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**SDG&E's Spring 2021 Community  
Solar Green Tariff (CSGT)  
Request for Offers  
Solicitation Summary**

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# Legal Disclaimers:

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## **Anti-trust:**

*All participants in today's meeting shall comply with anti-trust guidelines. These guidelines direct meeting participants to avoid discussions of topics or behavior that would result in anti-competitive behavior, including restraint of trade and conspiracy to create unfair or deceptive business practices or discrimination, allocation of production, imposition of boycotts and exclusive dealing arrangements.*

## **Rejection of Offers:**

*SDG&E MAKES NO GUARANTEE THAT A CONTRACT AWARD SHALL RESULT FROM THIS RFO EVEN AFTER AN OFFER HAS BEEN SELECTED AS A WINNING BID. SDG&E RESERVES THE RIGHT AT ANY TIME, AT ITS SOLE DISCRETION, TO ABANDON THIS RFO PROCESS, TO CHANGE THE BASIS FOR EVALUATION OF OFFERS, TO TERMINATE FURTHER PARTICIPATION IN THIS PROCESS BY ANY PARTY, TO ACCEPT ANY OFFER OR TO ENTER INTO ANY DEFINITIVE AGREEMENT, TO EVALUATE THE QUALIFICATIONS OF ANY RESPONDENT OR THE TERMS AND CONDITIONS OF ANY OFFER, OR TO REJECT ANY OR ALL OFFERS, ALL WITHOUT NOTICE AND WITHOUT ASSIGNING ANY REASONS AND WITHOUT LIABILITY OF SEMPRA ENERGY, SDG&E, OR ANY OF THEIR SUBSIDIARIES, AFFILIATES, OR REPRESENTATIVES TO ANY RESPONDENT. SDG&E SHALL HAVE NO OBLIGATION TO CONSIDER ANY OFFER.*

## **Document Conflict:**

*This presentation is intended to be a summary level discussion of the information and requirements established in the RFO Materials. To the extent that there are any inconsistencies between the information provided in this presentation and the requirements in the RFO Materials, the RFO Materials shall govern.*

# Overview of Solicitation

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- SDG&E is committed to advancing the State's RPS goals and to continue to be compliant with RPS regulations.
- SDG&E worked together with the CPUC and other IOUs to develop a successful solicitation process. Incorporated in this RFO are lessons learned from the prior RAM and Green Tariff Shared Renewables (GTSR) RFOs.
- SDG&E plans to fulfill the needs of the following Program:
  - Community Solar Green Tariff (CSGT) –  
<https://www.sdge.com/CSGTRFO>
- Assessment and selection transparency is paramount to us. Our Independent Evaluator, Harry Judd, will be involved in every step of the process.

# General Q&A Guidance

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- SDG&E will post questions and answers on the solicitation websites
- Questions can be submitted to either:
  - [ECRRAMSolicitation@sdge.com](mailto:ECRRAMSolicitation@sdge.com) (CSGT)
- Respondents **MUST** copy the IE on all communications
- Questions received and answers will be posted to the website periodically
- Deadline to submit questions is April 9
- Offers are due by April 23 at 12:00 PM PPT

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## **SDG&E and Supplier Diversity**

# Background on Diverse Business Enterprises (DBE) Program

- *SDG&E encourages Women, Minority, Disabled Veteran, Lesbian, Gay, Bisexual and Transgender (LGBT) Business Enterprises (“Diverse Business Enterprises” or “DBE”s) to participate in the RFO*
- *Obtaining Certification*
  - *Minority, Woman or LGBT Owned Business*

California Public Utilities Commission (CPUC) Supplier Clearinghouse  
<http://www.thesupplierclearinghouse.com/>
  - *Service Disabled Veteran Business*

State of California, General Services Office of Small Business and Disabled Veteran Business Enterprise Services (OSDS)  
<https://www.dgs.ca.gov/PD/Services/Page-Content/Procurement-Division-Services-List-Folder/Certify-or-Re-apply-as-Small-Business-Disabled-Veteran-Business-Enterprise#@ViewBag.JumpTo>
  - *Others Offering Certification*
    - Regional affiliates of the National Minority Supplier Development Council (NMSDC)
    - Small Business Administration 8(a) (SBA)
    - Women Business Enterprise Council (WBEC-WEST)

# Supplier Diversity Contact Information

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*DBEs can request additional information by contacting SDG&E  
at [vendorrelations@sdge.com](mailto:vendorrelations@sdge.com)*



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# Role of the Independent Evaluator

Harold Judd | Accion Group

## Overview Independent Evaluator

*ACCION GROUP (ACCION) is approved by the CPUC as the Independent Evaluator for the RFO.*

*ACCION was founded in 2001 and has experienced professionals with extensive industry experience in the areas of:*

- Evaluation & Dispatch Modeling
- Transmission & Distribution Systems
- Power Plant Construction & Operation
- Risk Analysis
- Legal Services (contracting & contract review)
  - PPA / APSA / Green Field Development / Turnkey Projects

*Harry Judd has more than thirty years of experience in regulated industries and emerging markets; His experience includes the following:*

- 100 Independent Evaluator engagements over the previous thirteen years
- Conducted RFPs for major clients including Duke Energy, BPA, the Colorado PUC, the Nuclear Decommissioning Finance Committee, the Georgia Public Service Commission, and xCel.

