BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's own motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources.	Rulemaking 11-09-011 (Filed September 22, 2011)

CLEAN COALITION REPLY TO RESPONSES TO JOINT MOTIONS OF SOUTHERN CALIFORNIA EDISON COMPANY, SAN DIEGO GAS & ELECTRIC COMPANY, AND PACIFIC GAS AND ELECTRIC COMPANY ON LANGUAGE IMPLEMENTING JOINT COST CERTAINTY PROPOSAL AND REVISIONS TO STREAMLINE RULE 21 FOR BEHIND-THE-METER NON-EXPORTING STORAGE DEVICES

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June 8, 2015

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On April 16, 2015, Administrative Law Judge Bushey issued a ruling setting a schedule for comments on the utility motions for cost certainty and energy storage interconnection. The Clean Coalition here replies to party comments and responses on the joint utility motions.

The Clean Coalition is a California-based 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, interconnection, and realizing the full potential of integrated distributed energy resources, such as distributed generation, advanced inverters, demand response, and energy storage. The Clean Coalition also works with utilities to develop Community Microgrid projects that demonstrate that local renewables can provide at least 25% of the total electric energy consumed within the distribution grid, while maintaining or improving grid reliability. The Clean Coalition participates in numerous proceedings in California agencies and before other state and Federal agencies throughout the United States.

Our reply comments are summarized as follows:

Regarding Cost Certainty -

- All but one of the parties submitting comments on the IOU cost certainty proposal express a preference for a cost envelope or a cost cap approach rather than the Fixed Cost approach offered by the utilities. We maintain our recommendations for the revised Cost Envelope Option (CEO) that we described in opening comments and we believe that our CEO meets the needs of those parties supporting a general cost envelope approach in their opening comments.

- Three parties (CalSEIA, SolarCity and NRG) also call for an enhanced Pre-Application Report modification. The Clean Coalition fully supports these recommendations and reiterates our suggestion for a Per Unit/Configuration Cost Guide to be created for distribution-interconnected systems, modeled on the Per Unit Cost Guide that is already available for transmission-interconnected generation.

Regarding Storage Interconnection –

- The Clean Coalition notes broad consistency among parties responding to the Joint Utilities' proposal. Parties continue to oppose the application of a unique and discriminatory treatment of charging loads associated with storage. Customer loads should be treated equally regardless of how the customer chooses to use the energy they receive from the utility.

- We further note general agreement among party comments that the Motion regarding storage interconnection should be either denied or postponed and modified, while also supporting action on the subject without delay.

- We agree with responding parties that cost responsibility associated with customer loads is appropriately addressed under Rules 15 and 16, not rule

21, and note that time of use rates and compensation or incentives for preferred behavior achieve the utility intent with greater efficiency.

- We believe that numerous topics beyond those addressed in the Joint Motions are ripe for resolution without delay and recommend that the appropriate next steps of this proceeding, and proper consideration of all topics to be addressed, be the subject of a separate request for comments from the Commission.

I. Reply comments on Cost Certainty Proposal

a. NRG

NRG recommends a cost cap and earlier cost determination approach than under the Fixed Price Option (FPO) offered by the IOUs. NRG writes (NRG Comments, p. 4):

> NRG would prefer a process which both provides a measure of cost certainty (in the form of a cost cap) and allows construction to begin much earlier in the timeline. The IOUs have proposed that projects that have qualified for fast track processing or the independent study process would qualify for the fixed price option; NRG offers that it would be reasonable to expect that, given those qualifications, a reasonable "not to exceed" estimate that includes a reasonable estimation margin could be developed within 30 days of application and the provision of all needed project information. Under such an arrangement, the interconnection customer would ultimately be billed the lesser of the cap estimate or the actual interconnection costs. Should the actual costs exceed the cap, the IOUs could recover the costs not recovered from the interconnection customer through whatever mechanism would have allowed the IOUs to recover costs above the fixed price in the IOUs' proposal.

