



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Regarding Policies,  
Procedures and Rules for the California Solar  
Initiative, the Self-Generation Incentive Program and  
Other Distributed Generation Issues.

RULEMAKING 12-11-005  
(Filed November 8, 2012)

**Response of Center for Sustainable Energy® to the Motion of Advanced  
Microgrid Solutions, Inc., Green Charge Networks, LLC, and Stem, Inc., to  
Reopen Record and Consider Grid Support Priority**

**Center for Sustainable Energy®**

**April 10, 2017**

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## Table of Contents

I.	Introduction	1
II.	Proposal for Additional Lottery Priority Category Based On Grid Support	1
III.	Conclusion	2

## I. INTRODUCTION

The Center for Sustainable Energy<sup>®</sup> (CSE) appreciates the opportunity to provide this Response to the *Motion of Advanced Microgrid Solutions, Inc., Green Charge Networks, LLC, and Stem, Inc., to Reopen Record and Consider Grid Support Priority* (Motion). CSE generally opposes the Motion and provides the following in response.

## II. PROPOSAL FOR ADDITIONAL LOTTERY PRIORITY CATEGORY BASED ON GRID SUPPORT

Commission Decision (D.)16-06-055 gave the Self-Generation Incentive Program (SGIP) Program Administrators (PAs) the authority to adopt additional lottery priority categories. Nevertheless, after deliberating for several months, the PAs decided not to overcomplicate the SGIP's lottery structure by establishing other priority categories, particularly lottery categories that could not be easily verified. CSE cautions that if any additional lottery priorities are established after program opening, they must be fair, transparent, and easily verifiable.

In their Motion, Advanced Microgrid Solutions, Inc., Green Charge Networks, LLC, and Stem, Inc., (the Joint Storage Parties) propose an additional "grid support" lottery priority category for energy storage projects that operate in a manner that provides benefits to the grid, such as limiting charging load to off-peak or other utility designated times only. Regrettably, this proposed priority category is even more vague than the priority category for storage charging from renewable generators, the priority category the Joint Storage Parties have separately proposed the Commission investigate.<sup>1</sup> Furthermore, the Joint Storage Parties suggest that verification for applicable projects would occur at the Proof of Project Milestone stage – several months after the lottery. Most notably however, the Joint Storage Parties' proposal suffers from the same inherent limitation as the priority for storage charging from

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<sup>1</sup> See *Motion of Advanced Microgrid Solutions, Inc., Green Charge Networks, LLC, and Stem, Inc., for Immediate Staff Investigation of Self-Generation Incentive Program*, April 3, 2017.

renewable generators in that compliance cannot truly be confirmed until the project is operational. This would exponentially exacerbate the complexity of lotteries, potential gaming, and inequities in the application process. CSE urges the Commission to not enact any additional program requirements or lottery prioritizations that are ambiguous and/or cannot be easily verified upon application submission.

### III. CONCLUSION

CSE appreciates the opportunity to provide this Response to the Motion.

April 10, 2017

A handwritten signature in black ink, appearing to read "Sachu Constantine", with a stylized flourish at the end.

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