

**ORA DATA REQUEST
ORA-SDGE-173-TCR
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: APRIL 9, 2018
DATE RESPONDED: MAY 17, 2018**

Exhibit Reference: SDG&E-14

SDG&E Witness: Alan F. Colton

Subject: Borrego Substation and interconnected Solar

Please provide the following:

1. Are DER developers required to pay SDG&E for the cost of interconnection studies? Provide a citation to the applicable section of CPUC Rule 21, and any exceptions or clarifications SDG&E provides to developer's outside of Rule 21.

SDG&E Response 01:

SDG&E objects to this request to the extent it seeks information that is outside the scope of the GRC. Subject to and without waiving this objection, SDG&E responds as follows: Yes, the developers are required to pay the cost of interconnection studies. SDG&E Electric Rule 21 section E.3.a describes the cost responsibility for interconnection studies. Note that the Desert Green project referenced in question 4 was interconnected under the WDAT (Wholesale Distribution Open Access Tariff), not Rule 21.

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2. Is it correct that NRG operates a 26 MW solar PV plant know as Borrego Solar 1 that is interconnected to the 69 kV transmission line attached to the Borrego substation? If not, please explain. If so, please provide the following:

- a. The budget code used for the interconnection study,
- b. The interconnection report provided to the developer to explain any upgrades required, and the associated costs,
- c. The budget code for any upgrade work performed,
- d. Other accounting codes that define the scope of work to be performed, for example internal orders or work orders,
- e. The final authorized budget for any upgrade work performed, total, CPUC, and FERC jurisdictional,
- f. The date SDG&E issued a permit to interconnect to the project developer,
- g. Expenditures to date for upgrades driven by this DER: total, capital expenditures, and O&M expense.
- h. Funding from sources other than ratepayers, including but not limited to customers, developers of the solar PV facility, the US DOE, the CEC, and vendors participating in the Borrego Springs microgrid (e.g., SMA, SAFT, Maxwell, etc.). Provide the actual funding from each source.

SDG&E Response 02:

SDG&E objects to this request to the extent it seeks information that is outside the scope of the GRC. Subject to and without waiving this objection, SDG&E responds as follows: Yes, NRG operates the Borrego Solar 1 plant interconnected to the 69kV transmission line attached to the Borrego substation.

- a. The budget code used for the interconnection study was 99995.
- b. Please reference the confidential “Confidential ORA-SDGE-173-TCR-Appendix A-T337 Individual Project Report.pdf”. This file is confidential in its entirety and is accompanied with a corresponding confidentiality declaration.
- c. The budget code for upgrades was 10134,
- d. Additional accounting codes are work orders 5984621 & 5984622.
- e. The final authorized budget for upgrades is \$9,591,000.

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SDG&E Response 02 Continued:

f. The execution date of the Large Generator Interconnection Agreement (“LGIA”), was 9/26/2011.

g. The generation in question is not a DER. The expenditures for the Reliability Network Upgrades to connect the generation on the transmission was \$8,133,543.

h. The information shaded in yellow is **Confidential and Protected Material Pursuant to PUC Section 583, GO 66-D, and D.17-09-023.**

Funding from sources other than ratepayers was [REDACTED] paid by developer, Borrego Solar 1, LLC.

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3. SDG&E provided a spreadsheet with 2012-2016 adjusted recorded costs in response to ORA's MDR. The tab for Ex. SDG&E-14 included a line item for budget code 101340 with a description "Borrego Solar 1 Integration." Please describe the scope of work associated with this budget code, and list any other budget codes associated with this project.

SDG&E Response 03:

SDG&E objects to this request to the extent it seeks information that is outside the scope of this proceeding. Subject to and without waiving this objection, SDG&E responds as follows:

The work associated with the budget code consisted of upgrading the 69kV bus with 69kV breakers/disconnects/PT's which were added as well as a new control shelter with relaying to interconnect the initial 26MW PV customer at Borrego Substation at the requested voltage of 69kV. The substation perimeter fence was also expanded out of necessity to allow enough space inside of the substation for addition of the new 69kV bus, associated equipment, and control shelter. The jurisdictional permit to expand the substation perimeter fence required installation of a flood gate system due to the original substation being built in a flood zone.

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4. Is it correct that a 6 MW solar PV plant know as Desert Green is interconnected to a 12 kV distribution line attached to the Borrego substation? If not, please explain. If so, provide the following:

Yes, Desert Green is a 6.5MW plant and is interconnected to a 12kV substation attached to the Borrego substation.

- a. The budget code used for the interconnection study,
- b. The interconnection report provided to the developer to explain any upgrades required, and the associated costs,
- c. The budget code for any upgrade work performed,
- d. Other accounting codes that define the scope of work to be performed, for example internal orders or work orders,
- e. The final authorized budget for any upgrade work performed, total, CPUC, and FERC jurisdictional,
- f. The date SDG&E issued a permit to interconnect to the project developer,
- g. Expenditures to date for upgrades driven by this DER: total, capital expenditures, and O&M expense.
- h. Funding from sources other than ratepayers, including but not limited to customers, developers of the solar PV facility, the US DOE, the CEC, and vendors participating in the Borrego Springs microgrid (e.g., SMA, SAFT, Maxwell, etc.). Provide the actual funding from each source.

SDG&E Response 04:

- a. The budget code used for the interconnection study is 99995.
- b. Please reference the confidential file “Confidential ORA-SDGE-173-TCR-Interconnection System Impact Study.pdf”. This file is **Confidential and Protected Material in its entirety, Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023, and is accompanied by supporting declaration.**
- c. The budget code for work performed was 97248.3.
- c. Additional accounting codes are work orders 2969770, 2969771, and 2969773
- d. The final authorized budget for upgrade work performed was \$540,000,

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SDG&E Response 04 Continued:

- f. The date SDG&E issued a permit to interconnect was 10/22/2014,
 - g. Expenditures to date are \$437,440 for capital construction of distribution upgrades. O&M expenses to date for this project were not separately tracked as those expenses are minimal.
 - h. The information shaded in yellow is **Confidential and Protected Material Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023, and is accompanied by supporting declaration.**
- Funding from sources other than ratepayers, was [REDACTED] provided from the project developer, Soitec Solar Development, LLC.

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5. During ORA’s tour of the Borrego substation on March 19, 2018, it appeared that upgrades or modifications had been performed within the substation fence line, and separate from the Borrego Microgrid yard. Provide the following for each upgrade or modification project at the Borrego Substation since 2009:

- a. Budget code,
- b. Other accounting codes that define the scope of work to be performed, for example internal orders or work orders,
- c. Description of the scope of work performed, or to be performed,
- d. The final authorized budget, total, CPUC, and FERC jurisdictional,
- e. Funding from sources other than ratepayers, including but not limited to customers, developers of the NRG and Invenergy solar PV facilities, the US DOE, the CEC, and vendors participating in the Borrego Springs microgrid (e.g., SMA, SAFT, Maxwell, etc.). Provide the actual funding from each source.
- f. Project start date,
- g. Project operational date,
- h. Expenditures to date, total, capital expenditures, and O&M expense.

SDG&E Response 05:

SDG&E objects to this request to the extent it seeks information that is outside the scope of this proceeding. Subject to and without waiving this objection, SDG&E responds as follows:

Please refer to “Confidential ORA-SDGE-173-TCR-Question 5 response.xlsx,” **which contains Confidential and Protected Material Pursuant to P.U. Code Section 583 & General Order 66-D and D.17-09-023**. The confidential information in this file has been shaded in yellow, it is also accompanied with a corresponding confidentiality declaration.