



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Forward
Resource Adequacy Procurement Obligations.

FILED

06/15/21
02:40 PM

Rulemaking 19-11-009
(Filed November 7, 2019)

**REPLY COMMENTS OF
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON
PROPOSED DECISION ADOPTING LOCAL CAPACITY OBLIGATIONS FOR 2022-
2024, FLEXIBLE CAPACITY OBLIGATIONS FOR 2022, AND REFINEMENTS TO THE
RESOURCE ADEQUACY PROGRAM**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

June 15, 2021

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RESOURCE ADEQUACY PROGRAM**

Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Reply Comments on the Proposed Decision Adopting Local Capacity Obligations for 2022-2024, Flexible Capacity Obligations for 2022, and Refinements to the Resource Adequacy Program, mailed in this proceeding on May 21, 2021. These Reply Comments are timely filed and served pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure and the instructions accompanying the Proposed Decision.

**I.
CEERT’S PROPOSAL FOR QC COUNTING OF DC COUPLED HYBRIDS IS
CONSISTENT WITH CURRENT ADOPTED COMMISSION POLICY**

D.20-06-031 adopted a Qualifying Capacity (“QC”) methodology for hybrid resources receiving the Investment Tax Credit that is applied when both the renewable and storage components are deliverable. It assumes the battery charges solely from the renewable and caps total QC at the interconnection limit.¹ CEERT’s proposal is simply to use the actual size of the renewable component as represented by its DC rating when calculating the renewable component QC for a DC coupled hybrid. Vote Solar, the Large Scale Solar Association, and the Solar Energy Industries Association (“Solar Parties”) articulate the reasoning well in their Opening

¹ See Existing Hybrid QC Methodology, Energy Division workshop presentation, Nov 23, 2020.

Comments. The Solar Parties correctly point out that the CEERT proposal is grounded in the fact that a DC coupled hybrid configuration avoids losses from “clipped energy” for generation in excess of the inverter AC rating.² The California Energy Storage Alliance (“CESA”) and Americans for Clean Power – California (“ACP-CA”) correctly observe that the DC configuration and the DC rating of the solar array required to easily implement the CEERT proposal are clearly and unambiguously contained in the California Independent System Operator (CAISO) Master File information used for the project Interconnection Studies.³

CEERT actually agrees with Calpine’s observation that, eventually, the broader, more granular implications of energy production from DC coupled hybrids need to be addressed more systematically.⁴ However, Calpine’s concern is misplaced for now. It is more appropriate to consider this topic in the proposed workshops on broader RA reform contemplated by the recent Proposed Decision on Restructure of the Resource Adequacy Program.⁵ The metrics surrounding energy production from all configurations of hybrid resources depend upon how the Pacific Gas and Electric Company (“PG&E”) “Slice of Day” reform proposal or the Southern California Edison – California Community Choice Aggregators Association (“SCE-CalCCA”) bottom up “Net Qualifying Energy” proposal or some combination of these two proposals are actually implemented in the future. Meanwhile, there is nothing “systematic” about using the correct data for the current QC calculation under the current RA paradigm.

² Solar Parties Opening Comments, at pp. 3-5.

³ See CESA Opening Comments, at p. 8 and ACP-CA Opening Comments, at pp. 3-4.

⁴ Calpine Opening Comments, at p. 5.

⁵ Decision on Track 3B.2 Issues: Restructure of the Resource Adequacy Program, Proposed Decision of AQLJs Chiv and Nojan, June 10, 2021.

**II.
CONCLUSION**

CEERT asks simply that its proposal for calculating QC for DC coupled hybrids under D.20-06-031 be adopted in this decision.

Respectfully submitted,

June 15, 2021

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