
Appendix A – WDT1489

[REDACTED]
[REDACTED]

Queue Cluster 10 Phase II Report

November 21, 2018

This study has been completed in coordination with the California Independent System Operator Corporation (ISO) per Southern California Edison Company's Wholesale Distribution Access Tariff (WDAT), Attachment I Generator Interconnection Procedures (GIP)

Interconnection Study Document History

No.	Date	Document Title	Description of Document
1	11/21/18	Queue Cluster 10 Phase II Appendix A Report	Final Phase II interconnection study report

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A. INTRODUCTION

██████████ the Interconnection Customer (IC), has submitted a completed Interconnection Request (IR) to Southern California Edison (SCE), the Distribution Provider, for its proposed ██████████ (Generating Facility).

In accordance with FERC approved SCE's WDAT Attachment I Generator Interconnection Procedures (GIP), the Generating Facility was grouped with Queue Cluster 10 (QC10) Phase II projects to determine the impacts of the group as well as impacts of the Generating Facility on SCE's Distribution System and the ISO Grid.

An Area Report and, where applicable, a Subtransmission Assessment Report have been prepared separately identifying the combined impacts of all projects on the ISO Grid and to distribution facilities served out of the Goleta 66 kV Subtransmission System, respectively. This Appendix A report focuses only on the impacts or impact contributions of the Generating Facility. This report is not intended to supersede any contractual terms or conditions specified in a forthcoming Generator Interconnection Agreement (GIA).

The report provides the following:

1. Distribution and transmission system impacts allocated to the Generating Facility.
2. System reinforcements or mitigation necessary to address the adverse impacts allocated to the Generating Facility under various system conditions.
3. A list of required facilities and a good faith estimate of the Generating Facility's cost responsibility and time to construct¹ these facilities. Such information is provided in Attachment 1 and Attachment 2 as separate documents in the Appendix A report package of the Generating Facility.
4. Identification of potential short circuit duty impacts to Affected Systems served from the Subtransmission or Distribution System.

The Generating Facility encompasses energy storage equipment that triggered the need to analyze its charging impacts on SCE's electric system. The analyses focused on the Charging Demand² aspects of the Generating Facility and considered varying levels of system demand with minimal generation dispatch within the local distribution system.

Consequently, the report also discloses the adequacy of SCE's electric system to support the Generating Facility when operating in charging mode, identifies system limitations that may restrict the Generating Facility when operating in charging mode during certain demand conditions, and provides a high-level explanation of potential exposure to the Generating Facility of charging restrictions on the electric system.

¹ It should be noted that construction is only part of the duration of months specified in the study, which includes detailed engineering, licensing, and other activities required to bring such facilities into service. These durations are from the execution of the GIA, receipt of: all required information, funding, and written authorization to proceed with design and engineering, procurement, and construction from the IC as will be specified in the GIA to commence the work.

² Charging Demand: The flow of wholesale electric energy from the Distribution System solely to charge the storage component of the Eligible Customer's Resource from the Distribution System for later redelivery of such energy, net of Resource losses, to the Distribution System. Charging Demand does not include the delivery of energy for purposes that are subject to the SCE's retail tariff.

The Generating Facility consists of all equipment and facilities comprising the IC's energy storage. [REDACTED] [REDACTED] generating facility in Goleta, California, as disclosed by the IC in its IR and/or Attachment B, as may have been amended during the Interconnection Study process, as summarized below:

Table A.1: Generation Facility General Information per the IR, including Attachment B



The IC has requested, and the GIA will provide for, a total net capacity of **50.1 MW** as measured at the high-side of the main step-up transformer(s) and **50 MW** at the POI. The Parties acknowledge that the Generating Facility has a total net capability that exceeds these values. Accordingly, the IC agrees to install, own, operate and maintain a control limiting device or, alternatively, by means of configuring the Generating Facility's control system to ensure the Generating Facility does not exceed the total net capacity provided under the GIA at the high-side of the main step-up transformer(s) and POI.

The Interconnection Facilities of the Generating Facility are illustrated in Figure A.1. While Figure A.2 illustrates the location of the Generating Facility. Additional information is provided in Table A.2

