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Comment Received From: Greg Thomson Submitted On: 3/13/2017 Docket Number: 16-EPIC-01

Comments Re: Increase Adoption of Emerging Clean Energy Technologies through Procurement

Please see attached document.

Additional submitted attachment is included below.

Date: March 13, 2017

Comments from: Greg Thomson Vice President of Program Development PATHION, Inc.

Re: EPIC Request for Comments: Increase Adoption of Emerging Clean Energy Technologies through Procurement

Note: Please see comments per the CEC's question list below. Thank you.

1. (For all groups) What are barriers that large-scale customers face when procuring emerging energy technology solutions? Would projects funded from this solicitation help address those barriers? If not, what specific changes would you recommend to help ensure the resulting projects meet large-scale customer procurement needs?

Barriers: The most significant barrier that large-scale customers face is the lack of a trusted governing entity for their city/town/county that streamlines, qualifies, and simplifies the entire vendor/technology/solution evaluation, utility interconnection, and deployment process. Group 4 would presumably satisfy this, and the requirement for Group 4 should be explicit as such. Group 4 should also encompass the ability to target optimal locations for utilizing clean energy technologies via a combination of data, such as: site physical characteristics, site electricity usage (maintaining confidentiality of course), feeder hosting capacity data, system peak reduction/capacity needs, potential grid deferral data, grid services value, etc. Taken together, this data will help accelerate procurement by illuminating the full value clean energy technologies can bring to the customer as well as the grid, including utility and ISO compensation. In other words, it is important that Group 4 does not result in a random approach to DER procurement, but one that provides targated information for large-scale customers, vendors, and utilities.

- 2. (For all groups) What are specific recommendations you can provide for improving the purpose of the solicitation outlined in this RFC? Please explain the rationale behind the recommendations.
- 3. (For all groups) Are there existing efforts that complement the groups identified in this RFC? What specific changes to this proposed solicitation would you suggest to best leverage

these existing efforts?

4. (For all groups) Are the proposed funding amounts identified in this RFC appropriate for the work requested? Please explain the rationale behind the recommendations, and, if applicable, what would the expected cost be to adequately test and evaluate the technology types identified in this draft solicitation?

Group 4 is a critical aspect of this. Large-scale customers need a streamlined yet comprehensive resource in order to easily identify, then engage, in the right clean energy / DER solutions. Based on this need for customers and the industry, an analogy for the Group 4 solution is the "Google of DER." Yes, this analogy is simplistic, but Google's differentiation for providing search on the web was integrating the right search and qualification data across the entire web, resulting in the most valuable and thus most used search results. We need the same for the DER industry. Given this, the amount for Group 4, at \$4M, is too small. This amount should at least be doubled, to \$8M, such that approximately four winners can utilize around \$2M each to develop their solutions.

5. (ForGroup1) Should the Energy Commission require test bed locations in both Northern and Southern California? Please explain the rationale behind the recommendations.

Requiring test bed locations in both Northern and Southern California would be extremely helpful in order to reduce the costs on companies shipping their products to the test bed location and sending staff to the location.

- 6. (Groups1and2) Are there additional technologies we should consider or technologies we should remove from the lists provided in this RFC? Please explain the rationale behind the recommendations.
- 7. (Group3) How can Group3 most effectively build trust with target customers to ensure that the target customers are buying high quality products?

See previous response regarding Group 4 (#1 above) and consider making Group 3 a component of Group 4.

8. (For Group 4) What are the largest impediments to successful deployment of solutions that can facilitate successful procurement of emerging energy technologies? Are there

solutions not addressed under this proposed solicitation that would address these impediments? Please explain the rationale behind the recommendations.

See answer to #1 above