

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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

Rulemaking 21-10-002
(Filed October 7, 2021)

**OPENING COMMENTS OF
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
ON THE ORDER INSTITUTING RULEMAKING TO OVERSEE THE RESOURCE
ADEQUACY PROGRAM, CONSIDER PROGRAM REFINEMENTS, AND ESTABLISH
FORWARD RESOURCE ADEQUACY PROCUREMENT OBLIGATIONS**

November 1, 2021

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

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Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates this opportunity to submit its Opening Comments on the Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Forward Resource Adequacy Procurement Obligations (OIR), pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC or Commission) and the instructions accompanying the OIR issued October 11, 2021.

**I.
BACKGROUND**

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, environmental organizations, public health groups and environmental justice organizations. 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. CEERT has long advocated before the Commission for increased use of preferred resources and for California to move towards a clean energy future.

CEERT was a party to and actively participated in the most recent resource adequacy (RA) rulemakings (R.17-09-020 and R.19-11-009). CEERT has also been a party to numerous other Commission proceedings, including, but not limited to, the Extreme Weather rulemaking (R.20-11-003), the Integrated Resources Plan rulemakings (R.16-02-007 and R. 20-05-003), Demand Response (DR) rulemaking (R.13-09-011), and the Long-Term Procurement Plan (LTPP) rulemakings (i.e., R.12-03-014, R.13-12-010).

II. CEERT COMMENTS ON PRELIMINARY SCOPE OF R.21-10-002

The OIR states that there will be two (2) tracks in this proceeding – an Implementation Track and a Reform Track.¹ CEERT intends to participate in all aspects of this proceeding, but these Opening Comments will be limited to the qualifying capacity (QC) counting conventions.² The OIR states that this rulemaking will consider “potential modifications to QC counting conventions and requirements for third-party demand response resources, hybrid resources, wind and solar resources, and other resources.”³

The use of hybrids going forward in RA is extremely important. In R.19-11-009, CEERT set forth a proposal for counting direct current (DC) coupled hybrid resources.⁴ This proposal was not adopted in Decision (D.) 21-06-029.⁵ However, while the Commission found CEERT’s proposal “not implementable at this time,” it also stated that it “welcomes further development of the proposal.”⁶ As such, CEERT recommends that the Commission make revisions to the RA counting methodology for hybrid resources based on CEERT’s proposal. In addition, CEERT

¹ OIR, at pp. 4-6.

² *Id.*, at p. 5.

³ *Id.*

⁴ CEERT Track 3B.1 Proposal, submitted in R.19-11-009 on January 28, 2021.

⁵ D.21-06-029, at pp. 49-50.

⁶ *Id.*, at pp. 49-50.

recommends that the Commission hold workshops to discuss this proposal to recognize the energy contained in a DC coupled hybrid when assigning a capacity value to that form of simple hybrid.

**III.
CEERT COMMENTS ON CATEGORY, NEED FOR HEARING, AND SCHEDULE**

CEERT does not object to the preliminary determinations regarding category, need for hearing and schedule.

**IV.
CONFIRMATION OF PARTY STATUS**

Pursuant to Section 7 at page 11: “Persons who file responsive comments become parties to the proceeding (*see* Rule 1.4(a)(2)) and will be added to the ‘Parties’ category of the official service list upon such filing.” By filing these responsive comments, therefore, CEERT requests “party status” and inclusion on the service list of R.20-10-002 as a party as follows:

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**V.
CONCLUSION**

CEERT appreciates the Commission’s consideration and the opportunity to provide Opening Comments on the OIR. CEERT urges the Commission to amend the preliminary scope for this OIR as recommended herein.

Dated: November 1, 2021

Respectfully submitted,

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