# Bid Conformance

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- *IE's role in the CSGT RFO:*
  - Monitor the Standards of Conduct to
    - Ensure equal treatment of all bids
    - Set separation of the Company's Evaluation Team & Bidders
    - Support clear & consistent Communication & Messaging
    - Create confidence in the Market regarding the Process
  - Review Draft Documents & Process before PUC Filing
  - Provide Independent Contact for Bidders
  - Monitor evaluation process and review results
  - Inform PUC of status, complaints & issues
- *Bids should comply with all the requirements of the RFO*
  - Any bids that are rejected because of conformance issues will be discussed with the IE
  - Any bids that are accepted that may have minor conformance issues will also be discussed with the IE
  - The goal is to ensure all bidders are treated in a fair manner

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**Overview of Schedule,  
Product, Procurement Targets  
and Eligibility Requirements**

## Overview of Programs

- The CSGT Program was implemented by the CPUC in D.18-06-027, D.18-10-007, and Resolution E-4999.
- **CSGT Program:**
  - Intended to provide low-income households located in a census tract that is in the top 25% statewide disadvantaged communities or in the highest 5% of CalEnviroScreen's Pollution Burden that do not have a CalEnviroScreen Score, to meet 100% of residential electric needs through local renewable generation and receive a 20% bill discount from their current electric rate.
  - SDG&E solicitation target of **up to 5 MW of CSGT capacity.**

# RFO Schedule / PPA Execution and Approval

No	Event	Date
1	Launch RFO	March 19, 2021
2	Deadline to submit questions	April 9, 2021
3	Answers to all Questions will be posted on SDG&E's website	April 16, 2021
4	Offer package due no later than <b>12 pm PPT</b> on this date	April 23, 2021
5	SDG&E Notifies Offerors of selection	May 24, 2021

\*Note: SDG&E has no control over CPUC approval, these date are approximate

# CSGT Eligibility Requirements

## Resource Requirements:

- Resources must be new facilities;
- Resources must be an Eligible Renewable Energy Resource as defined in PUC Section 399.12;
- Resources must be CEC-certifiable as an eligible renewable resource by the commercial operation date;
- Resources must utilize a commercially proven solar technology;
- Resources must sell its entire output and all plant attributes to SDG&E (full buy/sell) or sell all output and all plant attributes in excess of onsite load to SDG&E (excess sales);
- The full output from the facility must be sold to SDG&E, which means that SDG&E will not consider purchasing a portion of a project larger than 3 MW;
- All solar resources procured on behalf of CSGT customers from an CSGT Project shall comply with the California Air Resources Board's (CARB) Voluntary Renewable Electricity (VRE) Program. California-eligible greenhouse gas allowances associated with purchases from an CSGT Project shall be retired on behalf of CSGT Customers as part of the VRE Program; and,
- Each CSGT Project must meet Green-e<sup>®</sup> Energy eligibility criteria throughout the Delivery Term of the PPA.

## Project Capacity:

- Project contract maximum size is 3 MWac nameplate capacity.
- SDG&E may, at its sole discretion, determine that the Project appears to be part of an installation larger than 3 MW in the same general location that has been or is being developed by the respondent or the respondent's Affiliates, or appears to be sharing facilities.

# CSGT Eligibility Requirements

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## Location/Site Control:

- Projects must be located within the service territory of SDG&E or located in the Imperial Valley; and,
- The Respondent must have, at time of bidding, site control for the duration of the 10, 15, or 20-year power purchase agreement, as applicable, evidenced by documentation of:
  - Direct ownership
  - Lease
  - Option to lease or purchase upon PPA approval. The option must be an exclusive option to the Bidder effective until the completion of the RFO cycle.
- If notified of contract award, Respondent's site control documents must be: 1) in the name of the same entity that will execute the PPA, or 2) shall have been assigned to such entity by the time Respondent accepts its position on the shortlist.



# CSGT Eligibility Requirements

## Interconnection:

- Respondents must have completed a Phase II interconnection study (or distribution level equivalent) or executed an interconnection agreement or have passed the Wholesale Distribution Access Tariff (WDAT) or California Independent System Operator (CAISO) Fast Track screens and provide:
  - A copy of the most recent completed interconnection agreement or Phase II interconnection study with their offer, or Evidence of having passed the WDAT or CAISO Fast Track screen
  - Transmission level projects that have a Phase II interconnection study but do not yet have a completed interconnection agreement are required to apply for interconnection through the CAISO process to obtain an interconnection agreement.
  - Distribution level projects that do not yet have a completed interconnection agreement will be required to apply through SDG&E's WDAT process.

Note: If shortlisted, Respondent's interconnection documents must be: 1) in the name of the same entity that will execute the ECR PPA, or 2) shall have been assigned to such entity by the time Respondent accepts its position on the shortlist.

# CSGT Eligibility Requirements

## Developer Experience:

- The Respondent and/or members of the project development team must have experience. Respondents must provide evidence of having completed, or begun construction, of a project using a technology similar to the offered technology
- The Respondent will maintain contractual control of the facilities and be responsible for development, land acquisition, permitting, financing and construction for the facilities. Respondents must provide a description of how operational control will be maintained.

## Project Start Date:

- Offers must provide an anticipated delivery start date that is **within 36 months after the expected CPUC PPA Approval date.**
- **For CSGT projects,** CSGT subscriptions by low-income customers are required to be a **minimum of 25% of the project's contract capacity** prior to the project achieving commercial operations.

## Other Incentives Not Permitted:

- Respondents shall not have sought Small Generator Incentive Program (SGIP) benefits, California Solar Incentives (CSI) or Net Energy Metering (NEM) Program benefits for the projects being offered and shall not plan to seek or participate in such programs for the entire term of the PPA.

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## **Overview of the CSGT Offer Evaluation Process**

# Evaluation process for the CSGT RFO

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Once the bids are received and the relevant data is identified and extracted to a database, the evaluation process for the RFO will consist of the following steps:

1. Screen the bids for conformance with the eligibility requirements
2. Analyze the bids using SDG&E's Least-Cost / Best-Fit (LCBF) evaluation methodology to create an initial quantitative ranking, and a subsequent final ranking which may modify the initial ranking based on qualitative criteria
3. Select winning bids for projects based on the final ranking

# LCBF Overview

- Valuation and Selection Process
  - Least-Cost/Best-Fit (LCBF)
- Quantitative Evaluation
  - Net Market Value (NMV)
  - Each conforming offer is valued using this discounted cash flow analysis
- Qualitative Evaluation
  - Used to differentiate similarly valued offers
- Shortlisted Offers



# NMV - Typical Benefits and Costs

Typical Benefits	Typical Costs
Energy	Contract Payments
Ancillary Services (A/S) - Spin, Non-Spin, Reg Up, Reg Down	Variable Energy Costs (Fuel, VOM, GHG Compliance)
Capacity (RA)	Transmission Interconnection
Renewable Energy Credits (REC's)	Renewable Integration Adder

# Transmission Adder Calculation

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## Transmission Adder

1. Transmission costs from a project's latest transmission study will be used to calculate a transmission adder that will be applied to the project's Bid Ranking Price.
2. Only transmission costs that are reimbursable to the bidder will be used to compute the transmission adder. Amounts paid by the bidder for distribution interconnections and transmission-level upgrades that are not reimbursed will not be used in calculating the transmission adder. Those should be included in the respondents bid price.
3. In all cases, the reimbursable costs shown in the transmission studies submitted by the bidder will be used for adder computation.

