

SDG&E Supplemental Technical Comments on the RPS calculator

In its initial technical comments served on September 7, SDG&E pointed out what appeared to be an inconsistency in the value used for distributed solar across all three IOU areas. SDG&E has completed additional review of the RPS calculator and has found the following anomalies, which it believes requires a re-assessment of distributed solar projects in San Diego in the calculator.

Review of the 33% RPS Calculator – 8/23/12 version (RPSCalculator_2007_v3_20120823.xlm)

Under the most recent versions of the calculator beginning in March 2012, small solar projects, both ground mounted and non-res rooftop, were moved to either the commercial interest group of projects (tab – i commprojdata) or to the generic group of projects (tab – j genericprojdata). In choosing projects for the trajectory scenario, 70% weight is given to projects in the commercial interest group.

Inexplicably, most of the SDG&E large ground mounted solar PV has been assigned to the commercial interest group of projects (229 MW of 290 MW of ground mounted solar) in the South Coast area and is assumed to be able to interconnect without transmission upgrades. In contrast, none of the SCE large ground mounted solar in the South Coast area was placed in the commercial interest group (0 MW out of 549 MW). In the selection process, all of the large ground mounted solar PV in the commercial interest group was selected and none of the large ground mounted PV in the generic project group was selected. Similarly, in the Mojave Desert region, 34MW of large ground mounted solar out of 822 MW was in the commercial interest group. The 34 MW was selected.

It does not appear logical that over 75% of the ground mounted solar would be classified as “commercial interest” in SDG&E’s area as compared to 0% for SCE’s area. It should be noted that the RAM procurement to date has resulted in 1) NO new projects located in San Diego and 2) SDG&E’s winning projects are all located in the SCE area. This raises questions as to the cost effectiveness of the ground mounted solar projects assumed in the RPS Calculator, even if there was a commercial interest expressed. SDG&E recommends that all of the large ground mounted solar in San Diego be reassessed, and moved to the generic group of projects consistent with those in the SCE area.

In contrast, in the high DG 33% RPS calculator, most of the large ground mounted PV in the South Coast area are in the commercial interest group. Because there are less expensive projects in the SCE service area, a substantial portion of the large ground mounted PV in the SDG&E service area (more than half) does not get selected in the high DG version of the calculator.

Below is a list of the projects where there is assumed to be commercial interest in the calculator, but for which SDG&E questions the true commercial interest and/or viability.

LDPV_617
LDPV_796
LDPV_787
LDPV_277
LDPV_817
LDPV_227
LDPV_27
LDPV_97
LDPV_326
LDPV_37
LDPV_567
LDPV_596
LDPV_46
LDPV_757
LDPV_557