

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 14, 2018

Advice Letter 5282-G

Ronald van der Leeden
Director, Regulatory Affairs
Southern California Gas Company
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

SUBJECT: Proposed Modifications to the Self-Generation Incentive Program Energy Storage Field Inspection and Discharge Testing Protocol in accordance with Resolution E-4717.

Dear Mr. van der Leeden:

Advice Letter 5282-G is effective as of May 11, 2018.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division

April 11, 2018

Advice No. 89
(Center for Sustainable Energy®)

Advice No. 3965-G/ 5271-E
(Pacific Gas and Electric Company –U 39 M)

Advice No. 3780-E
(Southern California Edison Company – U 338-E)

Advice No. 5282
(Southern California Gas Company – U 904-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Proposed Modifications to the Self-Generation Incentive Program Energy Storage Field Inspection and Discharge Testing Protocol in accordance with Resolution E-4717

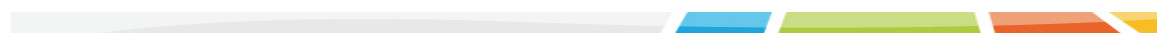
PURPOSE

In accordance with Commission Decision (D.)16-06-055, Ordering Paragraph 8, and Resolution E-4717, the Center for Sustainable Energy® (CSE), on behalf of the Self-Generation Incentive Program (SGIP) Program Administrators (PAs),¹ hereby submits this Advice Letter to propose modifications to the Self-Generation Incentive Program (SGIP) Energy Storage Field Inspection and Discharge Testing Protocol.

BACKGROUND

D.16-06-055 required the SGIP PAs to hold a workshop to solicit industry feedback on implementing a sampling protocol for field inspections and to subsequently publish a report including recommendations within six months of the date of the Decision. The Decision also stated, “[t]he program administrators should be allowed to file an advice letter proposing changes to the inspections/sampling regime, following the publication of this workshop report,

¹ The SGIP PAs are Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and CSE in the service territory of San Diego Gas & Electric Company (SDG&E).



if they believe it will benefit the program.”² Additionally, Resolution E-4717 granted the SGIP PAs authority to revise the field inspection protocol for energy storage projects as needed based on experience.

After Resolution E-4717 was issued on June 12, 2015, the SGIP PAs and their inspection teams had identified several ways to streamline the inspection process for electrical-discharging types of energy storage. On April 27, 2017, CSE, on behalf of the SGIP PAs, submitted an Advice Letter³ to propose modifications to the SGIP that would implement a Field Inspection Sampling Protocol and revise the Energy Storage Field Inspection and Discharge Testing Protocol. On May 17, 2017, the California Solar Energy Industries Association (CALSEIA), the California Energy Storage Alliance (CESA), and Tesla Corporation (Tesla) individually submitted Responses to the Advice Letter raising concerns over the proposed Protocols. In response to industry feedback, CSE, on behalf of the SGIP PAs, submitted a Reply to the Responses on May 24, 2017. On August 1, 2017, CSE, on behalf of the SGIP PAs, submitted a Supplemental Advice Letter,⁴ proposing revised modifications to the Field Inspection Sampling Protocol and the Energy Storage Field Inspection and Discharge Testing Protocol. A Disposition Letter was subsequently issued by CPUC Energy Division on August 29, 2017, approving the Advice Letter and the Supplemental Advice Letter.

Since the Disposition Letter was issued on August 29, 2017, SGIP stakeholders and SGIP technical consultants have identified additional revisions that should be made to streamline the discharge data requirements within the Energy Storage Field Inspection and Discharge Testing Protocol (Protocol). Accordingly, CSE, on behalf of the SGIP PAs, hereby submits this Advice Letter to propose additional revisions to further streamline the Protocol. Attachment A to this Advice Letter contains the revised Protocol.

PROPOSED AMENDMENTS TO ENERGY STORAGE FIELD INSPECTION AND DISCHARGE TESTING INSPECTION PROTOCOL

Energy Storage Field Inspection and Discharge Testing Protocol

A. Remove the 30-Minute Field Test Requirement.

SGIP applications currently have two options to meet SGIP discharge data requirements within the Protocol. Projects selected for an inspection may either provide: 1) one week’s worth of

² D.16-06-055, *Decision Revising the Self-Generation Incentive Program Pursuant to Senate Bill 861, Assembly Bill 1478, and Implementing Other Changes*, June 23, 2016, page 47.

³ CSE Advice Letter 78 / PG&E Advice Letter 3837-G/5062-E / SCE Advice Letter 3596-E / SoCalGas Advice Letter 5124, *Proposed Modifications to the Self-Generation Incentive Program to Implement a Field Inspection Sampling Protocol in accordance with D.16-06-055 and Revise the Energy Storage Inspection Protocol in accordance with Resolution E-4717*, April 27, 2017.

