



UM 2111

**Enforceable Timelines
December 17, 2024**



Agenda



- Welcome
- Staff look at FERC Enforceable Timeline
- Interconnection Trade Alliances (ITA) presentation
- Joint Utilities (JU) Presentation
- Interstate Renewable Energy Council (IREC) presentation
- Break
- Next Steps

Annual Handbook Update Process



- Order 24-068 requires Staff involvement

(W)e direct Staff to hold a workshop or similar process to review and collect feedback on utility handbooks at least annually in order to determine whether Commission engagement with any issues related to the process and content of the utility handbook is warranted.

We direct Staff to work with utilities and interested persons, as a part of the subsequent handbook update process , to deliver a proposal for regular proactive investigation of the potential for inverter specifications and configurations to eliminate the need for additional equipment.

- Jan 22 Workshop – Handbook feedback

- Staff requests parties wanting to provide verbal feedback on the utility interconnection handbooks attend the workshop

- Staff requests the JU provide any updates on inverters that will obviate the need for additional equipment

- Include any work done “with industry toward specification of an inverter model and a set of standardized configurations that can be safely relied upon without additional equipment.”

- Written comments for either topic will be considered as well.

Interconnection Delays



- Multiple complaints on interconnection
 - [UM 2354](#) (Sunset Ridge Solar vs PacifiCorp)
 - [UM 2343](#) (Marble Solar LLC vs PacifiCorp)
 - [UM 2322](#) (Sunthurst vs PAC – 5 projects)
 - [UM 2356](#): (Chapman Creek Solar vs PacifiCorp)
 - [UM 2353](#): (Pine Grove Solar vs PacifiCorp)
- Filed notices of intent
 - [UM 2305](#) (Green Solar vs PacifiCorp)
 - [UM 2342](#) (Blackwell Creek Solar vs PacifiCorp)
 - [UM 2359](#): (Round Lake Solar vs PacifiCorp)

FERC Order 2023



- FERC rationale for changes in approach, from paragraph 964:
We adopt these reforms to remedy the unjust and unreasonable rates stemming from interconnection queue backlogs and to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner. Specifically, these reforms will help ensure more timely processing of interconnection requests by incentivizing transmission providers to meet interconnection study deadlines

FERC Order 2023



- Eliminating reasonable efforts standard paragraph 966:
The lengthy interconnection study delays and interconnection queue backlogs throughout the country support our conclusion that the reasonable efforts standard does not provide an adequate incentive for transmission providers to complete interconnection studies on time... In response to those ongoing challenges, we find that it is just, reasonable, and not unduly discriminatory or preferential to eliminate the reasonable efforts standard and adopt a penalty structure that reasonably incentivizes transmission providers to ensure the timely processing of interconnection requests.
- Paragraph 967:
The reasonable efforts standard worsens current-day challenges, as it fails to ensure that transmission providers are keeping pace with the changing and complex dynamics of today's interconnection queues.

FERC Order 2023



- Paragraph 971:

Interconnection customers face financial harm when study deadlines are not met, ultimately inhibiting their ability to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner.

FERC Order 2023



- Eliminated reasonable efforts standard (Paragraph 962)
- Imposed study delay penalties
 - Cluster Study: \$1,000 per business day
 - Cluster Restudies: \$2,000 per business day
 - System Study: \$2,000 per business day
 - Facility Study: \$2,500 per business day
- Feature of Study Delay penalties (Paragraph 963)
 - Grace period of 10 business days
 - Deadline extensions of 30 days upon mutual agreement of all study participants
 - Penalties capped at initial study deposits
 - Penalties cannot be recovered through transmission rates
 - Quarterly OASIS post:
 - Total amount of study delay penalties
 - Highest amount paid to single interconnection customer

FERC Order 2023



- Questions:
- Do the FERC-addressed issues with study timelines have similar counterparts with completing interconnections?
- Would timeliness in completing interconnection studies, without timeliness in interconnecting customers be considered unjust and unreasonable?
- Any reasons such a framework would not be applicable on completing interconnections?

