BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U902E) for Authority to Implement Optional Pilot Program to Increase Customer Access to Solar Generated Electricity.	Application 12-01-008 (Filed January 17, 2012)
And Related Matters.	Application 12-04-020 Application 14-01-007

CLEAN COALITION REPLY COMMENTS ON THE GREEN TARIFF SHARED RENEWABLES PROGRAM PHASE IV TRACK B ISSUES

Brian Korpics
Staff Attorney
brian@clean-coalition.org

Kenneth Sahm White
Director, Policy & Economic Analysis
sahm@clean-coalition.org

Clean Coalition
16 Palm Ct
Menlo Park, CA 94025
(708) 704-4598

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I. INTRODUCTION

On April 15, 2015, in the Green Tariff Shared Renewables ("GTSR") proceeding, the California Public Utilities Commission ("Commission") issued the *Assigned Commissioner and Administrative Law Judge's Scoping Ruling for Phase IV of Consolidated Proceeding*, which was later supplemented by the October 26, 2016, *Administrative Law Judge Ruling (1) Adopting Comment Schedule on Senate Bill 793 and Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool and (2) Revising the Schedule for Phase 4 Track B*. Pursuant to the above rulings, and in response to parties' opening comments filed on November 9, 2015, the Clean Coalition hereby submits the following reply comments on Phase IV Track B issues. The comments below focus on: (1) the need to extend program eligibility to sub-500 kW projects, (2) the benefits of procuring resources other than solar, and (3) support for utilizing a modified ReMAT procurement mechanism.

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources ("DER")—such as local renewables, advanced inverters, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions. The Clean Coalition also collaborates with utilities and municipalities to create near-term deployment opportunities that prove the technical and financial viability of local renewables and other DER.

II. COMMENTS

1. *Consideration of sub-500 kilowatt projects*

The Clean Coalition supports the comments of CEJA, ORA, and SDG&E, which urge the Commission to extend GTSR program eligibility to sub-500kW projects. As noted in SDG&E's comments, opening up the program to a greater number and variety of resources will increase competition—driving prices down and lowering future costs for distributed solar to the benefit of both program participants and non-participating ratepayers.[1] Further, allowing sub-500 kW projects would create additional siting opportunities and address land constraints within densely populated areas.[2] CEJA argues that allowing these projects to participate in the program is one pathway to address the disproportionate siting of polluting facilities in disadvantaged communities.[3] CEJA also notes that siting these projects in disadvantaged communities would yield psychological benefits that could lead to exponential growth of both local solar resources and participation in the program.[4] Finally, ORA rightly asserts that these projects should count towards the utilities' RPS obligations if they fail to achieve the sufficient subscription level under the GTSR program.[5]

Only SCE's comments argue against eligibility of sub-500 kW projects. SCE recognizes that one of the issues described in Decision 15-01-051 will be solved by CAISO allowing aggregated resources to bid into its market, yet SCE goes on to argue that "aggregation of several

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[1] Opening Comments of San Diego Gas & Electric (U902 E) Company on Phase IV Track B Scope at 2 (Nov. 9, 2015).

[2] *See* Clean Coalition Opening Comments on the Green Tariff Shared Renewables Program Phase IV Track B Issues at 3–4 (Nov. 9, 2015).

[3] Phase IV Track B Opening Comments of the California Environmental Justice Alliance at 2 (Nov. 9, 2015).

[4] *Id.*

[5] Opening Comments of the Office of Ratepayer Advocates on Green Tariff Shared Renewables Program Track B Issues at 1 (Nov. 9, 2015).

resources across SCE's service territory *might* not be possible."[6] Even if this hypothetical proved true, PG&E and SDG&E should still have the option to open up the program to these resources and bid them into the CAISO market. Further, SCE can easily address its concern with CAISO's requirement for aggregation to occur within the same sub-lap, and not broadly across the entire service territory, by only accepting offers where CAISO-compliant aggregation is achievable in conjunction with other resources. As utilities develop portfolios of resources throughout their service areas, CAISO-compliant aggregation should be readily available and should not be construed as a barrier to development.

SCE also argues that the Commission should bar sub-500 kW projects from participating in the program because they will add administrative complexity and fixed costs unrelated to project size.[7] However, these costs are balanced by the benefits of increasing siting opportunities in the built environment and allowing communities to host solar projects close to load—two factors that will increase the overall success of the program. These factors are especially important to the Enhanced Community Renewables ("ECR") component, the rewards of which the Commission described as "community involvement, increased renewables, locational benefits, and certainty of renewable power cost."[8] It would be difficult for the utilities to successfully implement the ECR component and realize these rewards without the Commission extending program eligibility to sub-500 kW projects.