# Qualitative Evaluation

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Criteria may be considered in the Qualitative Evaluation:

- Project development status:
  - Electrical interconnection status
  - Permitting status
  - Fuel and water interconnections
  - Site control
- Developer attributes
  - Project financing
  - Development experience
  - Project viability
- Other attributes
  - Contribution to other procurement targets (CHP, RPS, Energy Storage)
  - Portfolio fit
  - Technology risk
  - Proximity to High Hazard Fuel Zone and ability to exceed the minimum fuel requirements from these zones
  - Start Date and Term



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# Overview of Bidding Protocols

# Required Bid Forms

**Offer Form** – There is no limit on the number of Forms that can be submitted. Therefore, respondents are encouraged, but not required, to submit additional offers for our consideration with shorter tenors or with escalators.

**Interconnection Agreement or Phase II Interconnection Study (or distribution level equivalent) and/or Fast Track Documentation** – Submit a copy of the most recent completed interconnection agreement, Phase II interconnection study or equivalent Fast Track documentation. For Projects located in Imperial Valley and dynamically transferred via pseudo-tie into SDG&E's service territory by the CAISO, submit copies of a completed Phase II interconnection study and provide documentation certifying the existence of the dynamic transfer arrangements.

**Site Control Documentation** – Submit copies of site control documents demonstrating: a) direct ownership; b) a lease; or c) an option to lease or purchase upon PPA approval (must be an exclusive option to the Bidder that will last until the completion of the RFO cycle).

**Site Maps** – Submit copies of all project maps showing location, facilities, layout, Interconnection, etc. and the Project single line diagram.

**Resource Report** - please submit a verifiable fuel resource plan

**Full PVSyst Model (Solar Only)** – the full PVSyst file must be submitted by exporting the entire project that contains the prj, met, inv, pan, etc. files.

# Mistakes on forms that can cause rejection of a bid

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- **Critical information missing from your bid submissions**
- **Entering information incorrectly: i.e. prices in cents/kWh and deliveries in kWh, instead of \$/MWh and MWh**
- **Adding to or renaming worksheets in offer form**
- **Making the utility fill out your offer form**

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# **Bid Submission Process**

# Registration and Logging On

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## Ways to Register:

1. Receive an invitational email from SDG&E followed by a link to access PowerAdvocate®
2. Register as a first-time user on [www.PowerAdvocate.com](http://www.PowerAdvocate.com)
  - Request for access using the Referral Information
3. Request for access using the PowerAdvocate® link located at: <https://www.poweradvocate.com/pR.do?okey=113672&pubEvent=true>

## How to Log On:

1. Launch a web browser and go to: [www.poweradvocate.com](http://www.poweradvocate.com), and then click on the orange **Login** button.
2. Enter your account **User Name** and **Password** (both are case-sensitive)
3. Click **Login**.

# The Supplier Dashboard

## What information is displayed on my Dashboard?

Your Dashboard displays all bid events to which you have been invited.

**Open and Pending Pre-Bid events**

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**Pending (not Pre-Bid) and Closed events**

Dashboard		Company Filter: <input type="text" value="All Companies"/>		Fill-In Data Sheets					
Event / Buyer	Msg	Open	Close	Download Documents	Upload Documents	Commercial	Technical	Pricing	
190 -cbl-1: 190 First St. Cable/Wiring Electric Power Utility		05/16/10 8:00 AM EDT	06/08/10 4:00 PM EDT	1	2	3	4	5	
T42g: Colorado River Sluice Gates Great Western Utilities	1/1	04/04/10 10:00 AM EDT	06/30/10 4:00 PM EDT	1	2	3	4	5	
1998-01: Grid Expansion Electric Power Utility		09/01/10 8:00 AM EDT	12/29/10 4:00 PM EST	1	2	3	4	5	

The numbers on the Dashboard represent a general workflow, though you can work in any order:

- 1 Download the bid package.
- 2 Upload bid documents, proposals, etc.
- 3 4 5 Fill in online datasheets if present.

Event name/number

Buying entity

Number of unread/total messages; click to access the **Messaging** tab.

# More Information & Additional Help

## PowerAdvocate Support

- [Support@poweradvocate.com](mailto:Support@poweradvocate.com)
- (857) 453-5800

## Online Help

- Access the Help System at any time by clicking on the **Help** button



Dashboard Profile Company **Help** Logout

## Event Dashboard

Fill-In Data Sheets

Event	Msg	Open	Close	Download Documents	Upload Documents	Commercial	Technical	Pricing
35697 : 2013 SDGE Energy RFP Sempra Energy		05/02/13 5:00 PM EDT	05/14/13 4:00 PM EDT	1	2	3	4	5

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*Please submit your questions by  
April 9<sup>th</sup>*



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# Overview of Power Purchase Agreements

## Standard PPA Terms - Applicable to GTSR Programs

Term	Description
Contract Document	<ul style="list-style-type: none"> <li>SDG&amp;E non-modifiable, standard RAM Power Purchase Agreement (PPA)</li> </ul>
Contract Duration	<ul style="list-style-type: none"> <li>10, 15, or 20 contract years</li> </ul>
Commercial Operation Deadline	<ul style="list-style-type: none"> <li>Must achieve Commercial Operation within 36 months of CPUC approval.</li> <li>One, 6 month extension allowed for certain delays related to permitting, interconnection or force majeure, in the aggregate</li> </ul>
Performance Security	<ul style="list-style-type: none"> <li><u>CPUC Approval Security (Execution to CPUC Approval)</u>: The greater of \$100,000 or \$2.50/MWh multiplied by 2 times expected annual generation</li> <li><u>Development Period Security (CPUC Approval to CP Satisfaction Date)</u>: \$5.00/MWh multiplied by 2 times expected annual generation</li> <li><u>Construction Period Security (CP Satisfaction Date to COD)</u>: \$10.00/MWh multiplied by 2 times expected annual generation</li> <li><u>Delivery Term Security (COD to End of Term)</u>: \$20.00/MWh multiplied by 2 times expected annual generation</li> </ul>