Figure A.1: Generating Facility One-Line Diagram

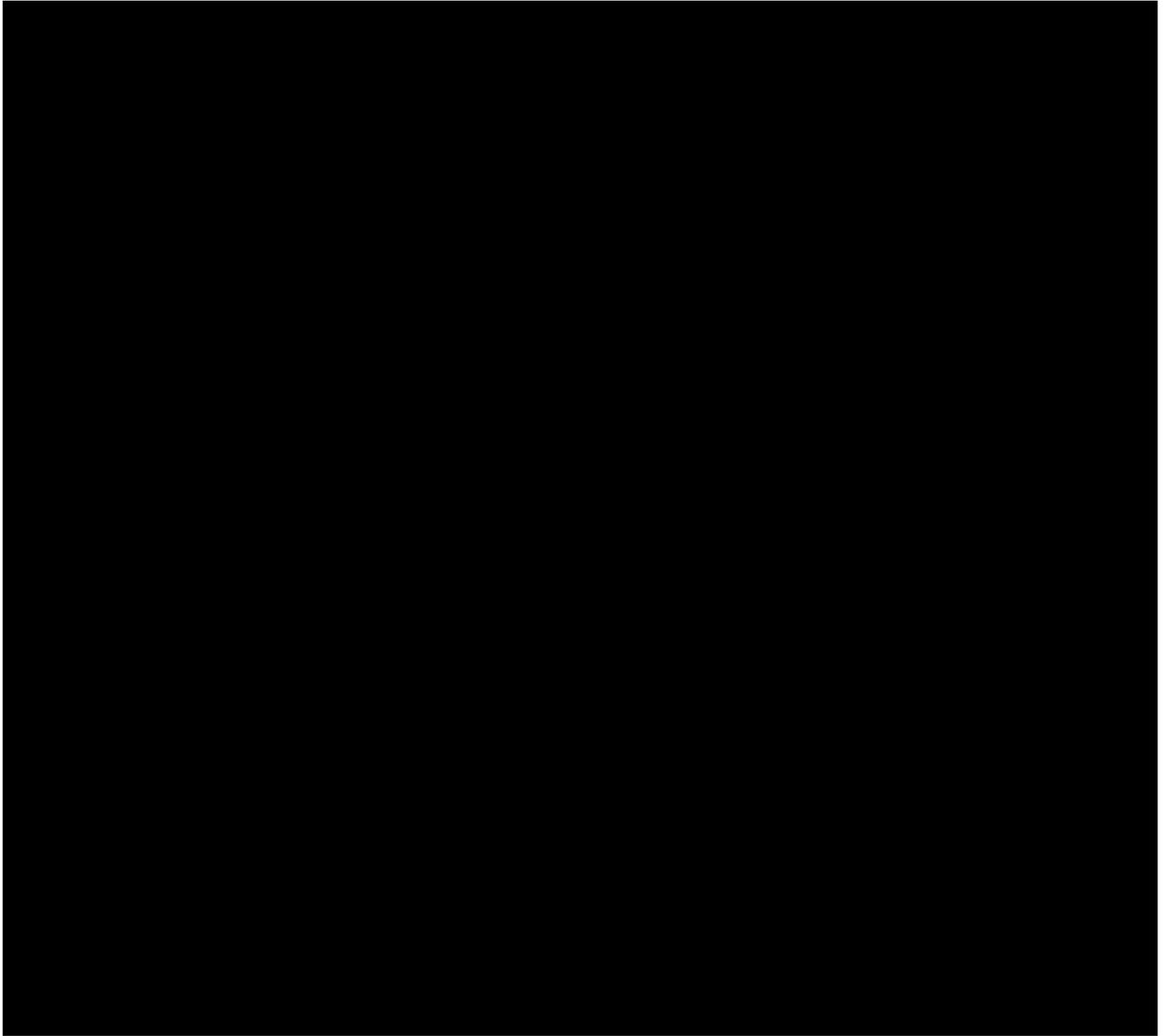


Figure A.2: Generating Facility Location Map

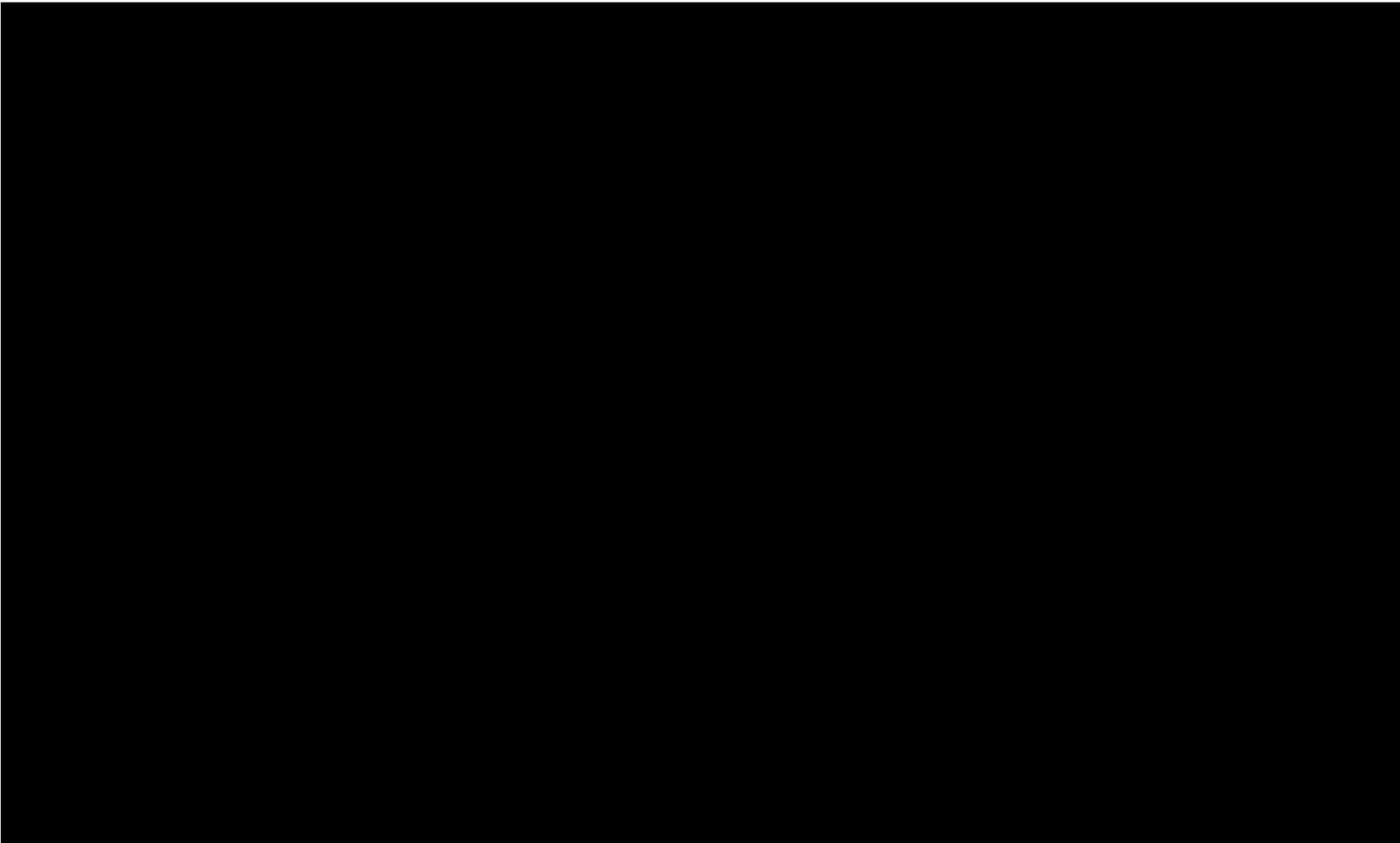


Table A.2: Additional Generating Facility General Information

Generating Facility Location	[REDACTED]
SCE's Planning Area	Northern Area
Interconnection Voltage	66 kV
POI	Goleta 66 kV bus
Number and Types of Generators	[REDACTED] units each rated at 2.2 MVA at 25°C and 1.98 MVA at 50°C but will be managed to not exceed a total gross MW output of 52.50 MW in order to meet the requested POI value at inverter terminal
Requested Maximum Generating Facility Delivery at POI ³	50 MW
Generation Tie Line	0.16 miles, 954 SAC Line Rating: 1090A / 1470A Z_1 (p.u.): 0.0004808+j0.003410, B = 0.0005428 Z_0 (p.u.): 0.0018900+j0.012742, B = 0.0005428
Main Step-Up Transformer(s) Main Transformer T1	[REDACTED]
Collector Equivalent	N/A
Pad-Mount Transformer(s) Downstream of Main Transformer Bank T1	[REDACTED]
Downstream of Main Transformer Bank T2	[REDACTED]

³ The MW output at the POI varies under different operating conditions. The IC is reminded that this value is tied to the generation tie-line (gen-tie) losses. The estimated Maximum Net Output value at POI and gen-tie losses illustrated in Section E, are contingent upon the accuracy of the technical data provided by the IC, and are subject to change should the IC change its gen-tie parameters during the detailed engineering and design phase of the Generating Facility. Please note that the Generating Facility shall not exceed the total net output of 50 MW at the POI.

Generator Data Downstream of Main Transformer Bank T1	[REDACTED]
Generator Auxiliary Load and/or Station Light and Power	2.0 MW
Voltage Regulation Devices Downstream of Main Transformer Bank T1	Two (2) sets of 2.0 MVAR capacitor bank
Dynamic Models Used Downstream of Main Transformer Bank T1	regc_a, reec_b, repc_a, lhvrt, and lhfrt
Deliverability Requested	Full Capacity
Option (A/B) Requested	Option A
Proposed Dates ⁴	
In-Service Date (ISD)	10/31/2021
Initial Synchronization Date/Trial Operation	11/15/2021
Commercial Operation Date (COD)	12/1/2021

B. STUDY ASSUMPTIONS

For detailed assumptions regarding the group cluster analysis, please refer to the QC10 Phase II Area Report. Below are the assumptions specific to the Generating Facility:

1. The Generating Facility was modeled as described in Table A.1 and A.2 above.
2. The facilities that will be installed by SCE and the IC are detailed in Attachment 1.
3. Roles and Responsibilities for Environmental Activities, Permits, and Licensing. The assumptions for the Environmental Activities, Permits, and Licensing are as follows:
 - i. SCE Facilities
 - a. SCE’s Interconnection Facilities (IF), Reliability Network Upgrades (RNU), and Distribution Upgrades (DU) allocated to the Generating Facility:

⁴ Such dates are specified in the Generating Facility’s Attachment B. Actual ISD, Initial Synchronization Date, and COD will depend on licensing, engineering, detailed design, and construction requirements to interconnect the Generating Facility after the GIA has been executed and/or filed at Federal Energy Regulatory Commission (FERC) for acceptance.

