

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

Order Instituting Rulemaking to Consider
Streamlining Interconnection of Distributed
Energy Resources and Improvements to
Rule 21.

Rulemaking 17-07-007
(Filed July 13, 2017)

**COMMENTS OF THE CLEAN COALITION ON
ASSIGNED COMMISSIONER'S AMENDED SCOPING MEMO AND
JOINT ADMINISTRATIVE LAW JUDGE RULING
REQUESTING RESPONSES TO QUESTIONS**

Kenneth Sahm White
Director Economic & Policy Analysis
Clean Coalition
16 Palm Ct.
Menlo Park, CA 94025
831.295.3734
sahm@clean-coalition.org

December 3, 2018

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

Order Instituting Rulemaking to Consider
Streamlining Interconnection of Distributed
Energy Resources and Improvements to
Rule 21.

Rulemaking 17-07-007
(Filed July 13, 2017)

**COMMENTS OF THE CLEAN COALITION ON
ASSIGNED COMMISSIONER’S AMENDED SCOPING MEMO AND
JOINT ADMINISTRATIVE LAW JUDGE RULING
REQUESTING RESPONSES TO QUESTIONS**

I. INTRODUCTION

Pursuant to the November 16, 2018 *Assigned Commissioner’s Amended Scoping Memo and Joint Administrative Law Judge Ruling* (“Ruling”), the Clean Coalition provides these responses to certain questions in the Ruling.

II. DESCRIPTION OF THE PARTY

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 is a project of Natural Capitalism Solutions, a 501(c)(3) non-profit.

III. COMMENTS

The Clean Coalition has actively participated in the Interconnection Discussion Forum and Working Groups 1 & 2 in the current proceeding, building upon a history of

leading participation in Rule 21 and related issues. We offer the following opening responses to the Ruling's questions.

1. In your opinion, what is the most efficient and appropriate way for the Commission to timely resolve the issues in the scope of this proceeding while ensuring that new issues are not ignored?

Beginning with a process through which issues are identified, these need to be evaluated for scope, action, and priority, and assigned to an appropriate path and schedule for resolution. This may make effective use of alternative forums or venues.

To a large degree the current proceeding and revised scoping appear aligned with this concept, as discussed further in response to questions 2 and 5 below.

2. How can the Interconnection Discussion Forum be better utilized to address arising issues during the life of this proceeding and afterwards?

The Discussion Forum to date has been only a periodic opportunity to raise and answer questions. Issues related to non-tariff utility interconnection business practices can be resolved with utility agreement. Both of these functions are important and worth continuing, but are not sufficient to address areas where there is either no mutual agreement or where Commission action is required.

The opportunity clearly exists for additional processes through a working group discussion forum under Energy Division guidance to play a central role in multiple areas. However, this would likely require a broader mandate and more frequent and ongoing activity than the Discussion Forum has had so far. Major roles may include:

- Resolving questions, including application of existing rules to new situations
- Assessing where modifications to the adopted tariff are required
- Working through problem solving and proposals, likely with one or more small sub-groups meeting more frequently

- Notifying the Commission to request guidance or ruling when necessary to resolve an issue, and/or to make recommendations regarding proposals

3. What is an appropriate amount of time for technical issues to be vetted by the Interconnection Discussion Forum in order to determine whether they should be resolved with Commission intervention?

This issue must be addressed on a case by case basis by Energy Division staff and Forum participants.

Some issues may be immediately identified as requiring formal action by the Commission upon a proposal delivered through the Forum. Such proposals may be unanimously supported by Forum participants upon first review, while others may equally quickly face impasse. However, it may also take considerable time to evaluate an issue and proposals, and only after this time will it be determined that Commission action is required.

As long as reasonable progress is being made toward a conclusion, the only Commission intervention warranted may be guidance, direction, encouragement, and responsiveness to associated requests.

4. What parameters should the Commission adopt for determining when the Commission should weigh in on technical issues?

As with the prior question, this issue should also be addressed on a case by case basis by Energy Division staff and Forum participants.

5. Should the Commission consider implementing a recurring, cyclical review process via a formal rulemaking proceeding for evaluating emerging or ongoing concerns regarding interconnection rules, policies, and procedures that are not resolved via the Interconnection Discussion Forum or the Expedited Interconnection Dispute Resolution process?

Yes. It has been apparent throughout the past decade, and through R.11-09-011 and R.17-07-007, that rapid developments in both technology and customer preferences

give rise to new capabilities and configurations not addressed by existing tariffs and procedures. This is unlikely to change, and a venue is needed in which solutions can be reviewed and approved. Where no schedule is established by the Commission, utility staff have no clear mandate or instruction regarding when matters will be resolved. As monopoly operators of the distribution systems, they are have little direct business incentive to address such matters with any priority. The Discussion Forum and Dispute Resolution processes are effective venues for identification of specific issues requiring Commission action and for addressing those that do not, but they cannot replace Commission rulings where these are needed.

It is possible that many issues may be addressed through a Motion, Application, or Advice Letter, however dedicated oversight by the Commission is necessary to ensure that Parties are responsive to engaging appropriate issues, and that proposals are acted upon in a timely manner. Maintaining an open proceeding is not sufficient in of itself, but it is likely a necessary mechanism.

IV. CONCLUSION

We appreciate the Commission's attention and parties' history of diligent work in addressing the issues associated with interconnection and offer these comments to further those ends. We urge the Commission's continued attention in order to resolve both the issues already identified and scoped for this proceeding as well as new issues as they continue to arise, and applaud the openness and proactive efforts in support of effective approaches, venues and mechanisms.

Respectfully submitted,



Kenneth Sahm White
Director, Economic and Policy Analysis
Clean Coalition

Dated: December 3, 2018

VERIFICATION

I, Kenneth Sahm White am the representative for the Clean Coalition for this proceeding. I am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true of my own knowledge, except for those matters that are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 3, 2017, at Santa Cruz, California



Kenneth Sahm White
Director Economic & Policy Analysis
Clean Coalition
16 Palm Ct.
Menlo Park, CA 94025
831.295.3734
sahm@clean-coalition.org