

**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
(Filed September 12, 2019)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON THE
PROPOSED DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE
MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

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May 19, 2020

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”) hereby submits our comments on the *Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions* (“PD”), issued on April 29, 2020 by Administrative Law Judge (“ALJ”) Colin Rizzo.

I. INTRODUCTION.

The Track 1 PD proposes to adopt resiliency strategies and proposals submitted by the Commission Energy Division staff and the investor-owned utilities (“IOUs”) with certain modifications or conditions in advance of the upcoming 2020 wildfire season. Despite differences on the specific “options” in some cases, the PD generally approves the various Staff Proposals on interconnection streamlining, storage charging, and storage system sizing. Furthermore, given that more “controversial” or “contested” elements of the IOU proposals were withdrawn or “deferred” for various reasons, the PD moved to conditionally approve or approve with modifications the three proposals from Pacific Gas and Electric Company (“PG&E”) and one from San Diego Gas and Electric Company (“SDG&E”). Taken together, the PD identifies near-term pathways to

support or enhance resiliency from customer-sited energy storage systems using existing interconnection processes and tariffs and to provide customer outreach and technical support while more cautiously addressing broader resiliency needs with short-term measures with temporary generators, make-ready deployments, and enhancements to existing microgrids.

CESA generally supports the PD for reducing the scope and impacts of future wildfire-related safety risks and Public Safety Power Shut-off (“PSPS”) events by enabling key customers and critical facilities to deploy resilient solutions in a more time-efficient manner, especially as the 2020 wildfire season quickly approaches. Even though CESA believes that certain “options” may better enable efficient and less complicated implementation, the PD generally lands favorably to advance the streamlining and fast-tracking of interconnection applications for resiliency projects. Additionally, as expressed in our comments on January 30, 2020 in response to the Ruling, CESA reiterates our views that the Track 1 proposals may be well-suited or sufficient to address urgent 2020 resiliency needs, but long-term frameworks are needed to guide microgrid development. The PD accomplishes this to some degree by limiting the time and scope of the IOUs’ 2020 resiliency solutions (*e.g.*, temporary generation), but more could be done to tee up key issues around data availability and competitive outcomes, phase resiliency approaches toward cleaner alternatives, and pilot concepts that could be scaled to broader applications.

To this end, CESA offers the following comments:

- The interconnection proposals should support medium and large customers in setting the 80/20 guideline and require timelines to be tracked.
- Interconnection Proposal 4 should be adopted as a Track 1 proposal since the smart remote disconnect pilot is a “shovel-ready” project and represents a scalable concept.
- The Commission rightly affirms the use of temporary gas generators as a short-term resiliency solution, but make-ready investments should support transition to clean resiliency alternatives.

- A broader framework needs to be established in Track 2 to support the consideration of the merits of all alternatives and to provide data that supports third-party microgrids.
- The microgrid framework should pursue competitive outcomes and establish policies that guide utility ownership of microgrids.

II. THE INTERCONNECTION PROPOSALS SHOULD SUPPORT MEDIUM AND LARGE CUSTOMERS IN SETTING THE 80/20 GUIDELINE AND REQUIRE TIMELINES TO BE TRACKED.

CESA is supportive and appreciative of the Commission for adopting the various expedited interconnection and streamlining proposals, such as the determinations made around virtual inspections, increased staff resources, and pre-PSPS storage charging. For Interconnection Proposal 1 regarding the development of standardized single-line diagrams (“SLDs”), however, CESA offers one modification. In the PD, the Commission proposes to adopt a blend of Options 1 and 2 for Rule 21 non-exporting storage, Net Energy Metering (“NEM”) solar, and NEM-paired storage, with the IOUs required to complete informal consultation with industry within 10 days and file an Advice Letter within 30 days of the issuance of the decision on a list of acceptable SLDs that follows an 80/20 guideline.¹

