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 DATA WORKING GROUP

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

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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 comments on the Data Working Group use cases and meetings.

- Clean Coalition proposes a Clearinghouse for Microgrid Data.
- Clean Coalition supports the use case submitted by 350 Bay Area, "Assessing Adoption of Front-of-the-Meter ("FTM") distributed energy resources ("DER"), including Community Solar."
- Clean Coalition supports use cases related to, "Design retrofits and electrification plans."
- Clean Coalition supports reducing overly restrictive 15/15/100 rule.
- Clean Coalition supports all use cases related to DERDevMkt.
- Data must be cleaned and organized to be of value.

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. CLEAN COALITION PROPOSES A CLEARINGHOUSE FOR MICROGRID DATA

A. Clean Coalition supports the development of a clearinghouse for microgrids to reduce bottlenecks associated with the deployment of behind-the-meter and Community Microgrids.

As the utilities work to rapidly modernize California's electric grid and adapting to the existential threats caused by climate change becomes an even greater priority, it is of critical importance to ensure that the process of deploying resilience strategies is as streamlined/effective as possible. Each site may have unique characteristics, such as square footage, energy usage, and climate data, but the process of deploying solutions like a microgrid should be as replicable as possible, to maximize the number of deployments and bring costs down, wherever possible. Many lessons learned on the front end of the process—related to design, interconnection, and study processes—exist but are not generally shared due to existing customer privacy concerns, meaning that different developers are blind to pitfalls other developers have had to struggle through, and are effectively forced to re-invent the wheel for each project (and in every utility service territory, in some cases). In addition, up-front utility coordination and cooperation has the potential to result in a more efficient use of resources, to the benefit of staff and the ratepayers. However, on the back end—once a project is deployed and operational—the difficulty in acquiring data persists, since a customer already has a working system and is no longer as focused on the data—especially when pulling data may incur an additional cost. As a result, valuable information needed for validation and learning purposes is often never compiled.

A clearinghouse is a central agency for the collection, classification, and distribution especially of information that is able to pull information for multiple different sources.[1] **In the context of microgrids, the Clean Coalition believes that a Clearinghouse with anonymized data from microgrid projects in each of the utility service territories would preserve the need for confidentiality while ensuring that a central location exists to store and access data associated with the development of microgrids.** For example, an anonymized id (and no inclusion of a specific address or zip code) along with load data, system size, square

[1] https://www.merriam-webster.com/dictionary/clearinghouse

footage, climate zone, level of resilience created by the system (e.g., 100% of the load for 24 hours or 25% of the load indefinitely, etc…), rate schedule, and interconnection data could be sufficient to provide an accurate picture of the development process and functionality of the system once operational. The types of data are certainly negotiable; the key is that including data can be done in a manner that is valuable for the parties involved with deploying and researching microgrids, while ensuring that customer confidentiality is retained. Accessing behind-the-meter (BTM") microgrid data is the most straightforward since consent comes from a single customer, albeit there is also value in making data from Community Microgrids available as well. To the extent possible, Community Microgrid data is a valuable tool to help further streamline the technology and develop single-line diagrams. If privacy concerns persist despite the opt-in feature other options could include coarsening the data (based on microgrid size, utility service territory, or climate zone) or providing tiered access (making summary data publicly available with a greater level of access for research entities or developers that complete data-sharing agreements),

Having such a granular level of detail available in a central location will help developers to determine appropriate load profiles and system sizing for future projects, while avoiding issues associated with the interconnection process. Utilities, CCAs, and regulators looking to make cost-effective investments in clean local and resilient energy would also benefit from having a clear data set to inform decision making.

B. An opt-in feature during the process of a customer providing a developer with Green Book data will safely enable participation in a clearinghouse for Microgrids.

It is important to ensure that any data collection process is simple, easily understandable, centered around consent, and not onerous for the facility whose data is being shared. This is achievable through a straightforward 'opt-in' feature, such as a checkbox, during the process of sharing Green Book data with a developer in the early stages of project development. Part of this feature should include an explanation about the data that will be shared and how it will be anonymized. To promote customer choice at all times, Clean Coalition has two recommendations. First, an 'opt-out' feature should also be available in case a customer changes their mind about having project data included in the Microgrid Clearinghouse. Second, in the event that the Commission feels it is important to receive secondary consent from a customer, the

'opt-in' feature may include a mechanism for a trusted entity—perhaps the utility or CCA responsible for billing—to contact the customer in a very specific situation, such as when the customer goes to pay their monthly bill. We do not support any method of contacting a customer that may result in multiple direct calls or emails, or random contact by an entity that the customer is unfamiliar with. The inclusion of customer data in a Microgrid Clearinghouse should not be onerous or complicated; conversely, entering a customer into a raffle for providing data or offering some kind of incentive may help lay the foundation of a very valuable data set.

IV. COMMENTS ON OTHER USE CASES

A. Clean Coalition supports the use case submitted by 350 Bay Area, "Assessing Adoption FTM DER, including Community Solar."