# Standard PPA Terms - Applicable to GTSR Programs

Term	Description
Energy Price Adjustments	<ul style="list-style-type: none"> <li>• Deliveries exceeding the Contract Capacity in each hour are paid \$0/MWh, and if the real time Locational Marginal Price (LMP) during delivery is less than zero dollars (\$0), Seller reimburses Buyer for the negative LMP prices for such excess energy amounts</li> <li>• Energy deliveries exceeding 115% of expected annual Contract Quantity in any period are paid 0% of the energy price for excess energy and is entitled to revenues from positive LMPs / responsible for costs associated with negative LMPs.</li> </ul>
Guaranteed Deliveries	<ul style="list-style-type: none"> <li>• Minimum annual net energy production:               <ul style="list-style-type: none"> <li>○ 90% for baseload projects (applicable to DAC-GT projects only), based on sum of one-year rolling average production; or,</li> <li>○ 80% for peaking projects, based on sum of two-year of rolling average production.</li> </ul> </li> </ul>
Economic Curtailment	<ul style="list-style-type: none"> <li>• SDG&amp;E shall curtail energy deliveries from the project for the economic purposes</li> <li>• Seller is be paid for amounts the project is deemed to have been able to deliver</li> </ul>
Resource Adequacy/Full Capacity Deliverability Status	<p>Seller must apply for deliverability as soon as possible (but not required as part of bid) if bidder is selecting FCDS pricing. Seller must receive FINAL deliverability studies (e.g. Final Phase II deliverability studies)</p> <ul style="list-style-type: none"> <li>• FCDS is not a condition precedent to commercial operation</li> <li>• For FCDS projects, the PPA Contract Price includes the value of FCDS.</li> <li>• The Contract Price will be reduced by a Deliverability Value until the project achieves FCDS.</li> <li>• FCDS projects must achieve FCDS by no later than <b>Jan. 1, 2030</b></li> <li>• For Energy Only projects, the PPA TOD factors do not include the value of FCDS</li> </ul>

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# Appendix

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**2021 CAISO Generator  
Interconnection & Deliverability  
Allocation Procedures (GIDAP)**

# CAISO Generator Interconnection and Deliverability Allocation Procedures

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**Interconnection to SDG&E transmission system is governed by the CAISO's FERC approved Tariff:**

- **Cluster Windows:** April 1 – April 15 of each year (If any date is not a Business Day, then the applicable date shall be the next Business Day.)

## **GIDAP PROCESS**

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- **Interconnection Request (IR)**

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  - **Scoping Meeting**

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  - **Project Grouping**

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  - **Phase I Interconnection Study**

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  - **Phase II Interconnection Study**

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  - **Posting of Financial Security**

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  - ❖ **Large/Small Generator Interconnection Agreements (LGIA/SGIA)**

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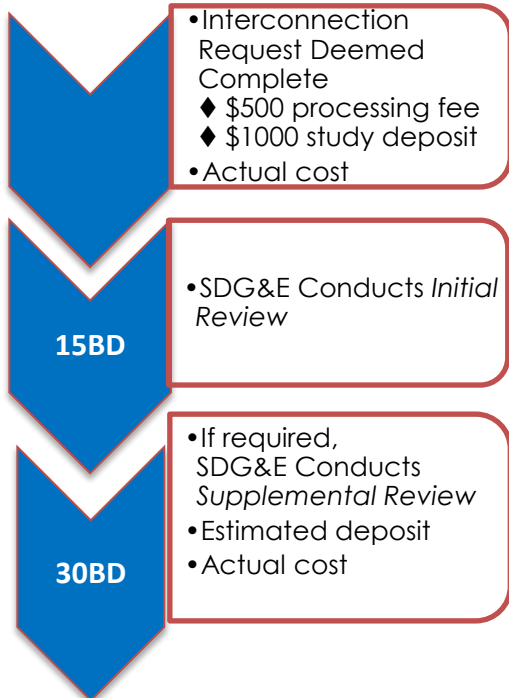
**SDG&E Interconnection  
Procedures to Connect to the  
Electric Distribution System**

