

May 8, 2012

Ms. Kimberly Bose Secretary Federal Energy Regulatory Commission 888 1st Street, N.E. Washington, D.C. 20426

Re: California Utilities Reply Comments in Docket No. RM12-10-000 (May 4, 2012)

Madam Secretary:

The Solar Energy Industries Association ("SEIA") has reviewed the reply comments filed May 4, 2012, by Pacific Gas & Electric, San Diego Gas & Electric and the Southern California Edison Company (collectively, "California Utilities") in the above captioned proceeding. The reply comments state that SEIA's Answer in this proceeding "mischaracterizes" the Rule 21 interconnection settlement.¹

Rather than engage in a point-by-point rebuttal of the reply comments, SEIA repeats the following statement from its Answer regarding the contents of the SEIA proposal:

Any reference to the 100% of minimum daytime load supplemental screen in this answer should be read to include the California settlement penetration test as well as the power quality & voltage fluctuation, safety and reliability screens. The 100% daytime load screen combined with these additional screens is at the heart of the SEIA proposal, provided the process is well defined and transparent from the solar developer perspective. Moreover, as stated repeatedly in the Petition, SEIA is not proposing to eliminate the 15% screen.²

To further clarify the SEIA proposal, attached is a chart from the Rule 21 settlement.³ SEIA supports modifications to the federal interconnection process consistent with the framework in the chart. SEIA hopes this will facilitate a common understanding of the SEIA proposal.

California Utilities Reply Comments at p. 2; and Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations, CPUC Docket R. 11-09-011 (submitted March 16, 2012) ("California settlement.")

SEIA Answer at p.2, n.l. California Utilities cite this language in a footnote in their reply but do not otherwise discuss it

California settlement, Revised Rule 21 Tariff at 60 "Interconnection Technical Framework Overview."

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Sincerely

Daniel M. Adamson

Vice President of Regulatory Affairs & Counsel

Attachment

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she has on or before the 8th day of May, 2012, served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Heather Whitpan, SEIA

Interconnection Technical Framework Overview Complete/Valid Interconnection Request Does the Applicant choose to go directly to Detailed Studies? **↓** No Non Export/Net Energy Metering (NEM) or Export? Go to Electrical Fast Track Eligibility MW Limit Independence Tests Non Export / Net and Detailed Studies **Energy Metering** Initial Review Screens A- H Networked Secondary Single Phase Generator Short Circuit Current Contribution Certified Equipment Short Circuit Interrupting Capability 6 Voltage Drop Transformer Rating Line Configuration Pass All Fail Any Screen Screens Does quick review of failed screens determine requirements to address the screens? Initial Review Screens I- M Will power be exported across the PCC? Yes No Generating Facility ≤ 11kVA? Yes No Supplemental Review (SR) Is Generating Facility a NEM project whose nameplate capacity is ≤ 500kW? Fail No Yes T. Dependency / Stability Test Pass No Aggregate generation ≤ 15% of line M Penetration Test section peak load? Pass Power Quality & Voltage Fluctuation 0 Yes All Safety and Reliability Test Fail Any Test Proceed with interconnection subject to Are requirements determined without further requirements determined by Initial Review or Yes study? SR, if any

From--Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations, California Public Utilities Commission R. 11-09-011 (Mar. 16, 2012) Signatories include SCE, SDG&E, PG&E and SEIA]

Go to Electrical Independence Tests and Detailed Studies