

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

Order Instituting Rulemaking to Integrate  
and Refine Procurement Policies and  
Consider Long-Term Procurement Plans.

Rulemaking 12-03-014  
(Filed March 22, 2012)

**OPENING COMMENTS  
OF THE VOTE SOLAR INITIATIVE**

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## SUBJECT INDEX OF RECOMMENDATIONS

Pursuant to Rule 14.3(b) of the Commission's Rules of Practice and Procedure, The Vote Solar Initiative ("Vote Solar") submits this Subject Index of Recommendations regarding changes to Judge Gamson's *Decision Authorizing Long-Term Procurement for Local Capacity Requirements*, mailed on December 21, 2012 (Proposed Decision).

***Vote Solar proposes the following augmentation, in italicized font, of Ordering Paragraph 7 as follows:***

7. In its proposed procurement plan to be reviewed by Energy Division, Southern California Edison Company shall show that it has a specific plan to undertake integration of energy efficiency, demand response, energy storage and distributed generation resources in order to meet or reduce local capacity requirement needs through 2021. *To ensure that Energy Division has sufficient information to evaluate Southern California Edison Company's analysis regarding meeting the 1,519 MW of distributed generation assumed to be in the LA Basin local area, the procurement plan should:*

- A. Identify existing distributed generation projects by the LA Basin LRA sub-area, locational zip code, the substation that is its first point of interconnection, the actual online date, the program under which it was procured, and NQC.*
- B. For known projects expected to come online during the forecast period, provide the same data in 7.A, above, except that the actual online date is replaced with the expected online date.*
- C. For unspecified but forecasted projects, provide full documentation of the manner in which the forecast was developed. This includes but is not limited to details regarding apportionment of programmatic-based forecasts for the entire service territory to the LA Basin local area, the basis for rejecting projects in interconnection queues, the derivation of NQC estimates for future resources, and source document citations.*

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Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, The Vote Solar Initiative ("Vote Solar") submits these opening comments on Judge Gamson's *Decision Authorizing Long-Term Procurement for Local Capacity Requirements*, mailed on December 21, 2012 (Proposed Decision).

Vote Solar fully supports the Proposed Decision and is highly appreciative of the effort that was required to sort out and address the difficult, often perplexing issues contained therein. As succinctly stated at page 78 of the Proposed Decision, "balancing the three criteria of ensuring reliability, consistency with the Loading Order and cost-minimization is a challenge." Fortunately, the Proposed Decision rises to the challenge and provides thoughtful, balanced and meaningful solutions that will deliver cost effective, reliable energy in a manner that preserves, protects and improves the environment.

Vote Solar does suggest, however, that the Proposed Decision would benefit from greater specificity and clarity regarding the potential for a gap between the 1,519 MW of distributed generation (DG) assumed to be in the LA Basin local area and the amount of DG that may be added under existing procurement authority. The assumed amount of DG

is based on the 33% Environmentally-Constrained scenario included in the Standardized Planning Assumptions for System Resource Plans issued by the CPUC Energy Division.<sup>1</sup>

To the extent that Southern California Edison Company (SCE) needs additional authority to achieve the 1,519 MW of DG in the LA Basin, the Proposed Decision grants SCE the authority to exceed the 1,500 MW procurement limit established therein. SCE is directed to analyze the potential gap in preparing its procurement plan for additional Preferred Resources. SCE is further directed to take any and all necessary steps to close any gap with new DG resources.<sup>2</sup>

The Energy Division is responsible for reviewing and approving SCE's procurement plan.<sup>3</sup> As currently drafted, the Proposed Decision is silent on what information SCE should include in its procurement plan. As a result, SCE's procurement plan may not provide sufficient information to easily allow Energy Division to assess whether a gap exists in procurement authority for DG located in the LA Basin, such that SCE would fall short of the 1,519 MW of assumed DG.

In order for Energy Division to be able to effectively evaluate SCE's assessment of the potential gap between DG that is expected based on existing procurement authority and the 1,519 MW of DG assumed to be in the LA Basin local area, the procurement plan materials should include certain data regarding the development of DG in the LA Basin. Existing programs to facilitate DG development include:

- California Solar Initiative (CSI),
- Net Energy Metering (NEM),
- Self Generation Incentive Program (SGIP),
- Renewable Auction Mechanism (RAM),
- Feed-In Tariff (FiT)
  - California Renewable Energy Small Tariff (CREST)

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<sup>1</sup> See <http://docs.cpuc.ca.gov/eFile/RULINGS/130670.PDF>. It is unclear from the documents the role Energy Division played in developing the specific DG assumptions for each of the local reliability areas and the method that was used to geographically allocate the resources. However, it appears that the Commission, rather than the California Independent System Operator, was responsible for performing the analysis to determine these input assumptions.