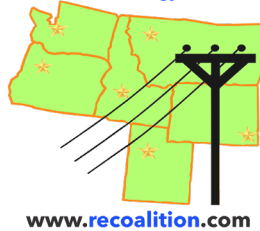
Interconnection Trade Alliance Presentation





UM 2111 Trade Groups' Presentation

Renewable Energy Coalition



www.recoalition.com

December 17, 2024

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Renewable Energy Coalition (the Coalition) and Oregon Solar+Storage Industries Association (OSSIA)

Overview

- Regulation Basics
 - Monopolies
 - OPUC Responsibilities
 - Solutions to Regulation
- Discussion of Problems and Solutions
 - Interconnection Customer
 - Utility
- Overall Solutions

Regulation Basics

- Oregon utilities are monopolies that own generation, distribution, and some transmission
- Monopolies have a duty to serve ALL customers without discrimination and charge reasonable rates
- However, incentivized to:
 - Provide bad services at high prices
 - Snuff out competitors
- Most utility employees: Public service/safety/reliability
- Purpose of regulation is to mitigate problems
- Regulation can be ineffective when not designed well/failure of regulatory incentives

OPUC Responsibilities



Protect
customers



Reduce customer
costs



Increase
competition



Regulate
monopolies

Protection of Interconnection Customer

- Interconnection customers need more protection from monopoly utility than retail customers
 - Utility provides service to and needs retail customers
 - Utility provides service to, but does not need interconnection customers
 - Utility may find more value in eliminating the interconnection customer competitor than providing service to the interconnection customer
 - Different from deregulated markets in which the utility views interconnection customer as a customer to sell a product rather than a competitor

Solutions to Regulation and Interconnection Service

- Some interconnection services are best served by monopoly, but some services are not
- Ensure safety and reliability, but not at any cost
- Underlying issue to interconnection delays → address issues surrounding a utility's monopoly power and incentive to reduce interconnection customer competition
- Solutions to monopolies: 1) reduce what the monopoly does; or 2) regulate the monopoly
- Power imbalance
- Any interconnection delay solution needs to be reviewed under this lens – minimize monopoly and regulate effectively

Interconnection Customers Have Been Raising These Issues for a Long Time

- Interconnection customers and trade groups have been raising issues for long time and proposing solutions
- This docket opened in 2020 after years of issues
- Raised interconnection issues in UM 2000/UM 2001 in 2019
- Proposed solutions have not been adopted, and the issues have persisted
- Some issues can be resolved with incremental progress, but fundamental issues will remain

Complaints

- Reliance upon Complaints Not Effective Public Policy
- Costly (interconnection customer and utility customers)
- Time Intensive (interconnection customer, OPUC, and utility)
- Adversarial rather than cooperative

Summary of Formal Interconnection Complaints Since 2017

- 25 complaints
- Main Issues:
 - Interconnection study process
 - Changed interconnection standards and interconnection designs
 - Equipment ordering
 - Crew availability
 - Lack of communication