The Clean Coalition supports NRG's recommendation in general and we note that our revised Cost Envelope Option (CEO) meets the concerns expressed by NRG. The CEO is a cost cap and a cost floor combined (this is what constitutes the envelope) and our proposal would allow the CEO estimate to be produced

significantly earlier in the interconnection process than under the IOU proposal. For example, our proposal provides 30 Business Days for the CEO estimate to be produced rather than 60 Business Days for the Fixed Cost Option estimate to be produced.

We also agree with NRG's concerns regarding the 125 Business Days (almost six months) for producing the FPO estimate (NRG Comments, pp. 3-4). The time required for the Fast Track or ISP plus the FPO—which is up to an additional 100 business days—is longer than warranted. For this reason we suggested in our opening comments reducing the 60 business day period for producing the FPO estimate to 30 business days. IREC suggests reducing this period even further and we agree that the estimate should be susceptible to being produced in less than 30 business days in most cases.

We reiterate the importance of working toward a medium term vision of developing "plug and play" predefined interconnection scenarios for many applicants and increasingly automated review and study processes. These goals have been adopted by the Commission in the Distribution Resource Plans Final Guidance and this proceeding should strive for alignment with both established goals and anticipated needs related to state wide emissions and renewable energy targets.

> An inevitable consequence of these rapidly evolving changes to utility distribution will be the need to add new infrastructure, enhance existing networks and adopt new analytical tools to allow consumers to be active managers of their electricity consumption through the adoption of DERs; the goal being to create a distribution grid that is "plug-and-play" for DERs. One integral step in this process is the need to dramatically streamline and simplify processes for interconnecting to the distribution grid to create a system where high penetrations of DER can be integrated seamlessly.[1]

[1] R. 14-08-013 Assigned Commissioner's Ruling on Guidance for Public Utilities Code Section 769 – Distribution Resource Planning. February 6, 2015. (p. 3)

To achieve these goals it will be necessary to improve upon the proposed timelines for offering applicants and Interconnection Agreement with known costs.

b. CalSEIA

CalSEIA opines that the $10,000 fee for the Fixed Cost Option is beyond the reach of the "vast majority of projects," leading CalSEIA to argue for an expanded Pre-Application Report rather than a focus on the cost certainty proposals. CalSEIA writes:

> [C]ustomer generation facilities that are larger than "cookie cutter" small systems but smaller than merchant generators are caught in the middle of the existing rules. For smaller systems, developers can assume that new interconnection facilities will not be needed. For larger systems, developers can assume that new interconnection facilities will be needed. For those in between, not having a clear picture whether new interconnection facilities will be needed creates tremendous cost uncertainty.

CalSEIA focuses on the importance of enhancing cost certainty early in the process and recommends that the Pre-Application Report be expanded to provide site-specific information to the Pre-Application Report. The report could still be limited to existing data that can be produced without a site visit. This would include the following information (CalSEIA Opening Comments, p. 5):

- Size of transformer serving the proposed interconnection location.
- Maximum allowable additional generating capacity on the customer side of the existing transformer without mitigation.
- Maximum allowable additional generating capacity on the customer side of the existing transformer with mitigation.
- Number and amperage of existing service conductors serving the existing customer switchgear.
- Distance to nearest installed recloser that can be activated or reprogrammed.

CalSEIA is correct that the PAR option, which the Clean Coalition first proposed in 2011, is focused on wholesale interconnections. The addition of information for customers utilizing NEM and related future successor tariffs is wholly appropriate and increasingly important. We agree with CalSEIA's recommendation to expand the Pre-Application Report under the rationale that more and earlier information is better for all parties concerned. As noted in their opening comments:

> Solar providers will often alter the system design after getting the results of the initial engineering review, but then they have to go back to the beginning of the process and the utility has to respond again to the amended application. This is incredibly inefficient for utilities, solar providers, and customers. … Utilities have existing information on as-built, in-service equipment capacity, but they do not share it because they are not required to do so under the existing Rule 21. (p. 5)

This accurate observation is aligned with prior comments by the Clean Coalition and is the rationale behind the PAR and queue reporting improvements already adopted in this proceeding. As we have previously pointed out, the critical information required to appropriately design a facility seeking interconnection is the understanding of the existing constraints on the system, including the circumstances under which an upgrade will be required. Simply identifying the maximum size or other characteristics of a facility that can be accommodated without triggering one or more successive upgrades is essential in order to design facilities reflecting local grid capacities. Adding the information suggested by CalSIEA to the PAR, when relevant, would help accomplish this.

