Regulatory Happenings for the Week of March 12, 2018

*Shaded table entries indicate that information is new or updated since last weekly report.

California Public Utilities Commission

Issue	Latest Developments
CPUC Commissioner's Meeting	The next Commission meeting is scheduled for 3/22/18. Agenda Items of Interest: #2 Decision Modifying D.15-10-032 in the OIR to address natural gas distribution utility cost and revenue issues associated with GHG emissions. Adopts a ghg allocation methodology for the natural gas utilities and closes the proceeding. (Consent Calendar). #5 Request for modifications to Electric Rule 21 Tariff to incorporate smart inverter phase 3 advances functions. (Consent Calendar). #7 Approval with modifications of SCE, PG&E and SDG&E' s prohibited resources restrictions for demand response programs. (Consent Calendar).
	 #16 Commission order to continue the Bioenergy Market Adjusting Tariff Program and to execute certain bioenergy contracts. (Consent Calendar). #22 Grid Modernization Guidance – proposes a framework for grid modernization guidance to inform future general rate cases (Consent Calendar). #41 Options to propose solar distributed generation in disadvantaged communities. #47 Opening of a new rulemaking to consider whether to adopt comprehensive post-disaster consumer protection measures for all utilities under the Commission's jurisdiction.
Renewable Portfolio Standard (RPS) (R.15- 02-020)	On 5/26/17, the ALJ issued a proposed decision implementing new compliance requirements for the RPS program in response to SB350. These new rules for long-term contracts start with the compliance period beginning 1/1/21. The changes affect the role of long-term contracts in RPS procurement requirements and the methodology for determining how excess procurement in one compliance period may be applied to later compliance periods. Various parties filed comments on 6/20/17. The <u>decision</u> was approved by the Commission at the 6/29/17 meeting. On 5/26/17 the Assigned Commissioner and ALJ issued a <u>ruling</u> identifying issues and a schedule of review for 2017 RPS procurement plans, the ruling asks for comments on the RAM proposal. Comments on the RAM proposal were due by 6/19/17 and reply comments were due by 6/30/17. Procurement plans were due by 6/30/17.
	On 8/24/17 the Commission adopted the <u>Final Decision</u> (D17-08-021) revising eligibility requirements for the RPS Feed-In Tariff in accordance with AB 1979 and AB 1923. These changes make it possible for hydroelectric generation facilities with effective capacity up to 4 MWs and bioenergy generation facilities with effective capacity up to 5 MWs to be eligible for feed-in tariffs as long as they meet other eligibility



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	criteria. On 9/27/17 SDG&E, PG&E, and SCE filed an <u>application for rehearing</u> of Decision 17-08-021. The utilities allege that the decision is contrary to law and an abuse of discretion because footnotes 8 and 11 violate California law in authorizing facilities participating in BioMAT and ReMAT to sell power in excess of the statutory 3 MW limit under other CPUC programs. On 10/12/17 the Utica Water and Power Authority filed a <u>response</u> , advocating that the application for rehearing be denied and the implementation of the
	decision should not be delayed. On 8/2/17 Shell Energy North America filed a <u>petition for modification</u> of D.17-06-026. Shell is requesting a modification of the decision to permit an LSE to count, for RPS compliance (including the 65% Long-term requirement), a long-term contract, ownership, and/or ownership agreement that is held by an LSE's customer, if the customer conveys or assigns eligibility of the renewable energy and credits to the LSE. In addition Shell is requesting a modification to eliminate the requirement that an LSE''s repackaged portion
	of a long terms RPS contract have term of 10 years to qualify for the LSE's 65% long term requirement. On 9/1/17 PG&E, SCE and SDG&E filed a joint response in opposition to Shell's petition, ORA also filed a response in opposition. On 10/4/17, the ALJ issued a ruling requesting comment on a staff proposal for implementing AB 1923
	provisions related to interconnection rules for bioenergy feed-in tariff under the California RPS. Comments were due by 10/24/17 and reply comments were due by 10/31/17. On 11/14/17, the ALJs in the proceeding published a proposed decision accepting draft 2017 RPS
	procurement plans, including the related solicitation protocols filed by PG&E, SCE and SDG&E. The proposed decision approves the request by PG&E, SCE and SDG&E to forgo holding a 2017 RPS solicitation and authorizes the utilities to conduct solicitations for the short-term (5 years or less), sales of RPS volumes during the timeframe covered by the 2017 RPS Procurement Plans. The utilities are still required to submit Tier 1 Advice Letters for Commission approval of short-term sales resulting from a solicitation. In addition the decision approves the request of the utilities to engage in bilateral transactions to sell RPS volumes, subject to the Commission review and approval via the Tier 3 Advice Letter process. The decision also approves the 2017 RPS Procurement plans filed by several small and multi-jurisdictional utilities, CCAs and ESPs. On 12/14/17 the decision was adopted by the Commission.
	On 1/4/18 the ALJ issued a <u>ruling</u> requesting comments on how SB350 impacts determination of RPS penalties for noncompliance with and waivers of RPS procurement requirements to inform a future Commission decision on revisions to RPS enforcement rules in light of SB350. The ruling identifies various issues for comment. On 1/12/18 the ALJ extended the comment deadline to 2/1/18 and reply comments to 2/12/18.
	On 1/12/18 Direct Energy Business, LLC, and on 1/19/18 Gexa Energy California, LLC and Liberty Power Holdings, LLC, filed motions requesting waiver of their respective RPS procurement requirements for compliance period one. Comments were due by 2/26/18. On 3/8/18 Direct Energy Business, LLC withdrew its motion for a waiver.
OIR to adopt rules and procedures governing Commission-regulated	On 5/15/17 the Assigned Commissioner issued a <u>proposed decision</u> approving the Natural Gas Leak Abatement Program consistent with SB1371. Comments were due by 6/4/17. The <u>decision</u> (D.17-06-015) was signed by the Commission on 6/15/17.



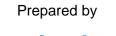
${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

