PREPARED SURREBUTTAL TESTIMONY OF BEN SCHWARTZ ON BEHALF OF THE CLEAN COALITION
Table of Contents

I. INTRODUCTION. ........................................................................................................1
II. RESPONSE TO SCE’S REBUTTAL TESTIMONY ..............................................1-3
III. RESPONSE TO SDG&E’S REBUTTAL TESTIMONY ..................................3-4
IV. CONCLUSION ....................................................................................................4
I. INTRODUCTION

Pursuant to Commissioner Reynolds’ Scoping Memo and the Administrative Law Judges’ (‘ALJ’) Amended Schedule and the ALJ’s Ruling Updating Procedural Schedule and Requiring Use of Briefing Outline (issued on April 21), the Clean Coalition submits this surrebuttal testimony in response to allegations made by Southern California Edison (‘SCE’) and San Diego Gas & Electric (‘SDG&E’) in rebuttal testimony.

II. RESPONSE TO SCE’S REBUTTAL TESTIMONY

SCE made several claims about Clean Coalition’s initial party proposal related to the effectiveness of Feed-In-Tariffs (‘FITs’). As indicated in our rebuttal testimony, the Clean Coalition is no longer promoting a FIT as the structure for a successor program to the existing Green Access Programs (‘GAP’) and is instead supporting the Coalition for Community Solar Access (‘CCSA’) Net Value Billing Tariff (‘NVBT’). Therefore, while we do not agree with multiple assertions that were made by SCE, this surrebuttal testimony will not address FIT-specific points and will instead address claims made related to Transmission Access Charges (‘TAC’) and streamlined interconnection under the Wholesale Distribution Access Tariff (‘WDAT’).

Transmission Costs: SCE makes two rather aggressive broad-brush arguments in response to the Clean Coalition’s suggestion that Community Solar-subscribed energy be exempt from TAC, neither of which actually address the logic behind the points we made. The first statement, “Moreover, the notion that customers served by distributed generation do not rely or depend on the CAISO grid is a fallacy, rejected more than two decades ago by FERC, when promoted by a company the Commission is familiar with – Enron,” is ludicrous as it seems to infer that implementing the Clean Coalition’s proposal for not assessing TAC to Community Solar energy generated on the local distribution grid would lead to an Enron-like situation.1 Clean Coalition’s party proposal and rebuttal testimony explains that distributed energy reduces the need for energy that originates on the transmission grid and can reduce all four main drivers of future transmission investment (policy, reliability, peak load, and economics). This is not to say that a DER host customer will never use any energy from the transmission grid, it is a statement about how those historical TAC should be assessed to the ratepayers. In fact, Clean Coalition has raised this very issue in stakeholder proceedings before the California Independent System Operator (‘CAISO’) in 2016 and 2018, who noted that, “The ISO is willing to revisit the point of measurement issue—for purposes of prospectively allocating the costs of future transmission facilities—if state policy makers and regulatory authorities, after careful consideration of the merits and implementation issues, support retail rate changes that

---

1 SCE Rebuttal Testimony, at p. 37.
provide a transmission cost credit (i.e., relief from retail rate charges for certain new
transmission facilities) to load-serving entities (LSEs) that have procured distributed
generation (DG) resources.”2 Therefore, SCE is completely incorrect that our proposal
would be Enron-like or would cause a cost-shift.3 Importantly, CAISO’s analysis stated that
to fully implement the Clean Coalition’s Peak Transmission Energy Downflow (“TED”)4
proposal, the California Public Utilities Commission (“the Commission”) would also need
to be involved to ensure that retail rates are transitioned accordingly.
It is also worth noting that the Clean Coalition’s comments reflect the Commission’s
intention that the GAP provide ratepayers who are unable to take service under the Net
Energy Metering (“NEM”) tariff with a program that can provide commensurate benefits.
In two separate cases, the Decision that adopted NEM 2.0 and the Decision that adopted the
Net Billing Tariff (“NBT”), the Commission declined to include TAC in the list of
nonbypassable charges, meaning that only energy imported from the grid is assessed TAC.
Granted, projects interconnected under the WDAT tariff do contribute to the gross load
measured by CAISO when allocating TAC, so if the Commission does adopt a NVBT that
includes an exemption for TAC on community solar-generated energy, the avoided TAC
should be included amongst the program costs and evaluated along with the broader
program. However, the concept of avoiding TAC on distribution-generated for a successor
GAP is in line with the Commission’s policy under NEM 2.0 and the NBT and is not
simply an attempt to skirt the rules or change cost causation principles in any way.
SCE’s second assertion is that “Clean Coalition, like CCSA, seemingly has no concept of
CAISO’s role in ensuring all retail load is served safely and reliably,”5 which is an odd
putdown, especially considering that Clean Coalition’s testimony6 (and SCE’s Rebuttal
Testimony7) both note that TAC **address historical costs**, which is different from future
cost CAISO will incur to serve load safely and reliably. It is also strange that SCE would
make such an insulting claim of the Clean Coalition and CCSA without citing sections in
opening testimony where these specific claims were made. Obviously, SCE was unable to
cite testimony because neither organization would ever make the claim that DER customers
do not benefit in some way from CAISO’s role in ensuring safety and reliability. The Clean
Coalition’s arguments simply address the cost-competitiveness of distributed generation
compared to transmission-generated energy and the value that distributed generation

