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| **Docket Number:** | 25-EPIC-01 |
| **Project Title:** | Electric Program Investment Charge 2026–2030 Investment Plan (EPIC 5) |
| **TN #:** | 265473 |
| **Document Title:** | Distributed Wind Energy Association Comments - Pursue the Recommendations of the Unintentional Island Working Group (UIWG) |
| **Description:** | N/A |
| **Filer:** | System |
| **Organization:** | Distributed Wind Energy Association |
| **Submitter Role:** | Public |
| **Submission Date:** | 8/8/2025 3:05:09 PM |
| **Docketed Date:** | 8/8/2025 |

*Comment Received From: Distributed Wind Energy Association*
*Submitted On: 8/8/2025*
*Docket Number: 25-EPIC-01*

## Pursue the Recommendations of the Unintentional Island Working Group (UIWG)

*Additional submitted attachment is included below.*

CALIFORNIA ENERGY COMMISSION

CALIFORNIA NATURAL RESOURCES AGENCY

# Electric Program Investment Charge 2026–2030 (EPIC 5) Research Concept Proposal Form

The California Energy Commission (CEC) is currently soliciting research concept ideas and other input for the Electric Program Investment Charge 2026–2030 (EPIC 5) Investment Plan. For those who would like to submit an idea for consideration, please complete this form and submit it to the CEC by **August 8, 2025**. More information about EPIC 5 is available below.

To submit the form, please visit the e-commenting link: https://efiling.energy.ca.gov/EComment/ECommentSelectProceeding.aspx and select the Docket **25-EPIC-01**. Enter your contact information and then use the "choose file" button at the bottom of the page to upload and submit the completed form. Thank you in advance for your input.

1. Please provide the name, email, and phone number of the best person to contact should the CEC have additional questions regarding the research concept:

   Michael Bergey, DWEA President: mbergey@bergey.com, 405-204-6653

2. Please provide the name of the contact person's organization or affiliation:

   Distributed Wind Energy Association (DWEA)

3. Please provide a brief description of the proposed concept that you would like the CEC to consider as part of the EPIC 5 Investment Plan. What is the purpose of the concept, and what would it seek to do? Why are EPIC funds needed to support the concept?

   DWEA recommends that the CEC support follow-on work recommended by the Unintentional Islanding Working Group (UIWG) in its December 2023 Final Report. Specifically, the need to address the deployment barrier on PG&E's requirements for Direct Transfer Trip (DTT) systems on some "non-inverter DER's" such as Megawatt scale distributed wind turbines. EPIC funding is required to further investigate the technical justification and alternatives to wired DTT, such as new safety test standards and certification or non-wired DTT.

4. In accordance with Senate Bill 96[i], please describe how the proposed concept will "lead to technological advancement and breakthroughs to overcome barriers that prevent the achievement of the state's statutory energy goals." For example, what technical and/or market barriers or customer pain points would the proposed concept address that would lead to increased adoption of clean energy technology or innovation? Where possible, please provide specific cost and performance targets that need to be met for increased industry and consumer acceptance. For scientific analysis and tools, provide more information on what data and information gaps the proposed concept would help fill, and which specific parties or end users would benefit from the results, and for what purpose(s)?

   The UIWG was created under CPUC Decision (D.) 21-06-002 to streamline the interconnection process for Distributed Energy Resources (DER's). Eleven meetings were convened by Gridworks. The Working Group established that only PG&E was requiring wired DTT, though not in all cases, for "non-inverter DER's" and that when required the DTT costs could exceed a million dollars. UIWG also reported that there have been no reported unintentional islanding (UI) events for "non-inverter DER's". Lowering DTT costs or providing certifications on UI safety would lower DER costs and increase large-scale DER deployment. To our knowledge, the recommendations of the UIWG Final Report have not been followed up.

