

### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED 06/18/24 04:59 PM R2106017

Order Instituting Rulemaking to Modernize the Electric Grid for A High Distributed Energy Resources (DER) Future

**Rulemaking 21-06-017** 

#### CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused the attached REPLY COMMENTS OF LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION (LGSEC) ON STAFF PROPOSAL FOR THE HIGH DER PROCEEDING to be served pursuant to the California Public Utility Commission's (CPUC) Rules of Practice and Procedure upon the official service list for R.21-06-017, obtained from the CPUC's website and attached hereto, by electronic mail (e-mail) to all persons with a valid e-mail address on the official service list and by U.S. Mail to all parties without a valid e-mail address on the official service list. I have also sent a hard copy by U.S. Mail to the Assigned Administrative Law Judges in this proceeding.

Executed 06/24/2024 at San Francisco, California.

/s/ Steven Moss Steven Moss Partner, M.Cubed

Regulatory Consultant for:
LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

296 LIBERTY STREET San Francisco, CA 94114 Telephone: (415) 643.9578 Email: steven@moss.net

June 24, 2024

# CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

Proceeding: R2106017 - CPUC - OIR TO MODERN

Filer: CPUC List Name: LIST

Last changed: June 12, 2024

## Parties, Served Via Email

JEANNE B. ARMSTRONG SEPHRA A. NINOW, J.D.

SR. COUNSEL - REGULATORY CENTER FOR SUSTAINABLE ENERGY

SOLAR ENERGY INDUSTRIES ASSOCIATION EMAIL ONLY

EMAIL ONLY EMAIL ONLY, CA 00000

SACRAMENTO, CA 00000 FOR: CENTER FOR SUSTAINABLE ENERGY

FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION

WARD CAMP JESS MELANSON

POWERLEY COO

EMAIL ONLY UTILIDATA, INC.

EMAIL ONLY, CA 00000 225 DYER STREET, CIC - 2ND FL.

FOR: POWERLEY PROVIDENCE, RI 02903

FOR: UTILIDATA, INC.

BRADY BORCHERDING C. BAIRD BROWN

DIR - GOVERNMENT AFFAIRS- WEST COAST ATTORNEY

FUELCELL ENERGY, INC. ECO(N) LAW LLC

3 GREAT PASTURE ROAD 230 S. BROAD STREET, 17TH FL.

DANBURY, CT 06810 PHILADELPHIA, PA 19102

FOR: FUELCELL ENERGY, INC. FOR: MICROGRID RESOURCES COALITION

WILFRED AUDLEY

MGR - BUSINESS DEVELOP.

ELEXSYS ENERGY USA INC.

8 THE GREEN, STE. B

DOVER, DE 19901

FOR: ELEXSYS ENERGY USA INC.

NOAH GARCIA

PRINCIPAL

ADVANCED ENERGY UNITED, INC.

1010 VERMONT AVE. NW, SUITE 1050

WASHINGTON, DC 20005

FOR: ADVANCED ENERGY UNITED, INC.

(FORMERLY ADVANCED ENERGY ECONOMY)

CHARLIE COGGESHALL

SR. ANALYST - WEST REGIONAL DIR CORPORATE VP - GOV'NT / INDUSTRY

AFFAIRS

COALITION FOR COMMUNITY SOLAR ACCESS A.O. SMITH CORPORATION

1380 MONROE ST., NW 721

WASHINGTON, DC 20010

FOR: COALITION FOR COMMUNITY SOLAR FOR: A. O. SMITH CORPORATION

ACCESS (CCSA)

JOSHUA C. GREENE, ESQ.

11270 WEST PARK PLACE, STE. 170

MILWAUKEE, WI 53224

MARY E. BROWN

SR. EXE. VP & CHIEF LEGAL OFFICER

OPEN ACCESS TECHNOLOGY INT'L., INC.

