

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

/s/ BEN SCHWARTZ  
Ben Schwartz  
Policy Manager  
Clean Coalition  
1800 Garden Street  
Santa Barbara, CA 93101  
Phone: 626-232-7573  
[ben@clean-coalition.org](mailto:ben@clean-coalition.org)

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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.

**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. **Since the Clean Coalition initiated Proposal 19-d, the majority of reply comments will focus on responding to the opening comments parties made on the subject.**

**III. COMMENTS**

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

The Clean Coalition wishes to begin by noting support for Green Power Institute’s statement that, “the burden is on any party suggesting that expanding the applicability of template SLDs would ‘delay processes via layers of complexity.’” All three utilities argued that

PG&E takes a different approach, suggesting that there is no reason to approve this proposal because all the necessary SLDs have been created through the microgrid proceeding. On the contrary, it is because of this response that it is completely necessary for Proposal 19-d to be approved. During the workshop, the IOUs opposed the proposal on the grounds that there is an existing process for the creation of SLDs with stakeholder input. In opening comments, PG&E is changing its tune to suggest that no other SLDs need to be created.<sup>1</sup> Thus, PG&E appears to be taking the position that it will not be creating and new SLDs without explicit pressure for the Commission, which is opposite of the proactive decision-making the state needs to further streamline the interconnection process. As noted in the Clean Coalition’s presentation, the SLDs required in the microgrid proceeding only apply to some situations, not all. Proposal 19-d asks the IOUs to qualify stakeholder demand for project types and to create a SLD only when there is significant demand (e.g. over 50 projects in a given category type). By creating a process to develop new SLDs in concert with the CPUC and stakeholders, the utilities and the PUC become partners rather than gearing up for a fight every time a new SLD is suggested (as was the case in the microgrid proceeding and has been the case in the Rule 21 working group).

SDG&E offers the argument that, “Increasing the number of template SLDs in the process introduces more risk that projects may not resemble the standardized SLD at the time of inspection and therefore PTO is delayed on the back end for further review.”<sup>2</sup> The Clean Coalition finds that there is no merit for this assertion since it is not unique to ZNE SLDs. As with any single line diagram, if the configuration does not match the purported SLD, it will simply be put aside for further study, not able to continue down the fast-track process. With the increasing amount of ZNE projects, lumping all projects together — ZNE and non-ZNE — will most definitely lead to increased time in the interconnection process. Effectively categorizing the projects prior to analysis will ensure that interconnection staff can quickly skim a diagram for the pertinent metrics to each type of project. The Clean Coalition commends SDG&E for the quick interconnection it has for the majority of the projects in its interconnection queue and believes that Proposal 19-d is the optimal way to ensure those times go down, even when the volume of

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<sup>1</sup> PG&E Opening Comments at 19

<sup>2</sup> SDG&E Opening Comments at 18-19

projects that need to be analyzed increases.

One of the main opposing arguments made by the utilities was that the Proposal would lead to increased costs and staffing needs. That argument has disappeared in opening comments; there was simply no way to justify it against the increased staffing needs that will be needed with the greater number of projects in the interconnection queues. The important reality is that this proposal will decrease the total amount of extra resources needed in proportion to the influx of ZNE projects that is imminent over the next decade. The Clean Coalition agrees with PG&E's assessment of the definition of functionality, though we would add that it includes projects that are using different tariffs (e.g. WDAT vs. NEM) and will be clear depending on customer demand.

#### **IV. CONCLUSION**

The Clean Coalition appreciates the opportunity to submit these reply comments in response to the E-Mail ruling.

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