Although the issue of improved cost predictability and PAR enhancement was not the direct subject of the Joint Utilities Motion, it is germane to the issue of additional matters to be addressed and can be adopted without delay, and we support these modifications. The Clean Coalition has consistently called for improved cost predictability in addition to addressing the need for cost certainty prior to the commitment of development deposits and actual construction.

As IREC suggests in some cases it may be necessary for the utilities to charge a little more than the standard $300 PAR fee, and we can accept a reasonable increase in PAR fees where substantial additional work is required by the utility. This expanded scope of the PAR would go beyond the "no analysis" approach that was the accepted basis for the PAR and may require additional discussion and deliberation in this proceeding.

We recognize and agree that for NEM and NEM-A projects the IOU and other parties' cost certainty proposals don't seem very relevant, as CalSEIA suggests. However, we crafted our revised CEO approach so that it should benefit most NEM-A projects also, and we included a lower deposit requirement ($2,500) for NEM-A projects in recognition that they are smaller projects with fewer resources.

c. CESA

CESA expresses support for the Clean Coalition's revised Cost Envelope Option for cost certainty (CESA Comments, p. 3):

> CESA appreciates the significant thought that went into the IOU proposal on cost certainty discussed in the Motion, but believes it could be substantially enhanced through the adoption of a modified "cost envelope" approach as proposed by the Clean Coalition in their Response filed today. Consistent with CESA's longstanding view that customers should have the option for in-depth studies to occur earlier in the interconnection study process, the Clean Coalition alternate proposal would create this mechanism, forming the basis of the cost envelope.

The Clean Coalition appreciates CESA's support in this manner and we look forward to further comments in CESA's reply.

CESA also calls for the Commission to begin one or more new tracks immediately to address other required improvements in Rule 21 (CESA Comments, pp. 6-7), including: 1) a new Pre-Application Service Planning Review option for developers wanting still more information but not wanting to

go through the Fast Track process to obtain it; 2) including timelines for construction work; 3) publication of cost guidelines by the utilities. The Clean Coalition agrees with these recommendations. We particularly support publication of cost guidelines, which is the same idea as our Per Unit Cost Guide recommendation that we first recommended early in this proceeding. A Per Unit Cost Guide, modeled after that already applied to transmission equipment and typical installation, remains a valuable basis for applicants to anticipate costs, for utility staff to apply consistent benchmarks in estimations, and for the Commission to compare the relative costs of comparable work between utilities.

d. BAC and PCAPCD

BAC and PCAPCD (filing together) also support a cost envelope approach (BAC and PCAPCD Comments, p. 3):

> BAC and PCAPCD urge the Commission to adopt the hybrid approach recommended in the Staff Proposal on Cost Certainty for the Interconnection Process (the "Staff Proposal")1 with the modifications described below. The hybrid approach would include the Utility Proposal for Fast Track projects and the modified cost envelope approach in the Staff Proposal, Part B, with some modifications.

While BAC and PCAPCD suggest a hybrid approach, like that recommended by the Staff Proposal in 2014, the Clean Coalition believes that the revised Cost Envelope Option we presented in opening comments would provide substantially faster results and broader applicability than a hybrid approach that includes the IOU Fixed Price Option. Accordingly, we support BAC and APCD in their call for a cost envelope approach but not in their recommendation to include the FPO as part of a hybrid approach.

