

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

Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering
Tariffs Pursuant to Public Utilities Code
Section 2817.1, and to Address Other Issues
Related to Net Energy Metering

Rulemaking 14-07-002

**CLEAN COALITION REPLY COMMENTS ON POTENTIAL MODIFICATIONS TO
SOLAR ON MULTIFAMILY AFFORDABLE HOUSING PROGRAM**

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I. INTRODUCTION

Pursuant to Rule 6.2 of the California Public Utilities Commission’s (“the Commission”) Rules of Practice and Procedure of the California Public, the Clean Coalition respectfully submits these reply comments in response to the *Administrative Law Judge’s* (“ALJ”) *Ruling Inviting Comments on Potential Modifications to Solar on Multifamily Affordable Housing* (“SOMAH”), issued at the Commission on May 5, 2023.

- The Clean Coalition strongly supports creating pathways within the program to enable deployments co-located deployments of storage, especially as a method of enable resilience.
- We concur with Center for Sustainable Energy (“CSE”) that master metered properties should be eligible for SOMAH,¹ as master metering is the best method of deploying a microgrid at a multi-metered property. Without a master meter, it is impossible to provide a site with resilience without relying on the utility distribution grid.
- We also support the recommendation from the California Solar and Storage Association (“CALSSA”) and Sunrun that the IOUs should designate a single point of contact for interconnection.²

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

¹ CSE Opening Comments at p. 23.

² CALSSA Opening Comments at p. 3 and Sunrun Opening Comments at p. 1.

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. The Commission should strive to reduce the barriers inhibiting the deployment of storage at SOMAH sites.

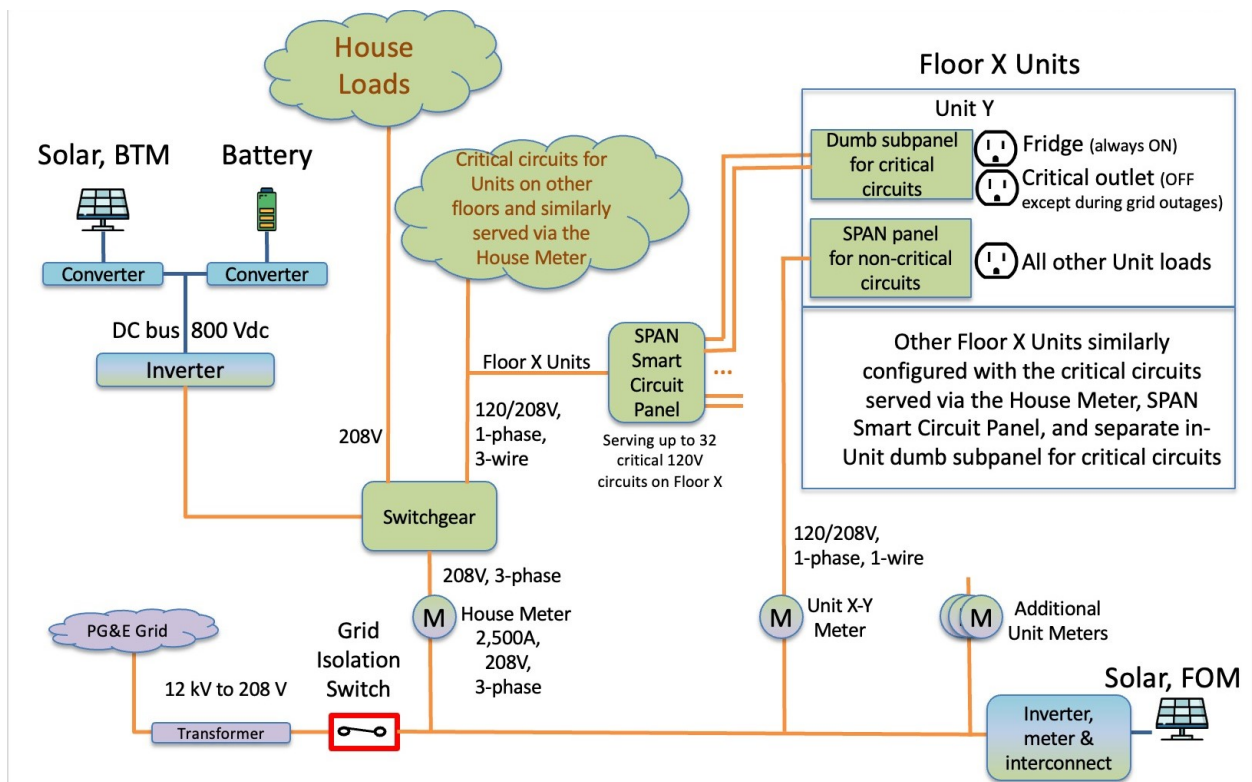
Over the last two years, the Commission has made the decision in multiple venues³ to promote deployments of solar+storage over standalone solar due to the added dispatchability that comes from paired storage. Energy produced during the middle of the day when renewable energy is plentiful is less useful to the grid than energy exported to the grid during peak periods when the content of electricity is much more carbon intensive. Beyond the reliability benefits that come from peak reduction, paired storage also enables a degree of resilience when it located behind-the-meter (“BTM”) by allowing the solar to continue generating when there is a grid outage. On the other hand, solar+storage projects located front-of-meter (“FOM”) will trip offline when a distribution grid outage occurs, providing no resilience. In line with the Commission’s logic in other proceedings considering the future of DER programs, it makes sense to enable the deployment of storage at SOMAH sites. SOMAH deployments are similar to virtual net energy metering (“VNEM”) deployments, very few of which include paired storage. The Clean Coalition believes that a thorough study should be completed on the barriers to deploying storage, which should consider interconnection difficulties, the difficulty of pairing FOM solar and storage to maximize economics, configuration changes, and how to enable full site resilience (e.g., a master meter).