# WDAT Study Process Timelines

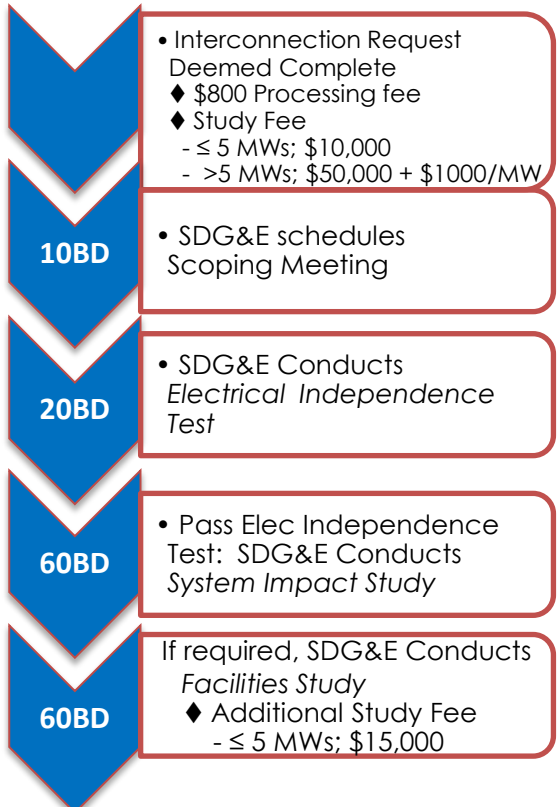
## Fast Track Process

2.0MW or Less for any location

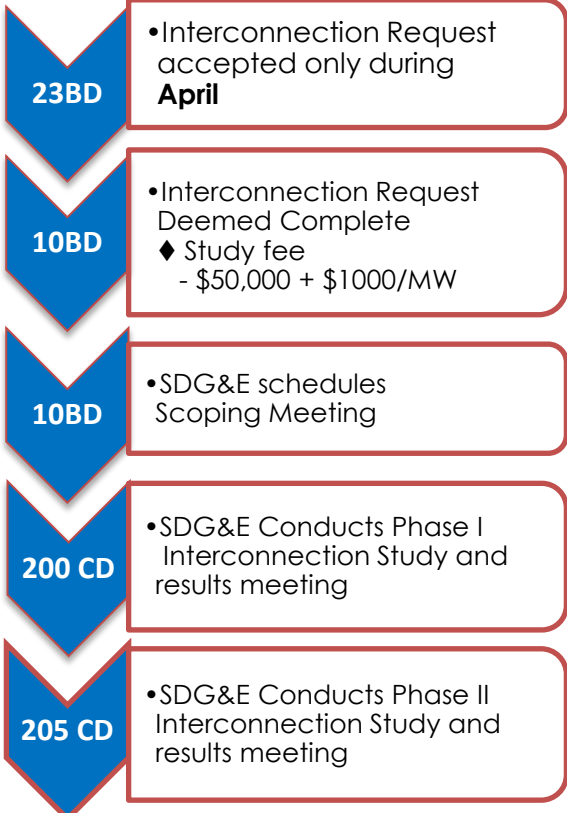
≤3MW @ 12kV for inverter-based gen w/in 2.5 miles of substn



## Independent Study Process



## Cluster Study Process



**Interconnection Agreement**

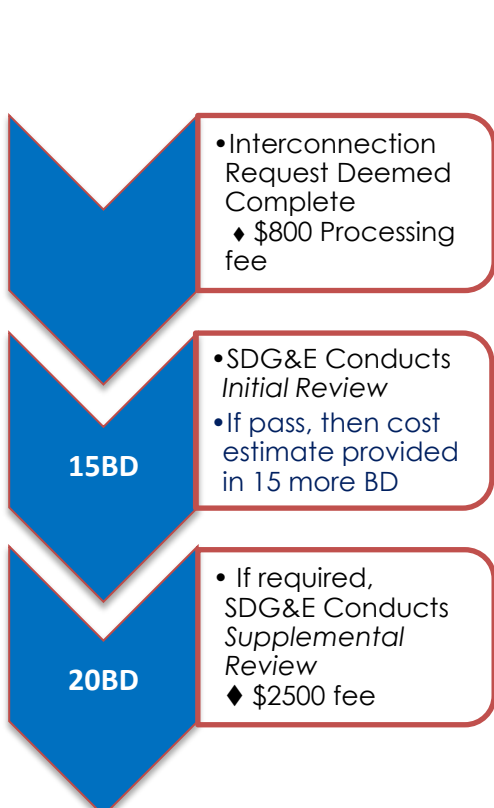




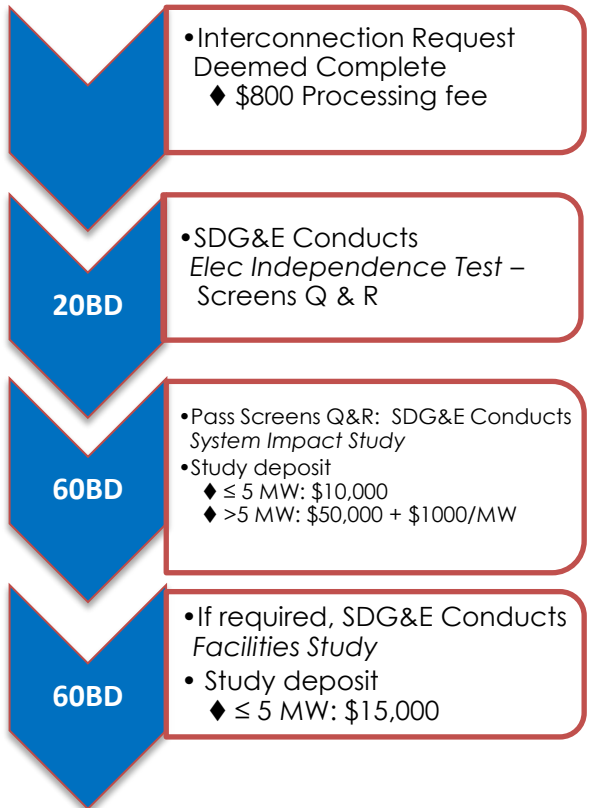
# Rule 21 Study Process Timelines

## Fast Track Process

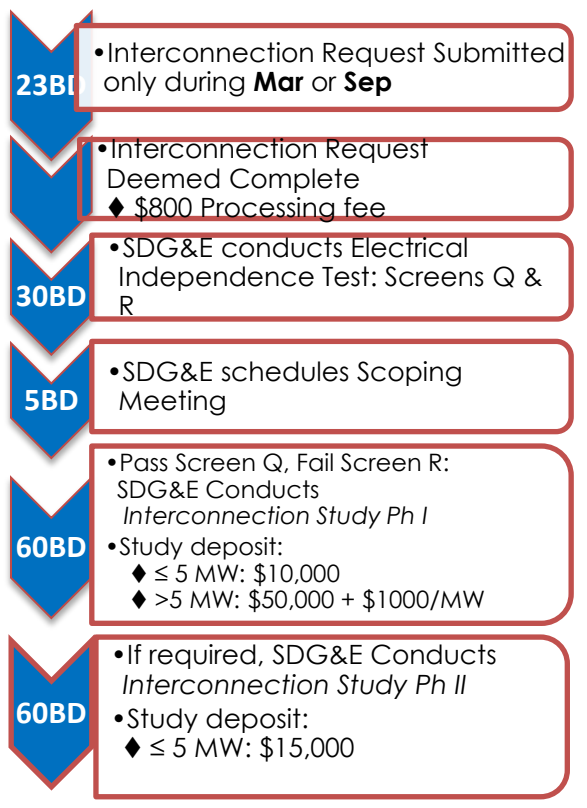
1.5 MW or Less or  
Any Size Non-exporting



