

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

Rulemaking 22-11-0013/09/23
(Filed November 17, 2022) 8 PM
R2211013

Order Instituting Rulemaking to Consider
Distributed Energy Resource Program Cost-
Effectiveness Issues, Data Access and Use,
and Equipment Performance Standards.

**OPENING COMMENTS OF THE
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
ON THE ORDER INSTITUTING RULEMAKING TO CONSIDER DISTRIBUTED
ENERGY RESOURCE PROGRAM COST-EFFECTIVENESS ISSUES, DATA USE AND
ACCESS, AND EQUIPMENT PERFORMANCE STANDARDS**

January 9, 2023

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

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The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates this opportunity to submit its Opening Comments on the Order Instituting Rulemaking to Consider Distributed Energy Resource Program Cost-Effectiveness Issues, Data Use and Access, and Equipment and Performance Standards (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 official OIR issued on November 23, 2022.

**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 has been a party to numerous other Commission proceedings, including, but not limited to, the Resource Adequacy (RA) rulemakings (R.17-09-020, R.19-11-009, and R.21-10-002), 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), Demand Flexibility (R.22-07-005) 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.22-11-013

CEERT has long advocated for reducing greenhouse gas (GHG) emissions and agrees with the OIR that “[t]he need to reduce GHG emissions is a leading driver of California’s energy policies.”¹ CEERT also appreciates that this proceeding advances the customer programs track of the Distributed Energy Resource (DER) Action Plan which, in part, “focuses on improving coordination, planning and developing consistent metrics across DER proceedings related to customer programs to maximize their contributions to [greenhouse gas] (GHG) reductions and other state energy goals.”²

Of particular interest to CEERT is incorporation of DERs into the integrated resource planning (IRP) modeling as candidate resources. As such, CEERT supports the Track 1 issue of improved coordination with other proceedings. In response to Track 1, Question 3 on page 20, CEERT responds that it is very important to fully incorporate DERs into the IRP process. Incorporating clean energy resources, such as DERs, will lead to California achieving its clean energy goals and reduce California’s reliance on fossil fuel generation.

¹ OIR, at p. 5.

² Id., at pp. 2-3.

**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 8 at page 29: “Persons who file responsive comments become parties to the proceeding 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.22-11-013 as a party as follows:

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***FOR: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE
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**V.
CONCLUSION**

CEERT appreciates the Commission’s consideration and the opportunity to provide Opening Comments on the OIR.

Dated: January 9, 2023

Respectfully submitted,

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