---

2 Transmission Access Charge Structure Enhancements: Draft Final Proposal. September 17, 2018, at p. 4
3 SCE Rebuttal Testimony at p 37-38
4 https://www.caiso.com/Documents/BriefingonTransmissionAccessChargeWholesaleBillingDeterminantInitiative-
CleanCoalition_Presentation-June2016.pdf
5 SCE Rebuttal Testimony at p. 38
6 Clean Coalition Testimony at p. 7. “…should not be assessed transmission access charges (“TAC”), which are
assessed at the customer meter to collect historical transmission costs.”
7 SCE Rebuttal Testimony at p. 38. “…but says nothing about who should pay for the historical transmission costs
allocated by the CAISO…”
provides in reducing transmission congestion, reducing the need for transmission-generated energy, and reducing transmission line losses. Interconnection: SCE claims that the Commission should not make any changes to interconnection, “because stakeholders have not been properly noticed that interconnection processes may be impacted by this proceeding,” and Fast Track interconnection for GAP projects, “would likely impact the ability of LSEs and developers not participating in GAP programs to bring new capacity, largely needed for reliability purposes, online in a timely manner as ordered by this Commission in the IRP.” Based on the Clean Coalition’s understanding, because interconnection has been an impediment to GAP project deployment in the past, addressing it is one of the several issues that are necessary to ensure that a Successor GAP is successful. Moreover, the last time SCE amended its WDAT tariff in a substantial manner was almost four years ago (in 2019), which was before California experienced significant Public Safety Power Shutoffs (“PSPS”), blackouts in 2020, or the extreme weather events in 2022, all of which have led to increased reliability-related procurements. Streamlined WDAT interconnection is necessary, and the Clean Coalition has provided a list of changes that would be beneficial to all projects seeking interconnection under WDAT in our rebuttal testimony. Improving the Fast Track interconnection process would also be beneficial to all projects as well, not just GAP projects. Moreover, ideally, most, if not all, GAP projects would be sized and eligible for Fast Track interconnection if they are medium-sized projects interconnected via the distribution grid. These projects are benefitting low-medium income customers and with requirements that will mandate paired solar+storage projects, each deployed GAP projects will contribute reliability benefits.

III. RESPONSE TO SDG&E’S REBUTTAL TESTIMONY

SDG&E criticizes CCSA’s proposals, saying, “The big picture failings of CCSA’s proposal are that it (1) would compensate generators as if they are distributed energy resources (DERs); (2) not require the generation to be sited near, or directly connected to, load (the proposal would permit any customer to subscribe to any qualifying project sited in the utility’s service area); and (3) proposes customer and generator compensation that would shift costs from non-participating customers – many of whom are disadvantaged – to program participants and solar developers. When considered as a whole, CCSA proposal

8 Clean Coalition Testimony at p. 7. “In fact, the closer a generation source is located next to where that energy is used, the less infrastructure is needed, and the less expense that is incurred. When this major advantage is priced into the total cost of energy, clean local energy is much more competitive – and actually less expensive in many cases.”
9 SCE Rebuttal Testimony at p. 40 and p. 40-41
11 See Attachment A of the Clean Coalition’s Rebuttal Testimony
has no net public interest benefits.”\textsuperscript{13} Clean Coalition’s proposed amendments would
address all of these concerns, because it would ensure that all NVBT projects are local DER
that provide reliability benefits and have subscribers within 5 miles (or in the same
distribution area). Therefore, the Commission should not find these arguments to be
persuasive and should adopt a NVBT with the Clean Coalition’s proposed modifications.

V. CONCLUSION

The Clean Coalition appreciates the opportunity to submit this surrebuttal testimony and
urges the Commission to support a modified version of the CCSA NVBT and address the
need for streamlined WDAT interconnection.

\textsuperscript{13} SDG&E Rebuttal Testimony at p. 20-21