## Independent Study Process



## Distribution Group Study Process



**Interconnection Agreement**



# Interconnection Process - Distribution



## Distribution Interconnections

- The process to interconnect to SDG&E's distribution system is managed by the Customer Generation group in the Transmission & Distribution Engineering Department
- SDG&E's nominal distribution voltage is 12kV with limited 12.47 kV and 4 kV
- All Applications must be submitted to SDG&E's Customer Generation group
- Two application processes:
  - WDAT - Wholesale Distribution Open Access Tariff (FERC)
  - Rule 21 - SDG&E Electric Rule 21 (CPUC)

## Application Package (WDAT and Rule 21)

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### *Distribution Interconnection Application Package (for WDAT and Rule 21) Includes:*

- Complete Interconnection Request
- Site Control Evidence
- Site Plan Diagram
- Single Line Diagram

An Invoice will be sent to Interconnection Customer (IC) and payment must be made before the application is considered complete:

- WDAT Application Fee: \$1,500
- Rule 21 Application Fee: \$800

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**WDAT**  
**Wholesale Distribution Open**  
**Access Tariff**  
**(FERC)**

# WDAT Application Form and Location

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WDAT Application Location - <http://sdge.com/wdat>

WDAT Interconnection Package submitted to:  
***WDATSGIPAPPLICATIONS@semprautilities.com***

*Or mail hardcopy application package to:*

***Customer Generation - CP52F***

***San Diego Gas & Electric***

***8316 Century Park Court***

***San Diego, CA 92123-1582***

**Application fee to be submitted to:**

***Customer Payment Services - CP61C***

***San Diego Gas & Electric***

***PO Box 129831***

***San Diego, CA 92112-9831***

# WDAT Application Process Timeline: (Fast Track & Study Process)

<b>Process Milestone</b>	<b>Duration</b>	<b>Responsible Party</b>
<b>Submit Application</b>	<b>Clock Starts</b>	<b>Interconnection Customer (IC)</b>
<b>Application Deemed Complete or Provide Notice of Additional Items</b>	<b>10 BD</b>	<b>SDG&amp;E</b>
<b>Provide Additional Items or Requests Extension</b>	<b>Additional 10 BD</b>	<b>Interconnection Customer (IC)</b>
<b>Deem Application Complete or Withdraw Application</b>	<b>Upon submittal of additional items</b>	<b>SDG&amp;E</b>

## Sec 6.1

### Reasonable Efforts

The Distribution Provider shall make reasonable efforts to meet all time frames provided in these procedures, including the payment of refunds, unless the Distribution Provider and the Interconnection Customer agree to a different schedule. If the Distribution Provider cannot meet a deadline provided herein, it shall notify the Interconnection Customer, explain the reason for the failure to meet the deadline, and provide an estimated time by which it will complete the applicable interconnection procedure in the process.

# WDAT Fast Track Study Process

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## *Fast Track*

- **Eligibility:**
  - i)  $\leq 2$  MW regardless of location on the circuit
  - ii)  $\leq 3$  MW if located on mainline (3 $\phi$  and  $>4/0$  or 336) and 2.5 circuit miles from substation
- **\$1500 non-refundable fee (\$500 processing + \$1,000 study deposit)**
- **Must Pass Fast Track Screens in Section 2**
  - Initial Review
  - Supplemental Review (if needed) Cost: typically \$2500
- **Small Generator Interconnection Agreement (SGIA)**

# WDAT Independent Study Process

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## *Independent Study Process:*

- **\$800 non-refundable interconnection fee + study deposits:**
- **Eligibility: Pass Electrical Independence Test**
- **System Impact Study:**
  - **≤5 MW: \$10,000**
  - **>5MW: \$50,000 and \$1000/MW**
- **Facilities Study: \$15,000**
- **Follow Study Process in WDAT Section 3**
- **Small Generator Interconnection Agreement (SGIA)**



# WDAT Cluster Study Process

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## *Cluster Study Process – approximately 18 months*

- **Generator Project ( $\leq 20$ MW) grouped in a cluster with other projects**
- **2 Application Windows:**
  - **April 1-30**
  - **October 15 – November 15**
- **Follow Study Process in Section 4**
- **Study deposit: \$50,000 + \$1,000/MW**
- **Small Generator Interconnection Agreement (SGIA)**

# WDAT Study Process

Study	Timing	Study Procedures	Study Deposit
System Impact Study	60 BD	<ul style="list-style-type: none"> <li>• <b>Dynamic Analyses</b></li> <li>• <b>Updated Interconnection Cost estimates</b></li> </ul>	$\leq 5 \text{ MW: } \$10,000$ <hr/> $> 5 \text{ MW: } \$50,000 + \$1000/\text{MW}$
Facilities Study	45/60 BD	<ul style="list-style-type: none"> <li>• <b>Electrical switching configuration</b></li> <li>• <b>Cost of equipment, engineering, procurement and construction work</b></li> <li>• <b>Time required to complete construction and interconnect</b></li> <li>• <b>Final Interconnection Cost estimates</b></li> </ul>	$\leq 5 \text{ MW: } \$15,000$ <hr/> $> 5 \text{ MW: } \$50,000 + \$1000/\text{MW}$

# WDAT Cluster Study Process

Study	Timing	Study Procedures	Study Deposit
Phase I (Start June 1)	200 CD	<ul style="list-style-type: none"><li>• <b>Dynamic Analyses</b></li><li>• <b>Updated Interconnection Cost estimates</b></li></ul>	\$50,000 + \$1,000/MW
Phase II (Start May 1)	205 CD	<ul style="list-style-type: none"><li>• <b>Electrical switching configuration</b></li><li>• <b>Cost of equipment, engineering, procurement and construction work</b></li><li>• <b>Time required to complete construction and interconnect</b></li><li>• <b>Final Interconnection Cost estimates</b></li></ul>	

# WDAT Small Generator Interconnection Agreement (SGIA) ≤20MW

Process	Duration	Responsible Party
Following the Facilities Study/Phase II	30 CD	SDG&E
<ul style="list-style-type: none"> <li>•IC executes SGIA; or</li> <li>•IC fails to execute SGIA; or</li> <li>•IC has not requested to file unexecuted SGIA; or</li> <li>•IC has not initiated Dispute Resolution;</li> </ul> + Interconnection Request Deemed Withdrawn	120 CD	Interconnection Customer (IC)
		SDG&E
		SDG&E & IC

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**Rule 21**  
**SDG&E Electric Rule 21**  
**Generator Facility**  
**Interconnections**  
**(CPUC)**