natural gas pipelines and facilities to reduce natural gas leakage consisted with SB1371 (R.15-01- 008)	A workshop was held on 8/1/17 to discuss the development of a template for consistency in Best practices compliance plans that will be required as part of the gas safety plans commencing 3/15/18. On 7/21/17 the ALJ issued a <u>ruling</u> providing notice of a prehearing conference on 8/24/17 and directing joint pre-hearing conference statements. The purpose of the PHC was to discuss the scope and procedural schedule of the second phase of the proceeding. A joint pre-hearing conference statement was due by 8/18/17. (see <u>email ruling</u> correcting PHC date). On 9/20/17 the Commissioner issued an <u>amended scoping ruling</u> . The second phase of the proceeding will focus on the following broad policy issues: 1) what data is necessary in order for the CPUC to consider a "cost-effectiveness" framework in this proceeding; 2) how should the CPUC's annual report requirements and 26 best practices be harmonized with information or action required by other entities such as the PHMSA, DOGGR, ARB and local air quality management districts; 3) pursuant to 975(f) how should rules and procedures including best practices and repair standards developed in this proceeding be incorporated into the applicable general orders; 4) how should ratemaking treatment for LUAF be structured and evaluated? On 11/30/17 the ALJ issued a <u>ruling</u> entering the ARB and CPUC's joint staff annual report on analysis of
	6/16/17 Utilities' reports into the record. Comments are requested on 1)whether the Joint staff annual report clearly illustrate the trends of findings based on CPUC/ARB staff's analysis of the June 2017 reports, and 2) what are "lessons learned" from this reporting and analysis process that were not identified by staff. Comments were due by 12/12/17.
OIR to Develop an Electricity Integrated Resource Planning Framework to Coordinate and Refine	On 10/7/16, the City of Lancaster, Sonoma Clean Power Authority, and Marin Clean Energy filed a <u>motion</u> requesting that the Commission take official notice of future load growth among operational CCA programs and the growing number of communities exploring CCA programs. On 10/24/16 SCE, SDG&E and PG&E filed a joint response requesting that the Commission deny the motion as the facts presented in the motion are not currently relevant in the proceeding.
Long-Term Procurement Planning Requirements (R16- 02-007)	On 12/21/16 the ALJ and Assigned Commissioner issued a <u>ruling</u> requesting comments on disadvantaged communities and other aspects of SB350, and modifying the proceeding schedule. Comments were due by 2/17/17 and reply comments were due 2/27/17.
	On 1/12/17, a webinar was held by the Modeling Advisory Group to ensure that modeling work undertaken by Energy Division and individual LSE's as part of the 2017 IRP is transparent and objective.
	On 1/18/17, the ALJ issued a <u>ruling</u> seeking comment on assumptions and scenario for use in long term planning in 2017, with emphasis on the CAISO Transmission Planning Process. Comments were due by 2/3/17 and reply comments were due by 2/10/17.
	On 2/23/17, the CPUC and the CEC hosted a joint workshop on GHG Target Setting for the Integrated Resource Planning (IRP) Process.
	On 2/28/17 Commissioner Randolph issued a <u>ruling</u> adopting assumptions and one scenario for use in long-term planning in 2017.
	On 5/1/17 the ALJ sent an email to the service letter informing parties that several workshops scheduled in the CEC Integrated Policy Report process may be of interest to parties to this proceeding. The first workshop was on 5/12/17.



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

On 5/16/17 the ALJ issued a ruling seeking comment from parties on a staff proposal titled <u>"Proposal for</u> <u>Implementing Integrated Resource Planning at the CPUC: An Energy Division Staff Proposal."</u> The ruling formally enters the proposal into the record. Comments were due by 6/14/17 and reply comments were due by 6/26/17
CPUC Energy Division staff held a webinar on the proposal for implementing IRP at the CPUC on 6/7/17.
On 6/13/17 the ALJ issued a <u>ruling</u> modifying the schedule of the proceeding. The ruling extended the initial comment period on the IRP Staff Proposal to June 28, 2017 and reply comments to July 12, 2017.
On 7/19/17 the ALJ <u>noticed</u> two modeling workshops. The first workshop was on 7/27/17 and allowed parties to ask clarifying questions and provide preliminary feedback on the first set of modeling results for the IRP process. The second workshop was held on 8/15/17. At this workshop, CES-21, a public-private collaborative research and development effort between PG&E, SCE, SDG&E and the Lawrence Livermore National Laboratory, presented its final report on the Grid Integration Flexibility Metrics and Standards Project. On 9/12/17 PG&E submitted the <u>final report of the grid integration flexibility metrics and standards</u> .
On 9/19/17 the ALJ issued a <u>ruling</u> seeking comment a proposed reference system plan and related commission policy actions. Comments were due by 10/26/17 and reply comments were due by 11/9/17. On 10/3/17 the ALJ issued a <u>ruling</u> correcting <u>Attachment C</u> to the original 9/18/17 ruling.
On 10/10/17 the ALJ granted a 10/7/16 motion from the City of Lancaster, Marin Clean Energy, and Sonoma Clean Power Authority for official notice of future load growth among operational CCA programs as well as the growing number of communities formally exploring and planning CCA programs. In the same ruling the ALJ granted the separate 3/6/17 motion of Magellan Wind LLC seeking official notice of executive actions relating to the potential value of California's offshore wind resources. However, both motions were granted for purposes of taking official notice that certain local, state and federal agency actions have occurred but not for purposes of reliance on any underlying facts associated with those actions.
On 11/27/17 the ALJ <u>denied a motion</u> by the Protect Our Community Foundation (POCF) for evidentiary hearings. POCF had alleged that an informal process is insufficient to fulfill the requirements of SB350 and the RESOLVE model must be subject to verification via hearings.
On 12/28/17 Commissioner Randolph issued a <u>proposed decision</u> setting requirements for load serving entities filing integrated resource plans. Various comments were filed on 1/17/18. The <u>final decision</u> was approved at the Commission's 2/8/18 meeting (D18-02-018).
On 1/30/18 Imperial County filed a motion to reopen the record to consider the impact of new import tariffs on solar cells and modules in the reference system plan.
On 2/28/18 Friends of the Earth, NRDC, CURE and PG&E filed a joint petition for modification of D18-02- 018 (the IRP decision). Decision 18-02-018 contains direction regarding the procurement of GHG free replacement resources in the event Diablo Canyon is retired earlier than 2024-2025, but does not address procurement direction for the planned retirement date. The joint parties have requested that the decision be modified to address this gap in direction.
The IRP Modeling Advisory Group will hold a webinar on 3/29/18.



