

DOCKETED

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Comment Received From: Anthony Brunello

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Docket Number: 16-EPIC-01

Re: Docket No. 16-EPIC-01 - More Than Smart Comments on Draft Solicitation on Modeling Tools to Evaluate Distributed Energy Resources (DERs) and Microgrids located behind the meter on California's Modern Distribution Systems

Additional submitted attachment is included below.



June 21, 2017

Jamie Patterson
California Energy Commission
Energy Research and Development Division
1516 Ninth Street, MS-43 Sacramento, CA 95814-5512

Re: Docket No. 16-EPIC-01 - Draft Solicitation on Modeling Tools to Evaluate Distributed Energy Resources (DERs) and Microgrids located behind the meter on California's Modern Distribution Systems

To Whom It May Concern:

Thank you for the opportunity to submit feedback on the Electric Program Investment Charge (EPIC) program's solicitation to improve dynamic distribution modeling tools that can determine how to operate with high amounts of renewables, Distributed Energy Resources (DERs), including plug-in electric vehicles, and microgrids using advanced smart grid equipment.

More Than Smart (MTS) provides comments addressing question #5:

Are there suggestions to better complement the needs associated with CPUC proceedings related to Modeling, distributed renewable generation, electric vehicles, the use of Smart Grid Technologies and Distribution Resource Planning? Please provide specific recommendations and rationale.

Background on More Than Smart

More Than Smart is a nonprofit organization based in California with the mission *to proactively support cleaner, more reliable, and more affordable power service through the integration of distributed energy resources into electricity grids*. MTS is actively managing several working groups related to planning and operating the distribution grid with high amounts of renewables and DERs. Under the California Public Utilities Commission (CPUC) Distribution Resource Plan proceeding (www.drpg.org), MTS manages working groups related to Integrated Capacity Analysis (ICA), the Locational Net Benefit Analysis (LNBA), and DER Growth Scenarios. In addition, MTS is managing similar work with the California Independent System Operator to clarify operational requirements at the Transmission to Distribution interface in California (<http://morethansmart.org/t-d-operations-interface-working-group/>); working with the US Department of Energy defining the outline for an electricity distribution system platform of the future (DSPx) that could be used in any state (<http://doe-dsp.org>); and is actively working with the State of Hawaii's Public Utility Commission to determine the current and future distribution



system planning needs of their existing distribution system. Thus our mission and experience are closely aligned with the objectives of this Grant Funding Opportunity (GFO) – we are focused on how to complement the needs of policymakers related to modeling, distributed generation, EVs, smart grid technologies and distribution system planning.

Comments:

To better complement the needs of CPUC proceedings related to distribution resource planning and related efforts before other policy-making bodies, *we suggest the GFO be restructured to include an additional Project Group to provide ongoing grid integration research coordination.* The valuable research conducted under the GFO’s Project Groups 1-4, and many other EPIC initiatives, would benefit from regular facilitated engagement with California policymakers and grid operators.

California’s grid policy, planning and operations are evolving dynamically, driven by unprecedented integration of renewables and distributed energy resources. Adapting to this dynamic environment, the CPUC and a wide-variety of stakeholders are increasingly adopting a new approach to developing policy solutions, and innovations in grid planning and operations. Policymakers, grid operators, renewable and DER vendors, and other interested parties are working through facilitated forums focused on grid policies, planning, and operations. As referenced above, the MTS facilitated working groups under the CPUC’s Distribution Resource Planning proceeding and Transmission-Distribution Coordination are just a few examples of this model in action. As a complement to relatively formal policy-making processes that occur infrequently, these forums allow California’s energy community to work through technical challenges that require timely solutions more quickly and collaboratively, reducing the number, complexity and acrimony of litigated proceedings.

A comparable proactive stakeholder engagement process *focused on grid integration research* is needed. The purpose of this engagement would be:

- To inform policymakers and grid operators of ongoing research related to renewable and DER integration;
- To allow EPIC grant recipients to receive feedback on their work to increase its relevance to dynamic challenges facing policymakers and grid operators; and
- To identify research gaps to inform future funding opportunities.

Regularly providing a forum wherein policy-makers, grid operators, and researchers, with experienced human resources available to sustain their coordination, would enable matrix style communication between critical stakeholders, allowing for more granular and timely sharing of perspective and coordination of finite research resources.

To support this coordination, MTS proposes the addition of an additional project group focused on fulfilling this purpose.



We thank you for the opportunity to provide input to the proposal. If you have any further questions, please call me at (916) 718-8292 or email me at tbrunello@morethansmart.org

Sincerely,

A handwritten signature in blue ink, reading 'Tony Brunello'. The signature is fluid and cursive, with the first name 'Tony' and last name 'Brunello' clearly distinguishable.

Tony Brunello
President
More Than Smart