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LSA Comments on RPS Eligibility Guidebook Workshop

Additional submitted attachment is included below.

LSA COMMENTS ON PROPOSED SCOPE FOR RENEWABLES PORTFOLIO STANDARD ELIGIBILITY GUIDEBOOK, TENTH EDITION

June 5th, 2025

The Large-scale Solar Association (LSA) very much appreciates this opportunity to comment on the California Energy Commission (CEC or Commission) proposals to update the current Renewables Portfolio Standard Eligibility Guidebook (Ninth Edition), as outlined in the presentation at the May 21st workshop, "Scoping Meeting on Proposed Updates for the RPS Eligibility Guidebook, 10th Edition" (Presentation).

LSA strongly supports the CEC's efforts to update the current Guidebook (9th Edition). As the CEC Staff has recognized, much has changed in the energy markets since 9th Edition was issued in 2017, and this update will greatly increase the clarity and usefulness of the Guidebook.

LSA's comments here focus on these items from the Presentation:

• <u>Item 4 – the "Storage Proposal."</u> The elements of the proposals are positive generally, and LSA suggests below additional details and coordination with the California Independent System Operator (CAISO) framework, and those of other major California jurisdictions.

While LSA understands the CEC's wish to provide independent guidance separate from these other jurisdictions, better coordination of CEC documentation with those other jurisdictions will help market participants and other stakeholders understand the connection and interaction of these rules with each other, and thus aid compliance in all areas.

• <u>Item 5 – "Metering Requirements."</u> LSA supports the proposals to support use of DC meters, and to harmonize accuracy requirements. LSA continues to urge the CEC to support alternative data-calculation methods, as long as accuracy can be properly verified.

LSA's input is organized based on the list of proposal elements in the Presentation for each of these topics.

Item 4: Storage Proposal

1 – Diagrams/categories of energy storage removed

While LSA understands the intent here to be additional flexibility and adaptability as the market evolved further, removal of all diagrams and storage categories would actually make the applicability and explanations less clear. Diagrams and categories are important explanatory tools that should be used to clarify the textual explanations.

Instead, LSA suggests that the CEC:

- Include more diagrams, updated to illustrate the kinds of project structures that reflect modern project design.
- Provide a better process to allow parties to suggest additions and modifications to the diagrams included, much more frequently than every 8 years.

2 – New glossary definitions added related to energy storage

LSA strongly supports additional and clearer definitions for the update. The CEC should start with definitions added to the CAISO tariff, as reflected in tariff Appendix A (Master Definitions Supplement) regarding Energy Storage and Mixed-Fuel Resources (MFRs, a relatively new term itself) and add other definitions from other jurisdictions as appropriate.

As suggested above, better coordination of terminology with other major jurisdictions will greatly assist compliance efforts.

<u>3 – Storage designated and metered separate from the facility not subject to loss</u> accounting

LSA appreciates the Staff's consideration (and apparent agreement with) our earlier comments supporting removal of any actual or implied requirements to subtract Round-Trip Losses (RTLs) from potential energy injection into storage, and later withdrawal and injection into the grid), for MFRs combining storage and renewable energy, including:

- **Co-located Resource (CLR) MFR configurations** (separate Resource IDs (and thus metering) for each fuel type); and
- Hybrid Resource (HR) MFR configurations (single Resource ID for both fuel types), subject to separate metering/measurement of the renewable energy production.

As LSA's earlier comments explain, subtracting RTLs related to storage injection and withdrawals for MFRs combining storage and renewable-energy components is highly inequitable compared to stand-alone projects with either storage or renewable energy that may be located in close proximity. For the latter, it is entirely possible that some or much of the renewable energy physically flows into the nearby storage facilities, yet none of the energy would be subject to RTL reductions.

4 – Only additions or enhancements subject to loss accounting

LSA understands that there are certain statutory provisions requiring adjustments of this type, and that the CEC Staff plans to define these situations "narrowly," based on the workshop discussion. However, LSA does not understand further what the Staff intends in this area and plans to comment further once the draft Guidebook update is released.

5 – All losses for interconnection needs still netted (i.e. transformer, line loss, etc.)

LSA does not oppose continued consideration of transformation losses and line losses to the Point of Interconnection (POI). It is common practice to adjust metering, for example, to subtract such losses for stand-alone storage and renewable resources, and fair with respect to assessing benefits from renewable energy to the grid.

6 - Any eligible resources used as inputs must be netted out (e.g. pumped hydro)

LSA is not sure what the Staff intends in this area, but usage on site of renewable energy that would otherwise be provided by energy from the grid should not disqualify the energy from being counted as a basis for RECs, subject to proper metering/measurement requirements. This is the same principle as the RTL concept, i.e., the renewable energy would be displacing potentially dirtier energy for that purpose, and LSA does not see a reason to exclude this energy from being counted as renewable.

Item 5: Metering Requirements

Add language allowing DC metering

• Must be consistent with AC metering requirements: Accuracy, testing, certification

LSA supports this proposal. The CAISO has been stating for some years that it is testing, or considering testing/certification, of DC meters, and we are hoping a CEC statement of support for such metering will encourage the CAISO to move forward with those efforts.

Add language requiring adjustment of DC values

- Include DC/AC conversion losses
- Adjust to value at high side of transformer
- Must be consistent with WREGIS requirements

LSA supports this proposal, assuming that it is consistent with current practices regarding subtraction of transformation losses and line loses to the POI.

Update metering accuracy requirements to ±0.5%

•A legacy clause may be added

LSA agrees that CEC and WREGIS standards should be consistent but suggests additional discussion in this area, including accuracy and cost of commercially available metering. It is not clear that the common standard should automatically be the more stringent standard.

Additional suggested reform: Measurement flexibility

Consistent with our earlier comments, LSA suggests that the CEC clarify that determination of RPS-eligible energy production using algorithms based on data from approved metering, or other legitimate methods, is acceptable.

For example, MFRs may have an overall project meter for at the POI and another meter for the storage. It should be acceptable for the WREGIS Qualified Reporting Entity (QRE) to report the solar energy production by subtracting the storage meter reads from the overall project meter reads. (This flexibility is particularly imports given the lack of currently certified DC meters.)

Broadening this concept, the CAISO has a procedure that allows Scheduling Coordinators to propose any method of calculating meter data after CAISO review and approval of a Settlement Quality Meter Data Plan.¹ The Commission should clarify that determination of RPS-eligible energy through approved SQMD Plans, or similar means where accuracy can be properly verified, is acceptable.

¹ See: (1) <u>Operating Procedure 5750 (Settlement Quality Meter Data (SQMD) Plan – Submission and Approval</u> <u>Process</u>), posted here: <u>https://www.caiso.com/documents/5750.pdf</u>; and (2) <u>SQMD Plan Template</u>, posted here: <u>https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.caiso.com%2Fdocuments%2Fsqmdplante</u> <u>mplate.docx&wdOrigin=BROWSELINK</u>.