**TOPICS TO ADDRESS IN WORKSHOPS AND ALs**

1. **Reduction of LGP only for safety and reliability, per D.20-09-035**
   1. Discuss how safety and reliability would specifically inform whether and how curtailment should be imposed
      1. Specify safety and reliability concerns: how a LGP profile could compromise safety and reliability of the grid unless there’s a reduction of export power
         1. What are the variables that drive the safety or reliability risk the utility is anticipating (i.e., is it changes in load, performance of other DERs, storms or other emergencies)?
      2. Discuss current business-as-usual practices on curtailment of export power
         1. Identify any circumstances that are already applicable to generating facilities (i.e., business-as-usual, or existing practices) to meet safety and reliability concerns
            1. How often has this happened per year over the past five years?
            2. In what types of situations has this happened?
            3. What have been the sizes of generators that have been curtailed?
         2. Identify any circumstances that are only applicable under the LGP-option
            1. Identify unique aspects of an LGP customer and detail the cause for why disparate treatment for LGP-option systems may be necessary to meet safety and reliability concerns.
            2. Identify circumstances in which export power must be reduced to below the lowest ICA-SG value identified at time of interconnection to ensure to safety and reliability
   2. Future Grid Conditions: discuss specifics of what this entails and how this would inform whether and how curtailment should be imposed
      1. Define Future Grid Conditions
      2. Articulate what future grid conditions are expected to result in actual hosting capacity being below the published ICA-SG value
         1. Discuss the extent to which Large IOUs may need to reduce generation to ensure safety and reliability without grid upgrades
         2. Discuss the effect future grid conditions may have on LGP customers and how those effects would differ from those experienced by a non-LGP generation customer
2. **Reduction of a Customer’s Export Power**
   1. Criteria for Reduction of Export Power–Clearly outline the criteria that will prompt the IOU to call for a reduction of export power and specific reasons for doing so
      1. Under what conditions/situations is a reduction to a customer’s LGP expected?
      2. How will the utility identify conditions that prompt a reduction of export power and what tools/data will be used?
      3. Address how each condition is justified based upon differences between an LGP and non-LGP customer interconnection. How does an LGP based upon the ICA introduce additional risk relative to a non-LGP customer based either on static ICA Op-Flex value or the historic 15% screen M criteria?
      4. What is the duration of the curtailment and what will prompt a return to the original LGP?
         1. The permanence of that reduction of capacity in generation.
   2. Fairness to non-LGP customers who may have paid for grid upgrades
      1. When a temporary reduction in generation is needed, whose export power should be reduced first?
         1. If there is a customer that paid for grid upgrades on that grid segment, should they have priority to retain their hosting capacity over the LGP customer?
3. **Mitigation Options and Remedies to Resume original LGP**
   1. Provide definitions for each mitigation option and discuss how mitigation options differ from upgrade measures
   2. Define and evaluate the availability of mitigation options
      1. Define and discuss what low-cost and common mitigations are available to avoid curtailment and under what circumstances they could be applied.
   3. Cost of Mitigation Options and Future Grid Conditions Affecting LGP Customers
      1. Discuss responsibility for any associated costs for mitigation options
      2. Future Grid Upgrades
         1. How upgrades should be treated if reduction to the lowest ICA-SG values are not sufficient to ensure the safety and reliability of the grid.
         2. Should the LGP customer have the option to perform grid upgrades (or pay for low-cost mitigation options) at a later time in order to maintain its original LGP
         3. If a subsequent upgrade increases hosting capacity, can the LGP customer reapply with the intent of increasing their export power?
4. **Implementation Process for Reductions to the LGP**
5. Establish a process to implement a reduction of the LPG once criteria are established
   1. What is the required documentation and the delivery timeline for an IOU to justify to the customer a reduction of the existing LGP.
   2. Specify how the customer will be notified of the change to LGP and how this change will be reflected in the Interconnection Agreement.
   3. Clarify whose responsibility it is to reduce the programmed schedule
      * + Will IOUs provide new schedule or identify the new limits and let customer re-do the schedule to fit within those limits?
        + Will customer have to re-submit a schedule for evaluation?
        + What time will the customer be allowed for completing LGP changes?
6. Scheduling Format
   1. Discuss the file format proposal to submit a Limited Export Profile schedule
      1. Discuss each IOUs’ scheduling option
   2. Discuss if a standard file format across all IOUs is best suited to submit the schedule
      1. Justify why or why not a standard file format is not suited