5. Please describe the anticipated outcomes if this research concept is successful, either fully or partially. For example, to what extent would the research reduce technology or ratepayer costs and/or increase performance to improve the overall value proposition of the technology? What is the potential of the innovation at scale? How will the innovation lead to ratepayer benefits in alignment with EPIC's guiding principles to improve safety,[ii] reliability,[iii] affordability,[iv] environmental sustainability,[v] and equity?[vi]

   DTT has been identified as a barrier to deployment of large-scale "non-inverter DER's" and has in some cases caused otherwise economic projects to be cancelled in the PG&E territory. UI needs to be avoided for a number of reasons but requiring wired DTT may be an overreaction to the risk and DWEA believes there is value to ratepayers to follow-up on the UIWG recommendations and finds ways to lower these interconnections costs.

6. Describe what quantitative or qualitative metrics or indicators would be used to evaluate the impacts of the proposed research concept.

The recommended metric is the potential reduction in interconnection costs due to limiting or eliminating the requirement for wired DTT or allowing lower cost implementations of DTT.

7. Please provide references to any information provided in the form that supports the research concept's merits. This can include references to cost targets, technical potential, market barriers, equity benefits, etc.

   1. https://gridworks.org/wp-content/uploads/2023/12/Final-UIWG-Report-12082023.pdf

8. The EPIC 5 Investment Plan must support at least one of five Strategic Goals:[vii]
   a. Transportation Electrification
   b. Distributed Energy Resource Integration
   c. Building Decarbonization
   d. Achieving 100 Percent Net-Zero Carbon Emissions and the Coordinated Role of Gas
   e. Climate Adaptation

   Please describe in as much detail as possible how your proposed concept would support these goals.

   DWEA's recommendation/concept aligns with the EPIC 5 Investment Plan strategic goals for b, c, and d. Large-scale non-inverter wind is an underutilized DER technology with significant deployment potential and lowering interconnection costs will encourage greater deployment. Behind-the-meter large-scale wind turbines are always connected to a building and the electricity they produce reduces the buildings carbon footprint. Wind energy has zero carbon emissions so increasing deployment of large-scale wind moves California closer to its 100% Net-Zero goal.

## About EPIC

The CEC is one of four EPIC administrators, funding research, development, and demonstrations of clean energy technologies and approaches that will benefit electricity ratepayers of California's three largest investor-owned electric utilities.

EPIC is funded by California utility customers under the auspices of the California Public Utilities Commission.

To learn more about EPIC, visit: https://www.energy.ca.gov/programs-and-topics/programs/electric-program-investment-charge-epic-program

EPIC 5 documents and event notices will be posted to: https://www.energy.ca.gov/proceeding/electric-program-investment-charge-2026-2030-investment-plan-epic-5

Subscribe to the EPIC mailing list to stay informed about future opportunities to inform the development of EPIC 5: https://public.govdelivery.com/accounts/CNRA/signup/31897

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i See section (a) (1) of Public Resources Code 25711.5 at: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=25711.5.

ii EPIC innovations should improve the safety of operation of California's electric system in the face of climate change, wildfire, and emerging challenges.

iii EPIC innovations should increase the reliability of California's electric system while continuing to decarbonize California's electric power supply.

iv EPIC innovations should fund electric sector technologies and approaches that lower California electric rates and ratepayer costs and help enable the equitable adoption of clean energy technologies.

v EPIC innovations should continue to reduce greenhouse house gas emissions, criteria pollutant emissions, and the overall environmental impacts of California's electric system, including land and water use.

vi EPIC innovations should increasingly support, benefit, and engage disadvantaged vulnerable California communities (DVC). (D.20-08-046, Ordering Paragraph 1.) DVCs consist of communities in the 25 percent highest scoring census tracts according to the most recent version of the California Communities Environmental Health Screening Tool (CalEnviroScreen), as well as all California tribal lands, census tracts with median household incomes less than 60 percent of state median income, and census tracts that score in the highest 5 percent of Pollution Burden within CalEnviroScreen, but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data.

vii In 2024 the CPUC adopted five Strategic Goals to guide development of the EPIC 5 Investment Plan. A description of the goals can be seen in Appendix A of CPUC Decision 24-03-007 available at: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M527/K228/527228647.PDF