

**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

**CLEAN COALITION OPENING COMMENTS IN RESPONSE TO E-MAIL
RULING DIRECTING RESPONSES TO QUESTIONS ON WORKING GROUP FOUR
REPORT AND ISSUES 11 AND 13**

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December 18, 2020

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I. INTRODUCTION

Pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) the Clean Coalition submits these reply comments on the E-mail Ruling Directing Responses to Questions on Working Group Four Report and Issues 11 and 13, issued on November 16, 2020. The Clean Coalition appreciates all the work that the Interconnection proceeding has achieved, including publishing the Working Group Four Report, the workshop on party proposals, and this ruling to help the ALJ achieve more clarity for a Proposed Decision. We request that the Commission take the stance that what is achieved in this proceeding should be forward-looking and help enable other proceedings rather than getting stuck in discussions about allocating resources that will surely benefit the state in the long run. Zero Net Energy projects in particular, are key to ensuring that California achieves decarbonization and clean energy goals; proposals relating to them should be given extra weight due to the added weight they will have across our society.

II. DESCRIPTION OF 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, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled

benefits of local renewables and other DER.

III. COMMENTS

a. Proposal 18-b: Perform Generation-to-Load Calculations with Hourly Load Profiles

The Clean Coalition supports a more granular approach to data analysis whenever possible. Proposal 18b will allow PG&E to spend less time on anti-islanding measures, streamlining the interconnection process and freeing resources that can be used for modernization or further streamlining the interconnection process.

1. Does this proposal apply to all projects regardless of system size?

Yes, Proposal 18-b should apply to all projects on interconnected via the distribution grid, or project under 3 MW. The nameplate solar does not always reflect the actual generation of PV; it therefore benefits PG&E and the greater distribution grid to understand the true resource profile or a project and respond accordingly.

2. The WG 4 Report (at 25) states that a “methodology presently does not exist” to derive hourly generation or hourly minimum load data from net load data. How long would be required to develop such a methodology and what would such an effort cost?

The Clean Coalition cannot provide an answer to this question since it appears to be directed at PG&E but can suggest that the total cost would be a net gain when smoothly transitioned into the interconnection process (both for the utility and the develop submitting the interconnection application).

3. If this proposal were adopted, how would this lack of information impact the distribution grid? If safety or reliability would be at risk due to lack of visibility, please describe the worst possible outcome that could result.

b. Proposal 18-c: Provide Interconnection Customers with Option to Hire and Independent Analyst to perform a Risk of Unintentional Islanding Study.

1. If there is a difference in opinion between the utility’s determination and that of the Independent Analyst, how would that be resolved?

In this situation, the opinion of the Independent Analyst should be accepted over the utility given the difference in the granularity of the anti-islanding study being carried out. The Proposal suggests that before a customer can pay for a study to take place, the utility will first sign off on a list of qualified analysts and transparently reveal the criteria used to create said list. The analysts, therefore, would have the trust of the utility and the qualifications to act in a similar fashion to utility employees. Thus, the more detailed study carried out by an analyst should hold more weight than a less-detailed study carried out by the utility.

2. How should projects be handled, both in terms of studies and in terms of queuing, if the third-party analyst processes are delayed?

Projects with guaranteed safety determined by independent analysts should be placed at the front of the queue and fast-tracked whenever possible.

c. Proposal 18-d: Convene and Unintentional Working Group on Distribution-System Level Solutions.

No comment.

d. Proposal 18-e: PG&E Will Adopt New Anti-Islanding Screens

No comment.

e. Proposal 18-f: Develop an interconnection guidebook on anti-islanding options.

No comment.

f. 18-g: Evaluate and Choose Least-Cost Anti-Islanding Solutions.

No comment.

g. 18-h: Specify Timelines for Determining Anti-Islanding Requirements.

No comment.

h. Proposal 19: General

For most of these proposals, no extra tariff reform will be needed. For example, Proposal 19-d is simply codifying an existing process and will require no Commission change.

i. 19-a: Enable Residential Home Builders to Submit Interconnection Applications Based on Street Address.