Formal Interconnection Complaints Since 2017

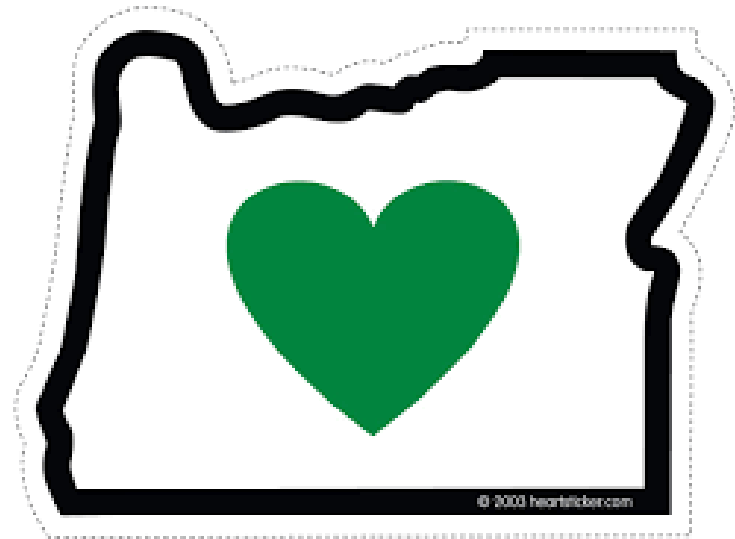
- Pacific Northwest Solar (Amity Solar) v. PGE, UM 1902 (interconnection study delays)
- Butler Solar, LLC v. PGE, Docket No. UM 1903 (interconnection study delays)
- Pacific Northwest Solar (Duus Solar) v. PGE, UM 1904 (interconnection study delays)
- Pacific Northwest Solar (Firwood Solar) v. PGE, UM 1905 (interconnection study delays)
- Pacific Northwest Solar (Starlight Solar) v. PGE, UM 1906 (interconnection study delays)
- Pacific Northwest Solar (Stringtown Solar) v. PGE, UM 1907 (interconnection study delays)
- Dunn Rd. Solar v. PGE, UM 1963 (required interconnection facilities)
- Sandy River Solar v. PGE, UM 1967 (contents of interconnection study and ability to hire third party)
- Waconda Solar v. PGE, UM 1971 (contents of interconnection study, ability to complete an independent System Impact Study, and ability to hire third party)
- St. Louis Solar, LLC v. PGE, UM 2057 (PPA damages from interconnection construction delays)
- Marquam Creek Solar waiver request (PGE), UM 1631 (reduction of size during interconnection study process)
- Carnes Creek Solar waiver request (PGE), UM 1631 (reduction of size during interconnection study process)

Formal Interconnection Complaints Since 2017

- Zena Solar v. PGE, UM 2074, UM 2164 (contents of interconnection study, ability to complete an independent System Impact Study, ability to hire third party, and required interconnection facilities)
- Sunthurst Energy v. PacifiCorp (five projects), UM 2118, UM 2322 (required interconnection facilities, contract execution, timeline for interconnections, and progress payment dates)
- Green Solar v. PacifiCorp, UM 2305 (delay of interconnection due to easement dispute, final designs, and equipment ordering)
- Blackwell Creek Solar v. PacifiCorp, UM 2342 (interconnection delays due to crew availability and equipment ordering)
- Marble Solar v. PacifiCorp, UM 2343 (interconnection delays due to final designs, changing interconnection standards, and equipment ordering)
- Cherry Creek Solar v. PacifiCorp, UM 2298, UM 2344 (resolution to project being tripped offline and restoration of interconnection service after a fire)
- Pine Grove Solar v. PacifiCorp, UM 2353 (interconnection delays due to equipment ordering and changing interconnection standards related to fire season)
- Sunset Ridge Solar v. PacifiCorp, UM 2354 (interconnection delays due to equipment ordering and failure to acquire permit)
- Chapman Creek Solar v. PacifiCorp, UM 2356 (interconnection delays due to equipment ordering and failure to notify customer about required easement)
- Round Lake Solar v. PacifiCorp, UM 2359 (interconnection delays due to construction delays and crew availability)

Effects On Oregon

- Not attracting capital to Oregon
- Oregon capital is *leaving* the state
- Higher costs to customers
- Failure to meet climate and renewable energy goals



Developer Business Models

- Entities that sell electricity to the utility for a secondary purpose
- Non-profits
- Government entities (cities, counties, etc.)
- Small-scale developers that are Oregon based
- Private companies or individuals that only develop a few projects
- Developers or financiers that only invest in small-scale projects
- Entities that do only one part or various parts of the development process (only sign PPA/IA, construction or operation)
- Large, national or international companies

Harms to Interconnection Customers

- Reputational harm
- Lost revenues
- Fewer contract years
- Increased costs due to delay (e.g., increased interest on loan payments, litigation, inflation, etc.)
- Interference with financing
- Effects on capital/financing for future projects
- Lost tax credits
- Failure to achieve climate and renewable goals

Harms to PUC/Public

- Reputational harm
- Increased costs and resources from complaints
- Failure to meet climate and renewable energy mandates
- With the Oregon Community Solar Program, customers do not receive bill credits, which is especially harmful to low-income customers

