALSSA deadline extension request.

The deadline extension is necessary due to a variety of circumstances. First, the implementation of smart inverter communications requirements was unexpectedly complicated. While the SunSpec CSIP was expected to fulfill the testing and certification needs of industry and of the utilities, it left significant gaps. Moreover, no government agency currently oversees the CSIP or vets testing labs to carry out the test procedures specified therein. These issues were compounded by the late release of the IOUs' implementation plans, which were provided to equipment manufacturers and developers of generating facilities on October 26, 2018—less than four months before the existing deadline. While these implementation plans were intended to provide clarity on the roll out of this new set of requirements, they generated additional uncertainty and controversy.

The extension will provide equipment manufacturers and developers of generating facilities with additional time to prepare for the forthcoming requirements. Hence, Energy Division staff find it appropriate to grant a six-month extension. As such, the deadline for compliance with the Smart Inverter Phase II communications requirements and with Phase III Functions 1 and 8 is extended to October 22, 2019.

This deadline extension applies only to the Smart Inverter Phase II communications requirements and to Functions 1 and 8 of the Smart Inverter Phase III requirements. It does not affect Smart Inverter Phase III Functions 5 or 6, which, pursuant to Resolution E-4898, OP 2.a, will be required for all inverter-based generating facilities as of February 22, 2019.