7901 COMPUTER AVENUE

BLOOMINGTON, MN 55435

FOR: OPEN ACCESS TECHNOLOGY

INTERNATIONAL, INC.

SCOTT D. LIPTON

ENERGY POLICY MGR, WESTERN REGION

ENCHANTED ROCK, LLC

1113 VINE STREET, STE. 101

HOUSTON, TX 77002

FOR: ENCHANTED ROCK, LLC

EDWARD L. HSU

SR COUNSEL

SOUTHERN CALIFORNIA GAS COMPANY

555 WEST 5TH STREET, GT14E7, STE. 1400 LOS ANGELES, CA 90064

LOS ANGELES, CA 90013

ANDREA LEON-GROSSMAN

VOTE SOLAR

PO BOX 641563

FOR: VOTE SOLAR

FOR: SOUTHERN CALIFORNIA GAS COMPANY

ALEX PFEIFER-ROSENBLUM

CALSTART, INC.

ATTORNEY

WILLIAM W. YU

48 S CHESTER AVE

SOUTHERN CALIFORNIA EDISON COMPANY

PASADENA, CA 91106

2244 WALNUT GROVE AVE.

FOR: CALSTART, INC.

ROSEMEAD, CA 91770

COMPANY

FOR: SOUTHERN CALIFORNIA EDISON

JACQUELINE PIERO

JANE KRIKORIAN, J.D.

VP - POLICY

MGR - REGULATORY PROGRAM

NUVVE HOLDING CORPORATION

UTILITY CONSUMERS' ACTION NETWORK

2488 HISTORIC DECATUR ROAD, STE. 200 3405 KENYON STREET, SUITE 401

SAN DIEGO, CA 92106

SAN DIEGO, CA 92110

FOR: NUVVE HOLDING CORPORATION FOR: UTILITY CONSUMERS' ACTION

NETWORK

(UCAN)

BILL POWERS

ROGER A. CERDA

THE PROTECT OUR COMMUNITIES FOUNDATION SR. COUNSEL - REGULATORY

4452 PARK BLVD UNIT 309

SAN DIEGO GAS & ELECTRIC COMPANY

8330 CENTURY PARK COURT, CP32D

SAN DIEGO, CA 92116

SAN DIEGO, CA 92123

FOR: THE PROTECT OUR COMMUNITIES

FOR: SAN DIEGO GAS & ELECTRIC

FOUNDATION COMPANY

JONATHAN HART

JACK BROUWER

MGR - PUBLIC POLICY

DIR.

POWERFLEX

UNIVERSITY OF CALIFORNIA IRVINE

15445 INNOVATION DRIVE

SAN DIEGO, CA 92128

FOR: EDF RENEWABLES, INC.

CENTER

NATIONAIL FUEL CELL RESEARCH CENTER

UNIVERSITY OF CALIFORNIA

IRVINE, CA 92697-3550

FOR: NATIONAL FUEL CELL RESEARCH

SARA FITZSIMON NELSON, J.D.

DIR - POLICY

CALIFORNIA HYDROGEN BUSINESS COUNCIL

18847 VIA SERENO

YORBA LINDA, CA 92866

FOR: CALIFORNIA HYDROGEN BUSINESS FOR: SYNERGISTIC SOLUTIONS

COUNCIL

ROBERT PERRY

PRINCIPAL CONSULTANT

SYNERGISTIC SOLUTIONS

3686 YOUNG WOLF DRIVE

SIMI VALLEY, CA 93065

BEN SCHWARTZ

POLICY MGR

CLEAN COALITION

1800 GARDEN STREET

SANTA BARBARA, CA 93101

FOR: CLEAN COALITION

EDWARD CAZALET, PH.D

CEO

TEMIX, INC.

EMAIL ONLY

EMAIL ONLY, CA 94022

FOR: TEMIX, INC.

SERJ BERELSON

SENIOR POLICY MANAGER, WEST

MAINSPRING ENERGY, INC.