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

Policies, Procedures and Rules for Regulation of Physical Security for the Electric Supply Facilities of Electrical Corporations (R15-06- 009)	On 3/10/17 the Assigned Commissioner issued a Phase 1 Scoping Memo and Ruling in this rulemaking regarding policies, procedures and rules for regulation of physical security for the electric supply facilities of electric corporations consistent with Public Utilities Code Section 364 and to establish standards for disaster and emergency preparedness plans for electrical corporations and regulated water companies pursuant to Public Utilities Code Section 768.6. Phase I of the proceeding will consider whether any new rules, standards or General Orders or modifications to other existing policies should apply to all electrical supply facilities within the jurisdiction of the Commission, including facilities owned by publicly owned utilities and rural electrical cooperatives. This phase will pertain to the requirements to address the physical security risks to the electrical supply facilities of electrical corporations and will also address whether the Commission should go beyond the physical security regulations of NERC's CIP-9-014-2. A proposed decision in Phase I is anticipated in February 2018. Phase II will address emergency and disaster preparedness plans. A workshop was held on 5/2/17.
	On 7/12/17 the ALJ issued a <u>ruling</u> issuing combined workshop notes and request for straw proposals. Comments on Attachment A to the proceeding were due by 7/28/17, straw proposals were due by 8/11/17 and comments on the straw proposals were due by 8/25/17. On 8/31/17 Bear Valley Electric Service, SCE, CMUA, LADWP, Liberty CalPeco, National Rural Electric Cooperative Association, Pacificorp, PG&E, SMUD, and SDG&E filed a joint draft straw proposal. The Office of Ratepayer Advocates and the Safety and Enforcement Division filed comments on 9/14/17. A workshop was held on 9/29/17 to review how SB699 informs the appropriate CPUC response and responsibility in addressing the physical security of California's system and the joint-utility proposal. The Office of Ratepayer Advocates and the Safety and Enforcement Division filed comments on 9/14/17.
	On 1/3/18 the ALJ issued an <u>email ruling</u> allowing parties to file legal briefs concerning the Commission's jurisdiction over publically owned electrical utilities and rural electric cooperatives. The scoping ruling in this proceeding asks the following question: "Should any new rules, standards, or General Orders or modifications to existing policies apply to all electrical supply facilities within the jurisdiction of the Commission, including publicly owned electrical utilities and rural electric cooperatives?" Legal briefs were due by 1/26/18. Reply briefs were due by 2/9/18. SMUD, LADWP, The National Rural Electric Cooperative Association and CMUA filed a <u>reply brief</u> .
	On 1/16/18 the ALJ issued a <u>ruling</u> allowing comments on the safety and enforcement division's risk assessment and safety advisory section <u>evaluation</u> of the joint utility proposal and recommendations for consideration posted on 1/4/18. Comments were due by 2/2/18 and reply comments were due by 2/16/18.
	On 1/19/18 the ALJ issued a <u>ruling</u> setting the prehearing conference for Phase II of the proceeding for 3/15/18. The prehearing conference will address the status, scope and schedule for Phase II along with any changes to the service list or procedural issues. Prehearing conference statements shall be limited to enumerated questions set forth in the ruling. These question include the number and type of workshops; what elements should be included in the emergency and disaster preparedness plans; what new rules, standard, general orders, or modifications should the Commission consider to ensure that entities are in compliance with Public Utilities Code Section 768.6; should the new rules apply to publicly owned electrical utilities and rural electric cooperatives and should any rules be adopted to insure that cities and counties have an opportunity to participate in plan preparation. Prehearing conference statements were due by 3/1/18.
Streamlining Interconnection of Distributed Energy	On 7/13/17 the Commission issued an order instituting the rulemaking to consider streamlining interconnection of distributed energy resources and improvements to rule 21. Various parties filed comments on 8/2/17, including CESA, Tesla, Chargepoint and CAISO.

Buchalter

${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

-	
Resources and Improvements to Rule 21 (R17-07-007)	A pre-hearing conference was held on 9/13/17. <u>Notice</u> On 10/2/17 the Assigned Commissioner and the ALJ issued a <u>scoping ruling</u> in the proceeding. The ruling sets forth three phases. The first phase will deal with urgent issues, the second phase will deal with ratesetting issues requiring coordination with R1408013 and the third phase will deal with small and multi- jurisdictional utility rules. The schedule for the proceeding currently runs through 2020. On 2/14/18 the ALJ issued an <u>email ruling</u> amending the schedule and extending the deadlines for the working group 1 proposal and the working group 2 proposal. The ALJ also reassigned Issue 6 (development of forms and agreements to allow Distributed Energy Resources to fulfill Rule 21 requirements related to smart inverters) to working group 2.
Resource Adequacy, Consider Program Refinements and Establish Annual Local and Flexible	On 9/28/17 the commission opened a <u>rulemaking</u> to oversee the resource adequacy program, consider program refinements and establish annual local and flexible procurement obligations for the 2019 and 2020 compliance years. The proceeding is the successor to R14-10-010. Comments on preliminary matters pertaining to the scope, schedule, and administration of the proceedings were due 10/30/17 and reply comments were due 11/9/17.
Procurement Obligations for the 2019 and 2020	On 11/7/17 a working group meeting was held to discuss weather sensitive demand response, behind-the- meter resources and comments on the OIR.
Compliance Years. (R17-09-020)	A prehearing conference was held on 12/4/17. Notice On 1/18/18 the Assigned Commissioner and ALJ issued a scoping memo and ruling. The proceedings will be divided into three separate tracks. Track 1 will consider system, local and flexible capacity requirements for the next year as well as time-sensitive refinements to the Commission's RA program, including adoption of the 2019 Local Capacity Requirements, adoption of the 2019 Flexible Capacity Requirements, adoption of the 2019 System RA Requirements, and top priority modifications to the RA program. Track 2 will address less time sensitive topics, including adoption of multi-year local RA requirements, refinements to local area rules and RA program. Track 3 will consider the 2020 program year requirement and may revisit RA counting rules for weather-sensitive and local demand response resources. Comments were due by 1/30/18 and proposals were due by 2/16/18. The proposals and comments were discussed at a 2-day workshop that was held at the CPUC on 2/22-23/18. Various parties filed comments on the proposals on 3/7/18.
Creation of a Shared Database or Statewide Census of Utility Poles and Conduit in California. (I17-06-027)	On 6/29/17 the Commission instituted an Order Instituting Investigation into the creation of a shared database or statewide census of utility poles and conduit in California (I17-06-027, R17-06-028 and R17-03-009 have been consolidated into this proceeding). A prehearing conference was held on 12/5/17. <u>Ruling</u> On 1/11/18 the Assigned Commissioner and ALJ issued a <u>ruling</u> requesting comments on the creation of a shared statewide database of utility pole and conduit information. Input is requested on (1) whether a proposed listing of data fields is complete; (2)whether any information categories should be treated as confidential; (3) which data fields are most essential to accomplish the safety and goals of the OII and OIR; (4) whether each pole owner should be responsible for maintaining and providing access to its database, or whether a third party facilitator should be shared. Comments were due by 2/8/18.



California Regulatory Happenings for the Week of March 12, 2018

	On 1/16/18 the ALJ issued a <u>ruling</u> amending the 1/11/18 ruling and attaching the correct listing of proposed data fields.
Successor to Existing	On 2/20/18 the ALJ issued a proposed decision adopting alternatives to promote solar distributed
Net Energy Metering	generation in disadvantaged communities. Opening comments were due by 3/12/18 and reply comments
Tariffs pursuant to	are due 5 days later. Commissioner Guzman Aceves issued an <u>alternate decision</u> . An all-party meeting was
PUC Section 2827.1	held on 3/13/18 so that parties could make comments to Commissioner Guzman Aceves on the two
(R.14-07-002)	alternate decisions.

