

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

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar Initiative,
the Self-Generation Incentive Program and Other
Distributed Generation Issues.

RULEMAKING 12-11-005
(Filed November 8, 2012)

**DISTRIBUTED ENERGY CONSUMER ADVOCATES
COMMENTS IN RESPONSE TO ASSIGNED COMMISSIONER'S AUGUST 22, 2013
RULING REGARDING THE TRANSFER OF RESPONSIBILITY FOR COLLECTING
SOLAR STATISTICS FROM THE CALIFORNIA SOLAR INITIATIVE TO THENET
ENERGY METER ININTERCONNECTION PROCESS**

Aram Shumavon
Distributed Energy Consumer Advocates
516 Whitewood Drive
San Rafael, CA 94903
a.shumavon@decapower.org
213.784.2507

September 9, 2013

**DISTRIBUTED ENERGY CONSUMER ADVOCATES
COMMENTS IN RESPONSE TO ASSIGNED COMMISSIONER’S AUGUST 22, 2013
RULING REGARDING THE TRANSFER OF RESPONSIBILITY FOR COLLECTING
SOLAR STATISTICS FROM THE CALIFORNIA SOLAR INITIATIVE TO THE NET
ENERGY METER INTERCONNECTION PROCESS**

Pursuant to Sections 1.4 of the California Public Utilities Commission (“CPUC”) Rules of Practice and Procedure, Distributed Energy Consumer Advocates (“DECA”) offers these reply comments in the above-captioned proceeding (R.12-11-005) on President Peevey’s August 22, 2013 Assigned Commissioner's ruling (“the ruling”).

DECA strongly supports the continuation of the gathering and public release of interconnection data and structures its comments here with the goal of ensuring those data remain publicly available and that their efficacy in policy advocacy and procurement planning are maximized. DECA believes the direction laid out in the ruling is consistent with the original intent and is a necessary element in transforming the grid toward one in which distributed generation resources are encouraged the maximum extent possible. A necessary element in this process is transitioning the electrical grid from a data-exclusivity paradigm, where a limited set of market participants control the information that is key to grid planning, to a data-openness paradigm, where data about how, when, and where energy is produced and consumed is readily available and transparent to all market participants and non-market participants alike. It is through this data availability that the next century’s grid will be optimized in a reliable and cost effective manner that balances the need for reliable energy infrastructure and the burden of that infrastructure on the environment.

I. DECA's Comments

While DECA is supportive of the additional data required to be made available as proposed by the ruling, there are five significant shortcomings as the gathering and release is currently envisioned. DECA strongly encourages an expansion of the proposal to include greater usefulness of the interconnection data.

The data released should include distribution feeder line information and identification of FERC jurisdiction busbars to which the resource would be aggregated up to.

Missing from the current CSI data is the ability to directly aggregate particular resources to specific busbars or price nodes in the California Independent System Operator's ("CAISO's") wholesale markets. The omission of these data make it difficult to accurately assign both physical and economic benefits and costs of California's distributed generation fleet. By including these data the CSI dataset will increase the applicability and usefulness of the program and the data in incredibly valuable ways and at negligible if not zero incremental cost.

The ruling should expand the data release requirement to persist into a post-CSI environment.

It is not made explicit in the ruling, but it should be obvious given the temporal proximity to the end of the CSI program that all interconnection data should be made apparent, regardless of its participation in the CSI program. The ability for the market to "see" the amount, type, location, and nature of interconnection represents no less than a window into the very future of generation interconnection. Without the ability to create transparency into the distributed

interconnection process the Commission will lack the ability to optimize its location on a programmatic basis. The time and costs associated with one-off data requests to individual utilities for interconnection data, should the applicability of this ruling to non-CSI distributed interconnections, would almost certainly preclude meaningful data requests from CPUC staff or others on a forward going basis.

The ruling should expand the data release requirement to include interconnection of technology neutral distributed generation resources.

The incredible benefits of the availability of the CSI database to California's distributed generation market cannot be underemphasized. Many market participants regularly access the data and adjust their strategies accordingly. Both developers and advocates can see which geographies have high project failure rate or long project completion time and adjust price and penetration estimates accordingly. The ability to see

The ruling should require the reporting of and passthrough to the cal solar statistics site, reported permitting expenses per project.

The need for transparency on permitting costs is obvious to most market participants. The inclusion of permitting costs associated with interconnection provides a useful tool for delineating where and how projects might be optimized to reduce their soft costs as well as the geographies in which targeted advocacy may be useful for reducing barriers to higher distributed generation penetration.

The ruling should require the reporting interconnection upgrades required by particular projects to the calsoarstatistics site.

The ability for developers to see where upgrades have already occurred as a result of interconnection processes provides an opportunity for other developers to target projects, maximizing the number of programs that benefit from such investment. The corollary is that all reported distribution upgrades should be made transparent so that an ability to spread such costs across projects can be implemented. Failure to do so runs the risk that multiple individual projects may not be realized because no individual project may be sufficiently sized to justify such an expense, but that in aggregate it would be cost effective to spread that cost across projects.

II. Conclusion

For the reasons set forth herein, DECA hereby submits comments on President Peevey's August 22, 2013 Assigned Commissioner's Ruling.

Respectfully submitted this 9th day of September, 2013.

By

/s/

Aram Shumavon

Aram Shumavon
Distributed Energy Consumer Advocates
516 Whitewood Drive
San Rafael, CA 94903
213.784.2507
a.shumavon@decapower.org