

January 14, 2022  
Rachel Peterson, Director  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 4004  
San Francisco, CA 94102

**RE: Clean Coalition Comments on Draft Resolution E-5190**

Dear Ms. Peterson,

**Introduction**

According to Rule 14.5 of the California Public Utilities Commission (“the Commission”) Rules of Practice and Procedure, the Clean Coalition submits these comments on Draft Resolution E-5190, *Approval, With Modifications, of Evaluation Criteria for the Partnership Pilot and Standard Offer Contract Pilot Pursuant to Decision 21-02-006*. We appreciate the substantial amendments the Commission has included in this Draft Resolution based on protests by the Clean Coalition and Cal Advocates of SDG&E AL 3780-E, PG&E AL 6218-E and SCE AL 4514-E. As is, this Draft Resolution outlines two robust programs; the proposed changes listed below are small in nature but will make the results more valuable to the future of grid planning processes.

**Discussion**

**The DPAG should select one Independent Evaluator for all three Investor-Owned Utilities**

The resolution suggests that the current DIDF process should guide the hiring of Independent Evaluators (“IE”) for each utility and that relying on a single is impractical. The Clean Coalition contends that the use of a single IE is the best way to ensure a consistent analysis is completed for each pilot program across all three IOU service territories. In turn, this makes it easier for the DPAG during the mid-stream and final evaluation processes. We ask that the Commission reconsider this recommendation, or at the very least, amend the Final Resolution to provide an explanation of why relying on a single IE is impractical.

**Including an analysis of the value added from installing DERMS is beneficial to Commission goals**

While the Draft Resolution does not mandate a counterfactual analysis of DERMS as the Clean Coalition requested, we do appreciate that the Commission has granted Energy Division the ability to determine when DERMS should be included in the evaluation process. With the increased focus on Smart Inverter Operationalization and the role of a Distribution System Operator in the High DER proceeding (R. 21-06-017), we believe that any analysis of DERMS as part of these two pilots will be of significant value in informing the future of the grid and reforming the DIDF.

**The number of parties that pass the pre-screening process should be included in all annual reports**

The Clean Coalition firmly believes that in addition to the actual projects that meet a deferral need, it is important to understand general developer interest each cycle and how the number of interested developers changes over time. An increased number of developers who complete the pre-screening process is a sign that the pilots are attractive. While it is not necessary to use this as a measure of success or a determination of cost-effectiveness, including this figure in the mid-stream and final evaluation are important indicators of the big-picture interest in DER deferral.

### **Will DER infrastructure technologies be allowed to meet deferral needs?**

As the two pilots begin the first cycle, it is worth considering the role of emerging DER technologies that have the capability to meet deferral needs. While the SOC and Pilot Program consider generating resources on either side of the customer meter, non-generating resources that can increase hosting capacity by optimizing frequency, voltage, and reactive power, could be extremely cost-effective alternatives to traditional infrastructure upgrades. A distribution STATCOM (“d-STATCOM”), for example, is a proven technology that has been used for optimization of the transmission system adapted for use on the distribution grid. The attached feeder analysis demonstrates the potential value d-STATCOMS can add if optimally sited across a feeder. Unlike traditional infrastructure solutions, as more DER are interconnected onto a feeder, d-STATCOMS will function more effectively, leading to increasing benefits over time. Since the purpose of DER deferral is cost-effective upgrades to mitigate the need for traditional infrastructure upgrades, the Clean Coalition believes that any certified DER should be eligible for the pilots. Even if these technologies are not initially eligible for participation, mid-stream and final evaluations should analyze the potential of these emerging technologies for future DER deferral.

### **Conclusion**

For these reasons above the Clean Coalition respectfully submits this comment letter on Draft Resolution E-5190 and urges the Commission approve the final resolution with a few slight amendments.

January 14, 2022

cc:

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