California Energy Commission

Issue	Latest Developments
CEC Business Meeting	The next regularly scheduled Business Meeting will be held 3/21/18. The agenda is now available. Agenda
Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP)	On 12/14/17 the Fuels and Transportation Division staff held a workshop to provide a forum for hydrogen stakeholders to discuss evaluation criteria for hydrogen refueling station applications. Critical milestones and data collection techniques will be discussed. <u>Notice</u> On 1/30/18 the Commission and the California Pollution Control Financing Authority (CPCFA) conducted a public workshop on EV infrastructure lending to the small business community. <u>Notice</u>
	On 3/5/18 the CEC posted the 2018-2019 Investment Plan Update for the ARFVTP.
	On 3/7/18 the CEC hosted a technology showcase and event celebrating 10 years of success implementing the CEC's ARFVTP. <u>Notice</u>
	On 3/15/18 the Lead Commissioner for Transportation and staff held a public meeting of the ARFVTP. Energy Commission staff presented an overview of proposed allocations included in the revised staff report of the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program. The Lead Commissioner for Transportation and Energy Commission staff are seeking input from the Advisory Committee, stakeholders, and the public regarding the proposed allocations and rationale. <u>Notice</u>
Electric Program Investment Charge (Docket No. 17-EPIC-	On 12/21/17 Commission staff conducted a public workshop to discuss the current state of HVAC technologies needed to help meet California's greenhouse gas (GHG) reduction and low global warming potential (GWP) refrigerant goals. <u>Notice</u>
01)	On 1/24/18 the CEC hosted a webinar to share information on innovative projects focusing on efficient water heating technologies. <u>Notice</u>
	On 2/7/18 the CEC hosted the 2018 EPIC Symposium. <u>More Information</u>
Integrated Energy Policy Report – (Docket No. 17-IEPR-01)	On 12/15/17 the Chair of the Commission conducted a workshop to explore a range of perspectives on the future of electricity and natural gas demand in California over the next 12 years. Staff from the Commission will present 12-year forecasts of electricity and natural gas consumption and electricity peak demand. Energy Commission staff will also present details regarding the treatment of additional achievable energy efficiency (including efforts to achieve SB 350 energy efficiency targets), self-



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	generation, electricity rates, hourly load forecasts, and climate change impacts on electricity and natural
	gas demand. <u>Notice</u> The Commission adopted the 2017 IEPR at the business meeting on 2/21/18. At the same meeting the Commission also approved the California Energy Demand Forecast for 2018-2030. The report presents baseline forecasts of natural gas and electricity consumption and of peak demand for California and utility planning areas. The report includes estimates of additional achievable energy efficiency savings and photovoltaic adoption and provides options for managed electricity forecasts for resource planning. <u>Press Release</u>
2018 Integrated Research Policy Report Update (18-IEPR-01)	On 2/12/18 the CEC issued a notice of request for public comments on the scoping order for the 2018 Integrated Energy Policy Report Update. The update will focus on two areas. First it will review the implementation of energy policies under the Brown administration and the role of these policies in establishing California's leadership in clean energy. The second portion will focus on issues from the 2017 IEPR which focused on implementing SB 350, including ongoing work to ensure energy reliability in Southern California and updating the energy demand forecast. <u>Notice</u> . The final scoping order is anticipated for release in March 2018 and the final 2018 IEPR update is anticipated for adoption in February 2019.
Renewable Energy for Agriculture Program (REAP)	On 3/8/18 Commission staff conducted a public workshop in Bakersfield to present preliminary program information and solicit public comment on initial concepts for the implementation of the Renewable Energy for Agriculture Program (REAP). <u>Notice</u>
Renewable Energy	On 2/1/18 Commission staff held a pre-rulemaking workshop on updates to power source disclosure. Notice
Research	On 1/25/18 Commission staff conducted a public workshop to discuss the Public Interest Natural Gas Research and Development (Natural Gas R&D) program's proposed energy-related natural gas research initiatives for the 2018-19 fiscal year (FY) and the program's proposed expansion request. <u>Notice</u>
	On 2/16/18 Commission staff conducted a public workshop to present preliminary program information and solicit public comment on the proposed Food Production Investment Program (FPIP), including proposed program implementation. During this workshop, staff will also provide a brief introduction to a proposed grant program to advance the use of renewable energy in agricultural operations located in disadvantaged communities. <u>Notice</u>
	On 3/12/18 Commission staff will conduct a webinar to discuss the potential for offshore renewable energy in California. The webinar will include presentations on data gathering efforts, status of the Bureau of Ocean Energy Management (BOEM)-California Intergovernmental Renewable Energy Task Force (Task Force), and the Department of Defense (DOD) mission compatibility assessment. <u>Notice</u>
SB 350- Clean Energy	As part of the 12/13/17 meeting, the Commission considered adopting a resolution and Charter
and Pollution Reduction Act of 2015	establishing the Senate Bill 350 Disadvantaged Communities Advisory Group (Advisory Group Charter). <u>Notice</u> ; <u>Charter</u> The resolution was adopted and the Advisory Group was established at the 12/13/17 meeting. <u>Press Release</u>
Siting	On 1/25/18 the Commission's Siting, Transmission and Environmental Protection (STEP) Division Compliance Office will host a workshop for power plant owners/operators and other stakeholders to discuss proposed revisions to the General Compliance Condition on Compliance Incident Reporting and

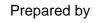
Buchalter

${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

the proposed Compliance Docketing Policy. <u>Notice</u>
On 1/30/18 Commission staff conducted a workshop on proposed changes to the California Code of Regulations related to power plant license amendments and other provisions of Title 20. <u>Notice</u>

California Air Resources Board

Issue	Latest Developments
Cap and Trade	On 7/25/17 AB398 was signed by the Governor and chaptered by the Secretary of State – Chapter 135, Statutes of 2017. The bill extends the Cap and Trade program and requires update to the scoping plan. The bill will require amendments to the regulation to impose price ceilings, containment points, offset credit compliance limits and industry assistance factors for allowance allocation.
	On 7/17/17 ARB posted the <u>Final Environmental Analysis</u> and <u>responses to comments on the</u> <u>environmental analysis</u> relating to the regulation amendments. On 7/27/17 ARB approved the proposed amendments to the Cap and Trade Regulation. <u>Notice of</u> <u>Determination</u> ; <u>Final Regulation Order</u> . On 8/4/17 the amendments were submitted to OAL on 8/4/17. <u>Request</u> ; <u>Informative Digest</u> . On 9/18/17 OAL approved the rulemaking and filed it with the Secretary of State. The effective date was 10/1/17. <u>Final Regulation Order</u> ; <u>Final Statement of Reasons</u> .
	On 9/22/17 it was announced that Ontario had entered into an agreement with California and Quebec to participate in cap and trade. The agreement goes into effect on 1/1/18.
	A workshop was held on 10/12/17 to discuss the next steps for the cap and trade regulation. <u>Notice</u> <u>Presentation</u> .
	On 11/21/17 ARB posted the results of the 11/14/17 Joint Auction #13 report.
	ARB released the January 2018 California-Quebec-Ontario Joint Auction Participant Training <u>Presentation</u> .
	On 1/30/18 ARB posted a notice of public hearing on 3/22/18 in Riverside, CA to consider approving the adoption of two proposed amendments to the Cap and Trade regulation. The narrow amendments are intended to clarify that 1. The regulation requires a successor entity after a change in ownership to be responsible for the outstanding, pre-transfer compliance obligation of the predecessor entity, and 2. The regulatory procedure for establishing the Auction Reserve Price in the Ontario and Quebec regulations. <u>Proposed Regulation Order Notice Agenda</u>
	Meetings were held on 3/2/18 to discuss potential amendments to the cap and trade regulation and SB350 Integrated Resource Plans. <u>Discussion Draft</u> <u>Price Containment Paper</u>
GHG Reporting	On 3/14/17 ARB hosted a webinar on GHG emissions data reporting for electric power entities. Registration