- SCE's scope of work will/will not require a California Public Utilities Commission (CPUC) license.
- ESD will act as the environmental liaison between the SCE team and IC team, and the lead for regulatory agency communication for permits covering SCE facilities. SCE environmental services include:
 - Collaborate with the IC during the environmental study phase on proposed study methodologies and findings, as studies are being planned and performed for SCE's scope of work.
 - Review IC's California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents, technical studies, surveys, and other environmental documentation addressing SCE's scope of work (IC to include SCE's scope of work in their environmental document).
 - Review of internal Environmental Services (ES) existing technical documents when available
 - General Order 131-D Consistency Determination and Environmental Evaluation
 - Support SCE team in developing the Generating Facility description, including scope changes during permitting/pre-construction or construction.
 - Communicate scope changes to the IC's environmental team, discuss/approve subsequent actions including new surveys as necessary
 - Regulatory agency communication, consultation, and reporting for permits addressing SCE's facilities and scope of work
 - Permit acquisition
 - Prepare environmental requirements for construction clearance
 - Develop communication plan
 - Pre-construction coordination field visit.
 - Environmental Awareness/Worker Environmental Awareness Program (WEAP) training
 - Construction monitoring oversight.
 - Construction and post-construction site assessments.
 - For internal substation work, if applicable, SCE will perform all environmental studies/surveys and monitoring and will provide survey information to the IC for incorporation into their environmental document. This study assumes no nesting bird issues during construction.
- IC performs all environmental studies and prepares draft environmental permit applications related to the installation of SCE's IFs, DUs, and Network Upgrades, but excluding internal substation work. The IC's responsibilities include, but are not limited to notifications to the Native American Heritage Commission (NAHC) and follow-up notifications to the tribes and individuals in the NAHC contact list, performing cultural and paleontological resources records searches, performing cultural resources inventories (survey and recording), performing testing and evaluation and/or data recovery of archaeological sites as applicable, and providing the appropriate documentation in the form of inventory reports, research design and/or data recovery reports as applicable, cultural and paleontological monitoring when/if required, and arranging curation agreements for artifacts and fossil specimens collected, performing a California Natural Diversity Database search, performing a habitat assessment, performing protocol or focused surveys for species with the potential of occurring in identified suitable habitat, conducting jurisdictional delineations for wetlands or other

regulated waters, preparing draft environmental permit applications, performing pre-construction biological resource surveys, performing biological resource monitoring during construction, performing cultural and paleontological monitoring during construction, mitigation costs including, but not limited to, offsite/compensatory mitigation and onsite restoration, and developing mitigation plans or other environmental reports or submittals, if required, to support installation of SCE's IFs, DUs, and Network Upgrades.

- Prior to commencing work and during execution of work, the IC should collaborate and obtain ES concurrence on all work outlined above. Should the IC-performed environmental studies, surveys, or monitoring not meet the Federal or State industry standards in accordance with Applicable Laws and Regulations, and as determined by ES, the IC shall be obligated to remedy deficiencies under SCE/ES's direction, or ES shall undertake additional environmental studies, surveys, or monitoring at the sole expense of the IC. If these scenarios occur, the cost estimate must be updated to reflect the changes to the assumptions.
- The estimated cost(s) provided in the Phase II study assumed that the IC will perform part of the environmental services scope of work (SOW) that would normally be performed by SCE for SCE-owned IF, RNU, and DU, if applicable, to interconnect the Generating Facility. The IC shall provide SCE an itemized accounting record of the actual costs for work performed by the IC in a form acceptable to SCE. The IC acknowledges and accepts that these costs will be subject to an Interconnection Facilities Charge, a Distribution Facilities Charge, if applicable, and Income Tax Contribution Component (ITCC).
- For further details on the environmental evaluation and permitting/licensing requirements for generation projects refer to Appendix K of the Area report.

4. Energy Storage Considerations:

- Charging is provided on an "as available" service basis. Charging restrictions will be implemented through the use of Distributed Energy Resource Management System (DERMS), as applicable.
- SCE's Distribution Standards and Practices are in the process of being updated to address energy storage facilities. The proposed Plan of Service in this report may require changes to comply with SCE's Distribution Standards and Practices.
- This study assumes that the Generating Facility will include all equipment, software, appropriate controls, and other related equipment necessary to maintain the energy storage facility demand restriction per SCE's requirements.
- In order to ensure limits are communicated in a timely and reliable manner, the IC is responsible for providing reliable communication between the Generating Facility and SCE to transmit the required telemetry data as outlined in SCE's Interconnection Handbook. Should the communication channel fail, the Generating Facility's operating limits will automatically revert to zero (no charging allowed).
- If the Generating Facility does not follow the given charging limitations, the Generating Facility will be disconnected.
- Depending on the study results, the Generating Facility may need to participate in the DERMS upon COD. However, if the studies do not identify an immediate need, the Generating Facility may be required to be included in DERMS in the future. Currently,

the cost to add the Generating Facility to DERMS could cost up to \$160k, in 2018 dollars. The actual cost to add the Generating Facility to DERMS is subject to change depending on when the Generating Facility will be added to the program. Such determination shall be made pursuant to a technical assessment to be performed by SCE at the time such potential need is identified.

- At this stage, since DERMS is conceptual and under development, it is assumed that DERMS will be available prior to the COD of the Generating Facility. Further details will be available during the detailed engineering and design phase of the Generating Facility. In concept, DERMS will monitor system loading conditions utilizing data from both SCE's and IC's facilities. DERMS will calculate the available charging capacity limits and will transmit the limits to the IC. It will be required that the IC's control system follows the provided limits. If the IC's control system does not comply with this requirement, SCE will mitigate this condition at its discretion including but not limited to disconnecting the Generating Facility from the grid using SCE controlled equipment.
- The preliminary charging analysis discussed in this report assumed that charging demand is curtailable before wholesale and retail load, and this assumption was used to determine the charging restrictions contained in this report for the Generating Facility.

5. Other Items to Consider:

- Final metering requirements will be identified as part of the detailed engineering and design of the Generating Facility and could result in modifications to the Generating Facility.

C. TECHNICAL REQUIREMENTS⁵

1. Preliminary Protection Requirements

Protection requirements are designed and intended to protect SCE's electric system only. The preliminary protection requirements were based upon the interconnection plan as shown in the one-line diagram depicted in line item #4 in Attachment 1.

The IC is responsible for the protection of its own system and equipment and must meet the requirements in the SCE's Interconnection Handbook.

2. Power Factor Requirements

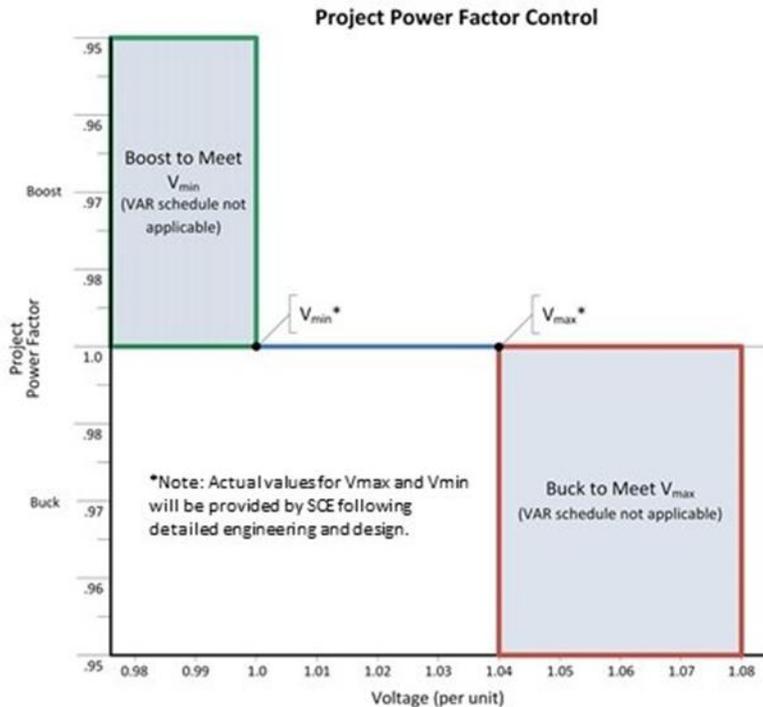
The Generating Facility will be required to maintain a composite power delivery at continuous rated power output at the terminals of the Electric Generating Unit at a power factor within the range of 0.95 leading to 0.90 lagging.

3. Operating Voltage Requirements

Under real-time operations, the Generating Facility will be required to operate under the control of automatic voltage regulator with settings as shown in the figure below. The actual values of the Vmin and Vmax will be provided once the Generating Facility executes a Generation Interconnection Agreement and detailed engineering and design is complete. The Vmin and Vmax values are to be used as the basis for setting up the automatic voltage control mode (with

⁵ The IC is advised that there may be technical requirements in addition to those that outlined above in Section C of this report that are included in SCE's Interconnection Handbook or that will be addressed in the Generating Facility's GIA.

its automatic voltage regulator in service and controlling voltage) of the Generating Facility in order to maintain scheduled voltage at a reference point.