In applying the 80/20 guideline, CESA recommends that the PD be modified to ensure that the IOUs consideration of standard SLDs recognize different customer types and sizes, such that an 80/20 guideline is used to established a set of standard SLDs for residential customers, another set for medium commercial customers, another for larger public facilities, and so on. Otherwise, CESA is concerned that a narrow interpretation of the 80/20 guideline would develop standard SLDs only for small residential customers, who likely represent the majority of overall customer counts. In this scenario where the 80/20 guideline is applied based on customer count, projects for

¹ PD at 22-26.

non-residential public or commercial facilities, or even multi-family residential buildings, may be overlooked in this interconnection fast-tracking and streamlining proposal. With the queue jumping proposal (Interconnection Proposal 3) presenting cost allocation challenges, it is imperative that standard SLDs be established for the public and critical facilities identified as priority notification customers and/or community resource centers in D.18-12-005 in order to be eligible for fast-track processes under Rule 21.

Furthermore, as CESA understands it, projects using one of the standard SLDs and with a net exporting capacity below 3 MW will be subject to fast-track review timelines of 15-30 business days for initial review, 20 business days for supplemental review if required, and 15 business days for draft interconnection agreement issuance. CESA sees value in having this timeline data be reported to support review of the status and any potential issues with implementing these interconnection proposals. Other than these changes, CESA supports Interconnection Proposal 1 and the timelines proposed in the PD regarding Advice Letter implementation.

III. INTERCONNECTION PROPOSAL 4 SHOULD BE ADOPTED AS A TRACK 1 PROPOSAL SINCE THE SMART REMOTE DISCONNECT PILOT IS A “SHOVEL-READY” PROJECT AND REPRESENTS A SCALABLE CONCEPT.

While the PD discusses how the Commission is persuaded that a pilot program using smart remote disconnects could be a cost-effective and resiliency resource, this proposal is deferred for consideration in Track 2.² CESA is disappointed in this proposed outcome given that Interconnection Proposal 4 adheres to the three guiding principles in the Staff Proposal,³ yet was not discussed in the Staff Proposal or in the PD on its merits, limitations, or concerns, instead

² PD at 28-29.

³ Staff Proposal at 7. The three guiding principles for Interconnection Proposals are: reduce the amount of time required to interconnect distributed energy resources that support resiliency; maintain the safety and reliability of the electric grid; and ensure just and reasonable rates for participating and non-participating customers.

seemingly suggesting that the Commission and staff does not have sufficient information at this time by deferring it for consideration in Track 2 or later. While appreciative of keeping this concept proposal in scope for the future, CESA believes that the Commission's deferral on this pilot proposal in Track 1 represents a lost opportunity to deploy a near-term 2020 resiliency strategy when the Commission appears intent on taking an "all-of-the-above" approach to avoid the catastrophic wildfire and PSPS events between 2017-2019.

First, an important reason for the Commission to reconsider and approve Interconnection Proposal 4 in the PD is that it would drastically reduce the amount of time required to enable distributed energy resources ("DERs") in being enabled to provide resiliency during PSPS events. Unlike the other proposals that are intended to expedite and streamline a multi-month interconnection process, Interconnection Proposal 4 more expeditiously enables resiliency service from DERs that cannot otherwise interconnect under Rule 21, such as the close to half million of electric vehicles ("EVs") that are unable to export power or cannot obtain the UL listings required for Rule 21 interconnection.⁴ Furthermore, the smart remote disconnect solution has broad applicability to support near-term resiliency for the millions of rooftop solar systems that are not currently paired with batteries and would automatically shut down during a utility power outage to prevent grid backflow. With a service disconnect at the meter (or socket), these EVs and/or standalone solar resources can be used as cost-effective temporary backup power and prevent generator backfeed onto the grid, in essence, by "separating" the customer premise from the distribution grid. Notably, in line with the urgency of 2020 resiliency solutions, installation of these devices can be completed within a single working day and be done outside of the customer premises by a certified meter installer and technician, subject to the appropriate distancing

⁴ Similarly, second-life batteries may be used for backup power with service disconnects.

precautions and protective equipment, to ensure safe procedures during the COVID-19 pandemic. With such minimal deployment timelines, Interconnection Proposal 4 represents the exact type of 2020 wildfire resiliency strategy that the Commission should be pursuing.

