

**DOCKETED**

<b>Docket Number:</b>	18-SOLAR-01
<b>Project Title:</b>	Solar Equipment Lists Program Implementation
<b>TN #:</b>	224639
<b>Document Title:</b>	SMUD Comments on Lead Commissioner Workshop on Solar Equipment Lists
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	SMUD/Steven G. Lins
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	8/31/2018 12:28:13 PM
<b>Docketed Date:</b>	8/31/2018

*Comment Received From: Steven G. Lins*  
*Submitted On: 8/31/2018*  
*Docket Number: 18-SOLAR-01*

**SMUD Comments on Lead Commissioner Workshop on Solar Equipment Lists**

*Additional submitted attachment is included below.*

**STATE OF CALIFORNIA  
BEFORE THE CALIFORNIA ENERGY COMMISSION**

<b>In the matter of:</b>	)	Docket No. 18-SOLAR-01
	)	
<b>Lead Commissioner Workshop on Solar Equipment Lists</b>	)	SMUD Comments on August 16, 2018, Workshop re: Solar Equipment Lists
	)	
	)	August 31, 2018

---

**Comments of the Sacramento Municipal Utility District  
on Lead Commissioner Workshop on Solar Equipment Lists**

SMUD appreciated the opportunity to participate on both panels during the recent equipment list workshop, convened by Commissioner David Hochschild, and appreciates the opportunity to follow up with these written comments.

Regarding the current “SB 1” Solar equipment and inverter list: SMUD has successfully developed and implemented a PV interconnection process that utilizes the current solar inverter list. SMUD has also adopted an interconnection requirement that is similar to the IOUs new Rule 21 interconnection requirement, mandating smart inverters for all solar interconnections in our territory. Therefore, we support the direction the Commissioner indicated of no longer listing inverters that lack smart-inverter functionality, as we agree that California has moved away from “non-smart” inverters. Using public resources to maintain a list of inverters that cannot be interconnected (nearly) anywhere in the state does not seem to serve the interest of Californians.

Panel on Adding Battery Storage to Equipment Lists

SMUD appreciated the inclusion of this topic during the workshop on Solar Equipment Lists and was pleased that we could contribute to the panel discussion. Both Commissioner David Hochschild’s introductory remarks and the panel discussion emphasized several points that SMUD supports. We would like to provide additional detail regarding our comments on the panel and also to express our interest in continuing our support in the dialog of how to enable energy storage as a resource to the electrical grid.

In July 2018, SMUD launched our first energy storage program, and we offer storage incentives to residential and commercial customers through the same interconnection portal that is used for PV interconnections. Our experience is that the installers of battery energy storage systems are, in most cases, the same contractors responsible for installing PV systems. By directing battery energy storage to the same interconnection system, we are building upon the knowledge that already exists among system installers in our territory. We consider it vital to have awareness of the

generating equipment connected to the grid and believe that a single, easy-to-use interconnection portal is one of the best ways to accomplish that.

Therefore, if the CEC created a storage equipment list, our platform could use that list in parallel with the solar list, thereby providing a familiar experience to installers in our territory and improving the overall ratio of systems that are successfully interconnected to our grid through the appropriate interconnection review process. This will create efficiencies both for SMUD and our customers, improve reliability, and increase the rate of storage integration to the grid overall.

If the CEC establishes clear and meaningful criteria that an energy storage system must meet in order to be added to the list, the CEC will ensure the usefulness of the list. While SMUD uses the same interconnection process for our entire service territory, we serve many local jurisdictions in our territory, and each of those has its own permitting and approval process. SMUD has developed deep relationships with these local partners to ensure that the interconnection and permitting processes support each other in the jurisdictions we serve.

SMUD is concerned that as energy storage increases in prevalence and the variety of technology types available expands, it is difficult for individual jurisdictions and utilities to maintain awareness of every permissible and safe system configuration. Therefore, the creation of a central list with clear and meaningful qualification criteria can provide a common point of reference for all jurisdictions and utilities across California (and the nation). A common list can increase consistency across installations, encourage adoption of common standards, improve system safety and give consumers access to better information to support their decision to purchase energy storage. This would be a significant public service and seems likely to increase the rate of storage installations, in support of California's aggressive storage and clean energy goals.

Thank you to Commissioner Hochschild, your staff, and the California Energy Commission staff for leading the discussion on this topic and for your consideration of our comments.

/s/

---

STEVEN G. LINS  
Deputy General Counsel  
Sacramento Municipal Utility District  
P.O. Box 15830, MS A311  
Sacramento, CA 95852-0830

/s/

---

JAMES FRASHER  
Senior Strategic Business Planner  
Sacramento Municipal Utility District  
P.O. Box 15830  
Sacramento, CA 95852-0830

cc: Corporate Files (LEG 2018-0409)