4. Harmonic Requirements

The harmonic impact of the subject inverter-based generation was not part of this study. Impacts on voltage distortion levels may be significant due to the penetration level of the Generating Facility with respect to the local distribution grid strength. As with all equipment connected to SCE's Electric System, the Generating Facility will be subject to the provisions of CPUC Rule 2.E, allowing SCE to require the IC to mitigate interference with service to other SCE customers, including harmonic impacts, if the harmonic interference is caused by the IC.

5. Low/High Voltage Ride-Through (LHVRT) and Low/High Frequency Ride-Through (LHFRT) Capability

Actual fault events have demonstrated that certain asynchronous generators (i.e., inverters) from specific manufacturers may be susceptible to false tripping or temporary shutdown during fault conditions. The most severe disturbance to date resulted in the temporary loss of 1,178 MW at photovoltaic plants when inverter control systems throughout Southern California responded to a 500 kV fault by temporarily stopping the production of electric power. Based on the results of an investigation performed into this issue, several causes and contributing factors have been identified which include:

- Apparent miscalculated frequency at many inverters when fault-induced phase shifts occurred in the reference voltage
- Inverter protection settings set to meet IEEE 1547 standards
- Momentary overvoltage
- Momentary under-voltage

The NERC PRC-024-2 standard currently allows generators to instantaneously trip if the system conditions are outside of a defined set of bounds. Because different inverter manufacturers use different methods to calculate frequency (zero crossing, DFT, PLL, etc.), the methods used by some manufacturers have resulted in calculations of the instantaneous frequency during power system disturbances that do not accurately reflect actual frequency. Inaccurate frequency calculations may result in the reduction of electric power from inverter-based resources which is an unacceptable response. In addition, voltage transients caused by capacitive switching (among other potential causes) can cause inverters to trip due to a momentary overvoltage condition which too is an unacceptable response unless the Generating Facility has reached the power factor lead (buck) limits and the voltage is still in excess of the maximum allowable voltage limit.

When under-voltage occurs during the fault, some inverters may cease operation temporarily. Such performance impacts system reliability and may not be allowed in the future reliability standards/interconnection standards.

The IC should work with the inverter manufacturer to ensure that the Generating Facility's inverters meet the requirements of NERC Standard PRC-024 and conform to the NERC industry recommendations issued on May 01, 2018:

https://www.nerc.com/pa/rrm/bpsa/Alerts%20DL/NERC_Alert_Loss_of_Solar_Resources_during_Transmission_Disturbance-II_2018.pdf

This NERC industry recommendations are required to be followed by all inverter based generation connected to the ISO controlled grid.

6. Primary Frequency Response Requirement

Per FERC Order 842, the IC is required to install a governor or equivalent controls with the capability of operating: (1) with a maximum 5 percent droop and ± 0.036 Hz deadband; or (2) in accordance with the relevant droop, deadband, and timely and sustained response settings from the Approved Applicable Reliability Standards providing for equivalent or more stringent parameters. The IC shall ensure that the Electric Generating Unit's real power response to sustained frequency deviations outside of the deadband setting is automatically provided and shall begin immediately after frequency deviates outside of the deadband, and to the extent the Electric Generating Unit has operating capability in the direction needed to correct the frequency deviation.

Also per FERC Order 841, nuclear generating facilities and certain Combined Heat and Power (CHP) facilities are exempt from these primary frequency response requirements.

An operating range shall be identified in the GIA that specifies a minimum state of charge and a maximum state of charge between which the electric storage resource will be required to provide primary frequency response. The GIA shall also specify whether the operating range is static or dynamic; in addition, the operating range is subject to reevaluation and modification by SCE in consultation with the IC and ISO.

D. RELIABILITY STANDARDS, STUDY CRITERIA AND METHODOLOGY

1. SCE Analysis

The generator interconnection studies were conducted to ensure the ISO Grid is in compliance with the North American Electric Reliability Corporation (NERC) reliability standards, WECC regional criteria, and the ISO planning standards. Refer to Section C of the Area Report for details of the applicable reliability standards, study criteria, and methodology. In addition, the Subtransmission Assessment was performed in compliance with SCE's Subtransmission Planning Criteria.

2. Coordination with Affected Systems

Per GIP Section 3.7, the SCE will notify the Affected System Operators that are potentially affected by an IC's IR or group of interconnection requests subject to a Group Study. The SCE will coordinate the conduct of any studies required to determine the impact of the IR on Affected Systems with Affected System Operators and, if possible, include those results (if available) in its applicable Interconnection Study within the time frame specified in the GIP. SCE will include such Affected System Operators in all meetings held with IC as required by the GIP. IC will cooperate with SCE in all matters related to the conduct of studies and the determination of modifications to Affected Systems. A transmission provider which may be an Affected System shall cooperate with SCE with whom interconnection has been requested in all matters related to the conduct of studies and the determination of modifications to Affected Systems.

Refer to Section F for additional information.

E. POWER FLOW RELIABILITY ASSESSMENT RESULTS

Discharging Analysis of the Generating Facility

Steady State Power Flow Analysis Results

1. Thermal Overloads

The Northern Bulk Area studies indicate that the Generating Facility contributes to overloads under contingency conditions when operated in discharge mode. However, mitigation and corresponding cost allocation was not assigned to this Generating Facility due to the relatively small contribution. At the subtransmission level, the Goleta Subtransmission Assessment did not identify any thermal overloads allocated to this Project when operated in discharge mode.

2. Power Flow Non-Convergence

The Goleta 66 kV Subtransmission System is served by two 220 kV lines which are supported on common transmission towers. Under the loss of these two 220 kV lines, the Goleta Subtransmission System will be effectively disconnected from the transmission system. Under this contingency, SCE would utilize three 66 kV system tie-lines and implement load rolling procedures to provide limited level of service to the Goleta 66 kV Subtransmission System load from the Santa Clara 66 kV Subtransmission System.

3. Voltage Performance

There were no voltage performance issues identified with the inclusion of the Generating Facility; refer to Area Report and/or Subtransmission Assessment Report for additional details.

4. Required Mitigations

No mitigations were identified to support discharge of the Generating Facility.

5. Line Loss Analysis for Generating Facility

Based on the technical data provided for the individual generator unit(s), the collector system equivalent, pad-mount and main transformer banks, the internal Generating Facility losses are shown in Table 1. In addition, losses incurred on the generation tie line are shown in Table 2 below. The Generating Facility losses identified represent those assuming the Generating Facility is limiting its output at the high side of the main transformer bank to achieve the desired MW delivery at the POI.

Table 1

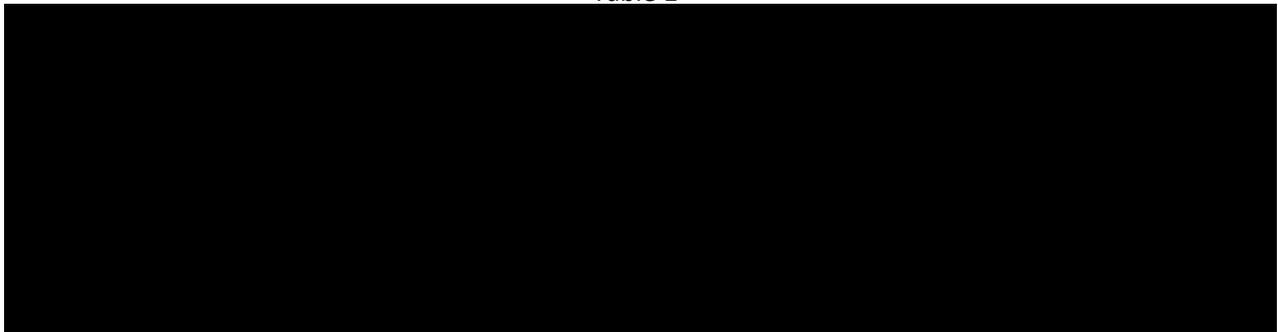
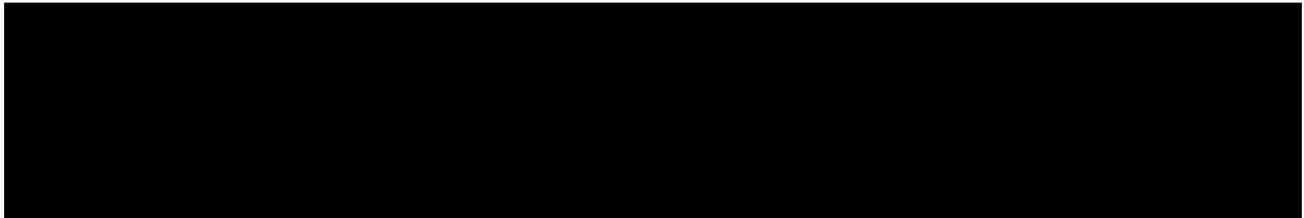
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Table 2