In contrast to their arguments in this proceeding, SCE is actively soliciting sub-500 kW renewable distributed generation in its second Preferred Resources Pilot ("PRP") request for offers ("RFO"), which established a 250 kW_{AC} minimum project size. In a Solar Siting Survey study performed by the Clean Coalition for the PRP region, the practical siting opportunities primarily consisted of large commercial rooftops, parking lots, and parking structures.[9] Reducing

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[6] Southern California Edison Company's (U 338-E) Phase IV Track B Opening Comments at 2 (Nov. 9, 2015) (emphasis added).

[7] *Id* at 3.

[8] *Decision Approving Green Tariff Shared Renewables Program for San Diego Gas & Electric Company, Pacific Gas and Electric Company, and Southern California Edison Company Pursuant to Senate Bill 43*, D.15-01-051 at 59 (Jan. 29, 2015).

[9] Clean Coalition, Solar Siting Surveys, http://www.clean-coalition.org/resource/solar-siting-surveys/ (last visited Nov. 19, 2015). The PRP area encompasses a large part of the cities of Irvine, Tustin, Santa Ana and Newport Beach, as well as all or parts of the cities of Aliso Viejo, Corona del Mar, Costa Mesa, Laguna Beach, Laguna Woods, Laguna Hills, Laguna Niguel, Lake Forest and Mission Viejo.

the minimum project size from 500 kW to 250 kW approximately doubled the potential solar procurement capacity in this multicity region. Moreover, SCE is offering this second PRP RFO because it did not achieve its procurement goals through the initial RFO.

Finally, contrary to PG&E's position, the Clean Coalition does not believe there is a reason to further delay consideration of these projects.[10] Reconsidering eligibility at a later date would require additional Commission resources to evaluate a relatively uncontroversial issue within a program with a limited lifespan.

2. *Procurement of renewable resources other than solar*

The Clean Coalition joins CEJA, SELC, SCE, and SEIA in urging the Commission to expand procurement to include renewable resources other than solar. CEJA notes the benefits of procuring energy storage resources along with solar.[11] SEIA's comments urge the Commission to clarify that solar projects coupled with storage are eligible ECR resources.[12] SCE supports procuring resources other than solar for both components of GTSR through SCE's proposed standard contract option, which would help ensure an efficient procurement process.[13] Finally, SELC importantly argues that the ECR component would be more viable with a greater diversity of technologies to procure.[14]

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[10] Opening Comments of Pacific Gas And Electric Company (U 39 E) on Track B Issues at 1–2 (Nov. 9, 2015).

[11] Phase IV Track B Opening Comments of the California Environmental Justice Alliance at 3 (Nov. 9, 2015).

[12] Opening Comments of the Solar Energy Industries Association On Track B Issues at 9–10 (Nov. 9, 2015).

[13] Southern California Edison Company's (U 338-E) Phase IV Track B Opening Comments at 3 (Nov. 9, 2015).

[14] Opening Comments of the Sustainable Economies Law Center on the Green Tariff Shared Renewables Program Phase IV Track B Issues at 16–18 (Nov. 9, 2015).

3. *Optimizing procurement under the GTSR Program, including utilizing other mechanisms for procurement aside from Renewables Portfolio Standard solicitation based on (RAM) model*

As described in opening comments, the Clean Coalition continues to advocate for use of a modified ReMAT solicitation for the GTSR program.[15] CEJA similarly supports the use of ReMAT,[16] and ORA recommends that the utilities use ReMAT in the initial stages of the program.[17] This position finds some support with the utilities as well, with PG&E stating that it is not opposed to using ReMAT for ECR procurement.[18]

III. CONCLUSION

The Clean Coalition appreciates the opportunity to submit reply comments on Phase IV Track B issues in this proceeding.

Respectfully submitted,

/s/ Brian Korpics
Brian Korpics
Staff Attorney
Clean Coalition

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[15] Clean Coalition Opening Comments on the Green Tariff Shared Renewables Program Phase IV Track B Issues at 4–5 (Nov. 9, 2015).

[16] Phase IV Track B Opening Comments of the California Environmental Justice Alliance at 3 (Nov. 9, 2015).

[17] Opening Comments of the Office of Ratepayer Advocates on Green Tariff Shared Renewables Program Track B Issues at 3 (Nov. 9, 2015).

[18] Opening Comments of Pacific Gas And Electric Company (U 39 E) on Track B Issues at 3 (Nov. 9, 2015).