

March 4, 2024
Energy Division
Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue, Room 4004 San
Francisco, CA 94102

**Re: Clean Coalition Protest of Southern California Edison Advice Letter 5203-E,
Modifications of Tariffs and Interconnection Forms to Sunset Schedule NEM-V-ST Virtual
net Energy Metering Successor Tariff and the Aggregation Provision of Schedule NEM-ST
Net Energy Metering Successor Tariff**

Dear Energy Division Tariff Unit,

Introduction

According to the California Public Utilities Commission (“the Commission”) General Order (“GO”) 96-B, the Clean Coalition submits this protest of Southern California Edison’s (“SCE”) Advice Letter (“AL”) 5203-E. AL 5023-E was submitted on February 12, 2024 for the purpose of modifying SCE’s Virtual Net Energy Metering (“VNEM”) and Net Energy Metering Aggregation (“NEM-A”) interconnection forms and tariffs to meet the requirements of the Virtual Net Billing Tariff (“VNBT”), in accordance with the requirements of D. 23-11-068.

In accordance with General Rule 7.4.2(2), the Clean Coalition is protesting AL 5203-E. As currently written, the modifications in the advice letter do not provide sufficient information to allow an applicant to provision a facility taking service under the VNBT with resilience in a standard and replicable fashion. The language adopted in D. 22-12-056 and SCE AL 4917-E-A makes clear that resilience is allowed but provides little detail on how to configure a system for resilience. AL 4917-E-A contains no additional language or information to create a standard pathway for resilience. The lack of available options to meet the requirements for isolated operation in the sub tariff modifications proposed in AL 5203-E makes resilience functionally out of reach for facilities utilizing the Virtual Billing Tariff. This AL perpetuates the existing lack of information about resilience without offering any solutions/workarounds. The Energy Division should reject AL 5203-E without prejudice until SCE provides more information in the tariff or offers a timeline for developing standard options. Promoting the deployment of solar+storage without a cost-effective configuration available to enable resilience actively reduces the value of each deployment, ignoring the significant need for resilience in a rapidly electrifying society.

Background

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.

Discussion

There are several challenges when it comes to provisioning a multi-unit facility with resilience with a front-of-meter solar or solar+storage deployment under the VNBT. First, there is no process in SCE’s service territory for a non-utility entity at a single site to utilize the distribution grid to deliver renewables-driven resilience to a multi-meter facility. A multi-meter site would need to deploy a grid isolation switch to enable a single property multi-meter site to be fully resilient. Of the three investor-owned utilities (“IOUs”), only Pacific Gas & Electric has an option available for Community Microgrids, through the Community Microgrid Enablement Tariff (“CMET”). The other option, the Microgrid Incentive Program (“MIP”) is limited to multi-property Community Microgrids. As a result, the Commission authorized a temporary workaround in D. 22-12-056 to enable isolated operation at a VNEM site without allowing the deployment of a Community Microgrid. The Commission approved SCE’s implementation of the Decision in AL 4917-E-A, which includes the phrase:

The Eligible Generator can be operated in isolation to provide backup/standby services to one or more Benefitting Accounts during a grid outage or testing periods. All loads served during isolation mode should have the same Point of Common Coupling as the Generating Account. During isolated operation, participating accounts must be configured such that no load or generation is registered on the Generating or Benefitting Account meters. Prior to installing a new Eligible Generator, or reconfiguring an existing Eligible Generator to provide backup services, the Owner or Operator must receive written approval from SCE confirming that the reconfiguration of the Eligible Generator complies with SCE’s electrical and interconnection requirements for the requested reconfiguration. SCE’s approval can be requested by submitting SCE’s Rule 21 Application Form for Non-Exporting Generators (Form 14-732) and selecting the “Isolated Operation” option of the form. Distribution Provider reserves the right to right to evaluate and approve other configurations designed to provide backup service to meters connected behind the same Point of Common Coupling in a manner that does not register generation on the benefiting account meters....¹