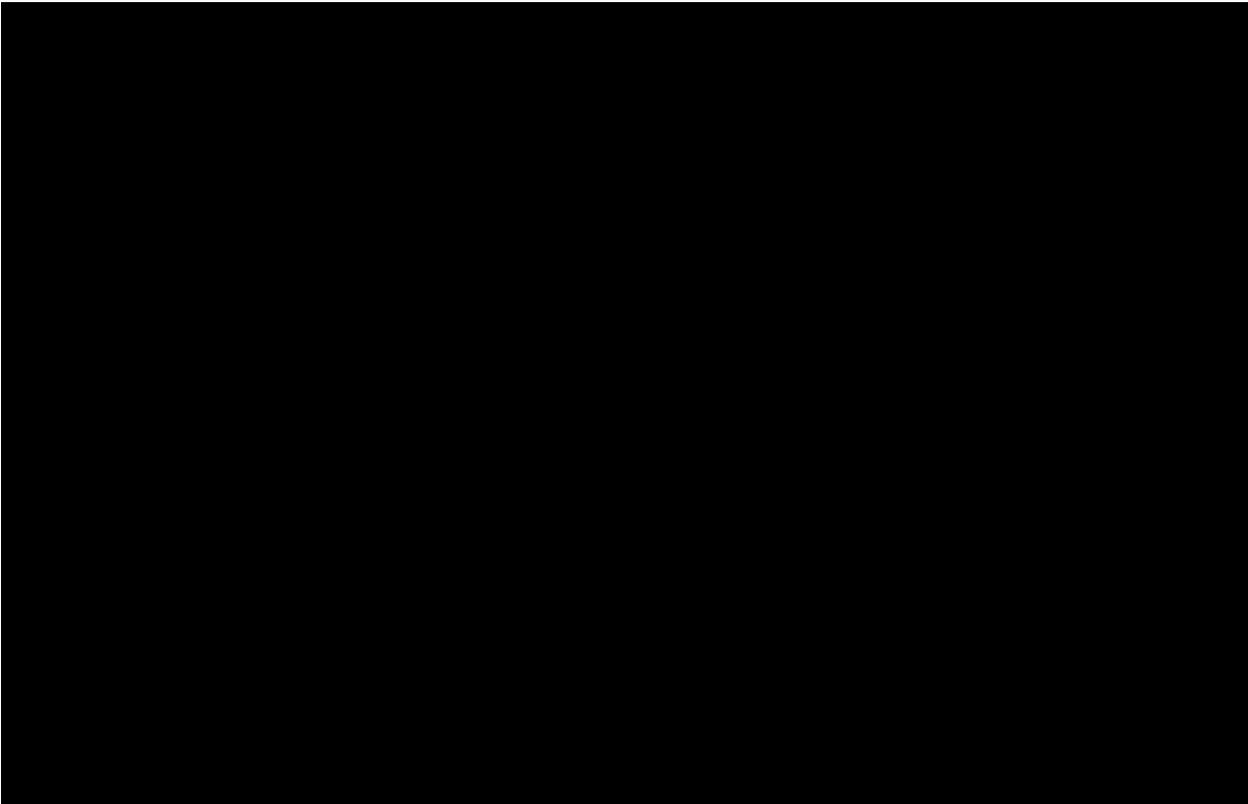
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6. Power Factor Evaluation

FERC Order 827 provides the reactive power requirements for newly interconnecting non-synchronous generators which requires these resources to design the facility to be capable of providing reactive power to meet power factor 0.95 as measured on the high-side of the IC's substation or other equivalent location. This capability should be dynamic.

Base case power flow was evaluated to determine reactive power losses internal to the Generating Facility in order to ascertain if the reactive capability of the Generating Facility is adequate to supply these losses and meet the power factor requirements. A summary of the power factor evaluation is provided in the table below.

Evaluation Assumptions



Based on the technical details provided, the Generating Facility, as proposed, does have the capability to meet 0.95 power factor requirement as measured at the high-side of the IC's substation or other equivalent location. Additional reactive power resources will not need to be installed to address the Generating Facility reactive power deficiencies.

Charging Analysis of the Generating Facility

Steady State Power Flow Analysis Results

1. Thermal Overloads

The group and/or Subtransmission study indicated that the Generating Facility contributes to overloads on the following facilities listed below under normal, single contingency, and multiple contingency conditions. The details of the analysis and overload levels, as well as the details of the recommended mitigation to address these overloads, are provided in the corresponding Area and/or Subtransmission Assessment Report(s).

I. Normal Conditions

The following thermal overloads were identified:

- Goleta #1 220/66 kV Transformer Bank
- Goleta #4 220/66 kV Transformer Bank

II. Single Contingency

- Goleta #1 220/66 kV Transformer Bank under the loss of the Goleta #4 220/66 kV Transformer Bank.

- Goleta #4 220/66 kV Transformer Bank under the loss of the Goleta #1 220/66 kV Transformer Bank.

III. Multiple Contingency

- None

2. Power Flow Non-Convergence

There were no non-convergence issues identified with the inclusion of the Generating Facility operating at the required power factor range; refer to Area Report and/or Subtransmission Assessment Report for additional details.

3. Voltage Performance

There were no voltage performance issues identified with the inclusion of the Generating Facility; refer to Area Report and/or Subtransmission Assessment Report for additional details.

4. Required Mitigations

The Generating Facility is required to provide 0.95 leading/0.95 lagging power factor regulation capability at the high-side of the IC's substation or other equivalent location. With respect to Charging Demand, SCE currently offers "as-available" service pursuant to the WDAT. To optimize the available system capacity for charging and to prevent the overloads specified above, it will necessary to include the Generating Facility in DERMS to monitor the following facilities:

I. Normal Conditions

- Goleta #1 220/66 kV Transformer Bank
- Goleta #4 220/66 kV Transformer Bank

II. Single Contingency

- Goleta #1 220/66 kV Transformer Bank under the loss of the Goleta #4 220/66 kV Transformer Bank.
- Goleta #4 220/66 kV Transformer Bank under the loss of the Goleta #1 220/66 kV Transformer Bank.

Refer to Attachment 1 and Attachment 2 for scope description and associated cost responsibility of these Distribution Upgrade(s) to the Generating Facility.

The IC is advised that the Generating Facility is dependent upon the installation and implementation of DERMS. Should DERMS not be operational prior to this Generating Facility initializing commercial operation, the Generating Facility will be required to follow a static charging schedule provided by SCE until DERMS is operational.