COUNCIL

3601 HAVEN AVENUE

MENLO PARK, CA 94025

FOR: MAINSPRING ENERGY, INC

SERJ BERELSON

DIR - POLICY

CALIF EFFICIENCY + DEMAND MGNT

1111 BROADWAY, STE. 300

OAKLAND, CA 94067

FOR: CALIFORNIA EFFICIENCY + DEMAND

MANAGEMENT COUNCIL

RACHAEL KOSS YOCHANAN ZAKAI

ATTORNEY ATTORNEY

ADAMS BROADWELL JOSEPH & CORDOZO SHUTE MIHALY & WEINBERGER LLP

601 GATEWAY BLVD., STE. 1000 396 HAYES STREET

SOUTH SAN FRANCISCO, CA 94080 SAN FRANCISCO, CA 94102

FOR: COALITION OF CALIFORNIA UTILITY FOR: INTERSTATE RENEWABLE ENERGY

EMPLOYEES COUNCIL, INC.

MATT MILEY AMANDA MYERS WISSER

CALIF PUBLIC UTILITIES COMMISSION MGR - REGULATORY, WEST

LEGAL DIVISION WEAVE GRID, INC.

ROOM 5135 222 7TH STREET, 2ND FL.

505 VAN NESS AVENUE SAN FRANCISCO, CA 94103

SAN FRANCISCO, CA 94102-3214 FOR: WEAVE GRID, INC.

LUKE MAY MILES MULLER

ATTORNEY ATTORNEY

SMALL BUSINESS UTILITY ADVOCATES NATURAL RESOURCES DEFENSE COUNCIL

548 MARKET STREET, STE. 11200 111 SUTTER STREET, 21ST FL.

SAN FRANCISCO, CA 94104 SAN FRANCISCO, CA 94104

FOR: SMALL BUSINESS UTILITY ADVOCATES FOR: NATURAL RESOURCES DEFENSE

COUNCIL

FOR: PUBLIC ADVOCATES OFFICE

(SBUA)

NIKHIL VIJAYKAR NIKHIL VIJAYKAR

ATTORNEY ATTORNEY

KEYES & FOX LLP KEYES & FOX LLP

580 CALIFORNIA STREET, 12TH FL. 580 CALIFORNIA STREET, 12TH FL.

SAN FRANCISCO, CA 94104 SAN FRANCISCO, CA 94104 FOR: AVA COMMUNITY ENERGY AUTHORITY FOR: JOINT CCAS: SILICON VALLEY

CLEAN

(FORMERLY EAST BAY COMMUNITY ENERGY

AUTHORITY)

ENERGY

AUTHORITY.

ENERGY AUTHORITY, PENINSULA CLEAN

ENERGY AUTHORITY, SAN JOSE CLEAN

AUTHORITY, SONOMA CLEAN POWER

NIKHIL VIJAYKAR MICHAEL COLVIN

KEYES & FOX LLP DIR - REGULATORY

ENVIRONMENTAL DEFENSE FUND 580 CALIFORNIA ST., 12TH FLOOR

SAN FRANCISCO, CA 94104 123 MISSION ST, 28TH FL.

FOR: SAN DIEGO COMMUNITY POWER (SDCP) SAN FRANCISCO, CA 94105

FOR: ENVIRONMENTAL DEFENSE FUND

NORA SHERIFF WALKER WRIGHT

ASSOCIATION ( CLECA )

ANDY A. UMANA

ATTORNEY SUNRUN, INC.

225 BUSH STREET, 14TH FLOOR BUCHALTER, A PROFESSIONAL CORPORATION

55 SECOND STREET, SUITE 1700 SAN FRANCISCO, CA 94105

SAN FRANCISCO, CA 94105 FOR: SUNRUN, INC.

FOR: CALIFORNIA LARGE ENERGY CONSUMERS

ATTORNEY CHIEF DEVELOPMENT OFFICER

AT&T SERVICE, INC. LEAPFROG POWER, INC.