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	On 4/13/17 ARB posted a proposed second 15-day modifications to the regulation. Comments were due 4/28/17 by 5pm. Notice The board approved the proposed amendments at the 6/29/17 Board Meeting. Agenda. On 7/21/17 the proposed amendments were submitted to the California Office of Administrative Law. Updated Informative Digest. On 9/1/17 OAL approved the rulemaking and filed it with the Secretary of State. Notice Final Regulation Order Final Statement of Reasons. The amended regulation became effective on 1/1/18.
Short Lived Climate Pollutants	On 4/11/16, ARB posted a proposed SLCP Strategy. Comments were due by 6/26/16. A workshop to discuss the proposed strategy was held on 4/26/16 and additional workshops were held on 5/3/16 in Bakersfield and Modesto. The Board discussed the matter on 5/19/16. <u>Notice</u> Comments on the workshop were due by 5/26/16. On 11/28/16, ARB posted the revised draft SLCP Strategy. Public workshops were held on 12/12/16 in Fresno, 12/15/16 in Diamond Bar, and 12/16/16 in Sacramento. Adoption of the strategy will be considered at the 3/23-24/17 Board meeting in Riverside. <u>Notice</u> . The Comment period ended on 1/17/17. <u>Presentation</u> On 3/14/17 ARB posted the <u>Final Proposed SLCP Reduction Strategy</u> , which includes the final environmental analysis and responses to comments on the analysis. Subgroup meetings were held on the following dates: Subgroup 1 – Non-digester projects 10/16/17. Subgroup 2 – Digester Projects 10/12/17. A workshop to discuss Hydrofluorocarbons Reduction Measures was held on 10/24/17. <u>Notice</u> <u>Presentation Draft Regulatory Language</u> On 12/29/17 ARB posted a <u>summary</u> of policies to encourage dairy biomethane projects and other projects to reduce methane emissions. On 1/5/18 the three dairy subgroups provided an update to the agencies on their processes and recommendations they have formulated to date. Presentations - <u>ARB;</u> <u>CDFA; CPUC; Subgroup 1; Subgroup 2; Subgroup 3</u> The SB1383 Dairy and Livestock subgroups held meetings in February. Subgroup 1, Fostering Markets for non-digester projects met on 2/5/18, subgroup 2, fostering markets for digester projects met on 2/26/18 and subgroup 3, research needs, including enteric fermentation met on 2/28/18. <u>Meeting Notice</u>
2030 Scoping Plan	On 1/20/17, ARB posted the 2030 Scoping Plan Update. The scoping plan was discussed at ARB board meetings on 1/27/17 and 2/16-17/17 board meetings. The public comment period ended on 4/10/17. Notice On 3/28/17 ARB staff presented an overview of the 2017 scoping plan update. On 4/26/17 the ARB and the AB32 Environmental Justice Advisory Committee held a joint meeting to discuss the Committee's recommendations on the Scoping Plan. Notice Agenda On 10/12/17 ARB staff presented updated modeling results reflecting the direction provided in AB398 and discussed the schedule for finalization of the 2017 scoping plan. Notice Presentation

Buchalter

${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	On 10/27/17 ARB released a revised 2017 climate change scoping plan.						
	On 11/30/17 ARB released the proposed final 2017 climate change scoping plan. On 12/14/17 the Board approved the scoping plan along with the finalized environmental documents. Meeting Notice Press Release Final Plan						
U.S. EPA Proposed	On 3/28/17 President Trump issued an executive order ordering his administration to review and						
Rules to Regulate	possibly rescind several Obama-era energy rulings, including the Clean Power Plan. The executive order						
Power Plants	also rescinded White House Council on Environmental Quality guidance on how federal agencies are to quantify ghg emissions when conducting NEPA reviews.						
	On 4/28/17, the D.C. Circuit granted the US EPA's request to pause litigation for 60 days over the Clean Power Plan and ordered briefing on whether the case should be remanded to the agency or just kept on hold. Briefs were due by 5/15/16. The panel also issued a similar stay order for the EPA's rule capping carbon emissions from new or reconstructed power plants. On 8/8/17 the D.C. Circuit postponed the litigation for 60 more days, granting the US EPA's request for more time to review its options about what to do with the rule. The court ordered the EPA to submit status reports at 30-day intervals.						
	At the 7/27/17 ARB board meeting the board approved California's proposed compliance plan for the Federal Clean Power Plan, certified the Final Environmental Analysis and approved the written responses to comments received on the Draft Environmental Analysis.						
	On 10/10/17the EPA issued a notice of proposed rulemaking proposing to repeal the Clean Power Plan.						
	On 12/18/17 the EPA issued an <u>advanced notice of proposed rulemaking</u> soliciting comments on a rule to replace the Clean Power Plan rule.						
Low Carbon Fuel Standard	The goal of the LCFS is to reduce carbon intensity of transportation fuel by at least 10% by 2020. On 2/20/18 ARB released the <u>Draft Proposed Regulation Order</u> and a <u>Portion of Draft Staff Report</u> .						
	On 3/6/18 ARB released various models and calculators, including the <u>OPGEE</u> and <u>CA-GREET</u> . In addition ARB issued the <u>Initial Statement of Reasons</u> and <u>Proposed Regulation Order</u> setting forth proposed amendments to the LCFS regulation and to the regulation on commercialization of alternative diesel fuels. A public hearing to consider the proposed amendments will be held on 4/27/18. <u>Notice</u>						
	On 3/12/18 ARB updated and replaced Guidance 17-03 with <u>Guidance 18-01</u> on Implementation Implications of a Modified Writ issued by the Superior Court of California, County of Fresno, On October 18, 2017 in the case of Poet, LLC et al. vs CARB et al. (No. 09 CECG 04659 JYH) on LCFS.						
Innovative Clean Transit Rules	The key goals of this measure include 1. Support the near-term deployment of zero-emission buses where the economics are viable and where transit service can be maintained or expanded; 2. Secure binding commitments from the state's transit providers for a long-term vision for transition to zero-emission technologies across all transit modes, and 3. Partner with transit agencies to pilot innovative approaches to improve access to transit systems with zero-emissions first- and last-mile solutions.						



California Regulatory Happenings for the Week of March 12, 2018

	On 12/15/17 a public workshop was held to discuss development of innovative clean transit. <u>Presentation</u> . The staff proposal on the ICT Rules include achieving a zero emission transit system by 2040 and encouragement of early action with opportunities for funding. Rules would be applicable to all public transit agencies that own or operate buses with GVWR > 14,000 lbs.
--	---

California Independent System Operator

Issue	Latest Developments		
Board of Governors	The next scheduled Board meeting is 3/22-23/18. Schedule		
Meeting	Agenda		

