

DOCKETED

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SDG&E Comments to CEC's Draft Guidelines for CA Solar Electric Incentive Programs_7th Edition

Additional submitted attachment is included below.



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Subject: Comments on CEC’s Draft Guidelines for California’s Solar Electric Incentive Programs (Senate Bill 1), Seventh Edition.

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to submit comments in response to the California Energy Commission’s (CEC) posted red-lined draft Guidelines for California’s Solar Electric Incentive Programs (Senate Bill 1), Seventh Edition, issued October 12, 2018.

SDG&E applauds the CEC for expanding its list to include energy storage systems. The Distributed Energy Resources (DER) market has evolved, and SDG&E has seen a large increase in energy storage device developments and interconnection. SDG&E believes that expanding the CEC list will continue to support the market growth and supports the interconnection process improvements that the California Utilities are working on.

I. SDG&E supports the intent of the revisions reflected in the Seventh Edition

SDG&E supports the CEC expanding its draft guidelines and its eligible equipment list to any device that can materially impact the behavior of a generator operating in parallel with the grid. SDG&E believes that the CEC’s efforts have been successful and have established a threshold of quality for generating facilities and their role in being good citizens on the grid. SDG&E believes that as generating facility technology evolves, the CEC’s process and equipment list should also evolve to capture all grid interactive generating facilities and all devices that control the operation of generating facilities. These devices include inverter control units, energy management systems, and Rule 21 aggregator systems.

II. Appropriate entity to certify conformance with test procedures

As reflected in the red-line edit below, SDG&E recommends replacing “SunSpec Alliance” with “a NRTL¹” in the draft language on page 13 of the guideline. SDG&E appreciates SunSpec’s efforts in creating a test procedure for IEEE 2030.5, but SDG&E does not believe it is appropriate for the CEC’s guidebook to require SunSpec to certify a NRTL’s testing to SunSpec’s test procedure. SDG&E anticipates that the market will determine how a NRTL gets prepared to test communication capabilities and how a NRTL will interact with SunSpec. Such interaction could include working with SunSpec to review its test results and seeking SunSpec’s stamp of approval. SDG&E believes that the CEC guidebook could define the minimum requirements for certification and approval to be listed on the CEC’s equipment list without determining how devices are tested and whether a third-party entity besides the NRTL is involved.

Product certification from a NRTL ~~SunSpec Alliance~~ to Common Smart Inverter Profile (CSIP) requirements, defined in IEEE 2030.5:2018, in accordance with the SunSpec Common Smart Inverter Profile (CSIP) Conformance Test Procedures.

III. Reference to milestone date

SDG&E recommends moving the sentence below, which is currently located on page 13 in the middle of Section C, to the end of Section C. The current placement may confuse readers to think that the timeline corresponds to the next section that provides certification details for advance functionalities

As of January 1, 2020, the Energy Commission ~~discontinue~~ accepting requests to list inverters that do not incorporate smart inverter functionality.

IV. CONCLUSION

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ Tim Carmichael

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¹ A NRTL in this context is a Nationally Recognized Test Laboratory or potentially another approved entity that can certify compliance.