



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)

**OPENING COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES ON QUESTIONS (b) - (k) OF THE
ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING**

September 16, 2020

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The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submit these Opening Comments on Questions (b) through (k) posed for party comment in the Assigned Commissioner's Scoping Memo and Ruling in Order Instituting Rulemaking (R.) 20-05-012 (Self-Generation Incentive Program (SGIP)) issued on August 17, 2020 (Scoping Memo). These Opening Comments are filed and served pursuant to the Commission's Rules of Practice and Procedure and the Scoping Memo.

**I.
CEERT APPRECIATES THE DECISION BY COMMISSIONER RECHTSCHAFFEN
TO INCLUDE THE COORDINATION OF THE RA, IRP, AND SGIP
RULEMAKINGS WITHIN THE SCOPE OF THIS PROCEEDING.**

CEERT welcomes the opportunity to address questions (b) through (k) posed by the Scoping Memo for party comment due today.¹ Before addressing those questions, however, CEERT first wishes to state its appreciation for the decision by Commissioner Rechtschaffen in the Scoping Memo to heed the suggestion to coordinate the Commission's Resource Adequacy (RA) and Integrated Resource Planning (IRP) Rulemakings (R.19-11-009 (RA) and R.20-05-003 (IRP)) with this new SGIP Rulemaking.²

¹ Scoping Memo, at pp. 8-10, 15.

² Scoping Memo, at p. 7.

As stated in its Motion for Party Status in this proceeding, CEERT is a nonprofit public-benefit organization founded in 1990 and based in Sacramento, California. CEERT is a partnership of major private-sector clean energy companies. CEERT designs and fights for policies that promote global warming solutions and increased reliance on clean, renewable energy sources for California and the West. CEERT is working toward building a new energy economy, including cutting contributions to global warming and reducing dependence on fossil fuels.³

With this background, CEERT in its Post-PHC Statement had stressed the importance of coordinating the RA and IRP Rulemakings with this new SGIP proceeding. Specifically, CEERT stated that the RA, IRP, and SGIP proceedings are inextricably linked because SGIP projects provide both system and local capacity value to the grid, provide greenhouse gas (GHG) reduction benefits, and provide Renewable Portfolio Standard (RPS) Program eligible energy. This is especially important in preparing for the overlapping retirements of Diablo Canyon and the once through cooling (OTC) gas plants. Coordination between these proceedings, as now confirmed by the Scoping Memo, will ensure that the resources necessary for California's clean energy transition and incentivized by SGIP will reduce GHG emissions, improve air quality by reducing criteria pollutants, and improve distribution and transmission system reliability and efficiency.

II. CEERT'S RESPONSES TO SCOPING MEMO QUESTIONS (b) – (k)

For Questions (b) through (g) and (i) through (k) posed by the Scoping Memo, CEERT does not have comments at this time, but reserves the right to do so in reply to the opening comments of other parties on those questions. CEERT's focus for purposes of these Opening

³ CEERT Motion for Party Status (July 27, 2020), at pp. 1-2.

Comments is on the issue of SGIP incentives for EV storage systems or EVSE posed in Questions (h) and (i) as follows.

h. How can SGIP incentives facilitate use of EV energy storage systems and/or EVSE to reduce peak load on the grid and/or to charge the storage system when excess electricity is available?

As observed over the past couple of months, flexible demand plays a necessary role in ensuring reliability as California's grid transition continues. EV controlled charging is probably the most significant single avenue of creating flexible load, as supported in the California Energy Commission's (CEC's) Senate Bill (SB) 100 Draft Results.⁴ Flexible demand, such as that supported by managed EV charging, can help prevent dirty gas generation from coming online, and therefore, helps reduce overall grid GHG emissions. Furthermore, managed EV charging can provide ancillary services to the grid by helping to mitigate excess renewable generation curtailment or by reducing peak load when necessary.

EV energy storage systems and/or EVSE provide clean resiliency benefits to both customers vulnerable to public safety power shutoffs (PSPS) as well as to the broader grid. However, SGIP incentives for EV storage systems and EVSE must be aligned with the IRP and RA programs to ensure best results.

i. How can SGIP incentives facilitate use of EV storage systems and/or EVSE to reduce grid GHG emissions?

CEERT incorporates by reference its response to Question (k) above here. CEERT also reserves the right to comment further on this topic in reply to the opening comments of other parties.

⁴ SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future, Draft Results Presentation (available at <https://www.energy.ca.gov/event/workshop/2020-09/senate-bill-100-draft-results-workshop>), at Slide 20.

**III.
CONCLUSION**

CEERT appreciates the opportunity to comment on questions (b) – (k) posed by the Scoping Memo for comment. CEERT also wishes to state its appreciation again for the Commissioner’s decision to explicitly include the coordination of the RA, IRP, and SGIP Rulemakings within the scope of this proceeding.

Respectfully submitted,

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