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Vote Solar Comments on 2025 IEPR Scope

Additional submitted attachment is included below.



California Energy Commission
715 P Street
Sacramento, CA

11 February 2025

Draft Scoping Order for the 2025 Integrated Energy Policy Report

Vote Solar thanks the California Energy Commission (CEC) for the opportunity to provide written comments to the 28 January 2025 Notice of Request for Comments on the Draft Scoping Order for the 2025 Integrated Energy Policy Report (IEPR).

Vote Solar tracks the annual IEPR process to assist decision-makers and state energy planners in considering how different types of distributed energy resources (DERs) impact the California Energy Demand forecast.

To this end, Vote Solar recommends that the CEC include in the scope of the 2025 IEPR a technical assessment studying how front-of-the-meter (FTM) distribution-connected community solar and storage resources reduce demand-side forecasts, and accordingly, identifying to what extent these resources avoid wholesale generation capacity, transmission, distribution, and other relevant system cost components.

Time Value of Distribution Connected Resources

Distribution connected community solar and storage resources have a much quicker development timeline than utility-scale resources because, among other reasons, distribution connected resources interconnect under the CPUC Rule 21 tariff. Broadly speaking, Rule 21 ensures distribution-connected resources follow clear and transparent interconnection standards and timelines and defined telemetry and smart inverter requirements ensure generation exports do not participate in wholesale markets.¹ There is a CPUC managed dispute process to resolve interconnection issues should they arise. In 2023, SB 410 (Becker) and AB 50 (Wood) required the CPUC to open a proceeding to shorten energization timelines which the CPUC did in D.24.09.090.² Taken together, these policies can assist energy planners' close near-term capacity shortfalls, but additional creative solutions are still necessary to maintain system level reliability while responding to local capacity needs.

¹ <https://www.cpuc.ca.gov/rule21/>

² D.24-09-020, Finding of Fact #3, "The maximum statewide energization targets adopted in this decision will shorten the longest amount of time the large electric IOUs may take to complete the steps of the energization process that are fully within the large electric IOU's control by five percent." p.83.

Vote Solar cautions state energy planners that relying too heavily on the friction-filled transmission market will invariably result in retaining existing fossil-gas capacity for ‘reliability’. This is directly contrary to our climate targets and cost ratepayers billions of dollars. Lastly, reliability-related contracts also take up critical capacity allotments in deliverability assessments, inadvertently crowding out interconnection requests of more streamlined carbon-free resources.

To get around this planning conundrum, Vote Solar recommends the CEC analyze the time value that community solar and storage resources leverage against the supply-side market. Vote Solar recommends the CEC evaluate how much value is unlocked when resources are interconnected under Rule 21 compared to other interconnection processes that take substantially longer. Vote Solar posits that bringing multiple gigawatts of incremental community solar and storage resources online within five years will improve local and system reliability metrics while materially reducing Resource Adequacy compliance costs.

Assisting Reliability in Local Reliability Areas

Vote Solar recommends the CEC analyze which specific circuits in each Local Reliability Area (LRA) are currently forecasting deficiencies and focus on these areas to study how new community solar and storage resources can alleviate those deficiency concerns. LRAs are “transmission constrained load pockets...where local generation capacity is needed for reliability due to insufficient transmission capacity into the load pocket to meet electricity demand with electricity from outside of the load pocket.”³

Distribution-connected community solar and storage resources are capable of lowering demand in LRAs much quicker than long-lead time supply-side solutions. Additionally, community solar and storage resources have the added benefit of reducing reliance on “non-preferred” resources operating in and around Stockton, Greater Fresno, the LA Basin, and the other seven Local Capacity Areas.⁴

Conclusion

Vote Solar thanks the CEC for the opportunity to provide comments on the draft scoping order for the 2025 IEPR. Vote Solar looks forward to continuing working with commissioners and staff toward finding creative solutions to remove many of the known barriers.

Respectfully,
Steve Campbell

³ 2025 Local Capacity Technical Study Final Report and Study Results, CAISO, 30 April 2024, <https://stakeholdercenter.caiso.com/InitiativeDocuments/Final2025LocalCapacityTechnicalReport.pdf>

⁴ *id.*