430 BUSH STREET, ROOM 6043 1700 MONTGOMERY STREET, SUITE 200

ANDREW HOFFMAN

SAN FRANCISCO, CA 94108 SAN FRANCISCO, CA 94111

FOR: PACIFIC BELL TELEPHONE COMPANY DBA FOR: LEAPFROG POWER, INC.

DISTANCE, LLC, AND AT&T MOBILITY (AT&T)

AT&T CALIFORNIA, AT&T CORP., SBC LONG

STEVEN MOSS

PARTNER - REGULATORY CONSULTANT

M.CUBED

296 LIBERTY STREET

SAN FRANCISCO, CA 94114

FOR: LOCAL GOVERNMENT SUSTAINABLE

ENERGY COALITION (LGSEC)

SARA STECK MYERS

ATTORNEY AT LAW

LAW OFFICES OF SARA STECK MYERS

122 28TH AVE.

SAN FRANCISCO, CA 94121

FOR: ENEL X NORTH AMERICA, INC.

ELIZABETH M. KELLY

ATTORNEY

LAW OFFICE OF ELIZABETH KELLY LAW OFFICE OF RACHELLE CHONG

PO BOX 225037

SAN FRANCISCO, CA 94122

FOR: ASSOCIATION OF BAY AREA

GOVERNMENTS FOR THE SAN FRANCISCO BAY

AREA REGIONAL AREA NETWORK (BAYREN) AND

COUNTY OF VENTURA FOR THE TRI-COUNTY

REGIONAL ENERGY NETWORK (3C-REN)

RACHELLE CHONG

COUNSEL

345 WEST PORTAL AVENUE, STE. 110

SAN FRANCISCO, CA 94127

FOR: ANTERIX INC.

MEGAN M. MYERS

COUNSEL

LAW OFFICES OF MEGAN M. MYERS

110 OXFORD STREET

LEANNE BOBER

SAN FRANCISCO, CA 94134

RENEWABLE TECHNOLOGIES (CEERT)

JOSEPH VELLONE

EV.ENERGY CORP

433 KIPLING STREET

PALO ALTO, CA 94301

FOR: EV.ENERGY CORP

FOR: CENTER FOR ENERGY EFFICIENCY AND

DAMON FRANZ

8

SR. POLICY ANALYST

CALIFORNIA COMMUNITY CHOICE ASSOCIATION TESLA, INC.

2300 CLAYTON ROAD, STE. 1150

CONCORD, CA 94520

FOR: CALIFORNIA COMMUNITY CHOICE FOR: TESLA, INC.

ASSOCIATION

MANAGING POLICY ADVISOR

901 PAGE AVENUE

FREMONT, CA 94538

HOWARD V. GOLUB

ATTORNEY

BEST BEST & KRIEGER LLP

2001 NORTH MAIN STREET, STE. 390 1547 PALOS VERDES MALL, STE. 196

WALNUT CREEK, CA 94596

FOR: CITY OF LONG BEACH, CALIFORNIA, A FOR: WILD TREE FOUNDATION

MUNICIPAL CORPORATION, ACTING BY AND

THROUGH ITS BOARD OF HARBOR

COMMISSIONERS

APRIL ROSE M. SOMMER

EXE. / LEGAL DIR

WILD TREE FOUNDATION

WALNUT CREEK, CA 94597

JENNIFER A. CHAMBERLIN

EXE. DIR / MARKETING DEV.