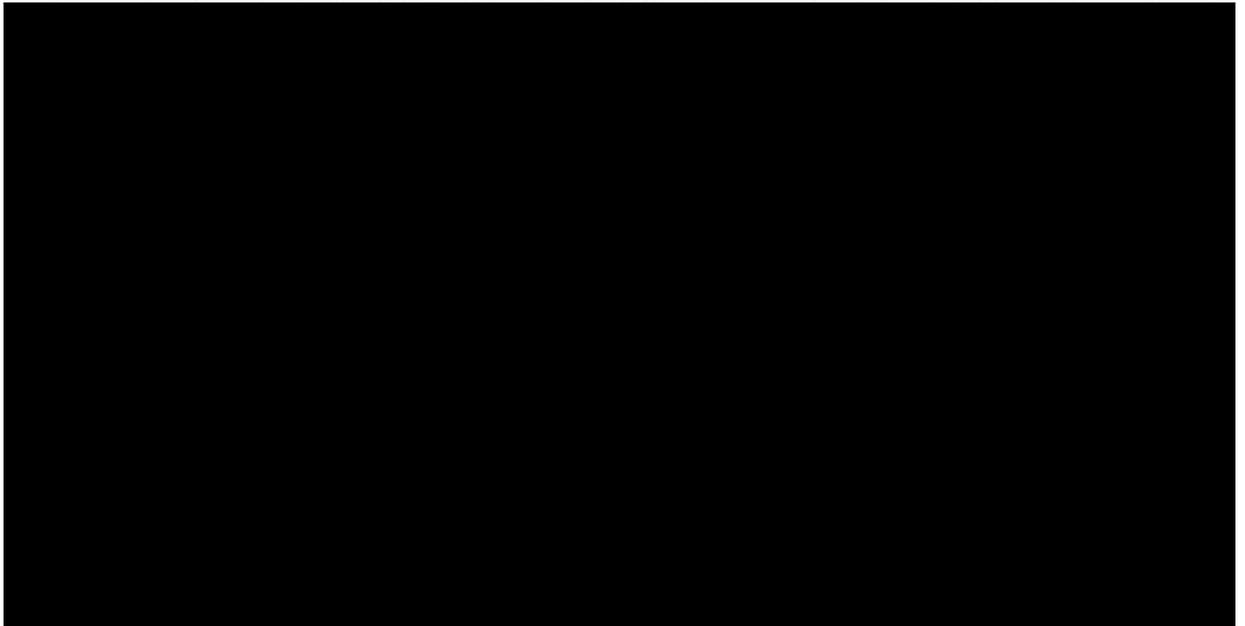
F. TRANSIENT STABILITY EVALUATION

1. Generating Facility Performance

Dynamic simulation study results illustrating the frequency and voltage performance of the Generating Facility based on the technical parameters supplied for the Generating Facility are provided below.

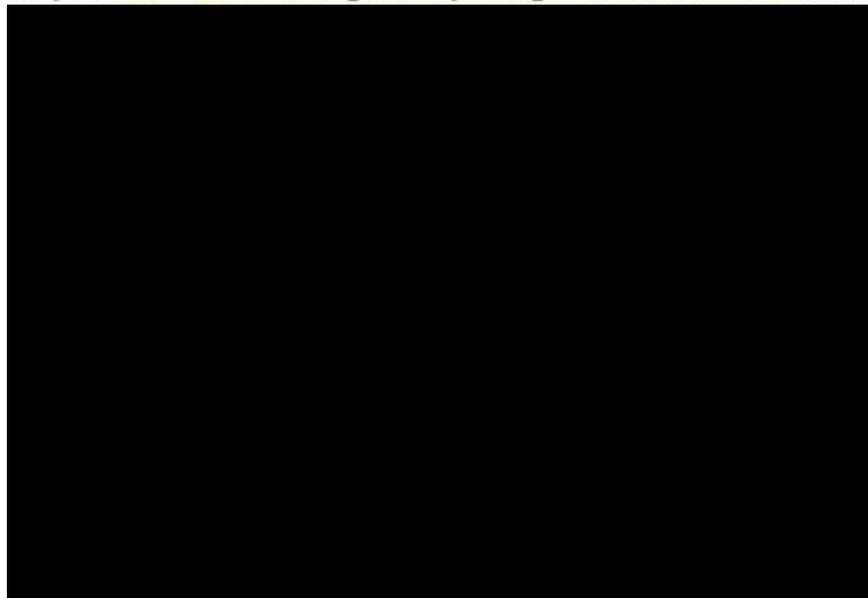
Voltage and Frequency Plots for Generating Facility at the high-side of the IC's substation with fault at POI

Voltage and Frequency Plots for Generating Facility at high-side of main transformer banks



Power Flow Plots for Generating Facility at inverter terminal with fault at POI

Power Output Plot for Generating Facility at high-side of main transformer banks



The results indicate acceptable performance and reflect the expected performance when Generating Facility ultimately interconnects.

2. System Performance

System transient stability performance was found to be acceptable. Refer to the Area Report for additional details pertaining to the Phase II transient stability evaluation criteria and assessment results, respectively.

G. SHORT-CIRCUIT DUTY RESULTS

Short-circuit studies were performed to determine the fault duty impact of adding the Phase II projects to SCE's electric system and to ensure system coordination. The fault duties were calculated with and without the projects to identify any equipment overstress conditions. Once overstressed circuit breakers are identified, the fault current contribution from each individual project in Phase II is determined. Each project in the cluster will be responsible for its share of the upgrade cost based on the rules set forth in Section 4 of the GIP.

1. SCE-owned Facilities

All bus locations where the Phase II projects increase the short-circuit duty by 0.1 kA or more and where duty was found to be in excess of 60% of the minimum breaker nameplate rating are listed in the Area Report (Appendix H) and applicable Subtransmission Assessment Report (Attachment 7). These values have been used to determine if any equipment is overstressed as a result of the inclusion of Phase II interconnections and corresponding Network Upgrades, if any.

- 1) If any equipment is found to be overstressed with the inclusion of the cluster and corresponding Local Area Deliverability Network Upgrades, further analysis is performed to identify the specific projects that drive the need for the upgrade. This further analysis identifies the individual project contribution at the impacted location which are then used to determine which project or group of projects drives the need for the mitigation.
- 2) If any equipment is found to be overstressed with the inclusion of the cluster and corresponding Local Area Deliverability Network Upgrades, subsequent mitigations or upgrades will be identified. Further analysis will be performed to identify the individual project contributions at the impacted location which are then used to determine which project or group of projects drives the need for the mitigation.

The QC10 Phase II breaker evaluation did not identify any additional overstressed circuit breakers triggered with the inclusion of the projects in QC10 Phase II

The responsibility to finance short circuit related Distribution and Reliability Network Upgrades identified from increases in short circuit duty through a group study shall be assigned pro rata to all projects requiring the upgrade based on SCD contribution of each project.

Please refer to the QC10 Phase II Area Report and/or the applicable Subtransmission Assessment report for additional details.

2. Affected Systems

Not applicable to the Generating Facility, since it's located within SCE's Distribution System that does not serve any municipalities.

3. SCE's Ground Grid Duty Concerns

The Generating Facility's contribution to the Goleta 66 kV Substation were found to be significant and will require the Generating Facility to be responsible for the cost of performing ground grid study at this location.

Refer to the Area Report and/or Subtransmission Assessment Report for further information.

4. Short Circuit Duty Considerations

SCD operational mitigation was identified taking into account new generation projects that have executed LGIAs /GIAs, approved SCE's Transmission Network Upgrades fully permitted and under construction, and new generation projects including the QC10 Phase II projects, which do not yet have an executed LGIA/GIA. The study results for these operational studies are provided in Section II of the Generation Sequencing Implementation Short Circuit Duty evaluation (Appendix G). Based on the study results, replacement of four (4) Vincent 500 kV circuit breakers (triggered by QC3&4) are required to be in place in order to enable interconnection of the Generating Facility. Replacement of the four (4) Vincent 500 kV circuit breakers has not been initiated, because this upgrade is required only when sufficient generation projects (with executed LGIAs/ GIA's in good standing) achieve ISD. The identification of the need for the Vincent 500 kV circuit breaker upgrades is based on the assumption that all queued generation projects actually materialize and are interconnected, but the true need occurs only when sufficient queued generation achieves ISD. This SCD mitigation will be continuously evaluated as part of ongoing LGIA/GIA negotiations with queued generation projects to properly define the actual trigger of SCD mitigation based on the actual execution of LGIAs/ GIA and development of generation facilities toward commercial operation.

H. DELIVERABILITY ASSESSMENT RESULTS

1. On Peak Deliverability Assessment

The Generating Facility does not contribute to any deliverability constraint.

2. Off- Peak Deliverability Assessment

The Generating Facility does not contribute to any deliverability constraint.

3. Required Mitigations

No Delivery Network Upgrades are required.