The Clean Coalition and other commenters have argued that, as proposed in the Motion, the FPO probably won't be effective. It will rarely offer benefits outweighing its costs and, therefore, is unlikely to be used by applicants very

often. Simplicity is important in policymaking and having both FPO and CEO options in addition to the default option will significantly complicate the interconnection process. Additionally, there should be a good chance that new policy tools will lead to real benefits. We feel that the FPO would be a confusing and dubiously beneficial option alongside a revised Cost Envelope Option. Accordingly, there is a good rationale for the Commission to instead pursue development of the staff-recommended Cost Envelope Option that has the support of all but one of the commenting parties.

In our revised Cost Envelope proposal we recommend offering applicants the choice of electing either a 10% or 25% envelope, with the larger range offering greater potential savings if the actual costs are more than 10% less than the estimate, as has often been the case. The Commission may consider also offering applicants a 0% envelope option and evaluate developer interest. This approach maintains the simplicity of consistent terms and features of the Cost Envelope proposal while allowing an applicant the greatest choice in electing the size of the certainty "envelope" relative to the estimate.

e. IREC

IREC also calls for a cost envelope approach rather than fixed cost, reiterating its support for adopting some variant of the Massachusetts model that IREC has supported for some time.

IREC comments that, as is, the IOU proposal will help those projects least in need of help. We agree with IREC and we have made similar remarks in previous comments.

IREC also comments on the IOU proposal, suggesting, among other things, that the no substation upgrades with respect to Fast Track projects and the no substation upgrades and the 5 MW limitations on ISP projects under the Fixed Cost approach should be eliminated (IREC Comments, p. 3, *et seq.*). Due to the

evidence provided by IREC showing that these limitations are not justified by the joint utilities' stated concerns, the Clean Coalition strongly supports IREC's suggestions in this regard.

Specifically, the utilities have not demonstrated why an equipment change at a substation is less subject to accurate price estimation than all other upgrade work that would be covered by any cost certainty proposal, much less that work within the boundaries of a substation is so fraught with estimation risk as to warrant denying any estimation certainty to an applicant. In fact, this provision substantially reduces the ability of an applicant to know whether of not they will be eligible for cost certainty, contrary to the goal of increasing certainty in the interconnection process. While our Cost Envelope proposal originally retained the "no substation upgrades" provision from the FPO in seeking a compromise that would be supported by the utilities, we now modify our position and recommend not including the "no substation upgrades" provision in any cost certainty offer.

IREC recommends that non-material modifications to interconnection requests be allowed under the IOU proposal (IREC Comments, pp. 10-11). As is, the IOUs' language prevents any modifications of the request once it is in the Fixed Price Option process. The Clean Coalition supports IREC's recommendation.

Last, IREC calls for additional data reporting moving ahead, on various aspects of the interconnection process to help the Commission identify a more comprehensive cost certainty program in a second phase, and also to evaluate whether the cost certainty option is working effectively and not imposing significant risks on the ratepayers (IREC Comments, p. 12). As always, the Clean Coalition supports better collection and use of data about all aspects of the interconnection process as well as the specific recommendations of IREC for this purpose.

f. SolarCity

SolarCity is the only commenting party that did not explicitly call for a cost envelope approach rather than the Fixed Cost option. SolarCity did not oppose the cost envelope approach; rather, the company focuses its comments instead on the need for an expanded Pre-Application Report process. The Clean Coalition fully supports SolarCity's comments in this regard. We support SolarCity's technical modification suggestions as well as SolarCity's suggestions for an "enhanced" PAR with respect to likely upgrades and likely costs of such upgrades, including the possibility of an additional incremental fee if a site visit is required to produce the enhanced PAR. SolarCity states (SolarCity Comments, p. 9):

> Going one step further, and to make the pre-application report truly user-friendly, SolarCity suggests that that the pre-application report could also provide the applicant the list of upgrades a project is likely to trigger based on the information submitted. Ideally this would include estimated costs to the applicant and to the general body of ratepayers of making identified upgrades, as well as the timeline for the identified upgrades to be completed. This could conceivably be provided on a project specific basis or, alternatively, the cost and timeline information could be provided more generically via a look-up table that draws from standard equipment lists, labor costs, timelines, as well as utility experience with actual upgrades that have been completed.