Second, CESA understands that the Commission and the IOUs may want to further understand how Interconnection Proposal 4 would work in terms of technical operations and installation, but the low-cost hardware device proposed in the pilot uses existing UL-listed meter socket-based technology. Since 2015 over 6,000 units have been installed for customers at utilities throughout the country, including Hawaiian Electric, Arizona Public Service, Green Mountain Power, and Con Edison,⁵ demonstrating the safety and reliability of the technology. At minimum, the Commission should support proof-of-concept of a solution that Connect California has developed as a standard design using off-the-shelf parts that can deliver immediate resiliency benefits for the 2020 wildfire season for the limited number of pilot participants and that can be later scaled to more participants for 2021 and beyond if proven successful.

Third, compared to the tens and hundreds of millions being proposed to support other large-scale or infrastructure-related projects, Interconnection Proposal 4 represents a cost-effective solution with broad applicability. Hardware device and installation costs have been estimated between \$1,600 and \$2,000,⁶ which can then leverage the existing EVs and/or rooftop solar that has already been deployed.⁷ In terms of ratepayer impact, this represents a favorable solution that

⁵ Weaver, J.. “New York utility gives free hardware to solar and EV buyers.” PV Magazine. 2019 May 8. <https://pv-magazine-usa.com/2019/05/08/new-york-utility-giving-free-hardware-to-solar-and-ev-buyers/>

⁶ See *Detailed Proposal – Connect California Backup Power System* submitted on December 24, 2019 to Energy Division following the Q4 2019 Interconnection Discussion Forum.

⁷ With the inherent mobility of EVs, there may also be potential for resiliency resources to be “moved” to the area of need in the future where similar smart remote disconnect capabilities are in place, in line with the IOUs use of rented temporary generation to provide flexibility and resiliency where needed.

has the added benefit of potentially informing future tracks in this proceeding on the broader applicability of this concept to single-premise DERs as well as multi-premise microgrids.

Finally, CESA sees merit in approving this proof-of-concept in Track 1 because it has potential applications to multi-premise microgrids. Instead of building new designated distribution lines for a proposed microgrid, the smart meter infrastructure could allow facilities that are not part of the microgrid to be remotely switched off to allow facilities part of the microgrid to share power when islanded, thus leveraging existing distribution lines. Furthermore, with more granular PSPS risk data, CESA imagines that remote disconnects could have applications in more surgically targeting buildings to turn off by circuit and feeder, except for certain critical facilities and vulnerable customers.

Taking into consideration all of the points above, CESA sees significant alignment with the staff's guiding principles and the Commission's near-term focus in Track 1 (along with potential alignment with future Track 2 issues). As such, CESA recommends that the Commission approve Interconnection Proposal 4 and direct the IOUs to include a proposed scope and implementation details in the same Tier 2 advice letter within 30 days of the decision's effective date as the other interconnection-, tariff-, and access-related proposals. The IOUs should work directly with industry stakeholders who have ready-made concepts, vendors, and pilot participants. To support an initial phase of the pilot, the Commission should authorize the IOUs to submit pilot proposals in line with Interconnection Proposal 4 for up to \$1 million per IOU, for which cost recovery can be sought through each of their upcoming General Rate Case ("GRC") proceedings.

IV. THE COMMISSION RIGHTLY AFFIRMS THE USE OF TEMPORARY GAS GENERATORS AS A SHORT-TERM RESILIENCY SOLUTION BUT MAKE-READY INVESTMENTS SHOULD SUPPORT TRANSITION TO CLEAN RESILIENCY ALTERNATIVES.