⁴ CSE Advice Letter 78-A / PG&E Advice Letter 3837-G-A/5062-E-A / SCE Advice Letter 3596-E-A / SoCalGas Advice Letter 5124-A, *SUPPLEMENTAL FILING: Revised Proposed Modifications to the Self-Generation Incentive Program to Implement a Field Inspection Sampling Protocol in accordance with D.16-06-055 and Revise the Energy Storage Inspection Protocol in accordance with Resolution E-4717*, August 1, 2017.

operational data, in addition to a field test measuring energy storage system output over the discharge duration specified on the application; or 2) one week's worth of operational data, in addition to a factory test measuring actual energy storage system output over the discharge duration specified on the application, *and in addition to* a 30-minute continuous discharge field test from the system at the project site. All documentation is required prior to scheduling a site inspection. These tests were created to ensure systems perform as expected.

The SGIP PAs have found that the 30-minute field discharge test is duplicative and unnecessary. One week's worth of data from the project site, in addition to a field or factory test measuring continuous discharge of output over the discharge duration specified on the application, is sufficient to demonstrate that the system is operating as expected and that the equipment can discharge its rated energy capacity. Furthermore, now that the latest revisions require one week's worth of operational data from all projects, both commercial and residential, before inspection is complete, a 30-minute discharge test to prove that projects can operate satisfactorily is redundant.

To verify system integrity and specifications, the SGIP PAs propose that certain information provided within the 30-minute discharge test be transferred to the one week's worth of data documentation. Specifically, the SGIP PAs propose that the document demonstrating one week's worth of operation at the project site contain 15-minute discharge interval data, a unique system identifier, date and time stamps, energy storage system power (kW) and/or energy kWh, and battery state of charge (SOC) information.

B. Remove the Requirement to Supply Discharge Data in No Less than 1-Minute and No More than 5-Minute Intervals.

The current Field, Factory, and 30-minute discharge tests require data to be submitted in 1- to 5-minute intervals.⁵ The SGIP PAs originally requested these short interval periods so that sufficient data points would exist for a 30-minute discharge test. Because there is not a practical need for a 30-minute discharge test, the SGIP PAs propose that data gathered in 15-minute intervals be sufficient for both factory tests and continuous discharge tests. Moreover, the SGIP PAs have found that requiring 1- to 5-minute interval data is a significant hinderance to some project developers and manufacturers that are not able to transmit data at greater frequency than 15-minute intervals. The SGIP PAs believe that removing the stringent 1- to 5-minute requirement and replacing it with a no greater than 15-minute interval requirement for the Field or Factory test will provide the PAs with sufficient information to verify system function and allow projects to move more efficiently through the inspection process.

C. Remove the Requirement to Supply Load Identification and Average Battery Cell Temperature or Ambient Temperature at the Time of the Test.

The SGIP PAs propose removing the requirement to identify the type of load served (i.e., native load, grid, or artificial load), as well as the average battery cell temperature or ambient temperature at the time of the Field and Factory tests. Knowledge of the battery cell

⁵ This does not apply to the week's worth of data.

temperature or load served is not relevant to the completion of the Field or Factory tests. To date, the absence of these details in an application results in test rejection and therefore delayed payment of incentives. The inclusion of this criterion is further confounding because there is no SGIP requirement that batteries must discharge within a given temperature band. Likewise, there are no requirements regarding the type of load that must be served by the system at the time of the Field or Factory test. Thus, the SGIP PAs propose removing the requirement to supply load and temperature data. If load or temperature is ever the reason a manufacturer or developer cannot achieve a desired discharge rate for Field or Factory tests, these details should be communicated to the SGIP PAs and handled on a case by case basis.

Attachment A contains the proposed revised energy storage inspection protocol.

Affected Sections:

2.5.3 - Field Verification Visit

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2 and D.16-06-055, this Advice Letter is submitted with a Tier 2 designation.

PROTESTS

Anyone wishing to protest this Advice Letter may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than May 1, 2018, which is twenty (20) days after the filing of this Advice Letter. Protests should be mailed to:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Ave., 4th Floor
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Copies of the protest should also be sent to the attention of the Director, Energy Division, Room 4004, at the address shown above.

A copy of the protest should also be sent via e-mail and U.S. mail to the addresses below on the same date it is mailed or delivered to the Commission:

For CSE:
Sephra Ninow
Associate Director, Regulatory Affairs
Center for Sustainable Energy®
9325 Sky Park Court, Suite 100
San Diego, CA 92123
E-mail: sephra.ninow@energycenter.org

For SoCalGas:
Attn: Ray Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
E-mail: rortiz@SempraUtilities.com

For SCE:
Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, CA 91770
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, CA 94102
E-mail: Karyn.Gansecki@sce.com

For PG&E:
Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

There are no restrictions as to who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

EFFECTIVE DATE

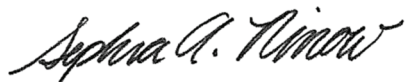
CSE requests that this Advice Letter become effective on regular notice, May 11, 2018, which is thirty (30) calendar days after the date of filing.

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NOTICE

CSE is providing a copy of this Advice Letter to service list R.12-11-005.



Sephra Ninow
Associate Director, Regulatory Affairs
Center for Sustainable Energy®

Attachments: Attachment A – Revised Energy Storage Field Inspection and Discharge Testing Protocol

cc: Service List R.12-11-005