

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009
(Filed September 12, 2019)

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON
THE PROPOSED DECISION ADOPTING SHORT-TERM ACTIONS TO
ACCELERATE MICROGRID DEPLOYMENT AND RELATED RESILIENCY
SOLUTIONS**

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”) hereby submits our reply comments on the *Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions* (“PD”), issued on April 29, 2020 by Administrative Law Judge (“ALJ”) Colin Rizzo.

I. INTRODUCTION.

CESA commends the Commission for issuing a PD that identifies near-term pathways to support or enhance 2020 resiliency. At this point, time is of the essence. CESA thus agrees that the Commission may wish to consolidate implementation-related advice letters, as suggested by the investor-owned utilities (“IOUs”),¹ instead of doing so in a piecemeal fashion. However, the Commission must reject proposals to delay advice letter filings to implement the various proposals, as any delay would contravene the Commission’s objectives to have 2020 wildfire solutions in place.² To avoid any implementation delay from protests to the advice letters, the Commission should also ensure that the IOUs work closely with market participants to identify viable and feasible solutions. In our reply comments, we address various parties’ comments. In particular, we focus on some concerns we have from the IOUs that express how they are already doing many of the interconnection-related proposals and thus should not be required to do more.

¹ Southern California Edison Company (“SCE”) comments at 12-13 and Pacific Gas and Electric Company (“PG&E”) comments at 11.

² SDG&E comments at 10.

II. STANDARD SINGLE-LINE DIAGRAMS ARE NEEDED FOR ALL DIFFERENT PROJECT TYPES AND SIZES BEYOND THE ONES THAT EXIST TODAY.

Many parties highlighted concerns about Interconnection Proposal 1 as potentially overlooking the need for standardized single-line diagrams (“SLDs”) for different project categories or sizes if only looking at application volume or by narrowly focusing on the specific use cases included in the PD.³ As Tesla noted, the IOUs should be required to develop such SLDs for any fast-track eligible project. However, San Diego Gas and Electric Company (“SDG&E”) argues that it is already compliant with Interconnection Proposal 1 since it already has developed standard SLDs for Net Energy Metering (“NEM”) paired with storage less than 30 kW, which accounts for 98% of interconnection requests.⁴ While appreciative of this work, this data point just serves to prove the point that current interconnection processes overlook the need for standardized and streamlined processes for larger systems that are likely needed to serve public and commercial facilities. Larger projects by its nature will generally have fewer interconnection requests, but it also may very well be that the lack of standardized SLDs contributes to the lack of interconnection requests. The Commission should push the IOUs against doing nothing or doing the minimum work needed to support the interconnection of resilient storage systems.

III. ADVANCED NOTIFICATION PERIODS AND EXISTING METERING AND DATA SUBMITTAL REGIMES SHOULD BE LEVERAGED TO ADDRESS CONCERNS RELATED TO STORAGE CHARGING AND SIZING PROPOSALS.

The IOUs expressed concerns regarding the storage charging proposals with leading to overload or other reliability issues from concurrent charging of storage systems in advance of Public Safety Power Shutoff (“PSPS”) events.⁵ In previous comments, CESA recommended that advanced notification periods of 48-72 hours would allow for these systems to ensure sufficient state of charge and not pose significant issues in aggregate.⁶ Given that the IOUs have expressed in R.18-12-005 the challenges in knowing exactly when a PSPS event will be triggered, CESA

³ Clean Coalition comments at 5; Enel X North America comments at 3; Microgrid Resource Coalition (“MRC”) comments at 6; and Tesla comments at 4.

⁴ SDG&E comments at 5.

⁵ SDG&E comments at 9-10 and PG&E comments at 12.

⁶ *Reply Comments of the California Energy Storage Alliance on the Administrative Law Judge’s Ruling Requesting Comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal*, filed on February 6, 2020, at 6-8. <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M327/K740/327740790.PDF>

believes that it is unlikely for significant concurrent charging right before the PSPS event since storage operators will also take a cautious approach in managing charging and maintaining a sufficient state of charge for an event that could occur at any moment within that window.

Moreover, any concerns about NEM integrity stemming from either of the storage charging or sizing proposals can be addressed by metering requirements in place that can detect gaming.⁷ Additional data or operational requirements, as recommended by The Utility Reform Network (“TURN”),⁸ are also unnecessary and would only add administrative burden when operational and greenhouse gas (“GHG”) reduction requirements are already in place that offer multiple pathways for the Self-Generation Incentive Program (“SGIP”). For example, several options are offered for new commercial storage projects, including demand response participation as one option. With most customer-sited storage being supported through SGIP, TURN’s recommendations to mandate dispatch or DR participation are unnecessary and duplicative. Furthermore, with extensive reporting already required in SGIP, the additional data requirements are unnecessary.

