

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

Order Instituting Rulemaking to Consider
Streamlining Interconnection of Distributed
Energy Resources and Improvements to Rule 21.

Rulemaking 17-07-007
(Filed July 13, 2017)

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON ORDER INSTITUTING RULEMAKING TO CONSIDER STREAMLINING
INTERCONNECTION OF DISTRIBUTED ENERGY RESOURCES AND
IMPROVEMENTS TO RULE 21**

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits these reply comments on *Order Instituting Rulemaking to Consider Streamlining Interconnection of Distributed Energy Resources and Improvements to Rule 21*, issued on July 21, 2017 (“OIR”).

I. INTRODUCTION.

In these reply comments, CESA responds to points made by the Joint Utilities and the Office of the Safety Advocate (“OSA”).

¹ 8minutenergy Renewables, Adara Power, Advanced Microgrid Solutions, AES Energy Storage, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Bright Energy Storage Technologies, BrightSource Energy, Brookfield, Consolidated Edison Development, Inc., Customized Energy Solutions, Demand Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectriQ Power, eMotorWerks, Inc., Energport, Energy Storage Systems Inc., GAF, Geli, Green Charge Networks, Greensmith Energy, Gridscape Solutions, Gridtential Energy, Inc., Hitachi Chemical Co., IE Softworks, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Johnson Controls, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NICE America Research, NRG Energy, Inc., Ormat Technologies, OutBack Power Technologies, Parker Hannifin Corporation, Qnovo, Recurrent Energy, RES Americas Inc., Sharp Electronics Corporation, SolarCity, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, UniEnergy Technologies, Viridity Energy, Wellhead Electric, and Younicos. The views expressed in these Reply Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

II. THE JOINT UTILITIES’ REFRAMING OF ISSUE TRACKS IS A REASONABLE GROUPING OF ISSUES IN THIS PROCEEDING.

CESA supports the Joint Utilities’ reframing of OIR issue tracks as it reasonably and logically groups issues along similar themes and topic areas.² However, CESA notes that the proposed tracks do not necessarily need to be addressed sequentially, as proposed by the Joint Utilities. As issues are resolved in other proceedings, for example, it is reasonable to address these issues in this proceeding without having to wait for Tracks 1a, 1b, and 2 to be completed.

III. A PLACEHOLDER TO ADDRESS THE INTERCONNECTION OF ELECTRIC VEHICLES SHOULD REMAIN IN THE SCOPE OF THIS PROCEEDING.

CESA disagrees with the Joint Utilities in deeming the interconnection of electric vehicles (“EVs”) as not being within the scope of this proceeding.³ While EV chargers require just a service connection, the interconnection of vehicle-to-grid (“V2G”) chargers would fall within the scope of Rule 21 interconnection rules and processes. Many market participants are exploring the viability of V2G to support the grid, and Rule 21 processes to address their load and generation review will therefore be needed. CESA therefore recommends that EV interconnection issues remain in the scope of Track 3 of this proceeding.

IV. SAFETY AND SUSTAINABILITY FOR THE RECYCLING OF LITHIUM-ION BATTERIES ARE IMPORTANT ISSUES BUT ARE NOT WITHIN THE SCOPE OF THIS PROCEEDING.

OSA, a new division within the Commission advocating on various safety issues on behalf of public utility customers, recommended in its comments that the OIR include an additional track within this proceeding to consider safety and environmental issues for the

² Joint Utilities’ comments at p. 2.

³ *Ibid*, p. 10.

recycling of lithium-ion batteries.⁴ While CESA agrees that developing the infrastructure and processes for the safe and sustainable recycling of lithium-ion batteries are important, these issues are not within the scope of this proceeding, which involves the development of safe and streamlined interconnection of distributed energy resources. CESA therefore respectfully disagrees with the OSA's recommendation, which should be addressed in a different, more appropriate proceeding.

V. **CONCLUSION.**

CESA appreciates the opportunity to submit these comments on the OIR and looks forward to working with the Commission and parties going forward in this proceeding.

Respectfully submitted,



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⁴ OSA comments at p. 2.