

Interconnection Process for Limited Generation Profile Projects

A Guide for Interconnection Customers Submitting a
Generating Facility Using Limited Generation Profiles

Effective July 9, 2025

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Background

- The California Public Utilities Commission (Commission) directed Southern California Edison (SCE) to allow generating customers the Limited Generation Profile (LGP) option. The LGP option allows DERs to perform within existing Integration Capacity Analysis (ICA) hosting capacity to avoid distribution grid upgrades.¹
- The LGP option allows the generator to use Interconnection Capacity Analysis-Static Grid (ICA-SG) values to maximize their generation using a time-varying export profile.
- SCE customers may interconnect with the LGP option as of July 9, 2025.
- SCE publishes this Interconnection Process Guide for LGP in response to Ordering Paragraph 4 of Commission Resolution E-5296.

¹ Note that LGP does not allow generating facilities to avoid all types of grid upgrades, since Integrated Capacity Analysis (ICA) does not account for everything. For instance, substation upgrades such as a bidirectional transducer must be paid for by the generating facility.

Summary of LGP Project Interconnection

1. Customer Preparation Phase

- Customer to download LGP .csv file from [DRPEP](#)²
- Customer to populate LGP .csv with proposed values (288 values)
- Customer to complete all required fields, including selecting a UL-certified Power Control System

2. Interconnection Request Phase

- Customer to complete Application Package by providing information required in interconnection request forms
- Customer to submit Application Package to SCE

3. Technical Evaluation Phase

- SCE to apply applicable review screens and assign interconnection queue
- SCE to compare the Customer's proposed LGP values to the most updated ICA-SG results
- If one or more LGP values does not conform with the allowable limits, SCE to inform customer and offer an optional review results meeting. Then, customer to revise their LGP .csv.
- SCE to notify Customer of completed Technical Evaluation Phase

4. Interconnection Agreement/PTO Phase

- Once LGP project passes Technical Evaluation Phase, then SCE and Customer to execute interconnection agreement, including attachments/appendices reflecting operational requirements of the LGP
- Customer constructs LGP facility
- Prior to issuing Permission to Operate (PTO), SCE may, at its sole discretion, conduct or witness field performance verification
- SCE to issue PTO