CAISO Stakeholder Initiatives

Issue	Latest Developments				
Flexible resource adequacy criteria and must offer obligations (FRAC-MOO)	On 5/1/17 the CAISO posted <u>the revised straw proposal</u> . The CAISO held a stakeholder call on 5/8/17 to discuss the revised straw proposal. Comments were due by 5/22/17. <u>Market Notice Presentation</u> A Phase 2 Working Group call was held on 8/2/17. <u>Market Notice</u> . Comments were due by 8/18/17. <u>Brattle Presentation</u> A Phase 2 Working Group Meeting was held on 9/26/17. <u>Market Notice</u> ; <u>Presentation</u>				
	On 11/2/17 CAISO postponed the stakeholder meeting originally scheduled for 11/9/17 because more time is needed to analyze the data and publish the proposal. A stakeholder meeting was held on 11/29/17. <u>Market Notice</u> . On 11/21/17 CAISO posted the <u>draft proposal</u> . Comments were due by 12/13/17. <u>Presentation</u> On 1/31/18 CAISO posted the <u>revised draft</u> flexible capacity framework. A stakeholder meeting was held on 2/7/18 to discuss the revised draft flexible capacity framework in the FRAC-MOO Phase 2 initiative. Comments were due by 2/21/18. <u>Market Notice Agenda and Presentation</u>				
Energy Imbalance Market (EIM)	ParticipantsOn 10/1/16 Arizona Public Service and Puget Sound Energy joined EIM. On 10/18/16, Mexico GridOperator CENACE announced it was exploring EIM participation for Baja California Norte.On 2/24/17 BANC agreed to join the EIM, acting on behalf of SMUD beginning in April 2019. NewsReleaseOn 5/30/17 CAISO and Powerex announced that Powerex would participate in the EIM beginning in April 2018. Powerex will be the first non-U.S. participant to join the market. On 10/3/17 an information call to discuss the Powerex EIM Implementation Agreement was held. Market Notice				

Buchalter

${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	On 6/1/17 CAISO and LADWP announced that they had signed an agreement for LADWP to join the EIM beginning in April 2019.
	On 10/1/17 Portland General Electric became the fifth western utility to begin full participation in the EIM.
	On 12/14/17 CAISO approved a proposal by CAISO management to enhance the EIM. The decision directs CAISO to move forward with a tariff change to use ISO modeling of energy storage (non-generator resources) more broadly and support participants in the western EIM in modeling their aggregated resources. The Board also accepted EIM enhancements that will automate some manual processes, support financial settlements and expand the market's general modeling capabilities. <u>News Release</u>
	<u>Miscellaneous</u>
	On 6/13/17 the CAISO announced a new initiative. Consolidated Energy Imbalance Market Initiatives. The initiative combines three EIM initiatives from the 2017 roadmap. Third Party Transmission Contribution for EIM Transfers, Management of EIM Imbalance Settlement for Bilateral Schedule Changes, and EIM Wheeling Rate Charges. A call to discuss the <u>Issue Paper</u> was held on 6/20/17. Comments were due by 6/30/17. <u>Market Notice Presentation</u> . A stakeholder meeting was held on 8/7/17 to discuss the straw proposal. The <u>straw proposal</u> was posted on 7/31/17. Comments were due by 8/17/17. <u>Market Notice</u> . On 8/28/17CAISO announced that the Business Requirements Specification for the new EIM functionality is now available. The new functionality will automate manual processes and facilitate EIM participation by entities both in and outside of the US. <u>Market Notice</u>
	A call was held on 9/12/17 to discuss the <u>Draft Final Proposal</u> . <u>Presentation Market Notice</u> . The comment deadline was 9/27/17. On 10/4/17 CAISO announced that it would accept supplemental comments until 10/11/17. <u>Notice</u>
	On 11/3/17 CAISO posted draft tariff language. Comments were due by 11/22/17 and a web conference to discuss was held on 11/30/17. <u>Market Notice</u>
	On 12/1/17 CAISO posted revised draft tariff language and held a call on 12/7/17 to discuss. <u>Market</u> <u>Notice</u> . On 12/13/17 CAISO posted the Final Draft Tariff Language.
	On 12/15/17 CAISO filed the <u>tariff amendment</u> with FERC in ER18-461. On 2/14/18 FERC issued an <u>order</u> accepting the tariff revisions, effective 2/15/18.
Reliability Services	On 2/2/17, CAISO posted the Phase 1B and Phase 2 Draft Tariff language. A call to discuss was held on 2/21/17. Market Notice
	On 4/7/17 the CAISO posted the Phase 1B and Phase 2 Draft Tariff language. A call to discuss was held on 4/24/17. <u>Market Notice</u>
	On 4/18/17 CAISO posted the Business Requirements Specifications v. 2.0.
	On 5/8/17 CAISO announced that the implementation date for the initiative had been extended to 2/13/18 from 11/1/17. The new effective date will be 4/1/18. The extension was discussed at the Market Performance and Planning Forum on 5/16/17.
	A technical working group call was held on 6/13/17 to clarify the tariff processes proposed in the

Buchalter

${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	initiative. Market Notice.
	On 7/7/17 The Second Revised Draft Tariff Language – Phase 1B and 2 was posted. A web conference to discuss was held on 7/21/17. <u>Market Notice</u> Comments were due by 7/14/17.
	On 8/3/17 CAISO posted the Phase 2 - Third Revised Draft Tariff Language. <u>Market Notice</u> . On 9/29/17 CAISO filed the tariff amendment for phase 1B and Phase 2 at FERC in docket ER18-1. On 10/23/17 various parties filed comments and protests and the CPUC filed a limited protest. The CPUC has requested that FERC reject the proposed tariff amendments regarding "listed local capacity." On 11/13/17 CAISO filed a motion for leave to file answer and answer to the various protests. On 11/30/17 CAISO filed another <u>motion</u> for leave to file answer and answer to SDG&E's filing. On 1/18/18 FERC issued an <u>order</u> accepting the tariff revisions as filed, effective 2/15/18. On 2/14/18 CAISO filed a <u>petition</u> for limited tariff waiver requesting a temporary suspension of the effectiveness of the tariff revisions. Due to implementation issues CAISO requested a temporary suspension until 3/16/18. FERC granted the
	suspension on 3/1/18. The initiative will now be activated for trade date 5/1/18. <u>Market Notice</u> CAISO held a call on 1/4/18 to discuss process changes for resource adequacy and outage coordination as part of the Reliability Services Initiative. These changes will be implemented in April 2018. Training was provided on 1/10/18. <u>Presentation</u> . <u>Market Notice</u> .
	On 3/5/18 and 3/8/18 the CAISO held the RSI 2017 and RAAIM calculation modification market simulation web conferences to discuss market simulation performance. CAISO has postponed the RSI implementation to March 2018 and activation to May 2017 and the RAAIM Calculation modification implementation to May 2018 and activation to July 2018. <u>Market Notice</u>
Energy Storage and Distributed Energy Resources Participation (Phases 2 and 3)	On 5/4/17 CAISO hosted a meeting to discuss the third revised straw proposal. Comments were due by 5/18/17. <u>Market Notice</u> . On 4/13/17 CAISO posted the <u>2017 Baseline Accuracy Work Group Proposal</u> prepared by Nexant. On 4/17/17 CAISO posted the <u>Third Revised Straw Proposal</u> . <u>Presentation</u>
	On 5/11/17 the CAISO announced that it was exploring options to determine whether market enhancements are appropriate to manage certain outage reporting limitations of energy storage resources with physical limitations. <u>Market Notice</u>
	On 6/2/17 a joint workshop was held with the CPUC to discuss Storage. Agenda
	On 6/9/17 the CAISO posted the <u>Draft Final Proposal</u> . A web conference was held on 6/15/17 to discuss. <u>Market Notice Presentation</u>
	On 6/28/17 ISO management formally notified the Board of Governors and the EIM Governing Body of their <u>initial decisional classification</u> of this initiative. Management concluded that the initiative falls within the EIM Governing Body's advisory role, which means that the initiative will be presented to the Board for approval. Any objection to this classification was due by 7/5/17.
	On 9/29/17 CAISO posted the Phase 3 <u>issue paper</u> . A stakeholder call was held on 10/12/17. The Phase 3 initiative will continue to identify and evaluate opportunities for increased participation of transmission grid-connected energy storage and distribution-connected resources in the CAISO market. Unresolved topics suggested by stakeholders in Phase 2 will also be considered. <u>Market Notice</u>
	A workshop to discuss the Phase 3 scope originally scheduled for 12/11/17 has been cancelled. The