No comment.

j. 19-b: Enable Residential Home Builders to Submit Applications for Multiple Units Via Single Submission or Via Batch Process.

No comment.

k. 19-d: Expand Utility Development of Single-Line Diagrams.

- 1. What specific examples of data/experience support the assertion that ZNE-specific SLD requirements would expedite interconnection through streamlining rather than delaying processes via layers of complexity?*

Within the next decade there is going to be a rapid increase in the number of developers submitting interconnection applications for Zero Net Energy (ZNE) projects to meet California's decarbonization goals, inherently increasing waiting times in the utility interconnection queues. Proposal 19-d proactively offers a solution to meet the demand as it increases, rather than solely relying on existing protocols and hoping it is sufficient to effectively prevent interconnection queues from backlog. It will not be enough. Therefore, the utility claims that approving this proposal will take resources should not be accepted. Much like the appeal of installing a PV system under the NEM tariff is to lower an electric bill over time, accepting Proposal 19-d creates a foundation that will result in less investment needed further down the line. Very simply, each utility can have a section on its website titled "Zero Net Energy" with pre-approved templates. If a developer chooses one of these templates and checks the ZNE box in the interconnection application, a less detailed review needs to be performed, reducing the demand on utility staff and reducing interconnection times. As SDG&E mentioned during the Workshop, 98% of the applications it receives are for NEM projects, which benefit from the existing Single Line Diagrams published on its website, yet they oppose Proposal 19-d because it will lead to the creation of more Single Line Diagrams. The Clean Coalition is impressed with SDG&E's forward thinking and hopes that the other two utilities will use Single Line Diagrams as effectively as SDG&E, but we view this as a reason to support this proposal rather than a reason to oppose it. Single Line Diagrams for Zero Net Energy projects will ensure the 98% number can

be maintained, while closing the gap with other project designs that are not included on the website. Most importantly, the proposal will be especially beneficial to underserved communities where Virtual NEM, Aggregated NEM and Solar on Multi-family Affordable Housing is prevalent

2. *How are the “functionally distinct configurations” (at 59) to be chosen?*

A “functionally distinct configuration” will be made clear when there is sufficient demand (e.g. around 50 applications) for configurations that have different purposes. The Clean Coalition presentation during the workshop suggested a few examples including: export (battery non-export or non-grid charging), wholesale aggregators (in FERC regulated markets), non-export (or non-export with a battery and no grid charging). During the workshop, each utility suggested that they already have a process to create Single Line Diagrams when there is demand from vendors. The Clean Coalition agrees that having such a process is important; this proposal simply codifies the existing process for Zero Net Energy projects where there is demand and ensures that it will occur in a timely manner. Adding new templates when 50 applications in a project category will not add extra layers of complication. Instead, it will actually increase the accessibility of interconnection applications and reduce the timeline before an application is accepted.

I. Issue F General:

1. *To what extent has D IDF interconnected projects to meet distribution deferral?*

Up to this point, front-of-meter (FOM) projects have been the only projects interconnected for the purpose of distribution deferral. However, that is set to change with the new DER Deferral Framework currently being discussed in the IDER proceeding (R. 14-10-003), which is setting the stage for two programs that will use aggregations of DER for deferral purposes. The Standard Operating Contract program will focus on FOM DER projects, while the Clean Energy Customer Incentive will have aggregations of behind-the-meter (BTM) and FOM DER. It is very important that the interconnection process does not become a roadblock inhibiting the success of deferral projects when it can be a smooth process that enables the success of aggregations DER to meet deferral needs.

m. Proposal F1: Determine Whether a DER Operational Alternative Would Be a Sufficient Mitigation for Operational Flexibility Constraints

No comment.

n. Proposal F2: Develop a Template Aggregator Agreement

No comment.

o. Proposal F3: Establish a Smart Inverter Operationalization (SIO) Working Group

No comment.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these opening comments in response to the E-Mail ruling. We reserve the right to reply to issues we have not initially commented on.

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