No other language, specifications, forms, or templates have been added since then. The language in AL 4917-E-A sets the precedent that a non-utility cannot directly serve utility grade meters during a grid outage, meaning that a single site with multiple meters and a standard VNEM configuration cannot be resilient solely through the addition of energy storage. An applicant must pursue a non-standard configuration, resulting in added hardship, cost, and complexity for what should be a standard function of a solar+storage deployment. Two years after the Commission adopted AL 4917-E-A, SCE’s implementation process for the VNBT offers no additional information or certainty for an applicant. AL 5203-E does not provide details on whether provisioning resilience necessitates a different connection point or an entirely separate configuration. No single line diagram is available nor are any technical specifications, leaving potential applicants to guess how to design a solution that complies with the language. Furthermore, AL 5203-E does not clarify that a site seeking resilience using this option will not lose legacy status as part of the reconfiguring process. With the possibility of losing legacy status, sites with existing VNEM solar will not have any interest in deploying storage and provisioning

¹ SCE AL 4917-E-A, at sheet 5.

resilience.

The prohibition of any load registering on the Generating Account or Benefitting Accounts during a grid outage suggests that a second set of wiring or controls could possibly be permitted. Yet, no further details are provided. The lack of information is uncharacteristic considering that the rest of the VNEM application process is so detailed, requiring an applicant to present information on every aspect of the configuration, technology, and site needed to promote the safe operation of the solar and the grid in all circumstances. The result, from a practical perspective, is that attaining resilience is not feasible for applicants under the VNBT. The vagueness surrounding the cost implications of resilience and the additional hurdle of receiving written approval from SCE without more than a single paragraph to work from present a picture of an extremely uncertain process, unlikely to be utilized by applicants seeking approval for a VNBT. AL 45203-E does not provide any additional information that clarifies the vague language in AL 4917-E-A. SCE does not provide any additional forms, questionnaires, or technical specifications to illustrate what a cost-effective configuration that does not register load on the Generating Account or Benefitting Accounts looks like. This is not an efficient outcome for potential applicants and will require additional utility resources for any applicant interested in resilience, compared to an application for a standard VNEM configuration.

At a high level, the preservation of incentives for low-income ratepayers demonstrates the Commission's continued interest in ensuring that the benefits of the NBT and VNBT flow to low and medium-income ("LMI") ratepayers and residents of disadvantaged vulnerable communities ("DVCs"). It is inconsistent with the Commission's stated goals in the DER Action Plan 2.0 and the ESJ Action Plan to approve interconnection forms and a tariff intended to enable resilience without a standard configuration that can be clearly presented to interested applicants. The lack of clarity in AL 4917-E-A perpetuates existing inequalities for resilience between single-meter and multi-meter facilities. Single-meter facilities taking service under the NBT can deploy certain solar+storage configurations or a Solar Microgrid for resilience. Multi-meter facilities using the VNBT are left guessing over how to interpret a single paragraph in the tariff.

The Clean Coalition understands that the Commission is limited by Public Utilities Code §780.5, which requires individual metering for residential units at multi-unit housing facilities. However, it is worth noting that the most effective and streamlined solution for resilience at multi-meter facilities is to deploy a master meter. AL 4917-E-A requires all loads served in the event of a grid outage to have the same point of common coupling. A master meter similarly could serve as a grid isolation switch at the point of common coupling, allowing a multi-meter facility to island without using grid infrastructure, much like a solar+storage microgrid deployed behind-the-meter at a single-meter facility. We recommend that SCE investigate use cases that include the use of a master meter for resilience with a VNEM configuration and include greater detail on how VNEM systems can be configured for resilience under the VNBT.

For these reasons, we urge the Commission to reject SCE's Advice Letter.

Conclusion

The Clean Coalition respectfully submits this comment letter on SCE AL 5203-E and looks forward to continuing the dialogue on the most effective ways to provision multi-meter facilities

with resilience.

Dated: March 4, 2024

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