

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the Self-
Generation Incentive Program and Related
Issues.

Rulemaking 20-05-012
(Filed May 28, 2020)

**POST-PREHEARING CONFERENCE STATEMENT OF THE
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES**

August 4, 2020

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CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES**

The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits this Post-Prehearing Conference (PHC) Statement in Order Instituting Rulemaking (R.) 20-05-012 (Self-Generation Incentive Program (SGIP)). This Post-PHC Statement is filed and served pursuant to the California Rules of Practice and Procedure and the Administrative Law Judge's (ALJ's) Email Ruling of July 17, 2020.

I.

**THE SCOPING MEMO IN THIS PROCEEDING MUST PROVIDE FOR
CONSIDERATION OF AND COORDINATION BETWEEN SGIP AND INTEGRATED
RESOURCE PLANNING AND THE RESOURCE ADEQUACY PROGRAM.**

CEERT appreciated the opportunity to participate in the Prehearing Conference (PHC) in R.20-05-012 (SGIP) on July 29, 2020. At that time, in addressing the scope of this proceeding, CEERT emphasized, as it did in its Motion for Party Status,¹ the importance of coordinating and considering actions taken in R.20-05-003 (Integrated Resource Planning (IRP)) and R.19-11-009 (Resource Adequacy (RA)) in ensuring that the technologies and resources incentivized by SGIP perform in a manner that reduce GHG emissions, improve air quality by reducing criteria pollutants, and improve distribution and transmission system reliability and efficiency, consistent with applicable law.²

¹ CEERT Motion for Party Status, at p. 2.

² R.20-05-012, at pp. 2-7.

On that point, CEERT offers these additional comments to more fully explain this concern and the need to expressly recognize the impact of IRP and RA on SGIP in the final, adopted Scoping Memo. Virtually by definition, projects eligible for SGIP provide both system and local capacity value to the electric grid, and, because they utilize preferred resources, SGIP resources normally provide Greenhouse Gas (GHG) benefits and could provide Renewable Portfolio Standard (RPS) Program eligible energy. As the Commission moves to centralize and coordinate all new resource procurement, including new RA capacity, in the IRP process and RA Program, where just recently the Commission acted to include establishing net qualifying capacity (NQC) values for Behind-the-Meter (BTM) distributed resources in the pending Track 3.A of R.19-11-009 (RA),³ the IRP and RA value streams of SGIP projects need explicit consideration in this proceeding.

The timing, funding, and volume targets in this round of SGIP are significant in potentially achieving market transformation for distributed clean preferred resources to assist in cost effectively meeting long term Senate Bill (SB) 100 decarbonization goals. The need to transition away from near exclusive reliance on centralized gas resources to supply local and system RA capacity to save ratepayer costs and allow achievement of other policy objectives, including closure of Aliso Canyon, is acute. SGIP plays an important role in this transformation.

II. CONCLUSION

CEERT appreciates this opportunity to more fully detail its request for the Scoping Memo in this proceeding to explicitly recognize and include coordination and consideration of the IRP and RA Program proceedings and outcomes in this SGIP Rulemaking.

³ On July 7, 2020, the Commission issued an Amended Scoping Memo in R.19-11-009 (RA) for Track 3, which includes this issue in Track 3.A, with a joint agency workshop on the issue to be followed by party comments in August and September 2020. (Amended Scoping Memo, at page 4.)

Respectfully submitted,

August 4, 2020

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