

January 9, 2025
Energy Division
Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue, Room 4004 San
Francisco, CA 94102

Re: Clean Coalition Response to Pacific Gas & Electric Advice Letter 7453-E, Establishment of Tariff 31 in Support of Customer-Owned Meter Socket Adapter Devices Pursuant to Resolution E-5194

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 response to Pacific Gas & Electric’s (“PG&E”) Advice Letter (“AL”) 7453-E. AL 7453-E was submitted on December 11, 2024, for the purpose of creating a procedure to allow single meter residential customers to deploy a customer-owned meter socket adapter, in accordance with Resolution E-5194.

In accordance with General Rule 7.4.2(2), the Clean Coalition is responding to AL 7453-E. We support PG&E’s intent to enable the use of customer-owned meter socket adapters but urge the Commission to go a step further by permitting all customer classes to utilize the proposed Rule 31 rather than just single-meter residential customers and to require that a streamlined and transparent process must exist for developers to receive approval from PG&E for new meter socket adapters.

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

Clean Coalition supports the proposal outlined in PG&E’s AL 7453-E with modifications to remove arbitrary limits restricting use to single meter residential facilities. Codifying a clear procedure through which a customer can increase behind-the-meter capacity without triggering costly main panel and distribution grid upgrades is necessary to meet the increasing demand associated with electrification in the most efficient manner possible. Clean Coalition also supports additional options for customer-level resilience. We encourage the other two IOUs to work with PG&E on the development of a streamlined and standardized procedure that can be used uniformly

by all three IOUs.

However, we advocate that the AL should be amended before the Commission adopts it to ensure that Rule 31 is not limited to single meter residential facilities. All types of facilities, residential and non-residential, should be able to access the benefits of customer-owned meter socket adapters. The need for additional capacity or load, or to provision resilience, is near universal for facilities in a state whose goal is electrification. Yet, the opportunity for savings at non-residential and multi-meter residential facilities with large loads is far greater than at single-meter residential facilities due to the increased likelihood that a project may require a major distribution upgrade. Grid upgrades to the primary distribution system or a substation are massive multi-year endeavors that cost millions of dollars and require significant utility resources. Minimizing these costs is in the best interests of both the residential/non-residential facilities avoiding upgrades and the ratepayers.

More fundamentally, the customer-owned meter socket adapters are deployable at all types of facilities. The technology can function in the same way at single meter residential and nonresidential facilities. It is unduly restrictive to limit use of these meter socket adapters to single meter residential properties given the viability of meter socket adapters for use at all facilities. We urge the Commission, in its discretion, to require PG&E to open Rule 31 up to all facility types. As a longer-term goal, Clean Coalition supports the development of standard designs (in the form of single line diagrams) that can be used to streamline the deployment of customer-owned meter socket adapters. For example, a pre-approved design that cuts the time for commercial and industrial customers seeking to add capacity down from months and years to weeks could rapidly improve the pace of development. Single line diagrams maximize safety by ensuring that the configuration a developer is proposing has been studied by the utility for a similar use case and increases certainty that an application is likely to be accepted if the proposal conforms to the standard design.

We also believe that the development of a transparent process through which developers can certify new customer-owned meter socket adapters with the utility is essential. PG&E's AL references Resolution E-5194, which specifically lays out a procedure for devices intended to perform electrical isolation functions. However, the function of customer-owned meter socket adapters includes, but is not limited to, resilience, making it important to have a comprehensive process in place to approve additional meter socket adapters for all use cases.

For these reasons, we urge the Commission to approve PG&E's Advice Letter with the Clean Coalition's proposed modification to allow all customer classes to use Rule 31.

Conclusion

The Clean Coalition respectfully submits this comment letter on PG&E AL 7453-E and looks forward to continuing the dialogue on the most effective ways to efficiently add capacity and provision a facility with resilience.

Respectfully,

/s/ BEN SCHWARTZ

Ben Schwartz
Policy Manager
Clean Coalition
1800 Garden Street
Santa Barbara, CA 93101
Phone: 626-232-7573
ben@clean-coalition.org

Dated: January 9, 2025

CC'ed:
ED Tariff Unit
edtariffunit@cpuc.ca.gov

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com
Service List: R. 19-09-009
Service List: R. 17-07-007