I. INTERCONNECTION FACILITIES, NETWORK UPGRADES, AND DISTRIBUTION UPGRADES

Please see Attachment 1 for SCE's IF's, RNU's, Delivery Network Upgrades⁶ (DNU's), and DU's allocated to the Generating Facility. Please note that SCE considered current system configuration, approved SCE sponsored projects, and all queued generation in determining scope for IFs and/or Plan of Service but

⁶ At the IC's discretion, the IC or parties other than SCE pursuant to Section 10.2 under GIP may construct an Option (B) Generating Facility Area Delivery Network Upgrades (ADNUs) not allocated TP Deliverability. If SCE does not construct the ADNUs, the IC is not required to make the third Interconnection Financial Security posting to SCE pursuant to Section 4.8.4.2.1 under GIP.

will not “reserve” the identified scope of upgrades for the proposed POI unless a GIA is executed per the specified timelines shown in Table K.1.

J. COST AND CONSTRUCTION DURATION ESTIMATE

1. Cost Estimate

The Generating Facility’s estimated interconnection costs, adjusted for inflation and provided in 'constant' 2018 dollars escalated to the Generating Facility’s feasible operating date (as identified below), are provided in Attachment 2 and the Generating Facility’s allocated cost for shared network upgrades are provided in Attachment 3. The costs will be utilized in developing the GIA. However, should there be a delay in executing the GIA beyond 2019, a new cost estimate adjusted for inflation will be required and reflected into the GIA.

2. Construction Duration Estimate

The construction duration for the identified facilities is as follows:

a. SCE’s Interconnection Facilities – 27 months

These facilities involve non-network facilities located within SCE’s Goleta 66 kV Substation and at the IC’s Generating Facility that are necessary to complete physical interconnection of the Generating Facility and ensure adequate line protection.

Please refer to Attachment 1 for details related to these facilities.

b. Reliability Network Upgrades

No RNUs were identified in this Phase II interconnection Study.

c. Voltage Support Mitigation

With DERMS, no required voltage support mitigations were identified in this Phase II Interconnection Study.

d. Distribution Upgrades – 27 months

i. Plan of Service Upgrades

These facilities involve upgrades located within SCE’s Goleta’s 66 kV Substation that are necessary to complete physical interconnection to the Goleta’s 66 kV Subtransmission System.

Please to Attachment 1 for details related to these facilities.

ii. DERMS

The Generating Facility will need to participate in DERMS.

Please refer to Attachment 1 for details related to this item.

K. IN-SERVICE DATE AND COMMERCIAL OPERATION DATE ASSESSMENT

An ISD and COD assessment was performed for this Generating Facility to establish SCE’s estimate of the earliest achievable ISD based on the QC10 Phase II Interconnection Study process timelines and the time required for SCE to complete the facilities needed to enable physical interconnection as an Interim

Deliverability or Energy Only Deliverability interconnection (as applicable) for the Generating Facility. This date may be different from the IC's requested ISD and will be the basis for establishing the associated milestones in the draft GIA.

Details pertaining to Full Capacity Deliverability Status and Partial Capacity Deliverability Status are provided below.

1. ISD Estimation Details

For the QC10 Phase II Interconnection Study, the estimated earliest achievable ISD is derived by the time requirements to complete the QC10 Interconnection Study Process, tender a draft GIA, negotiate and execute the GIA, and construct the necessary facilities as described below in Table K.1.

Table K.1 ISD and COD Assessment

Reference starting point	Days/Months	Issuance of Phase II Interconnection Study Report	11/21/18
Add:	30 CD	Phase II Results Meetings	12/21/18
Add:	15 BD (20 CD)	Starting Point: TPD Results issued and IC response provided	4/2/19
Add:	30 CD	Earliest Reasonable Tender of draft GIA	5/2/19
Add:	150 CD	GIA negotiation time as outlined in GIP <u>120</u> CD GIA execution, filing, and related activities <u>30</u> CD	7/31/19
Add: Construction Duration	27 months	Construction duration outlined in the Phase II Study Report. Construction completion no earlier than date which reflects earliest ISD	10/31/21
	Reference:	IC-requested ISD via Attachment B	10/31/2021
	Reference:	IC-requested COD via Attachment B	12/1/2021
		Difference between IC ISD and COD	1 month
Equals:		Earliest achievable In-Service Date (ISD)	10/31/21
		Earliest achievable Commercial Operation Date (COD) (Using difference between ISD and COD requested by IC)	12/1/21

Notes on the Achievable ISD and COD calculation:

- 1) Assumes duration required to construct those facilities required for an Interim Deliverability Interconnection or Energy Only interconnection (as applicable) for the Generating Facility until the applicable DNU's are completed.
- 2) The construction durations shown represent the estimated amount of time needed to design, procure, and construct the facilities with the start date of the duration based on the effective date of the GIA; and necessarily include timely receipt of all required information and written authorizations to proceed (ATP), and timely receipt of construction payments and financial security postings and other milestones.
- 3) Assumes that GIA is tendered after the TP Deliverability allocation results are disclosed.

2. ISD Conclusion

Based on these timelines, the IC's requested ISD of 10/31/2021 and COD of 12/1/2021 appears to be achievable if the schedule outlined in Table K.1 is followed.

SCE can reasonably tender a draft GIA by May 2019. The draft GIA should be executed and/or filed at FERC no later than August 2019 and will include the earliest ISD and COD as identified in Table K.1.

The CAISO will perform its Annual Reassessment (January - July 2019) and Transmission Plan Deliverability (TPD) Allocation⁷ (due April 2019). Any changes in scope, cost, or schedule requirements that come out of CAISO's Annual Reassessment and 2019 TPD Allocation will be reflected in a 2019 Reassessment Report, which will be used to revise the draft LGIA (if under negotiation) or amend the LGIA (if already executed).

L. TIMING OF FULL CAPACITY DELIVERABILITY STATUS, INTERIM DELIVERABILITY STATUS, AREA CONSTRAINTS, AND OPERATIONAL INFORMATION

The Generating Facility would be granted its requested FCDS only if the Generating Facility receives TPD allocation in the forthcoming TPD Allocation Study Process. Furthermore, timing of obtaining the requested FCDS is dependent on the completion of DNU's identified below in this report, which may be updated in any subsequent annual reassessment. Until such time that these DNU's are completed and placed in-service, the Generating Facility may be granted Interim Deliverability Status based on annual system availability. The sections below provide a discussion of the timing of FCDS, Interim Deliverability Status, Area Constraints, and Operational Information.

1. System Upgrades Required for Full Capacity Deliverability Status (FCDS)

In order to provide for FCDS, the following facilities are required in addition to the Reliability Network Upgrades described in Section 2 (b) of Attachment 1:

- a. Triggered Delivery Network Upgrades – None
- b. Delivery Network Upgrades Triggered by Earlier Queued Projects – None
- c. Approved Transmission Upgrades - Various
 - Eldorado-Lugo Series Capacitor Upgrade – The current estimated in-service date of this project is Dec 2022.
 - Lugo-Mohave Series Capacitor Upgrade – The current estimated in-service date of this project is Dec 2022.
 - Lugo – Victorville 500kV Upgrade - – The current estimated in-service date of this project is June 2021.
- d. Transmission Upgrades outside the CAISO Controlled Grid - None

2. Interim Operational Deliverability Assessment for Information Only

The operational deliverability assessment was performed for study years 2019 ~ 2022 by modeling the Transmission and generation in service in the corresponding study year. For details

⁷ The TPD Allocation Process is estimated to be completed in April 2019. The actual date may vary.

of the Transmission and generation assumption, refer to Section E.3 of the Area Report. The Generating Facility contributes to the Lugo – Victorville 500kV line overload under various contingencies and will have Interim Deliverability Status until all the upgrades listed above are in service.

3. Area Constraints

With all approved transmission upgrades modeled, no area deliverability constraints were identified for the Project. However, interconnection of new generation in advance of completing the approved transmission upgrades and upgrades triggered by queued ahead generation projects may result in increased congestion on SCE's Transmission System.