We note that the "look-up table" that SolarCity refers to here is the same concept as the Per Unit Cost Guide (or Per Configuration Cost Guide as a more specific alternative for distribution-interconnected systems) that the Clean Coalition calls for in opening comments and has called for in many other rounds of comments submitted in this proceeding since 2011. The Per Unit Cost Guide concept mirrors the same guide that is already available for transmission system

interconnection upgrades,[2] so there is a good precedent for our and SolarCity's request.

II. Reply Comments on Interconnection of Storage Facilities Proposal

The Clean Coalition notes broad consistency among parties responding to the Joint Utilities proposal. Parties continue to oppose the application of a unique and discriminatory treatment of charging loads associated with storage. Commenting parties, including the Clean Coalition, agree that customer loads should be treated equally regardless of how the customer chooses to use the energy it receives from the utility. While customer load characteristics, such as time of use, may be appropriately addressed in rate design, rates, fees, or other charges should remain consistent for all uses unless specifically defined otherwise by law.

The Clean Coalition firmly supports the apparent intent of the utilities to encourage customer load behavior that minimizes costs for both the individual customer and ratepayers at large; however, the proposed special treatment applied to storage devices is a fundamentally wrong approach. Customer owned storage devices represent a readily available grid asset, an asset that can cost effectively provide a variety of services and avoid significant capital investment that would otherwise be charged to ratepayers (as determined in D.13-10-040, Adopting Energy Storage Procurement Framework and Design Program). Customers should be incented to reduce their impact on the grid, and rewarded for providing services to the grid, through such mechanisms as Demand Response payments. Customers should not be penalized for making use of the load service connection to which they are entitled under equal access, and

[2] Each utility's transmission Per Unit Cost Guide is available here: https://www.caiso.com/informed/Pages/StakeholderProcesses/ParticipatingTransmissionOwnerPerUnitCosts.aspx.

should not be discouraged from acquiring and interconnecting devices which can support the grid and reduce ratepayer costs when offered incentive or compensation for doing so.

As we noted in our opening comments, while Rule 21 does consider the impact of momentary incidental loads associated with the operation of a generating device, such as those associated with the start of a large synchronous generator, this is entirely distinct from attempting to apply Rule 21 to ordinary customer loads. Only if a particular variety of storage technology exhibits these types of grid impacts is this relevant and appropriate. However, this is nearly universally not the case for battery storage devices, and is also already accounted for in generator review, and therefore does not require a change to address storage.

a. Solar City

The opening comments of SolarCity Corporation regarding behind-the-meter, non-exporting storage devices are broadly aligned with the positions of the Clean Coalition, and we agree with SolarCity that these positions reflect the concerns expressed repeatedly by parties in conference calls with the Joint Utilities in advance of the Motion submitted on May 1st. We note below points of particular importance and offer clarification on several issues.

In discussing the impact of discretionary application of the Joint Utilities' proposed in tariff language relating to charging loads under Rule 21, SolarCity states:

> "The purpose of Rule 21, and indeed the reason it has become the gold standard for interconnection, is because it has eliminated much of the subjectivity from the process. Indeed, the hallmark of a good interconnection process is that it establishes a clear and transparent process characterized by objective requirements and standards.

> Given the challenges SolarCity has already and in some cases continues to experience with interconnection, we are gravely concerned with the notion that individual utility engineers would be allowed to exercise this level of discretion and on that basis determine whether or not a system satisfactorily meets the vague requirements proposed by the utilities. While utility engineers are very likely to be well-intentioned in how they would approach this, it sets the stage for significant delays and variability as engineers develop on-the-fly or ad hoc criteria for what they individually deem reasonable." (p. 8)

Solar City's comments also mirror the long-standing position of the Clean Coalition in favor of clarity and predictability in the letter and application of rules, including Rule 21 in particular. While we understand and support the appropriate and helpful application of "engineering judgment" to mitigate hurdles created by an unwarranted application of technical standards when they are not relevant, we have consistently called for avoiding the creation of regulations in which "judgment" may unpredictably or inconsistently create additional costs or other barriers for the applicant. Per the Settlement Agreement this topic was to be addressed, and should be scoped for resolution in the remaining schedule for this proceeding.

