

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

Order Instituting Rulemaking to
Develop a Successor to Existing Net
Energy Metering Tariffs Pursuant to
Public Utilities Code Section 2827.1, and
to Address Other Issues Related to Net
Energy Metering.

Rulemaking 14-07-002
(Filed July 10, 2014)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE PROPOSED DECISION GRANTING PETITION FOR MODIFICATION OF
DECISION 14-05-033 REGARDING DIRECT CURRENT-COUPLED SOLAR PLUS
STORAGE SYSTEM**

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits these comments on the *Proposed Decision Granting Petition for Modification of Decision 14-05-033 Regarding Direct Current-Coupled Solar Plus Storage System* (“Proposed Decision”), issued by Administrative Law Judge (“ALJ”) Valerie U. Kao on October 5, 2018.

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Axiom Exergy, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Centrica Business Solutions, Clean Energy Associates, Consolidated Edison Development, Inc., Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectrIQ Power, eMotorWerks, Inc., Enel, Energport, ENGIE, E.ON Climate & Renewables North America, esVolta, Fluence Energy, Form Energy, GAF, General Electric Company, Greensmith Energy, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, KeraCel, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy, Inc., Parker Hannifin Corporation, Pintail Power, Primus Power, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Sempra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., True North Venture Partners, Viridity Energy, VRB Energy, WattTime, Wellhead Electric, and Younicos. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

I. INTRODUCTION.

CESA generally supports the Proposed Decision’s determination to approve the “no grid charging” and “no storage export” options for large DC-coupled solar-plus-storage systems as proposed in the *Petition of the California Solar Energy Industries Association for Modification of D.14-05-033 to Allow DC-Coupled Solar Plus Storage Systems* (“Petition”) filed by the California Solar and Storage Association (“CALSSA”) on September 1, 2017. The Proposed Decision closes a critical gap in the Net Energy Metering (“NEM”) framework to enable the interconnection of an emerging and growing class of DC-coupled NEM-paired storage systems that also ensures ‘NEM integrity’. CESA commends the Commission for making this important change.

However, though the Proposed Decision approves the software-based options for the two use cases, it makes this option contingent upon compliance with Rule 21 Phase 2 and Phase 3 communication requirements to provide real-time monitoring and communication capability.² In addition, the Proposed Decision also requires the firmware-based option for the “no storage export” case to provide “equal reliability and security as a non-export relay” as a specification.³ For both of these options, CESA recommends that these use cases be allowed so long as NRTL certification is achieved.

II. CERTIFICATION OF SOFTWARE AND FIRMWARE OPTIONS SHOULD SUFFICIENTLY ADDRESS NEM INTEGRITY.

While generally supportive of the Proposed Decision, CESA recommends that the Commission recognize that certification standards are being developed at UL that should be able to sufficiently address the NEM integrity concerns raised by the investor-owned utilities (“IOUs”) and the Commission, without requiring additional real-time monitoring requirements. Similarly,

² Proposed Decision, p. 15.

³ *Ibid*, p. 14.

as certification standards are being developed for firmware-based options, CESA recommends the usage of these standards. CESA generally supports the usage of applicable certification standards to address NEM integrity, security, and other interconnection concerns.

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments on the Proposed Decision and looks forward to working with the Commission and other stakeholders in this proceeding.

Respectfully submitted,



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