<sup>2</sup> Proposed Decision at pp. 76-77.

<sup>3</sup> *Id.* at Ordering Paragraphs 6 and 7.

- Renewable Market Adjustment Tariff (Re-MAT),
- Combined Heat and Power tariffs, and
- Utility Solar Photovoltaic and Fuel Cell Programs.

To improve the transparency of SCE's showing – thereby simplifying and streamlining verification by Energy Division of SCE's assumptions regarding DG installations -- SCE's procurement plan should provide detailed documentation about how each of these programs is expected to contribute to the total amount of new DG installed in the LA Basin. To the extent possible, SCE should provide lists for each program to identify existing, identified, and generic DG projects.

- For existing projects, SCE's lists should provide the name or identifier of individual DG facilities, the sub-area in the LA Basin Local Reliability Area (LRA sub-area) and the zip code in which it is located, the substation that is its first point of interconnection with the California Independent System Operator (CAISO) or SCE grid, the actual online date, the program under which it was procured (e.g., NEM, CSI, Re-Mat), and its Net Qualifying Capacity (NQC).
- For identifiable DG facilities that SCE expects to come online during the forecast period (e.g., projects that are under construction or seeking permits but not yet online), SCE should provide data similar to that provided regarding existing DG facilities except that SCE should indicate the expected online date rather than the actual online date.
- For unidentifiable (but expected) generic DG facilities, SCE should provide full documentation of the manner in which it developed its forecast of future DG additions. This should include details regarding the approach used to apportion programmatic-based forecasts for its entire service territory to the LA Basin local area. SCE should also clearly indicate the approach it used for accepting or rejecting projects that are on existing interconnection queues. SCE should explain how it derives its estimates of NQC for future resources.

To provide context for the lists described above, SCE's procurement plan should also provide citations to source documents used to prepare these lists. These source documents may include the following:

- California Solar Initiative dataset;<sup>4</sup>
- Renewable Portfolio Standard Progress Report;<sup>5</sup>
- California Energy Commission database of all power projects (100 kW or larger);<sup>6</sup>
- SCE's WDAT and Rule 21 Interconnection Queue<sup>7</sup> and
- Other Commission authorized sources that may arise in the future.

Vote Solar believes that these straight-forward and presumably non-controversial suggestions will aid the Energy Division in validating SCE's assessment of any gap in achieving the critical 1,519MW of assumed DG in the LA Basin. Further, due to the need to expedite the procurement process, Vote Solar believes that these suggestions will help reduce the possibility of subsequent controversy regarding the gap assessment methodology. In the Subject Index of Recommendations found at the beginning of these Comments, Vote Solar provides summarized language reflecting the suggestions that can be incorporated in Ordering Paragraph 7 of the Proposed Decision.

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<sup>4</sup> [http://www.californiasolarstatistics.ca.gov/current\\_data\\_files/](http://www.californiasolarstatistics.ca.gov/current_data_files/)

<sup>5</sup> [http://www.cpuc.ca.gov/NR/rdonlyres/EAAA73DA-C2DB-40CB-A0F4-B193165083D5/0/RPS\\_Project\\_Status\\_Table\\_2012\\_Dec.xls](http://www.cpuc.ca.gov/NR/rdonlyres/EAAA73DA-C2DB-40CB-A0F4-B193165083D5/0/RPS_Project_Status_Table_2012_Dec.xls)

<sup>6</sup> [http://www.energyalmanac.ca.gov/powerplants/Power\\_Plants.xlsx](http://www.energyalmanac.ca.gov/powerplants/Power_Plants.xlsx)

<sup>7</sup> [http://www.sce.com/nrc/aboutsce/regulatory/openaccess/wdat/wdat\\_queue.xls](http://www.sce.com/nrc/aboutsce/regulatory/openaccess/wdat/wdat_queue.xls)

**WHEREFORE**, Vote Solar respectfully requests that the Commission consider the above stated Comments, and augment the Proposed Decision as indicated.

Respectfully Submitted,

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