SolarCity properly addresses the claim raised by the utilities regarding cost responsibility impacts:

> "The utilities assert that there is a need to develop a process to allocate the costs that may engender as a result of the impact it may have on customers' load profiles. This issue is rendered moot by existing rules that already address this issue. Electric Rules 15 and 16 specifically address the issue of cost responsibility for upgrades necessitated to accommodate additional load, including additional load that may be created by storage systems. In light of these existing rules, SolarCity believes the utilities' proposal is misguided and should be rejected." (p. 9)

The Clean Coalition notes that parties have raised this point repeated in discussions with the utilities, and as we have noted also in reply to CESA, Commission guidance is required to establish a common understanding upon which parties may effectively develop further proposals.

While SolarCity and other parties dispute the applicability of Rule 21 to load impacts associated with the charging function of storage devices, information regarding both customer and distribution system load profiles and peak loads can be useful and should be added to the Pre-Application Report (PAR). As noted by SolarCity:

> For reasons already articulated, SolarCity fundamentally disagrees with the utilities' proposal to condition interconnection through Rule 21 on when a storage device charges. However, as a general matter, SolarCity believes the utilities should be making system loading data available to developers. These issues are currently being addressed in the Distribution Resources Planning Proceeding, R.14-08-013. (P. 9)

The Clean Coalition agrees with the comments of SolarCity, and we support the Utility proposal to include local peak load information in the PAR. Beyond this, Rule 21 was amended through the Settlement process specifically to support coordination of load and generation profiles through the use of coincident minimum load standards in interconnection review. This was implemented for the benefit of both Rule 21 applicants and ratepayers.

Where the information is available, providing applicants with both peak and minimum load profile data will assist in defining both the capacity of the grid to accommodate additional load or generation without upgrades, and the opportunity for applicants to design and offer their services to mitigate both load and generation limits. Although this information is not yet always available in a useful form, it is already collected can be derived from AMI records and other data, and the utilities should be supported and encouraged in bringing the data forward for use in grid planning and by third parties, including interconnection applicants.

SolarCity is correct in noting that these issues are being addressed in some respects in the DRP, however it would be appropriate and complimentary for this proceeding to make the data available through the PAR. The PAR only requires the inclusion of readily available information and does not require the

utilities to under take new data collection or analysis. Requiring the inclusion of this data will in no way conflict with or pre-empt and determination in the DRP proceeding regarding the collection, derivation, analysis or use of this data.

Regarding a change in function for which a customer may use energy storage,

> SolarCity disagrees with utilities' suggestion that there is a need to clarify the circumstances when new storage use cases may require customers to submit a new Rule 21 interconnection application. The implication appears to be that even after a storage device has gone through Rule 21 and been interconnected, should a customer change how that system is used, she may need to submit a new interconnection application. The Commission should approach this concept with great caution.

SolarCity is correct in urging great caution when considering overly broad or poorly defined restrictions on customer behavior and use of interconnected equipment. Clearly the Utilities have a right and obligation to propose standards for the safe operation of equipment connected to the utility network, subject to review by the Commission and affected parties. However, these general standards for safety and reliability must be applied consistently and no special category is required for storage devices. SolarCity correctly notes that, while UL certification for non-export systems should be the eventual goal to standardize this non-export certification, requiring UL certification would effectively prohibit any non-export installation in the near-term since such a UL certification is not yet available.

In the event that a facility seeking interconnection would be capable of operations that would ordinarily require upgrades to grid facilities, customers may request, and utilities should offer and permit specific clauses within individual interconnection agreements to include mutually agreed upon operational limits of the installation of customer equipment as a cost saving alternative. For example, a utility may allow a larger generator that would otherwise trigger utility upgrades if that generator agrees to limit its peak output

under specific conditions. Behind-the-meter non-exporting storage or generation is a good example of this – the applicant agrees not to export energy onto the grid. If the customer wishes to change the agreement in the future, only then would a new application be required.

b. CESA

CESA requests the Commission defer approval of the Joint Utility proposal to revise Rule 21 screens associated with load impact (screens C & D). Consistent with other parties' comments, CESA challenges the utilities' presumption that loads associated with the charging of storage devices are properly subject to Rule 21 (pp. 3-4).