³ Net Energy Metering (R. 20-08-020) and the Review of the Green Tariff (A. 22-05-022, A. 22-05-023, and A. 22-05-024). The Renewable Market Adjusting Tariff (R. 18-07-003) was amended to include an option for paired storage.

B. Master Metering should be allowed for SOMAH projects, to enable resilience.

At present, it is not possible for a facility to realize the full resilience benefits associated with solar+storage deployments in all three of the investor-owned utilities’ (“IOUs”) service territories. As discussed above, maximizing the resilience from solar+storage requires the deployment of a microgrid; under existing rules such a microgrid would use a portion of the existing distribution grid, making it a Community Microgrid. Yet, of the three, currently only PG&E has a program available to deploy Community Microgrids, which is called the Community Microgrid Enablement Tariff (“CMET”). The fact that the program is not iterative⁴ and is not available to residents in southern California (in SCE or SDG&E’s service territory) means that other solutions should be considered.

The ideal solution to the FOM solar+storage issue is allowing a SOMAH project to deploy a master meter. A master meter creates a single point of visibility for the utility, enabling the deployment of a grid isolation switch that is capable of islanding the entire site.



⁴ Each applicant has a unique timeline and so far only one project has been completed in three years.

The image above shows the proposed configuration for a CEC-grant funded project that must be net zero during peak periods (5-9pm) and must be capable of resilience. Each of the unit meters will be served by FOM solar (seen in the bottom right) and the House Units (common areas) will be served by a BTM Solar Microgrid because a master meter solution is not allowed. However, a master meter would solve the problem by allowing the site to island and serve loads internally, meeting the resilience requirement and ensuring that no energy is imported from the grid during peak times.

C. Designating a single utility point of contact will improve the interconnection experience for applicants.

We agree with CALSSA and Sunrun that interconnection is an issue and a single point of contact at each of the IOUs would improve the process (or at least streamline communication and give developers additional clarity.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments and hopes to continue the dialogue moving forward.

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