IV. VIRTUAL INSPECTIONS SHOULD BE PURSUED TO THE GREATEST EXTENT POSSIBLE WHERE SAFE AND RELIABLE.

Due to the COVID-19 pandemic, the Commission should strive to implement virtual inspections to the greatest extent possible, where our members report SCE’s virtual inspection process as being a model for the other IOUs to follow. As such, CESA disputes PG&E’s characterization of Interconnection Proposal 2 around setting the technical criteria to establish virtual inspection processes as having limited benefit.⁹ First, PG&E reports that only 4% of interconnection requests require field inspections, but CESA has questions about these numbers since visual inspections are generally required to receive permission to operate (“PTO”) according to its Rule 21 tariff and Distribution Interconnection Handbook.¹⁰ Second, while PG&E reports that field inspections occur within 10 business days, CESA believes that this data point is misleading for not capturing the logistical time required in scheduling time between the utility inspector and the customer/developer, in addition to the time gap between scheduling and actual

⁷ TURN comments at 1-2.

⁸ *Ibid* at 2.

⁹ PG&E comments at 10.

¹⁰ See Rule 21 Section L.5.a and PG&E Distribution Interconnection Handbook Section 4.12.

inspection, which can be significant if availability is limited for any one of these individuals. In sum, the Commission should reject these comments and affirm its determination on this proposal.

V. A SOLICITATION FOR CLEAN MICROGRID SOLUTIONS SHOULD BE LAUNCHED IN SUMMER 2020 TO SUPPORT 2021 RESILIENCY NEEDS.

CESA shares many of the views from parties seeking to push the IOUs toward cleaner solutions and transition away from backup diesel generators as soon as possible, including to leverage the make-ready infrastructure investments to support clean alternatives. To this extent, CESA is pleased to see that PG&E will report how it will likely not need the previously requested 300 MW of temporary generation and how it plans to propose a Clean Generation Framework for PSPS mitigation beyond 2020.¹¹ While these represent incremental improvements, CESA believes that more needs to be done, not only in line with the PD’s determinations, but also in advance of the next 2021 wildfire season. Tesla and GRID Alternatives proposed that PG&E should issue a Request for Offers (“RFO”) for clean energy solutions for the 2021 wildfire season.¹² CESA strongly agrees. The recent experience with PG&E’s Distributed Generation Enabled Microgrid Services (“DGEMS”) RFO, which provided one month to submit offers and 3-7 months to come online – an impossible timeline to bring any major generation or storage investments online. For substantial clean microgrid solutions to come online by the 2021 wildfire season, the Commission must prioritize needs assessment in Track 2 (e.g., appropriate service requirements, procurement parameters) and RFO authorization for issuance by Summer 2020 for any clean alternatives to be reasonably brought online within less than a year ahead of the 2021 wildfire season.

VI. BROAD SUPPORT EXISTS FOR INTERCONNECTION PROPOSAL 4 TO MERIT ITS AUTHORIZATION IN TRACK 1.

While parties did not comment on Interconnection Proposal 4 to use the existing IOU smart meter remote service disconnect capability, Connect California highlighted the broad support for the proposal in response to the January 21, 2020 Staff Proposal.¹³ Given this, as well as the need to identify short-term resiliency strategies, the Commission should reconsider their determination in the PD and authorize the IOUs to submit proposals in line with Interconnection Proposal 4. With

¹¹ PG&E comments at 8-10.

¹² Tesla comments at 9-10 and GRID Alternatives comments at 8.

¹³ Connect California comments at 4.

the “green light” from the Commission to begin scoping such a project and be certain of cost recovery, CESA believes the IOUs will be more likely to consider the idea and be required to minimally outreach to market participants to gauge the viability and implementability of a pilot at some scale for 2020, which they can later report in an advice letter filing of their results from the outreach and pilot development. Otherwise, at minimum, CESA agrees with Clean Coalition that this proposal should be mandated for inclusion in the Track 2 scope.¹⁴

VII. THE MICROGRID TARIFF DEVELOPED AS PART OF THE COMMUNITY MICROGRID ENABLEMENT PROGRAM SHOULD BE NON-PRECEDENTIAL.

CESA agrees with the concerns expressed jointly by the Climate Center and Vote Solar about the development of a community microgrid tariff through an advice letter process for the Community Microgrid Enablement Program (“CMEP”).¹⁵ Though lessons learned can be drawn following the development and implementation of a CMEP community microgrid tariff, stakeholders should be given an opportunity to vet and shape the development of microgrid tariffs that could be applicable across all IOUs. Key questions around interconnection and compensation need to be discussed as part of Track 2 for any tariff, which will be an important mechanism to support broader deployment of microgrids for resiliency. Despite this concern, CESA generally supports PG&E’s CMEP proposal and agrees that a similar type of technical assistance and financial assistance program(s) should be eventually developed for the other IOUs.

VIII. CONCLUSION.

CESA appreciates the opportunity to submit these reply comments on the Track 1 PD and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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¹⁴ Clean Coalition comments at 7.

¹⁵ Climate Center and Vote Solar comments at 4.