The Clean Coalition agrees that this fundamental question has created an impasse between the utilities and other parties during ongoing efforts to reach agreement on a common proposal. This issue remains unresolved and should be addressed by the Commission so that parties may work from a common understanding when evaluating proposals.

Additionally, CESA notes that the information required to implement the control of storage operation in relation to peak loads may not be available, and the requirements of related controlling devices has not been defined. This makes implementation impractical at this time even if it were determined to be appropriate under Rule 21. As such, we support CESA's request for deferral of the Utility Motion on this topic, a recommendation mirrored by IREC in their opening response (p. 15).

CESA's comments also properly reflect a clear and specific goal of this proceeding related to streamlining interconnection practices in general and non-exporting storage in particular. As noted, this goal is similarly reflected in other proceedings including Distribution Resource Planning (R.14-08-013) and Integrated Demand Side Management (R.14-10-003). While specific rule changes

may be required at times that conflict with this goal, proposals that are contrary to broader objectives warrant a higher standard of review and determination that no alternatives are available. As noted earlier in these comments, the Clean Coalition has long advocated for interconnection reform to demonstrate "plug and play" simplicity wherever practical, and the Commission specifically identified "plug and play" simplicity as a goal in its Guidance on Distribution Resource Plans (as discussed in the previous section). Changes in the Rule 21 tariff should be generally aligned with this goal while meeting all other requirements.

Consistent with other parties, including the utilities, CESA supports further work in this proceeding to address additional topics. The Clean Coalition supports CESA's recommendation that this process be led by Energy Division staff. While we believe that all parties participate in good faith, it is important to draw upon the oversight of Commission staff to ensure that each party's concerns are acknowledged and considered, whether in working groups, workshops, or formal proposal processes. This approach to defining the issues to be addressed generally leads to greater consensus and support resulting in more effective proposals. While the role of facilitator may not be the official responsibility of Commission staff, it can be very effective and should be supported. The use of an independent meeting facilitator may also be considered where this may speed the process and reduce the cost of ongoing proceedings.

CESA proposes a number of topics for expeditious attention in this proceeding. The Clean Coalition supports attention to these topics and notes that they are broadly consistent with the recommendations of the 2012 Settlement and prior scoping of this proceeding, while also identifying specific additional topics that have arisen over the course of this proceeding. We recommend that the future steps of this proceeding and proper consideration of all topics to be addressed be the subject of a separate request for comments from the Commission.

c. IREC

IREC also challenges the consideration of charging loads under Rule 21, and in particular raises concerns regarding new cost responsibility, including the potential for customers to be double charged for load service (pp. 10-11). In light of this, IREC suggests that tariff changes should not be made until the Commission has issued guidance on storage related interconnection cost allocation and allowed parties to develop proposals reflecting this guidance. This aligns with the recommendations of CESA and SolarCity, and is supported by the Clean Coalition. While tariff changes to clarify and streamline the process of interconnecting storage can and should be adopted without delay, only tariff amendments that do not create change existing cost allocation should be considered until the Commission has offered guidance on this issue.

The Clean Coalition agrees with IREC position that, to the extent applied, the requirements in Rule 21 screens C and D should be consistent with IEEE C57.91-1995 and/or the IOUs' internal transformer Overload Guidelines.

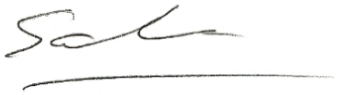
Lastly, we wish to note with continuing support IREC attention to the Massachusetts approach to interconnection cost certainty, as outlined in opening comments and over the past several years.

III. Conclusion

For the reasons stated above, the Clean Coalition urges the Commission to accept our proposed modifications to the joint IOU motions.

Respectfully submitted,

Sahm White



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Dated: June 8, 2015