CESA strongly supports the Commission’s determination that the use of temporary diesel generation may be necessary in the near term but does not represent a long-term resiliency strategy, thus balancing concerns about loss of life from PSPS or wildfire events versus potential health risks and backpedaling from the state’s decarbonization policy objectives.⁸ In particular, CESA agrees with the Commission’s determination to limit PG&E’s Temporary Generator Program to one year, not three years. CESA commends PG&E for its proposed Community Microgrid Enablement Program (“CMEP”) but also finds the PD to be reasonable for expanding CMEP eligibility to all customers prone to outage events, not just those in Tier 2 or 3 high fire threat districts (“HFTDs”).⁹ However, CESA recommends that the Commission make further revisions to ensure that the IOUs are incentivized and required to transition from temporary diesel generation in the near term to cleaner alternatives such as storage and solar-plus-storage in the long term.

For example, make-ready investments made by PG&E as part of their Track 1 proposal should support the potential connection of future clean alternatives such as energy storage instead of their initially proposed permanent gas generation. The circuit breakers, line reclosers, and switchgear proposed in PG&E’s Distributed Generation Enabled Microgrid Services (“DGEMS”) Make-Ready Program to ensure protection, safety, isolation, and seamless transitions can be scoped with consideration of the use of temporary generators in the near term but should, to a

⁸ PD at 71-73.

⁹ *Ibid* at 74.

greater degree, with clean generation and storage alternatives in the long term.¹⁰ Especially given the substantial cost estimates for the make-ready infrastructure (\$135 million),¹¹ a prudent use of these investments would be to make them ready to interconnect and install storage and/or other clean alternative solutions to replace the temporary generators. According to PG&E’s testimony, the make-ready program suggests that it can facilitate the interconnection of any generic generation source, which presumably includes storage.¹²

Furthermore, due to the projected costs (\$173.3 million) and environmental and health impacts of temporary diesel generators, CESA has questions about the 300-MW scope of the Temporary Generator Program, which is based on the 23 MW of mobile generation used in the 2019 PSPS events and the number of impacted circuits and customers from the 2019 PSPS events.¹³ While the 2019 experience is informative, the Commission should assess whether the full 300-MW scope is needed if other IOU-driven wildfire mitigation activities or customer-driven resiliency investments are taking place that may update and reduce the scope of expected 2020 and beyond PSPS events.¹⁴ Alternatively, PG&E could make an effort to either promote battery storage funded through the Self-Generation Incentive Program (“SGIP”) or use the funds proposed for the Temporary Generation Program to upfront finance battery storage systems for the 40 MW

¹⁰ PG&E January 21, 2020 Prepared Testimony Chapter 2 at 1 and PG&E April 1, 2020 Supplemental Testimony Chapter 2 at 3-5. CESA points to this revised proposal as pointing to future intentions of the make-ready program.

¹¹ PG&E January 21, 2020 Prepared Testimony Chapter 3 at 3.

¹² PG&E February 6, 2020 Rebuttal Testimony Chapter 1 at 1.

¹³ PG&E January 21, 2020 Prepared Testimony Chapter 3 at 4.

¹⁴ PG&E February 6, 2020 Rebuttal Testimony Chapter 1 at 6-10 and PG&E April 1, 2020 Supplemental Testimony Chapter 1 Attachment A. This point is addressed to some degree by PG&E’s Supplemental Testimony that attached a transmission facility assessment review that was rejected from the record in Track 1. However, there was a limited opportunity to review the Supplemental Testimony, which suggests that other wires investments are not feasible. Furthermore, the past several months likely involved additional vegetation management and other wildfire mitigation activities that could inform the scope.

proposed to provide “backup power support for societal continuity during PSPS events” at specific critical facilities,¹⁵ better ensuring that temporary generators are truly last resort.¹⁶