CPOWER

2475 HARVARD CIRCLE

WALNUT CREEK, CA 94597

FOR: CPOWER

STEPHEN CAMPBELL

DIR - POLICY, WEST

GRID ALTERNATIVES

1171 OCEAN AVE., SUITE 200

OAKLAND, CA 94608

FOR: GRID ALTERNATIVES

BENJAMIN C. ELLIS

ATTORNEY DIRECTOR

PACIFIC GAS AND ELECTRIC COMPANY

300 LAKESIDE DRIVE

OAKLAND, CA 94612

HOWARD M. CRYSTAL

ENERGY JUSTICE PROGRAM LEGAL

CENTER FOR BIOLOGICAL DIVERSITY

1212 BROADWAY, ST. SUITE 800

OAKLAND, CA 94612

FOR: PACIFIC GAS AND ELECTRIC COMPANY FOR: CENTER FOR BIOLOGICAL DIVERSITY

NIHAL SHRINATH RENEE SAMSON

ASSOCIATE ATTORNEY DIR - REGULATORY

SIERRA CLUB FREEWIRE TECHNOLOGIES

2101 WEBSTER STREET, SUITE 1300 1999 HARRISON STREET

OAKLAND, CA 94612 OAKLAND, CA 94612

FOR: SIERRA CLUB FOR: FREEWIRE TECHNOLOGIES

SEAN P. BEATTY MELISSA W. KASNITZ

PARTNER LEGAL DIR

BRB LAW LLP CENTER FOR ACCESSIBLE TECHNOLOGY

436 14TH STREET, STE. 1205 3075 ADELINE STREET, SUITE 220

OAKLAND, CA 94612 BERKELEY, CA 94703

FOR: FRONTIER CALIFORNIA INC., CITIZENS FOR: CENTER FOR ACCESSIBLE

TECHNOLOGY

TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. DBA FRONTIER

COMMUNICATIONS OF CALIFORNIA, AND

FRONTIER COMMUNICATIONS OF THE

SOUTHWEST INC. (FRONTIER)

EDWARD BURGESS JIN NOH

SR. POLICY DIRECTOR DIR - POLICY

VEHICLE-GRID INTEGRATION COUNCIL CALIFORNIA ENERGY STORAGE ALLIANCE

2150 ALLSTON WAY, SUITE 400 2150 ALLSTON WAY, STE. 400

BERKELEY, CA 94704 BERKELEY, CA 94704

FOR: VEHICLE-GRID INTEGRATION COUNCIL FOR: CALIFORNIA ENERGY STORAGE

ALLIANCE

JULIA A. LEVIN CLAIRE BROOME, MD

EXECUTIVE DIR ADJUNCT PROFESSOR PUBLIC HEALTH

BIOENERGY ASSOCIATION OF CALIFORNIA 350 BAY AREA

PO BOX 6184 26 NORTHGATE AVE.

ALBANY, CA 94706 BERKELEY, CA 94708

FOR: BIOENERGY ASSOCIATION OF CALIFORNIA FOR: 350 BAY AREA

TAM HUNT MICHAEL CALLAHAN

CONSULTING ATTORNEY SR. POLICY COUNSEL

COMMUNITY RENEWABLE SOLUTIONS, LLC MARIN CLEAN ENERGY

2247 SHATTUCK AVE. 1125 TAMALPAIS AVE.

BERKELEY, CA 94740 SAN RAFAEL, CA 94901

FOR: THE GREEN POWER INSTITUTE FOR: JOINT CCAS: MARIN CLEAN ENERGY,

AND CENTRAL COAST COMMUNITY ENERGY.

JASON SIMON MATTHEW DEAL

DIR - POLICY STRATEGY CHARGEPOINT, INC.

ENPHASE ENERGY 254 EAST HACIENDA AVENUE

1420 N. MCDOWELL BLVD. CAMPBELL, CA 95008

PETALUMA, CA 94954 FOR: CHARGEPOINT

FOR: ENPHASE ENERGY

HEATHER DAULER ARTHUR HAUBENSTOCK, ESQ.

