BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies.	Rulemaking 19-09-009

CLEAN COALITION RESPONSE TO PETITION OF THE CALIFORNIA SOLAR & STORAGE ASSOCIATION TO MODIFY D. 20-06-017 TO REMOVE AN ENERGY STORAGE SIZING LIMIT

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

July 14, 2025

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I. INTRODUCTION

Pursuant to Rule 16.4(f) of the California Public Utilities Commission ("the Commission") Rules of Practice and Procedure, the Clean Coalition respectfully submits these reply comments on the *Petition of the California Solar & Storage Association* ("CALSSA") *to Modify D. 20-06-017 to Remove An Energy Storage Sizing,* filed on June 13, 2025. CALSSA's Petition seeks to make permanent the removal of any sizing limits for energy storage deployed behind-the-meter ("BTM") under one of the Net Metering tariffs, noting that the existing exemption is set to expire later this year. The petitioner rightly points out that oversized energy storage is often an important aspect of a solar+storage system configured for resilience and discusses the importance of not limiting options for energy storage in a market that has trended toward solar+storage deployments under the Net Billing Tariff ("NBT").

The Clean Coalition strongly supports CALSSA's Petition and urges the Commission to clarify the issue in a timely manner by approving the Petition prior to the August expiration date. Waiting until after the existing exemption period is complete to consider the policy implications of an extension will add uncertainty and chaos to a market that has taken time to adapt following the adoption of the NBT and remains in flux due to recent changes to the Investment Tax Credit ("ITC"). Deployments of energy storage, especially oversized projects, have the ability to support the grid that will be increasingly valuable as projected load growth becomes a reality and electrification measures are more widely deployed. We concur with CALSSA that having a cap is "not necessary,"[1] and purport that removing the cap is one of the most effective measures that the Commission can take to synergistically achieve multiple policy goals. In addition to the evolving desire for resilience in the face of climate change and natural disasters, uncapped energy storage enables more Californians to

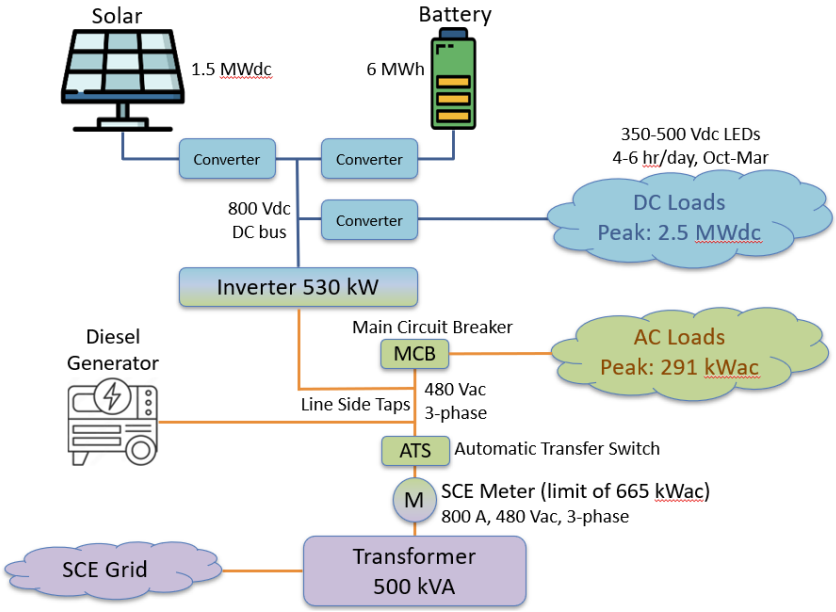
[1] Petition, at p. 6.

be “good grid citizens” that operate their systems to reduce midday curtailment and the total system peak.

II. COMMENTS

A. Oversized BTM energy storage is essential for resilience.

Removing the existing cap on energy storage will make it more difficult for customers to deploy a system capable of providing resilience for the most critical loads. We concur with CALSSA that, “It is obstructive to customers seeking resiliency solutions and limits the ability to provide grid value.”[2] When the Clean Coalition facilitates a Solar Microgrid, we often recommend a ration of 1x solar to 2x energy storage. This ratio ensures that most sites are afforded indefinite renewables-driven resilience to the most critical loads, even on the worst weather day. For example, the image below shows a designed DC Solar Microgrid for a farm looking to serve new greenhouses in Santa Barbara. The SCE feeder that the site is connected to is severely constrained, limiting the site to exporting 665 kW (ac) before a multi-million-dollar (and multi-year) grid upgrade is triggered. While the solar is sized at 1.5 MW(dc), the inverter is sized at 530 kW to ensure that system exports never exceed the limit imposed by SCE and the site only imports from the grid briefly each day.



1.5 MW DC coupled solar microgrid at a farm sited to serve 2.5 MWdc loads

[2] *Ibid.*

This Microgrid design is an elegant solution that addresses both the need for resilience and the local reliability constraints based on existing grid conditions, meeting the needs of the site and limiting the time/resources that would otherwise need to be spent on grid upgrades if oversized storage were not permitted. With more Californians seeking solar+storage and Solar Microgrid configurations under the NBT, re-instating a cap would pull the rug from under a market that has just begun to get situated. The new evidence provided by CALSSA in this petition both demonstrates why the normal time requirement for a Petition for Modification was not possible, while simultaneously highlighting data-driven reasons why the Commission should grant the petition. In addition to the importance of BTM resilience, the Commission acknowledged in D. 24-11-004 that promoting BTM storage, via programs like SGIP, was a key part of the way that the Commission is facilitating the deployment of SGIP in ESJ communities.[3] Limiting the ability to oversize energy storage chips away at this argument and reduces the ability of ESJ communities to provision community-scale resilience. For both BTM and community-scale resilience, large BTM batteries are extremely valuable and must not be limited.

B. Oversized energy storage will benefit system reliability.

Batteries with a high ramping rate are critical to mitigating the system peak or meeting emergency grid needs. In the last three years, massive efforts toward virtual power plants and utilizing BTM battery storage for grid stabilization during emergencies have occurred. The CEC's DSGS has become the most effective VPP in the nation, with other programs designed by utilities and private companies have provided hundreds of megawatts of capacity during annual peaks, when the energy is desperately needed. Oversized storage is a critical aspect of this success and must not be limited, for the reliability benefits that it provides.

III. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these comments. Permanently removing the cap on storage sizing limits will increase the amount of capacity available to support the grid and promote good grid citizenship, aligning with numerous other Commission policy objectives and permanently enabling Californians to provision BTM resilience.

[3] D. 24-11-004, at p. 65.

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