



# **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 San Diego Gas and Electric (SDG&E) 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.<sup>1</sup>

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.

SDG&E customers may interconnect with the LGP option as of July 9, 2025.

SDG&E publishes this Interconnection Process Guide for LGP in response to Ordering Paragraph 4 of Commission Resolution E-5296.

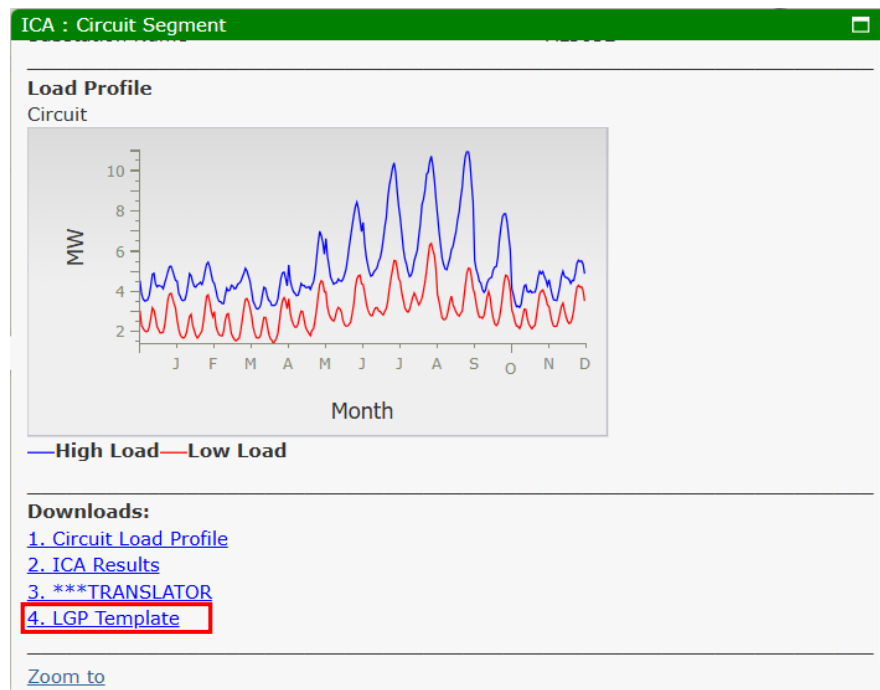
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<sup>1</sup> Note that LGP does not allow generating facilities to avoid all types of grid upgrades, since Integrated Capacity Analysis (ICA) does not account for everything. For instance, substation upgrades such as a bidirectional transducer must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



## 1. Customer Preparation Phase

- A. In this first phase, a Customer planning to use this operational approach should download the .csv template from [SDG&E Interconnection Map](#) for the line segment nearest to the intended interconnection point. For single-phase interconnection requests, the Customer must select the closest three-phase line segment. To obtain the required Limited Generation Profile (LGP) files, the Customer should first activate the Generation Capacity ICA layer and locate the desired line segment. By clicking on the segment, the Customer can scroll down the pop-up window and access the “Downloads” tab and retrieve the appropriate files from the Interconnection Map.



- B. In the downloaded LGP Template.csv file, the utility ID (MT\_UTILITY\_NAME), distribution feeder ID (MT\_ASSOCIATED\_FEEDER), three-phase electrical node ID (Node ID), 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 Template.csv image below:
    - SELECTED\_LGP\_CONFIGURATION: 24-Hourly
    - SELECTED\_LGP\_CONFIGURATION: Block
    - SELECTED\_LGP\_CONFIGURATION: 18-23-Fixed
- C. The Customer must define their proposed LGP values, ensuring they do not exceed the pre-populated limits established in section (B). These values should be entered into the EXPORT\_LIMIT\_WATTS column of the template. 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. As part of the interconnection application, the Customer must submit UL 3141 NRTL certification to confirm that the proposed interconnection equipment is a Underwriters Laboratories (UL)-certified Power Control Systems (PCS). This system must be capable of ensuring that power exports at the Point of Common Coupling (PCC) do not exceed the LGP values determined in section (C).
- E. The Customer is required to complete the .csv template with all necessary fields filled out, following the format shown in the sample template. This completed file must be included in the Interconnection Request Application Package.