Harms to Utility

- Reputational harm
- Cost recovery risk

Stages of Interconnection



Interconnection Studies



Cost Estimates/Payment Processes



Design, Engineering, Construction

Joint Delays

Uncontrollable Delays

- Supply Chain
- Pandemics/COVID-19
- Unexpected no fault issues can include
 - Permitting
 - Design
 - Construction
 - Weather
 - Fire

Solutions

- These are delays that affect both parties
- Some of these delays will likely always exist
 - Likely no solutions, but does matter how parties respond to inevitable delays
 - Key: Communicate and set expectations
- Many of these delays can be avoided or delay time minimized

Unique Delays

Interconnection Customer

- Project Sale
- Taxes/tariffs
- Developer Sophistication
- Land use delays
- Financing/grant funding
- Not making progress payments

Utility

- Personnel
- Delays in interconnection studies
- Erroneous studies
- Progress payments (timing and amount)
- Cost estimates
- Equipment ordering
- Design and construction
- Changing interconnection standards
- Communication
- Coordination with affected transmission provider
- Failure to manage subcontractors
- Failure to cooperate
- Monopoly power leveraging
- Cluster study
- Requirement for network interconnection service

Harm: Key Point

- Disproportionate harm
- Power imbalance
- Different incentives to avoid and fix delays



Interconnection Customer Delays and Solutions

Interconnection Customer – Key Delays and Solutions Summary

- At All Stages of Interconnection:
 - Delay: Project Sale
 - Solution: Discuss financing timelines when drafting Interconnection Agreement and milestones
- Interconnection Studies:
- Cost Estimates/Payment Processes:
 - Delay: Project payments can be unrealistic or require payment well in advance of equipment ordering; Missed progress payments
 - Solution: Set accurate payments that match work, ability to negotiate
- Design, Engineering, and Construction:
 - Delay: Contractor schedule constraints; inability to construct during winter or delays from weather
 - Solution: Might be outside of developer's control; ensure milestones and schedule in the Interconnection Agreement are sufficient; proper communication and setting expectations; extend COD

Interconnection Customer

Delay

- Lack of communication or proper processes in place when a project is transferred to another entity
- Utility may not be aware when a project is transferred
- Creates confusion and delays in interconnection process

Solution

- Discuss financing timelines when drafting Interconnection Agreement and milestones
- There should be no new substantive legal obligations to an already difficult process

Interconnection Customer

Delay

- Changes that affect financing and costs of project
 - Changes in tax laws (IRA)
 - US Department of Commerce investigation
- Problems related to financing/grant funding
 - Did not apply correctly
 - Funder delayed

Solution

- Many of these issues are outside the control of the customer, utility, and Commission
- If these delays occur, there might not be a solution to address other than all parties being flexible
- Maybe there is work the parties can take while other issues are being resolved
- Open to suggestions

Interconnection Customer

Delay

- Lack of developer sophistication
- Lack of developer experience

Solution

- Nonprofits, government, and/or utility providing assistance where needed to developers that are not as familiar with the development process
- Open to suggestions

Interconnection Customer

Delay

- Project payments can be unrealistic or require payment well in advance of equipment ordering
- Missed progress payments
- Can delay subsequent milestones including utility milestones

Solution

- Progress payments should be for the amount needed for next milestone and appropriately timed right before next milestone
- Utilities and interconnection customers should be allowed to freely negotiate payment options and timing including deposits, progress payments, financing, reimbursements, and final accounting to reduce the risk of interconnection customer delays

Interconnection Customer: Construction Delays

Delay

- Much smaller problem than utility caused construction delays
- Contractor schedule constraints
- Lack of a contractor
- Inability or delays to construct due to weather

Solution

- There might not be solutions for all delays
- Some of these delays may be outside of the developer's control
- Ensure milestones and schedule in the Interconnection Agreement are sufficient
- Ensure proper communication and setting expectations
- Extend COD dates
- Open to suggestions