With the distribution grid likely requiring between $26 and $52 billion in upgrades to meet the state's electrification goals, siting resources on the distribution grid near the loads being served will be a critical part of the transition to clean energy. FTM resources offer economies of scale associated with larger resources as well as the speedy deployment timelines connected with BTM DER. Understanding the level of penetration of FTM DER is an important data point needed to facilitate electrification and mitigate costly distribution upgrades wherever possible. For example, the Clean Coalition's Valencia Gardens Energy Storage ("VGES")[2] project demonstrates that strategically sited FTM energy storage can increase hosting capacity on a feeder, to the direct benefit of the ratepayers. VGES had the potential to increasing hosting capacity on a feeder in downtown San Francisco by as much as 25%.[3] Moreover, energy storage projects sited near distribution substations can relieve transmission and distribution losses, relieve congestion, stabilize frequency and voltage, provide reliability and resilience, and reduce additional transmission and distribution infrastructure that would otherwise be required to serve load.[4] Understanding where existing FTM projects are located or intended to be deployed will help provide the state, utilities, and researchers with an understanding of where projects are located, the value being created, how successful existing FTM programs are, and where opportunities to maximize value through future deployments exist.

[2] https://www.energy.ca.gov/sites/default/files/2024-07/CEC-500-2024-090.pdf
[3] *Ibid*, at p. 3.
[4] https://www.leylinecapital.com/news/a-brief-review-of-energy-storage-business-models

B. Clean Coalition supports use cases related to, "Design retrofits and electrification plans."

One of the most challenging aspects of achieving full electrification will be maximizing opportunities for energy efficiency and modifying the existing building stock in time to meet the state's climate and energy goals. Building new all-electric buildings is a far more straightforward task, thanks to the California Energy Code (Title 24) than addressing existing residential, commercial, and industrial facilities. Working on existing facilities requires identifying candidates, stakeholder engagement, crafting targeted solutions, allocating sufficient funding/resources, and doing all of that at a truly unprecedented pace. Achieving such a lofty goal is only achievable through a data-driven approach, necessitating readily available data. Without access to clean and organized datasets, the state will be left to craft policy based on best guesses and will find it extremely difficult to accomplish the needed pace. Furthermore, data is critical to ensure that the disadvantaged communities throughout the state are not left behind in the transition and that the implementation of electrification solutions does not further perpetuate the existing affordability crisis.

C. Clean Coalition supports reducing the overly restrictive 15/15/100 rule.

The 15/15/100 rule is overly restrictive in the name of confidentiality and security, often in circumstances that go beyond the actual confidentiality needs of customers. For example, in the development of Microgrid Incentive Program ("MIP") applications, the Clean Coalition was initially told that either permission would be required from every single residential customer to receive load data, or we could increase the boundary of the proposed Community Microgrid (somewhat arbitrarily) to include at least 100 residential customers—impacting the microgrid cost and reducing the application score. In both cases, the consequence would be reducing the viability of deploying a Community Microgrid, all because of the difficulty of acquiring load data. In the end a compromise (really more of a workaround) was reached, and the utility was able to provide us with average customer usage data, which while sufficient, was a less-than-ideal solution compared to receiving actual load data.

There are a number of other relevant situations where the 15/15/100 rule results in undue restriction. For example, on small or rural feeders with fewer than 15 customers, or in a situation where a single customer's load makes up more than 15% of the total feeder load, customer-level and aggregated data will not be published. As mentioned above, California is in a situation where

the distribution grid will require between $26 and $52 billion worth of upgrades to enable electrification, in addition to other reliability and resilience concerns. The 15/15/100 rule actively makes it more difficult to develop a project on any such feeder, whether a resilience-related project or electrification measure, potentially dooming small/rural feeders to transition at a slower rate than the rest of the state, and at a higher cost. The load requirement of at least 100 kW also impacts low-income housing, parks, and other low-usage areas, which may disproportionately impact disadvantaged communities. Grid transparency and DER siting, the two issues which the Commission intended the ICA maps to be used for, are untenable in these locations due to overly restrictive data privacy laws. Moreover, the Commission should note that customer groups are not requesting greater data privacy surrounding load data or even lauding the existing rules. Instead, a myriad of stakeholders has continually underscored the negative consequences of the existing rules and continue to request that the Commission relax the 15/15/100 rule.

D. Clean Coalition supports all use cases related to DERDevMkt.

More effectively integrating DER into markets, including distribution markets and programs, smartly siting DER, properly compensating DER based on the value provided, coordinating DER aggregations, and dispatching DER to align with grid needs all requires data to test and validate new processes moving forward. Many opportunities to demonstrate value exist, but the opportunities and the data don't currently exist. For example, DER deferral programs demonstrated that there is value for the ratepayers (nearly $8 million dollars from two projects in SCE's service territory), but with only a few opportunities for deployments and strict requirements, soliciting interested developers is challenging. Additional data about where opportunities for DER deferral exist will present a more accurate picture about the potential of non-wires alternatives. Likewise, the state is not making direct investments into resilience throughout the utility service territories; data showing where outages have occurred over a number of years and the likely cost of resilience-related spending could help demonstrate where cost-effective investments in Community Microgrids, energy storage, etc… could be of value.

E. Data must be cleaned and organized to be of value.

Clean Coalition strongly supports increasing the amount of data that is available for research, analysis, and policymaking. However, one of the existing issues is that the data that can be acquired is not in a standard format that is easily usable. Load data, for example, has to be shaped and formatted (and potentially transferred to a different application) before it can be used effectively. Compiling data sets is an important step forward but must not be the final step of the process. Each of the use cases submitted as part of the Data Working Group demonstrates the many ways that similar types of data can be applied, while also making it clear that data only available in pieces or siloed in different places is worth next to nothing.

V. CONCLUSION

The Clean Coalition respectfully submits these comments and urges the Commission to include our recommended additions in the final Data Working Group report.

/s/ BEN SCHWARTZ
Ben Schwartz
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