

April 1, 2019

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**Re: Response of the California Energy Storage Alliance to Advice 3966-E of Southern California Edison Company, Advice 4073-G/5491-E of Pacific Gas and Electric Company, Advice 5435 of Southern California Gas Company, and Advice 98 of Center for Sustainable Energy**

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Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits this response to the above-referenced Advice 3966-E of Southern California Edison Company (“SCE”), Advice 4073-G/5491-E of Pacific Gas and Electric Company (“PG&E”), Advice 5435 of Southern California Gas Company (“SoCalGas”), and Advice 98 of Center for Sustainable Energy (“CSE”). The Self-Generation Incentive Program (“SGIP”) Program Administrators (“PAs”) jointly filed these advice letters, *Proposed Modifications to the Self Generation Incentive Program Handbook Related to Energy Storage Equipment Specifications, Virtual On-Site Inspections, and Other Program Improvements and Handbook Clarifications* (“Joint Advice Letter”), on March 11, 2019.

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<sup>1</sup> 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, Aggreko, Alligant Scientific, LLC, AltaGas Services, Amber Kinetics, Ameresco, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Better Energies, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Clean Energy Associates, ConEd Battery Development, Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, EDF Renewable Energy, eMotorWerks, Inc., Enel X North America, Energport, Engie Storage, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, General Electric Company, Greensmith Energy, Gridwiz Inc., Hecate Grid LLC, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Johnson Controls, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Energy Solutions, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., Nuvve, Pattern Energy, Pintail Power, Primus Power, Polyjoule, Quidnet Energy, Range Energy Storage Systems, Recurrent Energy, SNC-Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., Tesla, True North Venture Partners, Viridity Energy, VRB Energy, WattTime, and Wellhead Electric. 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.

The SGIP PAs highlighted how SGIP has through many changes through the years and have thus found that certain modifications may reduce the complexity of the program as well as provide streamlining opportunities for the applicants and PAs. In the Joint Advice Letter, the PAs propose a number of modifications, as summarized below:

- Establish a public SGIP Equipment List for eligible, technically-reviewed equipment and modify energy storage component specification requirement
- Allow virtual inspection for residential projects
- Remove requirement for copy of check submitted with application
- Implement residential customer opt-out for non-critical email communications
- Include project cost affidavit and project cost breakdown in incentive claim form
- Remove requirement for third-party authorization to receive customer information form for systems less than or equal to 10 kW
- Require the final monitoring schematic for all projects
- Extend the application fee refundable period for three-step projects
- Correct the language for performance data provider (“PDP”) audits

CESA commends the PAs’ continued efforts to take feedback from stakeholders and propose actionable solutions that reduce administrative costs, improve operational efficiency of the application process, and expand general streamlining opportunities. CESA is supportive of the modifications to the SGIP Handbook that will improve the efficiency and flexibility to the program, as well as improve customer experiences. In doing so, CESA believes that SGIP-funded projects will better achieve the program’s goals. In this response, CESA only offers one area of comment or recommendation to supplement the proposed SGIP Handbook modifications.

## II. DISCUSSION.

- A. **The SGIP Equipment List should leverage the CEC Storage Equipment List and/or the PAs should shape the development of the CEC Storage Equipment List to provide a single list that supports both the interconnection and program eligibility use cases.**

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Currently, no list exists at the California Energy Commission (“CEC”) for “eligible” energy storage equipment as it exists for solar and inverter systems. The Solar Equipment List has been instrumental to facilitate distribution-level interconnection of equipment that meet basic reliability and safety standards as well as streamline eligibility for programs like the California Solar Initiative (“CSI”). Similarly, such a list for energy storage equipment is being developed at the CEC via a biweekly working group process to support comparable use cases. As such, the Storage Equipment List has the potential to be shaped to support program eligibility for energy storage systems in SGIP. Rather than maintaining two different lists and having applicants, host customers, and/or utility engineers refer to two separate lists, CESA believes it is more efficient and easier to understand all information user groups for any SGIP-funded project to look at one list. Thus, the PAs should participate in the CEC’s working group process and shape the data listed in the CEC’s Storage Equipment List to support program eligibility.

### III. CONCLUSION.

CESA appreciates the opportunity to submit this response to the Joint Advice Letter submitted by the SGIP PAs. CESA supports the PAs’ efforts to streamline and improve the SGIP program and seeks to ensure the success of the program.

Respectfully submitted,



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