Utility Delays and Solutions

Utility – Key Delays and Solutions Summary

- All Stages of Interconnection:
 - Delay 1: Not enough employees to work on interconnection
 - Solution 1: Hire more personnel; performance-based ratemaking
 - Delay 2: Lack of communication
 - Solution 2: Timely communicate; set and manage expectations; PBR
- Interconnection Studies:
 - Delay: Delays in interconnection studies/restudies; errors in interconnection studies/restudies
 - Solution: Study timeline deadlines; penalties for missed study deadlines; remove small projects from cluster studies; extend COD; PBR
- Cost Estimates/Payment Processes:
 - Delay 1: Timing and amount of progress payments
 - Solution: Better timing; match need; negotiation; PBR
 - Delay 2: Dispute over upgrades
 - Solution: PBR, Dispute resolution
- Design, Engineering, and Construction:
 - Delay 1: Ordering equipment
 - Solution 1: Require utility to order equipment by date in Interconnection Agreement; allow customer to order equipment
 - Delay 2: Changing interconnection standards after Interconnection Agreement signed; lack of communication on changed standards
 - Solution: Clearly lay out requirements in interconnection studies and Interconnection Agreement; utility Interconnection Handbooks; extend COD; PBR

Utility

Delay

- Utility claims too many projects interconnecting
- Not enough employees to work on interconnection
- Causes other issues such as delays in construction and slow communication

Solution

- Hire more personnel
- Performance-based ratemaking (PBR)
 - Incentivize management to hire sufficient employees

Utility

Delay

- Delays in interconnection studies or restudies
- Delays caused by studying the interconnection wrong, errors in interconnection study, and having to redo the study

Solution

- Study timeline deadlines
- Penalties for missing study timelines deadlines
- Removing small projects from cluster studies
- Extend COD
- PBR: Penalties and performance payments for study redos/delays

Utility

Delay

- Timing and amount of progress payments
- Requiring progress payments too early
- Requiring too large of progress payments

Solution

- Progress payments should be better timed (i.e., close to when the payment is actually needed)
- Progress payments should match the actual need (i.e., only charge what is needed for the next step in the process)
- Utilities and interconnection customers freely negotiate payment options and timing including deposits, progress payments, financing, reimbursements, and final accounting to reduce the risk of interconnection customer delays
- PBR: Penalties and payments for matching payments to equipment need

Utility

Delay

- Unreasonable cost estimates
- “Gold-Plating”

Solution

- Process through which an interconnection customer may challenge utility cost estimates/proposed interconnection facilities and propose alternatives
- Engineering stamp
- PBR: Penalties and payments for actual work matching cost estimates

Utility

Delay

- Utility delays in ordering equipment, obtaining permits
- Utility orders equipment too late, forgets to order equipment
- E.g., Several projects in the monthly reports mention delays in long-lead equipment such as fiber materials not being ordered timely

Solution

- Utility order equipment by date in Interconnection Agreement if utility has received progress payments for the equipment
- Utility should ensure there is enough time to order long-lead time equipment before agreeing to milestones
- Allow interconnection customer to order equipment
- PBR: Penalties for not ordering equipment by date in Interconnection Agreement if utility has received progress payments for the equipment

Utility

Delay

- Delays in design and construction – poor project management
 - Refusal to admit mistakes
 - Utility fails to follow plans (e.g., inaccurately claims poles or other work in wrong place)
 - Refusal to meet with customer
 - Not starting design and engineering work when required in the IA
 - Not acquiring or timely informing interconnection customer of outstanding easements
 - Utility changes its designs after it approved designs because miscommunication with utility crews
 - Utility changes interconnection standards that require design changes
 - Utility fails to construct facilities that match IA
 - Utility did not visit site
 - Crew availability

Solution

- Better internal communication at utility on interconnection requirements
- Clearly lay out interconnection requirements in Interconnection Agreement and studies
- Provide extensions of commercial operation dates for delays and ensuring that interconnection customers are able to recover all damages, including consequential damages
- Allow interconnection customer to hire third parties to construction facilities and do not allow utility to delay that work
- Do not sign Interconnection Agreement Amendment if schedule not realistic
- Hire more personnel