## Sample of LGP Template.csv File

	A	B	C	D	E	F	G	H
1	Node ID	976350_OH						
2	Download Date	7/7/2025						
3	Last ICA Refresh Date	5/29/2025						
4	Customer Selected LGP Configuration	INSERT VALUE [24-Hourly, Block, 18-23-Fixed]						
5	MT_FILE_INFO_TYPE	N/A						
6	MT_UTILITY_NAME	SAN DIEGO GAS & ELECTRIC						
7	MT_UNIQUE_SCHEDULE_ID	N/A						
8	MT_ASSOCIATED_FEEDER	1458						
9	SCHEDULE_ENTRY	START_DATE	EFFECTIVE_DAY_TYPE	START_TIME	EXPORT_LIMIT_WATTS	Maximum 24-Hourly LGP Value (W)	Maximum Block LGP Value (W)	Maximum 18-23-Fixed LGP Value (W)
10	SCHEDULE_ENTRY	1-Jan ALL		0:00	INSERT VALUE	2610000	2610000	2610000
11	SCHEDULE_ENTRY	1-Jan ALL		1:00	INSERT VALUE	2610000	2610000	2610000
12	SCHEDULE_ENTRY	1-Jan ALL		2:00	INSERT VALUE	2610000	2610000	2610000
13	SCHEDULE_ENTRY	1-Jan ALL		3:00	INSERT VALUE	2610000	2610000	2610000
14	SCHEDULE_ENTRY	1-Jan ALL		4:00	INSERT VALUE	2610000	2610000	2610000
15	SCHEDULE_ENTRY	1-Jan ALL		5:00	INSERT VALUE	2610000	2610000	2610000



## 2. Interconnection Request Phase

A. The Customer is to provide all requested information and documents that are typical and general to all interconnection requests.

B. The Customer is to provide the completed .csv template with LGP values within SDG&E's Interconnection Portal.

i. In the event SDG&E's Interconnection Portal is unable to accept the upload of a .csv file, SDG&E 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 [Netmetering@sdge.com](mailto:Netmetering@sdge.com).

b. The email address for Rule 21 export projects is [DGInquiries@sdge.com](mailto:DGInquiries@sdge.com).

C. The Customer is to provide information on their certified control system within SDG&E'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. Technical Evaluation Phase

- A. SDG&E, 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. SDG&E will verify that it has the most updated ICA-SG profile corresponding to the Customer provided three phase electrical node (Node ID/Line Section ID) from 1(B).
- D. SDG&E will review the most updated ICA-SG profile and determine if the requested export values are at or below 90% of the minimum ICA- SG value for each specific time period within the selected LGP configuration.
  - i. If the requested export is at or below the maximum LGP value for each specific time period, then the project can continue with its evaluation.
  - ii. If 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 export for one or more of the specific time periods is not at or below 90% of the specific time period's minimum ICA-SG value, the project will fail Initial Review. SDG&E will inform the Customer via e-mail and offer an optional Initial Review results meeting. Customer will have 5 Business Days (BD) after the notification, or after the optional Initial Review results meeting to update their proposed limited generation profile such that all values for all specific time periods are at or below 90% of the ICA-SG values.
  - iv. If the Customer responds with a conforming export request, 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 SDG&E finding the ICA values are outdated then the LGP project is exempted from the 20% reduction limit.
  - v. If the Customer does not respond within 5 BD of the notification or the Optional Initial Review Results Meeting, SDG&E will proceed to evaluate the project using full nameplate, 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.

- vi. Customers have 10 BD from the notification of Initial Review failure to notify SDG&E whether to proceed to Supplemental Review as per Rule 21 F.2.a. SDG&E would evaluate the project using the generator nameplate capability for Screen N and applicable portions of Screens O and P. 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.



## 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 specifications.
- 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, SDG&E 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 SDG&E. 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. SDG&E 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, SDG&E 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. SDG&E reserves the right to confirm the generator has not reconnected.
  - c. SDG&E 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 SDG&E, 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, SDG&E may, at its sole discretion, conduct or witness field performance verification to ensure that equipment installed by the Customer is configured and operating consistently with (i) the Limited Generation Profile values attached to the Customer's interconnection agreement, and (ii) the requirements of Rule 21. Where feasible, SDG&E may choose to conduct or witness field performance verification remotely.

ii. At the request of SDG&E, Customer shall provide SDG&E 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. SDG&E will coordinate the field performance verification procedure with the Customer.

C. PTO will be issued by SDG&E 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 SDG&E.



## 5. Operational Performance Phase

SDG&E 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, SDG&E 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.



## **SDG&E's Procedure and Steps for LGP Curtailment**

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

**Step 2.** Following Step 1, SDG&E 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, SDG&E 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. SDG&E 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 the Large IOUs' standard practices and timelines for design, permitting, and construction and recover the costs of these upgrades from ratepayers – the utilities do not believe any further commission action is required for the utilities to pursue such upgrades or recover the costs from these upgrades from ratepayers. The Utility will provide the LGP customer with a non-binding estimate of when those upgrades will be in-service. Once the upgrades are operational, the Utility will provide the LGP customer with a new LGP reflecting the hosting capacity made available by the upgrades.

b) If the Utility does submit a tariff deviation and the deviation is approved, then the Utility 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, the Utility 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.