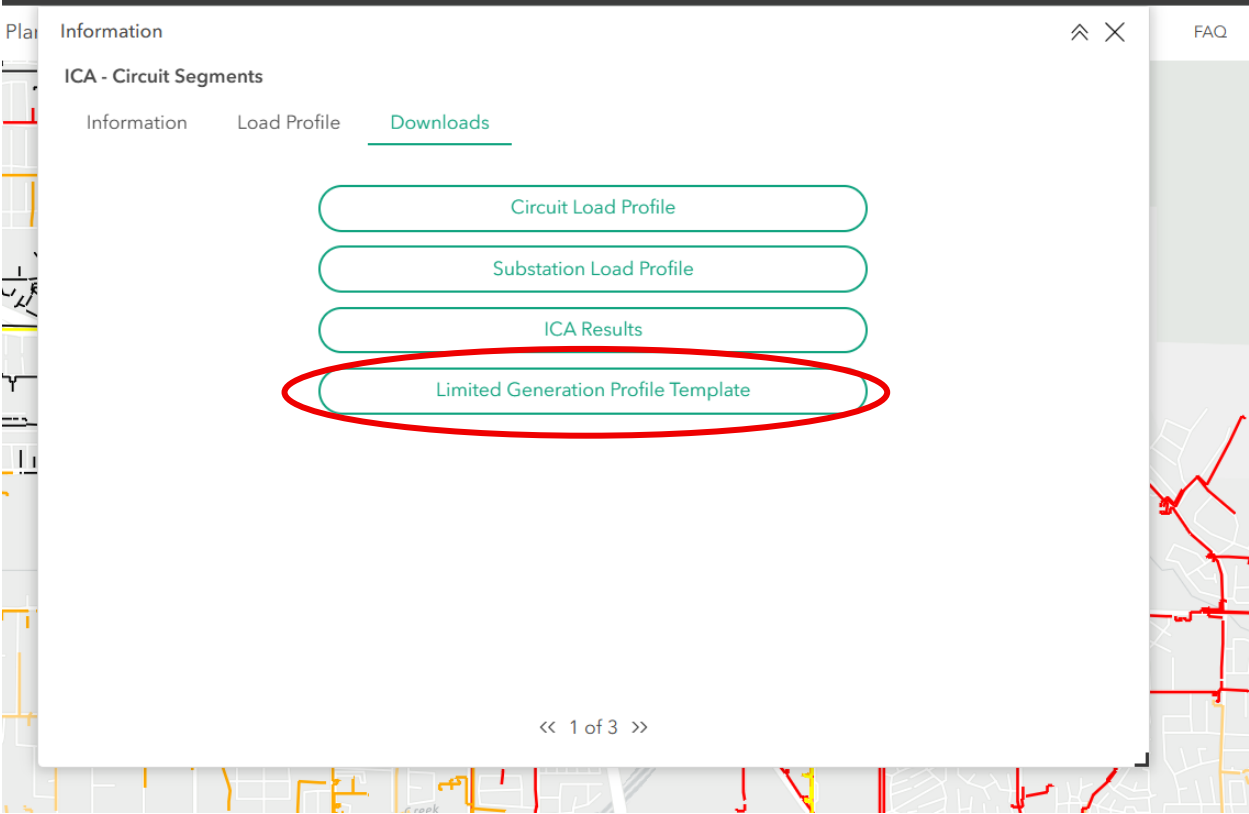
5. Operational Performance Phase

- SCE to monitor compliance with the LGP attached to the Customer's interconnection agreement

² SCE's Distributed Resources Plan External Portal (DRPEP) can be found at <https://drpep.sce.com/drpep/cdn/19/drpep-interactive-user-guide/index.html#/>

1. Customer Preparation Phase

A. In this phase, a Customer who intends to use this operational method downloads the .csv template from SCE's [DRPEP](#) (when ICA values are available) for the node that is closest to the proposed point of interconnection. If the interconnection request is for a single-phase electrical connection, the Customer should use the electrically-closest three-phase electrical node. The customer is able to download the necessary LGP files by first enabling the ICA layer and navigating to the node of interest. Then, by clicking on the node to open the widget, a customer can click on the downloads tab to download from the correct link.



B. In the downloaded LGP .csv file, the utility ID (MT_UTILITY_NAME), distribution feeder ID (MT_ASSOCIATED_FEEDER), three-phase electrical node ID (MT_ASSOCIATED_NODE), date of the last ICA online refresh date, and precalculated maximum LGP values for each LGP configuration will be prepopulated. The Customer will not alter the .csv file format. The Customer should examine the three pre-populated maximum LGP hourly value

columns to identify the configuration the Customer seeks to utilize. The pre-populated columns contain the maximum allowed LGP value for each of the three LGP configurations after calculating the posted ICA results at the time of download and applying the required 10% buffer.

- i. The customer shall populate the second comment field with one of the allowed entries, as seen in the sample LGP .csv image below:
 - SELECTED_LGP_CONFIGURATION: 24-Hourly
 - SELECTED_LGP_CONFIGURATION: Block
 - SELECTED_LGP_CONFIGURATION: 18-23-Fixed
- C. The Customer shall determine their proposed LGP values to not exceed the pre-populated as determined in (B) and insert values into the EXPORT_LIMIT_WATTS column. The format for submitting the Limited Generation Profile values requires populating a profile that contains 24 values per month for each of the 12 months, totaling 288 data points. During operation of the Customer’s generator, the Limited Generation Profile value for each hour will depend on the Limited Generation Profile configuration selected by the Customer.
- D. Within the interconnection application package, the Customer shall select a certified control system from SCE’s provided list of Underwriters Laboratories (UL)-certified Power Control Systems (PCS) that can control the exports at the PCC to not exceed the values determined in (C).
- E. The Customer must prepare the .csv template with all required fields completed, consistent with the sample template below, as part of the Interconnection Request Application Package.

Sample LGP .csv File

MT_FILE_INFO_TYPE	SCH-PS							
MT_SCHEDULE_FORMAT_VERSION		1						
MT_UTILITY_NAME	SCE							
MT_ASSOCIATED_FEEDER	Weeks							
MT_ASSOCIATED_NODE		64325901						
COMMENT	LAST_ICA_REFRESH_DATE:March 10		2023					
COMMENT	SELECTED_LGP_CONFIGURATION: 24-Hourly							
						MAXIMU M_24- HOURLY_ LGP_VAL UE_WATT S	MAXIMU M_BLOCK LGP_VAL UE_WATT S	MAXIMU M_18_23_ FIXED_LG P_VALUE_ WATTS
SCHEDULE_ENTRY	START_DATE		EFFECTIV E_DAY_TY PE	START_TI ME	EXPORT_LIMIT_ WATTS			
SCHEDULE_ENTRY		1-Jan	ALL	0:00	[INSERT VALUE]	9119223	9171882	9138951
SCHEDULE_ENTRY		1-Jan	ALL	1:00	[INSERT VALUE]	9033714	9155286	9138951
SCHEDULE_ENTRY		1-Jan	ALL	2:00	[INSERT VALUE]	9106884	9155286	9138951
SCHEDULE_ENTRY		1-Jan	ALL	3:00	[INSERT VALUE]	9044815	9155286	9138951