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	workshop will not be held until 2018. <u>Market Notice</u>
	On 11/6/17 CAISO hosted a workshop to discuss proposed topics for phase 3. Several Stakeholders gave presentations. <u>Market Notice</u> On 11/17/17 CAISO posted the draft tariff language for phase 2. A web conference to discuss was held on 12/12/17. <u>Market Notice</u> .
	A customer partnership group call was held on 12/13/17 to discuss implementation of demand response current changes associated with phase 2 of the proceeding. Questions and comments to be discussed during the call were due by 12/6/17. <u>Market Notice</u>
	A workshop to discuss Phase 3 was held on 1/16/18. Market Notice Agenda Presentation
	On 2/15/18 CAISO posted the Phase 3 straw proposal. A workshop to discuss phase 3 was held on 2/21/18. Comments were due by 3/7/18. Market Notice
	A workshop to discuss Phase 2 was held on 2/27/18. Market Notice Presentation
	On 2/22/18 CAISO posted the <u>Phase 3 straw proposal</u> . A technical working group meeting will be held on 3/29/18. Comments are due by 4/9/18. <u>Market Notice</u> .
Transmission Access Charge Options for Integrating New Participating Transmission Owners.	CAISO held a stakeholder meeting in Folsom on 12/13/16 to review the draft final proposal for the TAC Options Initiative. On 12/6/16, CAISO posted the <u>draft final proposal</u> . <u>Market Notice Presentation</u> . The comment deadline ended on 1/11/17.
	On 12/20/16, CAISO posted an addendum to the draft regional framework proposal. The addendum is intended to provide clarifications in light of questions raised at the 12/13/16 workshop. Comments were due by 1/11/17. <u>Market Notice</u>
	On 3/2/17 CAISO posted a summary of stakeholder comments and the CAISO's responses. Summary
Regional Resource Adequacy	On 12/1/16, CAISO posted a <u>Regional Framework Proposal</u> . A meeting was held on 12/8/16 to review the draft final proposal. <u>Market Notice</u> . The comment deadline was 1/11/17.
	On 3/1/17 CAISO posted the <u>draft regional framework proposal stakeholder comments and CAISO</u> responses.
Regional Integration California GHG compliance	The CAISO held a stakeholder meeting on 5/31/17 to discuss the draft final proposal for the initiative. On 5/25/17 CAISO posted the <u>Draft Final Proposal</u> .
	On 6/22/17 CAISO held a call to discuss a revised draft final proposal. <u>Market Notice Presentation</u> . On 6/26/17 CAISO posted the <u>Revised Draft Final Proposal</u> . Comments were due by 7/6/17.
	A stakeholder call was held on 12/4/17 to continue discussions on the initiative and the attribution accuracy report. Comments on materials presented were due by 12/18/17. <u>Market Notice</u> . <u>Presentation</u> . <u>CAISO presentation</u>
	On 2/20/18 CAISO posted the updated <u>Second Revised Draft Final Proposal</u> . A call to discuss was held on 2/22/18. <u>Market Notice Recording</u>
Miscellaneous Tariff Revisions	On 2/10/17, CAISO announced that it was expediting three minor tariff language revisions in advance of the broader tariff clarifications filing process. These changes include (i) revising section 34.13.12 to be consistent with other provisions in the tariff allowing for automatic acceptance of bids from SC's when they do not act within a specified time period; (ii) aligning periods for negotiated default energy bids, and



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

	(iii) removal of the obligation to post effective flexible capacity factors for resources under construction. <u>Proposal</u>
	A call to discuss these proposed changes was held on 2/23/17. <u>Market Notice</u> . On 3/9/17 CAISO filed the tariff changes at FERC in docket ER17-1132. <u>Tariff Filing</u> . On 4/24/17 FERC issued a <u>letter order</u> accepting the tariff amendment.
Review Transmission Access Charge	On 4/12/17 CAISO posted a background white paper entitled <u>"How Transmission Cost Recovery Through</u> <u>Transmission Access Charge Works Today."</u>
Structure	On 6/30/17 CAISO posted the <u>issue paper</u> . A stakeholder meeting was held on 7/12/17. <u>Market Notice</u> <u>Presentation</u> . A working group meeting was held on 8/29/17 to discuss the 6/30/17 issue paper. An additional meeting to discuss is scheduled for 9/25/17. Comments following the meeting were due by 10/13/17. <u>Market Notice</u> On 9/15/17 CAISO posted <u>Supporting Materials</u> . On 9/20/17 CAISO posted the questions submitted by stakeholders on Clean Coalition's proposed solution presenting during the 8/29/17 working group meeting. These questions were discussed at the 9/25/17 meeting. <u>Market</u> <u>Notice</u> .
	On 10/18/17 CAISO announced that the straw proposal had been postponed.
	On 1/11/18 CAISO posted the <u>Straw Proposal</u> . A meeting to discuss was held on 1/18/18. Comments were due by 2/15/18. <u>Market Notice</u>
2017 Expedited GIDAP Enhancements	On 7/21/17 CAISO announced a new initiative entitled "2017 Expedited GIDAP Enhancements." <u>Issue</u> <u>Paper and Straw Proposal</u> . The initiative addresses two issues that CAISO believes merit immediate attention and expedited resolution. The first extends GIDAP parking provisions and the second revises the interconnection request window and validation timeframe. In light of the slowdown in procurement by utilities CAISO proposes to extend the parking period for an addition year (for 2 years total) and commits to examine the TP Deliverability qualification criteria comprehensively in a 2017 initiative. Second, CAISO proposes to shorten the interconnection request window and lengthen the time for correction and validation. CAISO proposes that the next open interconnection request window will run from 4/1 to 4/15 and the validation process will be extended by 15 days. <u>Market Notice Presentation</u> . A call to discuss was held on 8/4/17, comments were due by 8/11/17.
	On 8/30/17 CAISO posted a <u>Revised Straw Proposal</u> . A call to discuss the revised straw proposal was held on 9/6/17. Comments were due by 9/13/17. <u>Market Notice</u> <u>Presentation</u> .
	On 10/10/17 CAISO posted the <u>draft final proposal</u> . Comments were due by 10/23/17. A call to discuss was held on 10/16/17. <u>Market Notice</u> . On 11/30/17 CAISO posted draft tariff language. Comments were due by 12/13/17. A call to discuss was held on 12/20/17. <u>Market Notice</u>
	On 1/9/18 CAISO filed the tariff amendment with FERC (ER18-626). The amendment is comprised of two sets of revisions. The first set of revisions are associated with extending the current "parking" period from one year to two years for interconnection requests still seeking a ppa before committing to Full Capacity Deliverability Status. The second set is associated with shortening the interconnection request window by two weeks and lengthening the time for correction and validation. This revision would shorten the interconnection window to two weeks, April 1 – April 15. On 3/9/18 FERC issued an order accepting the proposed tariff revisions, effective 3/11/18.



