

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

Order Instituting Rulemaking to Consider  
Distributed Energy Resource Program Cost-  
Effectiveness Issues, Data Access and Use, and  
Equipment Performance Standards.

Rulemaking 22-11-013  
(Filed November 17, 2022)

**CLEAN COALITION COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING  
REQUESTING PARTY COMMENTS ON THE SCOPE OF WORK FOR  
CONSULTANT AND THE DATA WORKING GROUP**

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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 respectfully submits these reply comments in response to the *Administrative Law Judge’s (“ALJ”) Ruling Requesting Party Comments on the Scope of Work for Consultant and the Data Working Group*, issued at the Commission on July 17, 2023. The Clean Coalition advocates:

- Statement 1 should include a sub-point on the need for more detailed data to help improve the interconnection experience for distributed energy resources (“DER”).
- Statement 1(a) should include the phrase, “to maximize benefits”. The ability to make an informed decision suggests a framework to evaluate options based on value creation over the lifetime of an asset.
- Statement 1(c) should also include Energy Commission proceedings, including the DER OII (to better include consideration of non-energy benefits).
- Statement 1(d) implies that resilience will be included in safety planning. However, the Clean Coalition advocates that resilience is explicitly listed.

**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 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. Draft scope of work for the consultant**

The Clean Coalition does not have any particular concerns with the draft scope of work for the consultant, though we do request that the changes to the scope of work for the Data Working Group are also reflected in the Scope of Work for the consultant.

#### **B. Draft scope of work for the Data Working Group**

The Clean Coalition believes that Statement 1 needs to be changed and an amendment should be added to better reflect the purpose of this OIR. On page 3 of the Scoping Memo, Track 2 is described as examining, “the rules and requirements to improve data access to facilitate adoption, evaluation, and utilization of DERs by customers and other entities and to improve DER integration with the grid.”<sup>1</sup> A major aspect—and a barrier in many instances—is the time and cost of the interconnection process. Improving data collection surrounding interconnection will lead to more effective demand-side program design and increase the potentially increase efficiency of DER deployments. Ideally this can include data on both Rule 21 and WDAT interconnections. While there is an existing proceeding on Rule 21 interconnection (R. 17-07-007), the proceeding has been focused more on refining the interconnection process than on data collection, leading to scenarios where parties have been frustrated by the lack of comprehensive data collection.

In addition, statement 1(a) should include the phrase, “to maximize benefits” to help local government officials add another layer of analysis beyond the cost of a project. For governments, deployments that add the greatest number of benefits to local residents and the broader grid are the most valuable. Cost considerations should not be the sole/primary evaluation metric,

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<sup>1</sup> R. 22-11-013 at p. 3.

especially if lifetime costs of an asset are being considered without an accurate accounting of lifetime benefits created.

The Clean Coalition also advocates that statement 1(c) should be amended to include reference of work being conducted by the California Energy Commission (“CEC”), particularly the DER OII. Whereas the Commission’s High DER proceeding does not rely on the assumption that there will be a high number of DER or prescribe what a reasonable number of DER looks like, the CEC’s OII will be studying the full range of benefits create by DER, including non-energy benefits. The Clean Coalition strongly supports bringing in collaborators from the CEC due to the valuable perspective that they will bring.

Finally, we support explicitly adding resilience to statement 1(d). The existing language in the Ruling includes the phrase “public health/safety planning,”<sup>2</sup> which implies the inclusion of resilience-related planning without clearly listing that it will be in scope. Therefore, the Clean Coalition advocates for resilience to be directly included. We believe that this inclusion is reasonable because resilience has not been properly valued and the subject has been removed from the existing scope of the microgrids proceeding (R. 19-09-009). The study of the value of resilience will no longer be addressed in Track 5 of the proceeding and no Track 6 is currently planned. Moreover, the Resiliency and Microgrids Working Group has met fewer than 10 times over the last year and is not scheduled to work on creating a standard value of resilience.<sup>3</sup> Therefore, based on the OIR and the Scoping Memo, this proceeding is an appropriate forum to include discussions on the value of resilience.

### **C. Formation of the Data Working Group**

No comment at this time.

## **IV. CONCLUSION**

The Clean Coalition respectfully submits these comments and urges the Commission to include our recommended additions.

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<sup>2</sup> ALJ Ruling, at p. 2.

<sup>3</sup> The working group recently discussed the North Coast Resiliency Initiative, which has more to do with planning than the value of resilience. Prior to that meeting, the last time the value of resilience was discussed was in a meeting last year (about social burden costs). Nothing formal has gone onto the record.

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