Furthermore, CESA hopes that PG&E will make available more detailed results of the Request for Information (“RFI”) for alternative resiliency solutions, such as mobile battery storage units, in order to understand specifically how and where such technologies were deemed infeasible. In Supplemental Testimony, PG&E explained that the mobile battery responses (*e.g.*, Tesla’s mobile battery systems, BoxPower’s containerized solar and storage, Scale Microgrid’s microgrid technology) did not meet the physical space, load, and duration requirements for PG&E’s proposed use cases, leading PG&E to instead focus on phasing in the use of renewable diesel.¹⁷ While the use of renewable diesel in temporary generators are more preferable (and generally supported by CESA), the Commission and other stakeholders may benefit from more detailed results information on how these alternative technologies did not specifically meet certain use cases. For example, for the customer-sited use cases, CESA is unclear on how and why these clean/mobile alternatives would not meet the performance or space requirements when such solutions can often be sufficient to address many customer resiliency needs when stationary and permanently interconnected. Such detailed evaluation results may then inform potential bridge resiliency strategies as well as transitions to a long-term resiliency strategy. Mobile battery storage units may not cover the full range of resiliency needs given their duration of charge/discharge and the limited amount of commercial options, but they present a clean alternative that aligns with the state’s clean energy goals that warrant a deeper consideration and reporting of their availability and feasibility.

¹⁵ PG&E January 21, 2020 Prepared Testimony Chapter 3 at 7.

¹⁶ PG&E February 6, 2020 Rebuttal Testimony Chapter 2 at 3.

¹⁷ PG&E April 1, 2020 Supplemental Testimony Chapter 3 at 17-18.

To summarize our concerns, while CESA is supportive of using temporary generators to address near-term resiliency needs, more information could be provided and efforts could be made to outline a long-term resiliency strategy that substantiates the level of temporary diesel generators needed today and that seeks to phase out their use in favor of cleaner alternatives in the long term. Leveraging the make-ready proposal to facilitate this transition appears like one such opportunity.

V. **A BROADER FRAMEWORK NEEDS TO BE ESTABLISHED IN TRACK 2 TO SUPPORT THE CONSIDERATION OF THE MERITS OF ALL ALTERNATIVES AND TO PROVIDE DATA THAT SUPPORTS THIRD-PARTY MICROGRIDS.**

While Track 1 offered limited time and opportunity to consider broader microgrid issues and policies, CESA recommends that the Commission expeditiously move to Track 2 to consider microgrid solutions in the IOUs' Wildfire Mitigation Plans ("WMPs") and to enable multi-premise microgrids, including third-party-owned and -operated microgrids. Many of the IOUs' Track 1 proposals built off their proposed activities and investments in their WMPs, which points to the need to better coordinate and share information between the WMP proceeding (R.18-10-007) and the Microgrids proceeding (R.19-09-009). Otherwise, CESA is concerned that Commission will not have a clear view of the various alternatives when assessing wildfire mitigation investments and expenditures for effectiveness, targeting, prioritization, and cost competitiveness. Moreover, rather than putting resiliency and wildfire mitigation investment decisions solely in the hands of the IOUs, CESA believes that efforts should be made to inform and encourage bottom-up, third-party microgrid development, which will also bring in private investment capital where possible to support resiliency needs.

In particular, the Commission has noted the need for more granular data on wildfire mitigation and PSPS risks in the multiple Draft Resolutions on the IOUs' WMPs, in addition to the need to get better insight into the decision-making criteria on how the IOUs target investments

and expenditures at specific locations and identify one solution over the other. For example, the Wildfire Safety Division (“WSD”) explained that it “expects specific and detailed data on the results of its segment-by-segment analysis and its covered conductor pilot in future WMPs to enable the Commission to validate the effectiveness of SDG&E’s prioritization and resource allocation methods” in its comments and review of SDG&E’s 2020 WMP filing.¹⁸ Similar comments were provided across all Draft Resolutions that proposed to conditionally approve the IOUs’ 2020 WMP filings. Among the many conditions, the Commission directed the need for more granular data and information to support its review on how effective, targeted, and prioritized the WMP investments and expenditures were in reducing PSPS events and wildfire risks.