${f C}$ alifornia Regulatory Happenings for the Week of March 12, 2018

Imbalance Conformance Enhancements	 On 11/29/17 CAISO announced a new initiative Imbalance Conformance Enhancements. An issue paper and straw proposal was posted and a call to discuss was held on 12/8/17. <u>Market Notice</u>. <u>Presentation Issue Paper and Straw Proposal</u> The scope of the initiative it so clarify the CAISO's authority to conform for imbalance in both real time and the day ahead. The initiative will also propose enhancements for the conformance limiter to ensure price spikes do not result. Comments were due by 12/20/17. On 1/30/18 CAISO posted the <u>Draft Final Proposal</u>. A call to discuss was held on 2/6/18. <u>Market Notice Agenda and Presentation</u> On 3/14/18 CAISO posted the <u>Updated Draft Final Proposal</u>. Market Notice. Comments are due by 3/21/18.
Reliability Coordinator	On 1/2/18 CAISO announced that it would become its own Reliability Coordinator and offer these services to other balancing authorities and transmission operators in the western US. These services include outage coordination, day-ahead planning and real-time monitoring for reliability. In order to accomplish this task, CAISO gave notice of withdrawal to its current reliability coordinator Peak Reliability. CAISO also provided withdrawal to the agencies funding the agreement with Peak Reliability, including, but not limited to, BANC, WAPA, LADWP, APS, BPA, IID, MID, PacifiCorp, SMUD, Salt River Project, and TID. An informational call was held on 1/4/18 and public meetings in Folsom, Portland and Phoenix on 1/17/18, 1/18/18 and 1/19/18 respectively. Market Notice
Interconnection Process Enhancements 2018	On 1/4/18 CAISO launched a new initiative, Interconnection Process Enhancements 2018. On 1/17/18 the CAISO posted the <u>issue paper</u> . A stakeholder meeting was held on 1/24/18. Comments were due by 2/7/18. The initiative will evaluate potential changes to enhance the CAISO generator interconnection procedures and agreements. <u>Market Notice</u> Topics fall into six broad categories, 1. Deliverability; 2. Energy Storage; 3. Generator Interconnection Agreements; 4. Interconnection Financial Security and Cost Responsibility; 5. Interconnection Requests; and 6. Modifications. <u>Presentation</u>
Day-Ahead Market Enhancements	On 2/8/18 CAISO launched a new initiative, Day-Ahead Market Enhancements. This initiative will address ramping and uncertainty previously left to be resolved by the real-time market. A stakeholder meeting was held on 3/7/18 to discuss the issue paper and straw proposal. Enhancements to be considered include combining the Integrated Forward Market with the Residual Unit Commitment process, changing the day-ahead scheduling granularity from hourly to 15-minute and adding an imbalance reserve product. At the kickoff meeting, CAISO discussed additional design elements. <u>Market Notice</u> . On 2/28/18 CAISO posted the <u>issue paper/straw proposal</u> . Comments on the issue paper are due by 3/21/18. Presentation

Buchalter

California Regulatory Happenings for the Week of March 12, 2018

Federal Energy Regulatory Commission

Issue	Latest Developments				
Large Generator Interconnection Reforms NOPR RM17- 8-000	On 12/15/16 FERC proposed reforms to its large generator interconnection processes aimed at improving the efficiency of processing interconnection requests, removing barriers to needed resource development, and assuring continued reliability of the grid. The NOPR revises regulations, the pro forma Large Generator Interconnection Procedures and the pro forma LGIA. While the NOPR applies to large generating facilities (>20MW), the NOPR does seek comment on whether any of the proposed changes should be applied to small generating facilities. <u>News Release NOPR</u> . Comments were due 60 days after publication in the Federal Register.				
	On 2/23/17, the Commission extended the comment deadline to 4/13/17. On 4/28/17 MID filed an answer.				
	On 7/3/17 Sunflower Electric Power Corporation Mid-Kansas Electric Company requested leave to submit out of time comments. On 7/20/17 Renewable Energy Systems Americas, Inc. submitted a motion to intervene out of time.				
	On 2/2/18 FERC announced that it would convene a technical conference on April 3 rd and 4 th to discuss issues related to the coordination of Affected Systems raised in the complaint filed by EDF Renewable Energy against MISO, Southwest Power pool and PJM and this Notice of Proposed Rulemaking.				
Grid Reliability and Resilience Pricing (AD18-7)	On 1/8/18 FERC initiated this proceeding after terminating RM18-1, a rulemaking tasked with evaluating the DOE pricing proposal. This proceeding will holistically examine the resiliency of the market and asks RTOs and ISOs to provide information on whether the Commission needs to act regarding resiliency. RTOs filed comments on 3/9/18, including CAISO.				
	On 3/14/18 various energy industry associations filed a joint motion for a 30 day extension of time to file reply comments.				
Electric Storage Participation in Regional Markets	On 2/15/18 FERC voted to remove barriers to the participation of electric storage resources in the capacity, energy and ancillary services markets operated by RTOs and ISOs. The order is intended to enhance completion and promote greater efficiency in the nation's electric wholesale markets, and support the resilience of the bulk power system. Order 841				

Buchalter

California Regulatory Happenings for the Week of March 12, 2018

Upcoming Meetings

March 2018				
Monday	Tuesday	Wednesday	Thursday	Friday
19 CAISO Reliability Requirements Customer Partnership Group 10am	20 CPUC Quarterly meeting of the EM&V stakeholders 10am CAISO Review of RMR and Capacity Procurement Mechanism 10am	21 CEC Business Meeting 10am	22 ARB Board Meeting (in Riverside) 9am CPUC Meeting 9:30am CPUC Board Meeting 10:30am	23 ARB Board Meeting (in Riverside) 8:30am
26	27 CAISO Energy Storage and DER Phase 2 Implementation Customer Partnership Group meeting 1pm CPUC pre-hearing conference in R.11.03.12 cost and revenue issues associated with ghg 1:30pm	28 CEC Webinar on Emerging Technologies: Innovative Energy Efficient Walls 9:30am	29 CPUC Workshop on how to improve public access to public records 9:45am CAISO Energy Storage and DER Phase 3 Technical Working Group Meeting 10am CPUC IRP Modeling Advisory Group Webinar 10am	30

Buchalter

California Regulatory Happenings for the Week of March 12, 2018

Contact Info



Gwenneth O'Hara Chair: Energy and Natural Resources Group Shareholder 916-945-5174 gohara@buchalter.com



Ann Springgate Special Counsel 415-227-3545 aspringgate@buchalter.com



Meghan Thomas Attorney 916-945-5176 <u>mthomas@buchalter.com</u>