## Rule 21 Application Form and Location

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Rule 21 Application Location:

[http://regarchive.sdge.com/tm2/pdf/ELEC\\_ELEC-SF\\_142-05203.pdf](http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SF_142-05203.pdf)

WDAT Interconnection Package submitted to:

[DGAPPLICATIONS@semprautilities.com](mailto:DGAPPLICATIONS@semprautilities.com)

Application fee to be submitted to:

*Customer Payment Services - CP61C*

*San Diego Gas & Electric*

*PO Box 129831*

*San Diego, CA 92112-9831*

# Rule 21 Fast Track Study Process

- Size limit: ≤1.5 MW; \$800 application fee
- Initial Review (13 screens) – 15 BD from receipt of valid application package
  - Pass Initial Review:
    - Identify upgrades/interconnection facilities
    - Prepare cost estimate
    - Draft Generator Interconnection Agreement (GIA)
  - Fail Initial Review:
    - Request Supplemental Review or Detailed Study
    - Withdraw IR
- Supplemental Review (3 additional screens) - 20 BD from receipt of additional information
  - Pass Supplemental Review:
    - Upgrades Required - Cost Estimates; Draft Generator Interconnection Agreement (GIA)
    - No Upgrades Required – Draft GIA
  - Fail Supplemental Review:
    - Request Detailed Study
    - Withdraw IR

# Rule 21 Independent Study Process

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## Applicability

Size:

- >1.5 MWs and  $\leq$  5 MW: \$10,000 study deposit
- > 5 MW: \$50,000 study deposit + \$1000/MW

## Electrical Independence Tests

### Transmission System – Screen Q

Pass – Electrical Independence Test for Distribution System

Fail – Transmission Cluster Study (WDAT)

### Distribution System – Screen R

Pass – Independent Study Process

Fail – Distribution Group Study Process



# Rule 21 Independent Study Process

## Independent Study Process

### Interconnection System Impact Study

- Scoping Meeting Scheduled (5 BD after passing Screens Q & R)
- Provide Detailed Study Agreement to Applicant (15 BD)
- Commence SIS from receipt of DSA from Applicant (30 BD)
- Final SIS report (60 BD)
- Schedule Results Meeting if requested by applicant – (10 BD from SIS report)
- Tender Draft GIA (if **IFS waived**) w/in 30 CD after waiving IFS

### Interconnection Facilities Study (if required)

- $\leq 5$  MW: Requires additional \$15,000 deposit; additional information
- Commence IFS, issue final report (60 BD if upgrades/45 BD no upgrades)
- Schedule Results Meeting if requested by applicant (5 BD - from request)
- Tender Draft GIA (w/in 30 CD of issuing IFS)

# Rule 21 Cluster Study Process

## Distribution Group Study Process

### Phase I Interconnection Study

- Application must be submitted during two study windows: **March** and **September**
- Scoping Meeting Scheduled (5 BD - after Elec. Independence Test)
- Provide Detailed Study Agreement to Applicant (15 BD)
- Conduct Phase I study and issue final study results report (60 BD from start of study)
- Results meeting upon Applicant request (optional; 5 BD to schedule meeting)
- Tender Draft GIA (30 CD after results meeting if Phase II study is waived).

### Phase II Interconnection Study (if required)

- $\leq 5$  MW: Requires additional \$15,000 deposit; additional information
- Phase II study begins (60 CD after Phase I final study results report)
- Final Phase II study results report completed (60 BD)
- Results meeting upon Applicant request (optional; 5 BD to schedule meeting)
- Tender Draft GIA (30 CD after results meeting)

# SDG&E Distribution Interconnection Process

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Additional Resources available at [www.sdge.com](http://www.sdge.com)

Click on:

More Info

Doing Business With Us

Customer Generation

- Pre-Application Report (\$300)
- SDG&E WDAT and Rule 21 Interconnection Queue
- WDAT tariff
- Rule 21 tariff
- Interconnection Interactive Map (shows line capacity and available capacity after existing and queued generators)
- Generator Interconnection Handbook

# SDG&E Distribution Interconnection Process

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Questions:

Ken Parks - Customer Generation Manager

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858-636-5581

Mike Turner - Principal Engineer

[mturner@sdge.com](mailto:mturner@sdge.com)

858-654-8326

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**2021 CAISO Generator  
Interconnection & Deliverability  
Allocation Procedures (GIDAP)**

# Cluster Study Windows and IR

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During the Cluster Study Windows, Interconnection Customers (ICs) must submit:

- A completed **Interconnection Request (IR)**
- Provide evidence to demonstrate **Site Exclusivity**
  - Or an additional deposit in lieu of Site Exclusivity is required: \$250K for a Large Generating Facility and \$100K for a Small Generating Facility

*NOTE: For Cluster 5 under the CAISO Tariff Appendix DD, will address high cost & large scope DNUs through the TPP.*

# Cluster Study Windows and IR

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*A completed IR includes:*

- IR form
- Point of Interconnection (POI)
- Technical Data (Attachment A, Appendix 1)
- Voltage Level
- Study Deposit - \$150,000\*
- IC elects deliverability:
  - Full Capacity (FC) - Delivery Network Upgrades for deliverability built, if needed, required to qualify for Resource Adequacy (RA) in PPA
  - Partial Deliverability for \_\_\_% of electrical output
  - Energy Only (EO) - No Delivery Network Upgrades for deliverability built, not qualified for RA
  - \* *Pending FERC Approval.* Currently, \$50K + \$1K per MW, up to \$250K

# Scoping Meeting and Project Grouping

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- CAISO to schedule Scoping Meeting within 5 Business Days of the IR being deemed complete
- Scoping Meetings must be completed within 60 days of the close of the Cluster Study Window
- Face to Face project review with SDG&E and CAISO
- Sets the stage for development of the Phase I Study Agreement
- IC must designate Phase I Point of Interconnection (POI) within 3 Business Days of the Scoping Meeting
- CAISO tenders Phase I Study Agreement including study plan to IC within 10 Business Days of POI designation.
- IC to execute the Phase I Study Agreement within 30 days

*After the Scoping Meetings, at the CAISO's option and in coordination with SDG&E, an IR may be studied individually or in a group study based on their interconnection points and shared transmission needs.*