Importantly, microgrids represent an alternative solution that should be weighed against all other investment and expenditure category. As the data quality and granularity of wildfire and PSPS risks improve, CESA recommends that the Commission incorporate the WMP data into a long-term microgrid framework to be developed in Track 2 of this proceeding, as such data will inform where and the degree to which microgrids are needed to mitigate said risks. By making this data broadly accessible to customers and to third-party developers in the framework developed in this proceeding, such customers and developers will also be empowered to better understand their location-specific risks of de-energization or wildfire events, which helps form their own value of resiliency and continued power. Additionally, the IOUs may be more likely to consider microgrids as alternative solutions as a result— an area that the Commission has highlighted as lacking in the WMPs¹⁹ – and avoid duplicative efforts by customers and third parties.

¹⁸ Draft Resolution WSD-005 at 27.

¹⁹ See, for example, Draft Resolution WSD-003 at 38: “PG&E has committed to installing microgrids and switches to sectionalize the grid to mitigate PSPS events. However, PG&E explains that construction resource, land access, permitting, substation upgrades and the presence of interconnection points are limiting factors in microgrid deployment. Further, PG&E does not state how each of these factors will limit

In sum, CESA sees significant value in incorporating the data being submitted and developed as part of the WMPs and in coordinating the two proceedings to support the more strategically develop microgrids by both utilities and third parties, avoid duplication where present, and ensure the most effective and cost competitive resiliency solutions are pursued.

VI. THE MICROGRID FRAMEWORK SHOULD PURSUE COMPETITIVE OUTCOMES AND ESTABLISH POLICIES THAT GUIDE UTILITY OWNERSHIP OF MICROGRIDS.

With several of the IOU proposals pulled from Commission consideration, CESA believes that there are important determinations that the Commission could make in Track 1 to inform how future track proposals should be guided in order to be granted Commission approval. Due to the urgency of developing and implementing resiliency strategies and solutions ahead of the 2020 wildfire season, CESA understands that more robust competitive solicitation processes may not have been able to be pursued. For example, Southern California Edison Company (“SCE”) submitted a Motion on March 16, 2020 that reported on the results of its 2020 Microgrid Pilot Request for Proposals (“RFP”), which was prepared and issued in a closed process to a set of qualified vendors already “onboarded” to SCE’s systems.²⁰ While looking forward to more detailed lessons learned from this RFP and to the potential for a follow-up solicitation in 2021 or 2022, the Commission should ensure that RFPs going forward are issued in a more open process with more lead time that invites a broader pool of bidders and technologies, which may contribute to lower resulting bid costs in future RFPs.

microgrid deployment or identify limitations to microgrid deployment posed by its network system design. PG&E also does not explain if it considered microgrid proposals as alternate solutions to traditional grid design.”

²⁰ See *Motion of Southern California Edison Company’s (U 338-E) to Supplement January 21, 2020 Response* filed on March 16, 2020 in R.19-09-009 at 2-3.

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M329/K656/329656630.PDF>

Similarly, the PD conditionally approved the procurement of the local area distribution controller (“LADC”) project to enhance the operations of an existing microgrid, subject to review of contract timelines and terms. CESA is generally supportive of the LADC project; however, though the RFP was reported as adhering to affiliate transaction rules, CESA has some concerns that the RFP process was not as broadly accessible as possible. Thus, the Commission should ensure that all future solicitations are open and accessible to a broad range of bidders and technologies, RFPs are designed to ensure a level playing field regarding ownership model, and any enabling technology (*e.g.*, LADC) be prescriptively required to be used for all future microgrids when many third parties may be using their own in-house technologies.