M. ADDITIONAL STUDY ANNOTATIONS

1. Conceptual Plan of Service

The results provided in this study are based on conceptual engineering and a preliminary Plan of Service (POS) and are not sufficient for permitting of facilities. The POS is subject to change as part of detailed engineering and design.

2. The study does not include analysis related to the power output rate of change that may occur due to the following or other conditions:

- System morning start up for solar generating facilities: That is when each morning the Generating Facility commences to generate and export electrical energy to the electric system.
- Cloud Cover: Solar generating facilities have significant generation output variation (Variability) which can have an impact on electric system voltage profiles.

3. IC's Technical Data

The study accuracy and results for the QC10 Phase II Interconnection Study was contingent upon the accuracy of the IR technical data provided by each IC during the Interconnection Study Cycle. Any changes from the data provided as allowed under GIP would have been submitted in Attachment B within ten (10) Business Days following the Phase I Interconnection Study Results Meeting. Any changes in the Attachment B submission that extended beyond the modifications allowed in accordance with Section 4.5.7.2.2 of GIP will need to be evaluated following the Material Modification Assessment (MMA) process to determine if such change results in a material impact to queued-behind generation requests. These change(s) would only be allowed if it is determined that there were no material impacts to queued-behind generation requests.

4. Study Impacts on Affected Systems

Results or consequences of this Phase II Interconnection Study may require additional studies, facility additions, and/or operating procedures to address impacts to neighboring utilities and/or regional forums. For example, impacts may include but are not limited to WECC Path Ratings, short-circuit duties outside of the ISO Controlled Grid, and sub-synchronous resonance (SSR). Refer to Affected Systems Coordination Section H of the Area Report and above in Section F for additional information.

5. Use of SCE's Facilities

The IC is responsible for acquiring all property rights necessary for the IC's Interconnection Facilities, including those required to cross the SCE's facilities and property. This Phase II Interconnection Study does not include the method or estimated cost to the IC of SCE mitigation measures that may be required to accommodate any proposed crossing of SCE's facilities. The

crossing of SCE's property rights shall only be permitted upon written agreement between SCRE and the IC at SCE's sole determination. Any proposed crossing of SCE property rights will require a separate study and/or evaluation, at the IC's expense, to determine whether such use may be accommodated.

6. SCE's Interconnection Handbook

The IC shall be required to adhere to all applicable requirements in SCE's Interconnection Handbook. These include, but are not limited to, all applicable protection, voltage regulation, VAR correction, harmonics, switching and tagging, and metering requirements.

7. Western Electricity Coordinating Council (WECC) Policies

The IC shall be required to adhere to all applicable WECC policies including, but not limited to, the WECC Generating Unit Model Validation Policy.

8. System Protection Coordination

Adequate Protection coordination will be required between SCE-owned protection and IC-owned protection. If adequate protection coordination cannot be achieved, then modifications to the IC-owned facilities (i.e., Generation-tie or Substation modifications) may be required to allow for ample protection coordination.

9. Standby Power and Temporary Construction Power

The Phase II Interconnection Study does not address any requirements for standby power or temporary construction power that the Generating Facility may require prior to the ISD of the Interconnection Facilities (IF's). Should the Generating Facility require standby power or temporary construction power from SCE prior to the ISD of the IF's, the IC is responsible to make appropriate arrangements with SCE to receive and pay for such retail service.

10. Licensing Cost and Estimated Time to Construct Estimate (Duration)

The estimated licensing cost and durations applied to this Generating Facility are based on the Generating Facility scope details presented in this Phase II Interconnection Study. These estimates are subject to change as the Generating Facility's environmental and real estate elements are further defined. Upon execution of the GIA, additional evaluation including but not limited to preliminary engineering, environmental surveys, and property right checks may enable licensing cost and/or duration updates to be provided.

11. Network/Non-Network Classification of Telecommunication Facilities

- a. Non-Network (Interconnection Facilities) Telecommunications Facilities: The cost for telecommunication facilities that were identified as part of the IC's Interconnection Facilities was based on an assumption that these facilities would be sited, licensed, and constructed by the IC. The IC will own, operate, maintain, and construct main and diverse telecommunication paths associated with the IC's generation tie line, excluding terminal equipment at both ends. In addition, the telecommunication requirements for the RAS were assumed based on tripping of the generator's breaker in lieu of tripping the circuit breakers and opening the IC's gen-tie at SCE's substation.
- b. Network (Network Upgrades) Telecommunications Upgrades: Due to uncertainties related to telecommunication upgrades for the numerous projects in queues ahead of this Generating Facility, telecommunication upgrades for earlier queued projects without a signed GIA which upgrades have not been constructed were not considered in this study. Depending on the scope of these earlier queued projects, the cost of telecommunication upgrades identified for Phase II may be reduced. Any changes in these

assumptions may affect the cost and schedule for the identified telecommunication upgrades.

12. Ground Grid Analysis

A detailed ground grid analysis will be required as part of the detailed engineering for the Generating Facility at the SCE substations whose ground grids were flagged with duty concerns.

13. SCE Technical Requirements

The IC is advised that there may be technical requirements in addition to those that outlined above in Section C of this report that will be addressed in the Generating Facility GIA.

14. Applicability

This document has been prepared to identify the impact(s) of the Generating Facility on the SCE's electric system; as well as establish the technical requirements to interconnect the Generating Facility to the POI that was evaluated in the final Phase II Interconnection Study for the Generating Facility. Nothing in this report is intended to supersede or establish terms/conditions specified in GIAs agreed to by the SCE, ISO, and the IC.

15. Process for Initial Synchronization Date/Trial Operation Date and COD of the Generating Facility

The IC is reminded that the ISO has implemented a New Resource Implementation (NRI) process that ensures that a generation resource meets all requirements before Initial Synchronization Date/Trial Operation Date and COD. The NRI uses a bucket system for deliverables from the IC that are required to be approved by the ISO. The first step of this process is to submit an "ISO Initial Contact Information Request form" at least seven (7) months in advance of the planned Initial Synchronization Date. Subsequently an NRI project number will be assigned to the Generating Facility for all future communications with the ISO. SCE has no involvement in this NRI process except to inform the IC of this process requirement. Further information on the NRI process can be obtained from the ISO Website using the following links:

New Resource Implementation webpage:

<http://www.caiso.com/participate/Pages/NewResourceImplementation/Default.aspx>

NRI Checklist:

<http://www.caiso.com/Documents/NewResourceImplementationChecklist.xls>

NRI Guide:

<http://www.caiso.com/Documents/NewResourceImplementationGuide.doc>

16. ISO Market Dispatch

This study did not evaluate any potential limitations that may be driven by the ISO market under real-time operating conditions.

17. Interconnection Request to Third-Party Owned Facilities

Generating Facility's requesting to interconnect to a Third party owned facility will need to obtain written approval from the owner(s) of the facility prior to execution of the GIA.

18. Future Charging Restrictions

Charging restrictions not identified in this study may occur in the future if the underlying operating assumptions prove to be different from the conditions evaluated in this study.

Attachment 1:
Interconnection Facilities, Network Upgrades, and Distribution Upgrades
Please refer to separate document

Attachment 2:
Escalated Cost and Time to Construct for Interconnection Facilities, Reliability Network Upgrades,
Delivery Network Upgrades, and Distribution Upgrades
Please refer to separate document

**Attachment 3:
Allocation of Network Upgrades for Cost Estimates and Maximum Network
Upgrade Cost Responsibility**

There is no network upgrade required for the project.

Attachment 4:
SCE's Interconnection Handbook

Preliminary Protection Requirements for Interconnection Facilities are outlined in SCE's Interconnection Handbook at the following link:

https://www.sce.com/wps/wcm/connect/348e4d71-5c2a-431f-bf78-16267486fdc9/Interconnection%2BHandbook_1483725988_1485215238.pdf?MOD=AJPERES

Attachment 5:
Short-Circuit Duty Calculation Study Results
Please refer to the Appendix H of the Area Report

**Attachment 6:
IC Provided Generating Facility Dynamic Data**



Attachment 7:
Subtransmission Assessment Report
Please refer to separate document