DUPUTY DIR - REGULATORY VP - REGULATORY

SAN JOSE CLEAN ENERGY BLOOM ENERGY CORPORATION

200 EAST SANA CLARA STREET 4353 NORTH 1ST STREET

SAN JOSE, CA 95113 SAN JOSE, CA 95134

FOR: SAN JOSE CLEAN ENERGY FOR: BLOOM ENERGY CORPORATION

BRADY VAN ENGELEN THOMAS R. BRILL

SR MGR - POLICY & GOVT AFFAIRS ATTORNEY

BLOOM ENERGY CORPORATION GREENBERG TRAURIG, LLP

4353 NORTH 1ST ST 18565 JAMBOREE ROAD, SUITE 500

SAN JOSE, CA 95143 IRVINE, CA 95312

FOR: BLOOM ENERGY CORPORATION FOR: PILOT TRAVEL CENTERS LLC (PTC)

AISHA CISSNA KORI CORDERO

MGR - REGULATORY ATTORNEY / DIR - SELF GOVERNANCE

REDWOOD COAST ENERGY AUTHORITY YUROK TRIBE

633 THIRD STREET PO BOX 1027

EUREKA, CA 95501 KLAMATH, CA 95548

FOR: REDWOOD COAST ENERGY AUTHORITY FOR: YUROK TRIBE

(RCEA)

LORENZO KRISTOV PH.D WILLIAM H. WEAVER

CONSULTANT ASSIST. GEN. COUNSEL

THE CLIMATE CENTER CA. INDEPENDENT SYSTEM OPERATOR CORP

PO BOX 927 250 OUTCROPPING WAY

DAVIS, CA 95617 FOLSOM, CA 95630

FOR: THE CLIMATE CENTER FOR: CALIFORNIA INDEPENDENT SYSTEM

OPERATOR CORPORATION

BRAD HEAVNER JOHN KENNEDY

POLICY DIR. SR. POLICY ADVOCATE

CALIFORNIA SOLAR & STORAGE ASSOCIATION RURAL COUNTY REPRESENTATIVES OF

CALIF.

1107 9TH ST., STE. 820 1215 K STREET, SUITE 1650

SACRAMENTO, CA 95814 SACRAMENTO, CA 95814

FOR: CALIFORNIA SOLAR & STORAGE FOR: RURAL COUNTY REPRESENTATIVES OF

ASSOCIATION CALIFORNIA (RCRC)

MARISSA NAVA NICHOLAS BLAIR

BRAUN BLAISING SMITH WYNNE, PC ADVOCATE - REGULATORY

555 CAPITOL MALL, SUITE 570 ASSOC. OF CALIFORNIA WATER AGENCIES

SACRAMENTO, CA 95814 980 9TH STREET, SUITE 1000

FOR: CALIFORNIA CHOICE ENERGY AUTHORITY SACRAMENTO, CA 95814

FOR: ASSOCIATION OF CALIFORNIA WATER

AGENCIES (ACWA)

JOHN LARREA KEVIN JOHNSTON

DIR - GOVN'T AFFAIRS ATTORNEY

CALIFORNIA LEAGUE OF FOOD PRODUCERS CALIFORNIA FARM BUREAU FEDERATION

2485 NATOMAS PARK DRIVE, STE. 550 2600 RIVER PLAZA DRIVE

SACRAMENTO, CA 95833 SACRAMENTO, CA 95833

FOR: CALIFORNIA LEAGUE OF FOOD PRODUCERS FOR: CALIFORNIA FARM BUREAU

FEDERATION

ROBERT D. SWEETIN MICHAEL MURRAY

ATTORNEY MISSION: DATA COALITION

DAVISON VAN CLEVE, P.C. 1752 NW MARKET ST., STE. 1513

1750 SW HARBOR WAY, SUITE 450 SEATTLE, WA 98107

PORTLAND, OR 97201 FOR: MISSION: DATA COALITION

FOR: ELECTRIFY AMERICA, LLC

#### Served Via US Mail

KELLY A. HYMES
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5104

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214

MANISHA LAKHANPAL CALIF PUBLIC UTILITIES COMMISSION ADMINISTRATIVE LAW JUDGE DIVISION AREA

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214