

September 12, 2022
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CPUC Energy Division Tariff Unit
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Re: Protest of the California Energy Storage Alliance to Advice Letter 4063, et al. of the Joint Utilities

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”) hereby submits this Protest to the above-referenced Advice Letter 4063-E of San Diego Gas and Electric Company (“SDG&E”), Advice Letter 6687-E of Pacific Gas and Electric Company (“PG&E”), and Advice Letter 4851-E of Southern California Edison Company (“SCE”), *Joint Utility Evaluation Process and Criteria to Assess Microgrid Different Isolation Technologies Pursuant to Final Resolution E-5194 and Decision 21-01-018* (“Joint Advice Letter”), submitted jointly by the investor-owned utilities (“IOUs”) on August 22, 2022.

I. INTRODUCTION & BACKGROUND.

Guided by Decision (“D.”) 21-01-018, the Commission issued Resolution E-5194 that adopted the IOUs’ proposed microgrid isolation technologies evaluation process and criteria, with several modifications and clarifications. To be consistent with Resolution E-5194, the IOUs made a number of revisions and included new clarifications to the testing and evaluation process, as previously submitted in supplemental advice letters (*i.e.*, Advice 3734-E-B, *et al.*).

Upon reviewing the Joint Advice Letter, CESA finds the Joint Advice Letter to be generally compliant and consistent with Resolution E-5194, with much of the redlines detailed in Attachment A incorporating the same or similar language as the Findings in Resolution E-5194. However, CESA submits this limited protest regarding a revision made by the IOUs to the Supplier Technical Checklist, which among other things, lists the “general standards” currently required for equipment that comprises a microgrid. Specifically, CESA opposes the IOUs’ revision to “suggest” the use of the UL 414 standard updated in 2022 as the applicable standard for meter sockets. Absent the inclusion of a grace period to make applicable the UL 414 standard updated in 2020, CESA fears that the IOUs’ evaluation process in practice will not approve any microgrid isolation technologies for installation and use.

II. DISCUSSION.

In the below sections, CESA discusses one particular shortcoming of the proposed criteria and evaluation process in the Joint Advice Letter and recommends that the Commission reject the revision in Table 1 of the Supplier Technical Checklist to suggest or require UL 414 standard updated in 2022 as the applicable standard for meter sockets. To support electrical isolation methods and technologies for more timely deployment to provide resiliency to customers in the face of public safety power shutoff (“PSPS”) events and other outages, CESA urges the Commission to reject the IOUs’ proposal on this particular matter and instead require the IOUs to accept the UL 414 standard updated in 2020 for a period of two years from the effective date of the Joint Advice Letter.

A. A two-year grace period from the effective date of the Joint Advice Letter should apply to the applicability of the 2020 update of the UL 414 standard for meter sockets.

The Supplier Technical Checklist outlined in Attachment A provides a comprehensive list of the technical requirements that any supplier must provide to the Joint Utilities in order to complete the evaluation process for new isolation technology.¹ The final evaluation process and criteria would stipulate that the submitted technology must comply with the most current applicable standards, which, as CESA understands the Supplier Technical Checklist, may include but are not limited to those identified in Table 1.² Despite this “suggested” language,³ CESA views the inclusion of the listing of the 2022 update of the UL 414 standard as leading to the exclusion or rejection of microgrid isolation technologies that are certified to the 2020 update of the UL 414 standard. In other words, any technology that is certified to UL 414 as the applicable standard would be subject to the 2022 standard for IOU approval for use by virtue of the elimination of the 2020 standard in Table 1.

This modification and replacement are problematic because microgrid isolation technologies where UL 414 is the applicable standard would likely be rejected and/or not evaluated as part of the IOUs’ processes. With the 2022 update being issued in June of this year, it is impossible for any microgrid isolation technology to be certified to this updated standard, considering no Nationally Recognized Testing Laboratory (“NRTL”) is currently positioned to test and certify technologies and devices to this updated version in the few months since the issuance of the updated standard – *i.e.*, it will take some time for NRTLs to incorporate the update into their testing and certification processes. Further, any technology or device would also be required to be

¹ See Joint Advice Letter Attachment A at 2.

² *Ibid* at 6.

³ The various options and suggestions are intended to allow for different types of microgrid isolation methods and technologies, but any given one would likely have a single applicable standard.

re-certified to the 2022 update once the NRTLs are set up to do so, which would likely entail another 12-18 months before it would even be considered as part of the IOUs' evaluation process.

Such outcomes are unreasonable in light of the urgent need for low-cost solutions to support customer resiliency in the face of outage risks tied to PSPS events, wildfires, and extreme heat and weather events. With the resolution of this evaluation process already significantly delayed since the issuance of D.21-01-018, this change would unreasonably prolong the timeline for customers to be able to access and deploy microgrid isolation technologies certified to UL 414. The IOUs have also not substantiated the necessity to immediately require the 2022 update, where the use of meter sockets certified to the 2020 update would pose unreasonable reliability or safety risks.

The immediate applicability of standards when adopted is also unreasonable in the context of how rules, regulations, and policies in other areas, such as for generator and storage interconnections, often create grace periods (*e.g.*, one to two years) for which existing requirements and certifications are still deemed valid. Such approaches have been utilized to reflect how time is needed for manufacturers and technology providers to modify and update their technologies to new requirements and standards and to recognize the legitimacy of technologies certified to existing standards and requirements during a transition period, thereby avoiding disruptive impacts to the market for various technologies supporting grid reliability and decarbonization.⁴ Only after the end of these grace periods are devices expected to be certified to the updated standard.

In line with this common and best practice, CESA recommends that the Commission reject the IOUs' proposal on this particular manner and instead require the IOUs to accept the UL 414 standard updated in 2020 for a period of two years from the effective date of the Joint Advice Letter.

⁴ *See, e.g.*, forward effective dates of various smart inverter requirements as standards and testing processes are updated and officially issued.

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III. CONCLUSION.

CESA appreciates the opportunity to submit this Protest in response to the Joint Advice Letter and looks forward to collaborating with the Commission and IOUs to better enable the use of microgrid isolation technologies pursuant to D.21-01-018 and Resolution E-5194.

Respectfully submitted,



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