2. Interconnection Request Phase

- A. The Customer is to provide all requested information and documents that are typical and general to all interconnection requests.³
- B. The Customer is to provide the completed .csv template with LGP values as determined in 1(C) and the information for 1(B) within SCE's Interconnection Portal.⁴
 - i. In the event SCE's Interconnection Portal is unable to accept the upload of a .csv file, SCE will accept e-mailed .csv files as an alternative method to provide the Customer's proposed Limited Generation Profile values.
 - a. The email address for NEM projects is NEM@sce.com.
 - b. The email address for Rule 21 export projects is Rule21@sce.com.
- C. The Customer is to provide information on their certified control system within SCE's interconnection application portals.
- D. If Applicant does not resolve deficiencies to the Interconnection Request within the time frames consistent with the Tariff, Distribution Provider will deem the Interconnection Request withdrawn. Applicant may submit a new Interconnection Request.

³ Refer to [PCI USER GUIDE](#) and [GIPT USER GUIDES](#) for detailed steps on how to complete interconnection requests.

⁴ Rule 21 NEM export interconnection applications must be submitted through SCE's PowerClerk at <https://sceinterconnection.powerclerk.com/MvcAccount/Login> and other Rule 21 export interconnection applications must be submitted to Rule21@sce.com.

3. Technical Evaluation Phase

- A. SCE, consistent with applicable existing Rule 21 timelines, will apply all the applicable Initial Review Screens (A-L) based on the Nameplate capacity where applicable. Screen D, J, and K will use the maximum LGP value. Screen M will use the individual LGP values.
- B. The published interconnection queue will reflect the nameplate capacity for all projects, including LGP projects.
- C. SCE will verify that it has the most updated ICA-SG profile corresponding to the Customer provided three phase electrical node from 1(B).
- D. SCE will evaluate the most updated ICA-SG profile and determine if the requested export values are at or below the maximum allowed LGP value for each specific time period within the selected LGP configuration.
 - i. If the export request for each specific time period is at or below the maximum allowed LGP value, then the project can continue with its evaluation.
 - ii. If all Initial Review screens (A-L) are met and all requested LGP values are at or below the maximum allowed LGP value for each specific time period, then the project would pass Fast Track.
 - iii. If the requested LGP value for one or more of the specific time periods is not at or below the maximum allowed LGP value for the specific time period, the project will fail Initial Review. SCE will inform the Customer via e-mail to the customer and offer an optional review results meeting. Customer will have 5 Business Days (BD) after the notification, or after the optional result reviews meeting to update their proposed limited generation profile such that all values for all specific time periods are at or below the maximum allowed LGP value for.
 - iv. If the Customer responds with a conforming LGP .csv, the Customer's queue position will not change. The update to the LGP values should abide by the existing material modification criteria in section F.2.b of Rule 21, with the exception that when the project fails Screen M due to the SCE finding the ICA values are outdated then the LGP project is exempted from the 20% reduction limit.
 - v. Customers have 10 BDs from the Optional Initial Review Results Meeting to pay the Supplemental Review fee to proceed to Supplemental Review.

- vi. If the Customer does not respond within 5 BD of the notification or the Optional Initial Review Results Meeting with a conforming LGP .csv, SCE will proceed to Supplemental Review of the project, where Screens N and O are performed with maximum LGP values and Screen P is performed with inverter nameplate value, and the Customer will be responsible for the costs of any distribution upgrades necessary to allow interconnection at the generator's full nameplate value. The Customer's queue position will not change.
 - a. Any project that fails Supplemental Review will no longer be LGP eligible.

4. Interconnection Agreement/PTO Phase

- A. Execute Interconnection Agreements. The interconnection agreements will contain the operational requirements of the Limited Generation Profile, including:
- i. Provisions in the Interconnection Agreements to ensure that the Generating Facility control systems meet the approved operating specification.
 - ii. Provisions in the Interconnection Agreement to (i) require prompt remedial action by the Customer if the Limited Generation Profile attached to the Customer's interconnection agreement is not followed, and (ii) clarify that if prompt remedial action is not taken or if multiple instances of not operating according to the Limited Generation Profile values occurs, SCE may terminate the interconnection agreement.
 - a. For exports at the PCC which exceed the Limited Generation Profile values, but which do not immediately cause a safety and/or reliability concern, Customer will be notified by SCE. Customer will then be required to take remedial action within 15 business days of notification to conform to the Limited Generation Profile values. If remedial action is not taken within 15 business days from being notified, the Permission To Operate (PTO) will be revoked in accordance with the Customer's interconnection agreement and the generator must disconnect from the grid. SCE reserves the right to confirm that the generator has not reconnected.
 - b. For exports at the PCC which exceed the Limited Generation Profile values, and which impose an immediate safety and reliability concern, SCE will take immediate action to disconnect the generator from the grid until remedial action is taken. If remedial actions are not taken within 15 business days from being notified (or being disconnected), the PTO will be revoked in accordance with the Customer's interconnection agreement. SCE reserves the right to confirm the generator has not reconnected.
 - c. SCE will not impose additional requirements on a Customer whose PTO is revoked as a result of failure to take remedial

action. As such, the Customer can request interconnection of generation under any CPUC approved procedure.