Utility

Delay

- Changing interconnection standards after Interconnection Agreement is signed
- No standards/failure to communicate standard
- Lack of communication or explanation of changed standards
- Changed standards not reviewed by stakeholders beforehand or approved by Commission
- Examples:
 - Changing access roads size or location
 - Energization during fire season
 - Energization after fire near facility
 - Not work on interconnection until project is green tagged

Solution

- Utility needs to clearly lay out requirements in interconnection studies and Interconnection Agreement
- Hopefully, the changes to the Interconnection Handbooks will help address some these issues
- Extend COD
- PBR: Penalties for requirements not specified in Interconnection Agreement or failure to explain utility action

Utility

Delay

- Communication:
 - Lack of communication on progress of interconnection
 - Lack of communication about cause or reason for delays
 - Communication not timely

Solution

- Timely communication
- Manage and set expectations
- PBR: penalties or payments for timely and complete communications

Overall Solutions to Reduce Delays

- Require utilities to hire more personnel
- Require utility to act reasonably, non-discriminatory, and in good faith
- Allow interconnection customer to hire third parties to complete interconnection studies, construct interconnection facilities, order equipment, etc.
- Provide appropriate process and remedies for utility violations of the rules

Solution: Hold Customer Harmless

- Interconnection Customer should not be harmed for delays outside of their control
- Revise Interconnection Agreements to allow interconnection customer to recover all damages from utility
- Extend CODs
- Also: Community Solar subscribers should also be held harmless

Most Important Solution: Incentives

- Revise Interconnection Agreements to allow interconnection customer to recover all damages from utility
- Revise incentives to utility – performance-based ratemaking
 - Penalties and
 - Payments for performance



Conclusion

- PUC is engaged and interested
- Do not know all problems and more problems will likely develop over time
- Do not know if solutions will always work
- PUC solutions to date have been incremental, but not enough
- Problems will keep arising unless the fundamental issues related to monopolies and regulation are addressed

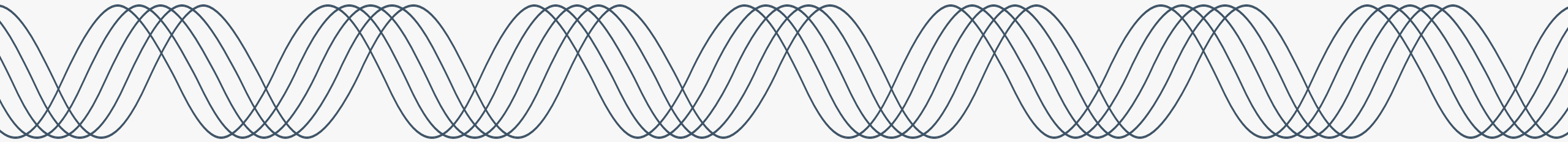
Joint Utilities Presentation





Interconnection Delays

UM 2111 Policy Discussion
Joint Utilities' Presentation
December 17, 2024



Two Phases

Two phases of interconnection will be discussed separately:

1. Interconnection Study Process: from Application through execution of Interconnection Agreement
2. Interconnection Construction Process: from execution of Interconnection Agreement through energization/interconnection

This discussion focuses on issues relevant to small generator interconnections. But many of the issues apply equally, or more so, to large generator interconnections.

Typical Issues Delaying the Interconnection Study Process

- Interconnection customers not timely returning necessary documents/responding to requests for information
- Need for restudies after a project drops out
- Sheer volume of requests
- Delays from Affected Systems (rare, but possible for small generators)



Overview of Interconnection Construction Process and Timing



- Each utility uses Commission-approved SGIAs.
- The SGIA will include an attachment that includes project-specific milestones. Typical milestones include:
 - Date by which customer provides initial project design
 - Date when utility will begin engineering and procurement
 - Date by which customer obtains necessary permits/ROW
 - Date by which customer provides final design
 - Date when engineering is complete
 - Date when construction begins
 - Date when construction ends
 - Commercial Operation Date (COD)
- Milestones typically developed to meet an agreed upon COD
- Intervals for milestones are project-specific and will change if the assumptions underlying the milestone change
- The SGIA will also include an attachment with project-specific progress payments that are tied to milestones (OAR 860-082-0035(5))