# Phase I Interconnection Study

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- *Typically* commences July 1st each year – Completed and Final Phase I Study report issued by year-end (may be extended)
- SDG&E - Reliability Network Upgrade (RNU) studies (a short circuit, stability, and power flow analysis, including off-peak analysis)
- CAISO - Delivery Network Upgrade (DNU) studies (an On-Peak and Off-Peak (for information only) Deliverability Assessment for FC projects, required to receive Resource Adequacy (RA) qualification for PPA)
- Preliminary identification of the Interconnection Facilities and Network Upgrades required for each IR - Assess the POI and potential alternatives
- Establish max. cost responsibility for RNU, Local Delivery Network Upgrades (LDNU), and Interconnection Facilities

# Phase I Interconnection Study

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- Phase I Study Results Meeting - within 30 Days of study completion
- Within 10 Business Days of Results Meeting, IC may submit to CAISO desired modifications to the IR, including: decrease in the electrical output of proposed project, modify technical parameters of facility, and/or modify the interconnection configuration.
- GIDAP Phase I results provide each project with cost cap for its RNU and LDNU
  - *Retains GIP provisions on security postings*
  - *LDNU cash reimbursement to align with TP deliverability allocation*
- **Phase I does not cap project exposure to ADNU costs**

# Between Phase I and Phase II Interconnection Studies

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- To continue to Phase II, IC must elect either Option (A) or Option (B)
- **Option (A)**
  - *Project requires TP deliverability to continue to commercial operation*
  - *Project posts security for RNU and LDNU (not for ADNU)*
  - *Phase II study will not identify any ADNU costs*
  - *Option to park for a year if not allocated TPD*
- **Option (B)**
  - *Project is willing & able to pay for ADNUs without cash reimbursement by ratepayers*
  - *Project posts security for RNU, LDNU, and ADNU*
  - *ADNU security posting equals \$/MW cost rate determined in Phase I Study, times project MW deliverability*
  - *ADNU no cash reimbursement, treated as merchant transmission, eligible for Congestion Revenue Rights (CRRs)*

# Phase II Interconnection Study

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- Typically commences May 1st each year – Completed and Final Phase II Study report issued by year-end (may be extended)
- Updates analyses performed in the Phase I studies to account for changes, i.e. changes to IRs, withdrawal of IRs, as applicable
- Identifies final Network Upgrades (RNU, LDNU, ADNU) needed to physically interconnect the Generating Facilities and assigns responsibility for financing the identified final Network Upgrades
- Identifies ADNU cost estimates, but not cost caps for Option (B) projects
- Identifies final POI and SDG&E's and IC's Interconnection Facilities and provides cost estimate of the final SDG&E's and IC's Interconnection Facilities
- Phase II Study Results Meeting within 30 Days following Study completion. CAISO, SDG&E, and the IC discuss the Phase II Interconnection Study report, including selection of the final COD.

*Note: CAISO shall coordinate the Phase I and Phase II Interconnection Studies with SDG&E and any Affected System Operators*

# Application of Posting Requirements for NUs to (A)& (B) Projects

<p style="text-align: center;"><i>Network Upgrades</i></p> <ul style="list-style-type: none"> <li>•ADNU, LDNU, RNU for B projects</li> <li>•LDNU and RNU for A projects</li> </ul>			
Project Size	First Posting (Due 90 days after phase I study complete)	Second Posting (Due 180 days after phase II study complete)	Third Posting (Due at start of construction)
20 MW or less	<p>Lesser of</p> <ul style="list-style-type: none"> <li>• 15% of phase I study estimated network upgrade costs</li> <li>• \$20,000 per MW</li> </ul> <p>(but not less than the lesser of \$50,000, or the estimated cost of network upgrades)</p>	<p>Lesser of</p> <ul style="list-style-type: none"> <li>• \$1 million</li> <li>• 30% of lower of phase I or phase II study estimated network upgrade costs</li> </ul> <p>(but not less than the lesser of \$100,000, or the estimated cost of the network upgrades)</p>	100% of lower of phase I or phase II study estimated network upgrade costs
Greater than 20MW	<p>Lesser of</p> <ul style="list-style-type: none"> <li>• \$7.5 million</li> <li>• 15% of Phase I estimated network upgrade costs</li> <li>• \$20,000 per MW</li> </ul> <p>(but not less than the lesser of \$500,000, or the estimated cost of network upgrades)</p>	<p>Lesser of</p> <ul style="list-style-type: none"> <li>• \$15 million</li> <li>• 30% of lower of phase I or phase II study estimated network upgrade costs</li> </ul> <p>(but not less than the lesser of \$500,000, or the estimated cost of the network upgrades)</p>	100% of lower of phase I or phase II study estimated network upgrade costs

# Generator Interconnection Agreements (LGIA & SGIA)

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- Three-party agreement between the CAISO, SDG&E, and IC
- SDG&E to provide Draft GIA to IC no later than the sum of (i) 180 Calendar Days plus estimated time to construct facilities prior to the In-Service Date of the project.
- Negotiations to be completed within 120 Calendar Days of GIA tendering.
- Final GIA to IC within 10 Business Days after completion of GIA negotiation process.

# Reimbursement of LDNU postings

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- *All projects are reimbursed for RNU costs up to \$60,000 per MW of installed capacity after commercial operation.*
- *Option (A) and (B) projects allocated TP deliverability receive full reimbursement of LDNU postings after commercial operation.*
- *Option (A) projects not allocated TP deliverability that remain in queue as energy only are reimbursed for first LDNU posting.*
- *Option (B) projects not allocated TP deliverability are not eligible for reimbursement of LDNU or ADNU costs*

# Generation Interconnection Information

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*SDG&E Interconnection Website:* <https://www.sdge.com/more-information/customer-generation/interconnection-transmission-facilities>

Download and review SDG&E Interconnection Handbook

- Links to CAISO interconnection queue, tariffs and websites
- Links to SDG&E interconnection queue, tariffs and websites
- Link to NERC/WECC Reliability Standards
- Links to Process Summaries
- Link to SDG&E Self Generation Technologies site

*CAISO Generation Interconnection Process Contact:*

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