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

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
(NOT CONSOLIDATED)	
In the Matter of the Application of Pacificorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005 (Filed July 1, 2015)
And Related Matters.	Application 15-07-007 Application 15-07-008

**COMMENTS OF SOLARCITY CORPORATION ON ASSIGNED COMMISSIONER'S
RULING ON TRACK 3 ISSUES**

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**COMMENTS OF SOLARCITY CORPORATION ON ASSIGNED COMMISSIONER’S
RULING ON TRACK 3 ISSUES**

Pursuant to the *Assigned Commissioner’s Ruling on Track 3 Issues* issued on August 9, 2016 (Ruling), SolarCity Corporation (SolarCity), respectfully submits the following comments.

1. Description of SolarCity

SolarCity is California’s leading full service solar power provider for homeowners and businesses – a single source for engineering, design, installation, monitoring, and support. The company currently has more than 5,000 California employees based at more than 40 facilities

around the state and had installed solar energy systems for over 285,000 customers nationwide as of June 30, 2016.

2. Introduction

As a leading provider of distributed, behind-the-meter energy solutions, SolarCity is keenly interested in the Commission's ongoing efforts to reform utility distribution planning processes. If done correctly, these reforms can ensure that California's largest investor-owned utilities (utilities) are fully accessing the value of distributed energy resources (DERs) to the benefit of ratepayers and California. The Ruling proposes to cull the list of issues to be addressed in Track 3 from the 22 items that were listed in the Scoping Memo issued on January 27, 2016, to 8 issues.

SolarCity appreciates that given limited time and resources available to the Commission and stakeholders, there is a need to prioritize what issues the Commission can drive to resolution, identify those issues that are being addressed, and eliminate issues that are too ill-defined for meaningful action. However, we are concerned that in its effort to narrow the scope to a more manageable and defined set of issues, the Ruling may be cutting short additional dialogue and action on important issues. SolarCity is particularly concerned in this regard with respect to data access, something that SolarCity believes is foundational to any effort that seeks to fundamentally alter utility distribution planning to both facilitate and fully take advantage of the capabilities of DERs.

Specifically, the Ruling indicates that data access and confidentiality issues have been “[a]ddressed in Track 1, as well as IDER and energy efficiency proceedings.”¹ SolarCity does not dispute that issues related to data access have been discussed in Track 1 as well as in the IDER

¹ Ruling, p. 6 (item 17 in table).

and energy efficiency proceedings. Indeed, in this Distribution Resources Plans (DRP) proceeding there has been extensive discussion on data access issues to date. That said, from SolarCity's perspective and as detailed further below, there remain a number of outstanding questions that would lend themselves to additional dialogue and Commission action. SolarCity feels it is critically important to ensure that the Commission continues to actively engage stakeholders specifically within the context of the DRP proceeding on data access issues. To that end, we request that data access be included among the Track 3 issues as well as renew our call and support for the creation of a data access working group.

3. Discussion

Data is the lifeblood of any robust distribution planning process. Ultimately, the identification of a grid need and the selection of the least-cost, best-fit solution to the need is based on data related to the grid, data related to load and DER adoption, and data related to the distribution investment options. Without access to this information, the ability of DER providers to offer solutions is inherently limited and ratepayers will only benefit from DER solutions to the extent that utilities accurately assess needs and solutions. Undoubtedly, this assessment would be improved with informed technical input from the ecosystem of DER providers and experts.

SolarCity contends that determinations made exclusively by utilities would be suboptimal and inconsistent with overarching objectives of the DRP proceeding. One of the critical factors creating the opportunity to reform the utility planning process is the increased sophistication of non-utility entities to develop robust DER-driven solutions. However, fully leveraging these capabilities is fundamentally dependent on robust access to data that heretofore has been largely if not exclusively held and used solely by the utilities.

