

**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 SOLAR PLUS STORAGE SYSTEM**

Alex J. Morris
Vice President, Policy & Operations

Jin Noh
Policy Manager

CALIFORNIA ENERGY STORAGE ALLIANCE
2150 Allston Way, Suite 400
Berkeley, California 94704
Telephone: (510) 665-7811 x110
Email: amorris@storagealliance.org

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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 Solar Plus Storage System* (“PD”), issued by Administrative Law Judge (“ALJ”) Valerie U. Kao on December 28, 2018.

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Avangrid Renewables, 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 X North America, Energport, ENGIE, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, GAF, General Electric Company, Greensmith Energy, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, NantEnergy, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy, Inc., Parker Hannifin Corporation, Pintail Power, Primus Power, Quidnet Energy, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), 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 strongly supports the PD's determination to approve the "no grid charging" and "no storage export" options for large 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 on September 1, 2017.

II. THE PROPOSED DECISION CREATES A VIABLE PATHWAY OPTION FOR SOLAR-PLUS-STORAGE SYSTEMS BUT STAKEHOLDERS SHOULD BE CONSULTED ON IMPLEMENTATION AND TECHNICAL DETAILS.

CESA appreciates and supports the Commission's key revisions made to the original PD issued on October 5, 2018 that affirm that certification standards being developed at Nationally Recognized Testing Laboratories ("NRTLs") will address the reliability and security concerns of the investor-owned utilities ("IOUs"). Similarly, the PD removes the additional real-time monitoring requirements from the original PD and affirms that standards should address any NEM integrity concerns for both firmware and software based options.²

The only area of concern is around the specific details around what the IOUs will propose to ensure that a device's configuration file is "non-editable",³ which CESA presumes will be detailed in the Tier 2 advice letters that will be submitted by the IOUs within 45 days after the issue date of this decision. Some clear guidance could be provided on what the IOUs should propose in their advice letters. For example, while it is important to ensure that the device's configuration file is non-editable, the IOUs should also propose a clear and efficient/streamlined process by which interconnection customers can apply for "edits" to the device's configuration file as, while still complying with the "no grid charging" and "no storage export" options, customer

² PD, pp. 18-19.

³ *Ibid*, p. 19.

needs change and/or different use cases (*e.g.*, additional grid services) are pursued. As previously noted by CESA and others, one of the benefits of software-based options is the flexibility afforded to customers as customer and grid needs evolve.⁴ This benefit and advantage should be preserved while still providing safeguards for the IOUs regarding violations of policy requirements and/or technical grid operations. Thus, prior to filing their advice letters, the IOUs should be directed to convene at least one stakeholder meeting to solicit feedback regarding their proposed process by which the IOUs would ensure that systems are configured and programmed to operate consistent with no-grid charging or no-export operations.

In sum, though, the PD 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’ but also creates new non-metering pathways for solar-plus-storage systems in general. CESA commends the Commission for making this important change.

⁴ *Ibid*, p. 11.

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,



Alex J. Morris
Vice President, Policy & Operations
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Berkeley, California 94704
Telephone: (510) 665-7811 x110
Email: amorris@storagealliance.org

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