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CPUC Energy Division Tariff Unit
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**Re: Protest of the California Energy Storage Alliance to Advice Letter 4473-E
of Southern California Edison Company**

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”) hereby submit this Protest to the above-referenced Advice Letter 4473-E of Southern California Edison Company (“SCE”), *Southern California Edison Company’s Proposed Schedule BTMM, Behind-the-Meter Microgrid, Pursuant to Decision 21-01-018* (“Advice Letter”), submitted by each of the investor-owned utilities (“IOUs”) on April 21, 2021.

I. INTRODUCTION & BACKGROUND.

In Track 2 of the Microgrids proceeding (R.19-09-009), the Commission adopted a number of proposals to continue implementation of Senate Bill (“SB”) 1339, which directed the Commission to reduce barriers to microgrid development that ensures safety and reliability. Issued on January 21, 2021, Decision (“D.”) 21-01-018 adopted Proposal 3 Option 4 and 5 with modifications that would direct the IOUs to establish a new microgrid rate schedule applicable to a single customer establishing a behind-the-meter (“BTM”) microgrid.¹ In adopting this proposal, the Commission explained that it will help commercialize microgrids.² In each of the IOU Advice Letters, the IOUs commonly defines a microgrid and cites and incorporates a number of applicable existing tariffs in the newly proposed Behind-the-Meter Microgrid (“BTMM”) schedules, including Rule 18, Rule 21, Net Energy Metering (“NEM”), departing load non-bypassable tariffs, and standby tariffs.

Upon reviewing SCE’s Advice Letter, CESA generally supports the proposed BTMM tariff and finds it to be mostly compliant with the orders in D.21-01-18. However, CESA finds issue with one aspect of the Advice Letter relating to the application and review process requirements for BTMMs consisting of backup generation that only operates during a grid outage.³ Specifically,

¹ D.21-01-018 at Ordering Paragraph (“OP”) 4.

² D.21-01-018 at Findings of Fact (“FOF”) 19-21.

³ See SCE Schedule BTMM Special Conditions Section 3.b.

SCE would require customers with backup generators that do not operate in parallel with SCE's electric grid to submit a Generating Facility Interconnection Application. Since these backup generators or devices are not "interconnecting" or running in parallel with the distribution grid, BTMM customers should only be subject to the requirement that they "notify the location of the generator" and gather information gathered on the location of the transfer switch that safely protects any connected generator from backfeeding the grid. Such language and requirements are consistent with the applicable California Health and Safety Code §119085(b)⁴ and are included in the advice letters of Pacific Gas and Electric Company ("PG&E") and San Diego Gas and Electric Company ("SDG&E") and should be similarly applied to SCE's Schedule BTMM.⁵

II. DISCUSSION.

In this Protest, CESA recommends that the Commission reject SCE's requirement for backup generators that intend to only operate during an outage to be subject to a generator interconnection application process. While this issue was not specified or addressed in D.21-01-018, the IOUs should then be consistent with existing rules, regulations, and codes. To this end, according to the California Health and Safety Code, a generator interconnection application for backup generators that intend to only operate during an outage should not be required, as the applicable statute requires notification to the utility of the location of the generator if it can energize the premise electrical system.⁶

Along these lines, PG&E and SDG&E submitted their respective advice letters that is consistent with these existing rules, regulations, and codes and does not overreach in subjecting these backup generators to generator interconnection application processes. PG&E, for example, simply address a notification and contact requirement to have the "generator" noted on the service point at their premise, while SDG&E requires an installation request form to be submitted. As CESA understands it, these notification and communication requirements are consistent with the California Health and Safety Code and do not conflate the utilities' interconnection processes with the notification requirement defined by §119085(b). With information provided by the BTMM customer on the location of the generator and on project configurations and design (*e.g.*, via a notification package), the IOUs can check to ensure that there is no inadvertent backfeed to the IOU distribution grid and that the generator will not connect to the utility's electric system.

CESA thus recommends that SCE be directed to make modifications accordingly. Not only is SCE's proposed requirement inconsistent with existing rules, regulations, and codes, but it also

⁴ California Health and Safety Code 119085(b): "Any owner, renter, or lessee who possesses and operates an electric generator, when the generator is connected to a commercial, industrial, or residential structure's electrical system that is connected to the service of a public utility or utility district, shall **notify the utility of the location** of the generator." [emphasis added]
https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC§ionNum=119085

⁵ SDG&E Schedule BTMM Special Conditions Section C.2 and PG&E Schedule E-BTMM Application and Review Process Requirements Section 2.

⁶ California Health and Safety Code 119085(a)-(b).

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stifles innovation for the use of innovative backup resources such as vehicle-to-grid (“V2G”) non-exporting resources and isolation devices, among others, to support California customers with critically and urgently needed resiliency.

III. CONCLUSION.

CESA appreciates the opportunity to submit this response to the Advice Letters and looks forward to collaborating with the Commission and IOUs to support BTM microgrid development for resiliency.

Respectfully submitted,



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Service list R.19-09-009