To date, the issue of data access has been discussed in a number of different places both within and outside of the DRP proceeding. Within the DRP proceeding, data access has been discussed via the following: in response to the February 6, 2015 Guidance Ruling which indicated what elements the utilities needed to include in their DRP filings with respect to data access; in the July 1, 2015 DRP applications of the utilities within which each opined with varying degrees of specificity on how they intended to fulfill this guidance; in the August 31, 2015 responses and protests to the utilities DRP applications; and in the utilities' September 15, 2015 replies to parties' responses and motions. As well, in April of this year, the Administrative Law Judge asked parties a set of detailed questions regarding data access² and on May 23 the Commission held a workshop to discuss data access. SolarCity appreciates all of these efforts, as well as the discussions that have occurred to date on in the context of the Integration Capacity Analysis (ICA) and Locational Net Benefit Analysis (LNBA) working groups. However, despite the dialogue to date, SolarCity believes there are a number of questions and issues that remain outstanding. SolarCity identifies the following issues as unresolved and in need of additional focus and ultimately a Commission decision.

- The extent of any limitations that may be placed on certain types of data to address utility confidentiality and security concerns. Based on conversations to date it remains unclear what types of data would be subject to restrictions in terms of who would be able to access different data sets and under what constraints or requirements. This discussion could also explore the usefulness of reasonable changes to current confidentiality and security guidelines to enable more robust sharing of grid information.

² *Administrative Law Judge's Ruling Instructing Utilities and Non-Utility Parties to Answer Data Request*, April 29, 2016.

- How data will be shared as part of the utilities' routine distribution planning process. Data access discussions currently underway in this DRP proceeding center around Demonstrations A and B in Track 2. While some progress can be made in these discussions, the conversation is not driving toward a solution that will support the maximization of shared data in the utilities' annual distribution planning processes. Discussion of data in the context of proposed changes to routine utility practice will unlock the most value from the data being shared.
- The establishment of a centralized platform that would serve as a gateway or means by which data access would be provided. We note that the utilities' joint presentation made at the workshop on May 23 highlights the challenges of trying to access data that the utilities currently make available. Specifically, slides 13 and 14 of that presentation provide a laundry list of proceedings, reports and online databases through which various types of data can be accessed. SolarCity contends that particularly as the Commission looks to expand the types of data that will be made available, there is a pressing need to create a centralized platform to facilitate access and utilization of this data.

Given these outstanding items we ask that the Commission include data access among the Track 3 issues, either as a new standalone Sub-Track 4 or as part of the currently proposed Sub-Track 3. Additionally we reiterate our support for the creations of a data access working group, initially made in response to the April 29, 2016 Ruling.³ This group would be charged with performing the following tasks:

³ *Response of SolarCity Corporation to the Administrative Law Judge's Ruling Instructing the Utilities and Non-Utility Parties to Answer Data Request*, May 13, 2016, pp. 3-4.

- Systematically identifying the types of data that should be made available in support of the DRP vision.
- For each data set or type identified, determining the format the data should be provided in, the interim means by which this data would be accessed, the manner in which the data is to be maintained, and the types of restrictions or other requirements to address customer confidentiality or security concerns.
- Determining the scope of the requirements for a centralized data sharing platform that would serve as a single point of entry to access the data identified above and establish a schedule and process for the development/implementation of such a platform.

The working group should be directed to meet for a minimum of three day-long sessions to discuss these issues subsequent to which it should provide the Commission a status update. We believe it would be reasonable for this update to be provided to the Commission by October 31, 2016. This update would then inform a decision to be issued in Q1 2017 establishing the DRP data access regime.

SolarCity understands that some of the envisioned activities of this working group may overlap with discussions that have taken place in the context of the ICA and LNBA working groups. Thus, coordination will be critical. However, we also believe that the lack of a specific venue or forum dedicated to data access issues has forced these groups to tackle issues that are better addressed in a more global manner, as we are proposing here. SolarCity expects that there would be many common participants between the other DRP working groups and a new working group, which would facilitate coordination.