Engineering Design

- Interconnection studies will identify requirements for interconnection (e.g., necessary equipment) and those requirements will set forth in the SGIA
- The requirements identified during the study process are based on simplified one-line diagrams—not detailed engineering plans for the construction of the actual facilities
 - Reflects a trade-off between having faster and lower cost studies that require detailed design post-SGIA execution
- After the SGIA is signed, and upon receipt of progress payment funds, the utility will begin the detailed engineering work necessary to take the one-line diagram and turn it into a construction-ready plan
 - Requires on-the-ground survey work to understand where interconnection facilities can be located and how the utility facilities will be tied to customer facilities
 - Not uncommon to discover issues during this process that requires redesigns to accommodate real-world conditions that were unknown/unknowable during the study process
 - Requires regular coordination between utility and customer through all phases of the project.

Construction

- Construction timelines are project-specific and vary depending on the complexity of the interconnection requirements.



Typical Issues Delaying the Interconnection Construction Process

- Customer failing to make required progress payments
 - SGIA typically states that failure to make progress payments results in a work stoppage
 - Repeated starts and stops increases the costs and time to interconnect
- Customers missing milestones
 - For example, delaying the initial design package will delay the utility engineering, which will lead to cascading delays of all other milestones
- Difficulty obtaining required permits or easements
 - Customers are typically required to obtain all necessary permits and easements, even for utility facilities
 - Delay in obtaining required permits or easements will likely delay construction
 - Denial of required permit or easement (or a change to the expected easement) may also require redesign of facilities, which will cause further delays
 - Constructing across federal land can lead to longer construction timelines

Typical Issues Delaying the Interconnection Construction Process



- Supply chain constraints
- Failure to coordinate
 - Can require redesign of utility facilities to match what customer constructed
- Constructing facilities that do not match what is required
 - Placing poles in the wrong place
 - Building roads in the wrong place or of the wrong size
 - Building a customer line to the wrong place for connecting to a utility line
- Sale to new owner, which can cause delays because the prior owner failed to meet its obligations anticipating the sale and the new owner fails to understand its obligations.
- Affected system issues, including both construction required by affected systems (like BPA) or need to install utility equipment in an affected system substation
- Unanticipated construction issues
 - On-the-ground conditions differ from what was expected
- Many of these delay issues are compounded for large generator interconnections given the likelihood of more complex design and construction requirements



Thank you

Interstate Renewable Energy Council - Presentation





Interstate Renewable Energy Council

SHUTE MIHALY
& WEINBERGER LLP

UM 2111 Workshop
December 17, 2024



Study Timelines and Construction

- IREC is interested in exploring having certain new procedures developed in this workstream apply to both new generation and new loads.
- Existing tariffs concerning new service and line extensions do not include equivalent study timelines or third-party design/construction.
 - Where line extension tariffs allow for third party construction, they are very limited and not relevant to distribution system upgrades.
 - PAC's does not apply to increasing distribution system capacity.
 - PGE's does not apply to construction outside of the customer's property.
- Where existing line extension tariffs and rules don't cover the situations this workstream intends to address, the workstream can produce procedures that apply to new generation and new loads.



Transportation Electrification Results in New Loads and the Need for Upgrades

- Advanced Clean Vehicle rules have stringent near-term requirements that will result in EV loads coming online and applying for service soon.
- Advanced Clean Trucks rule requires medium- and heavy-duty vehicle manufacturers to sell zero-emission and near-zero-emissions vehicles as an increasing percentage of their annual sales through 2035.



Contact

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Next Steps



- Options to move forward
 - Additional workshops?
 - Move to contested case?
 - Stakeholder suggestions?
- Staff to provide notes on workshop
 - Will suggest process to move workstream forward
- January 22 workshop
 - Utility Interconnection Handbooks: Feedback requested from Stakeholders
 - Inverter discussion – are there inverters available to avoid additional protection equipment?
 - Continuation of DTT workstream?

Conclusion



Thank you for participating