- iii. Provisions in the Interconnection Agreement to require that a Customer without Automated Metering Infrastructure must provide telemetry to the distribution operations control center designated by SCE, where the telemetry monitors power flows at the Customer's PCC.
- B. Conduct field performance verification (Rule 21 Commissioning Test)
- i. Prior to issuing a PTO, SCE may, at its sole discretion, conduct or witness field performance verification to ensure that equipment installed by the Customer is configured and operating consistent with (i) the Limited Generation Profile values attached to the Customer's interconnection agreement, and (ii) the requirements of Rule 21. Where feasible, SCE may choose to conduct or witness field performance verification remotely.
 - ii. At the request of SCE, Customer shall provide SCE with a written field performance verification procedure per Rule 21, Section L.5.a, 10 BDs prior to the date of the field performance verification. SCE will coordinate the field performance verification procedure with the Customer.
- C. PTO will be issued by SCE if (i) the field performance verification demonstrates compliance with the Limited Generation Profile values attached to the Customer's interconnection agreement, and (ii) all applicable agreements and documentation (such as a release from the Authority Having Jurisdiction (AHJ)) have been completed and copies provided to SCE.

5. Operational Performance Phase

SCE will monitor compliance with the Limited Generation Profile attached to the Customer's interconnection agreement as follows:

- A. For a Limited Generation Profile project with generator nameplate less than 1 MW, Automated Metering Infrastructure (AMI) data will be used to monitor export at the PCC, if AMI is available. If AMI is not available, telemetry monitoring export at the PCC will be required. The interconnection agreements should be updated to include the requirement that telemetry at the PCC will be required, at Customer's expense, if AMI is not available.
- B. For a Limited Generation Profile project with generator nameplate greater than or equal to 1 MW, telemetry is required. If telemetry is monitoring only the generator output, SCE has the ability to use AMI data, if available, to monitor export at the PCC. If AMI is not available, or Customer opts out, telemetry at the point of common coupling will be required at the Customer's expense.

SCE's Procedure and Steps for LGP Curtailment

Step 1. For conditions that warrant urgent action, SCE will take initial actions in accordance with good utility practice. (Note, the cause of the violation will typically be identified after the event.)

Step 2. Following Step 1, SCE will assess whether low-cost mitigation measures can be implemented to restore some or all of the LGP exports and output of non-LGP generating facilities.

Step 3. If there is a continuing need to reduce an LGP customer's exports after considering any identified low-cost mitigation measures, SCE will undertake a study to establish the updated LGP. The study will incorporate the system conditions to determine current hosting capacity in order to determine the export levels at which safety and reliability concerns are addressed. SCE will identify upgrades to restore LGP values to those in the facility's interconnection agreement and also upgrades to restore LGP values to at least the lowest ICA-SG level as set forth in the LGP customer's generator interconnection agreement. The Utility now has two options:

a) If the Utility does not submit a tariff deviation, then the upgrade shall be performed to restore LGP values to those in the facility's interconnection agreement, at ratepayer expense. The upgrades will be conducted in accordance with SCE's standard practices and timelines for design, permitting, and construction and recover the costs of these upgrades from ratepayers – SCE does not believe any further Commission action is required for the utilities to pursue such upgrades or recover the costs from these upgrades from ratepayers. SCE will provide the LGP customer with a non-binding estimate of when those upgrades will be in-service. Once the upgrades are operational, SCE will provide the LGP customer with a new LGP reflecting the hosting capacity made available by the upgrades.

b) If SCE does submit a tariff deviation and the deviation is approved, then SCE shall conduct the upgrade needed to restore LGP values to a level not below the lowest ICA-SG level, at ratepayer expense. In this case, SCE will notify the LGP customer of the continuing need for a reduction of the LGP customer's exports to the grid and the customer can choose to pay for

further upgrades required to restore the LGP exports to the level set forth in the interconnection agreement. The customer will also be notified of the updated LGP and the effective date.

Revision Log

Revision Number	Revision Date	Description	Author
1	July 9, 2025	First publication	Christina Tan