Finally, in light of the experience with the Track 1 proposals, CESA recommends that the Commission consider establishing a policy to guide utility ownership of microgrids in future tracks of this proceeding. Decision (“D.”) 19-06-032 from the 2018 Energy Storage Applications proceeding, for example, offers a potential starting point for consideration in guiding how the evaluation of microgrid solutions under utility- versus third-party ownership models could be conducted.²¹ Generally, the principle guiding Assembly Bill (“AB”) 2868 programs and investments could also be applied, where the Commission considers whether any utility-owned microgrid solution does not “unreasonably limit or impair the ability of non-utility enterprises to market and deploy energy storage systems”; in other words, the customer segments where the markets are “working” and where costs are competitive may be better left to third-party development (*e.g.*, behind-the-meter microgrid development for many customer types).

²¹ See Appendix A at 2 of D.19-06-032, *Decision Implementing the AB 2868 Energy Storage Program and Investment Framework and Approving AB 2868 Applications with Modification* issued on July 5, 2019 in A.18-02-016, *et al.*.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M309/K522/309522481.PDF>

VII. CONCLUSION.

CESA appreciates the opportunity to submit these comments on the Track 1 PD and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Alex J. Morris".

Alex J. Morris
Executive Director
CALIFORNIA ENERGY STORAGE ALLIANCE

May 19, 2020

Appendix A:
Proposed Revisions to Findings of Fact, Conclusions of Law, and Orders

Proposed Revisions to Findings of Fact, Conclusions of Law, and Orders

New Finding of Fact

43. Allowing advanced metering infrastructure to enable electrical isolation may be a viable, emerging resiliency strategy in the context of public safety power shutoff mitigation, and an IOU that has positively assessed that viability may use existing procedural means to request recovery of costs for a pilot program.

Conclusions of Law

8. It is reasonable to direct PG&E, SCE, and SDG&E to approach the template design with a goal that the template serves 80 percent or more of potential interconnection projects, and that those template designs be standardized across the utilities **and be representative of different customer types and sizes.**

16. It is reasonable to require PG&E, SCE, and SDG&E on February 15, 2021 to file an information only filing in this proceeding, describing the results of the expedited interconnection process; including:

- (a) Describing the number of projects that utilized the expedited interconnection process; and
- (b) Describing frequency of meeting the expedited timeliness; and
- (c) For any projects that fit the expedited criteria, but nonetheless experienced a delay, the utility shall provide an explanation about why the project was delayed; **and**
- (d) Reporting the interconnection timelines of projects that utilized the expedited interconnection process.**

34. It is reasonable to conditionally authorize the PG&E Make-Ready Program from 2020 through 2022 and to limit the scope of PG&E's Make-Ready Program to the number of substations necessary to keep customers energized during PSPS events or other loss of transmission line events, consistent with the goal to minimize the impact of PSPS.

New Conclusion of Law

47. It is reasonable to authorize PG&E, SCE, and SDG&E, within 60 days of the date of issuance of this decision, each to submit a Tier 2 Advice Letters proposing a pilot proposal that uses advanced metering infrastructure to enable electric isolation. Such Advice Letters shall include the program design, evaluation plan, and requested costs/budget.

Orders

4. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit information only filings on February 15, 2021 in this proceeding, that: (a) describe the results of the expedited interconnection process under Section 4.1.3; (b) describe the number of projects that utilized the expedited interconnection process; (c) the success in meeting the expedited timeliness; ~~and~~ (d) if any project experienced a delay, the utility shall provide an explanation about why the project was delayed; **and (e) report the interconnection timelines of projects that utilized the expedited interconnection process.** In this advice letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 4.

New Order

25. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) are authorized to each submit Tier 2 Advice Letters within 60 days of the date of issuance proposing a pilot proposal that uses advanced metering infrastructure to enable electric isolation that shall include program design, evaluation plan, and requested costs/budget.