



California's Distributed Energy Resources Action Plan: *Aligning Vision and Action*

Discussion Draft: September 29, 2016

Introduction

The California Legislature recently enacted legislation to further California's deep commitment to reducing greenhouse gas emissions and deploying distributed energy resources. Senate Bill 350, approved by the Governor in 2015, commits California to reduce 2030 greenhouse gas emissions (GHG) by 40% below 1990 levels, increases to 50% the share of electricity to be produced by renewable generation, doubles targets for energy efficiency, and encourages widespread transportation electrification. Assembly Bill 327, approved by the Governor in 2013, requires reform of utility distribution planning, investment, and operations to "minimize overall system cost and maximize ratepayer benefits from investments in preferred resources," while advancing time- and location-variant pricing and incentives to support distributed energy resources.¹

Distributed energy resources (DER), which are defined as distribution-connected distributed generation resources, energy efficiency, energy storage, electric vehicles, and demand response technologies, are supported by a wide-ranging suite of California Public Utilities Commission (Commission) policies.² The Commission is actively considering augmentations and refinements to many of these policies in Commission proceedings.³ This DER Action Plan (Action Plan) seeks to align the Commission's vision and actions to shape California's distributed energy resources future.

Senate Bill 350 requires the Commission to implement an integrated resource plan (IRP) process to identify optimal portfolios of resources to achieve the state's GHG goals and meet the challenge of renewable integration, and DERs will play an important role.⁴ The Commission anticipates that this Action Plan will inform, and be guided by, IRP as that process takes shape.

At the July 14, 2016 voting meeting, the Commission adopted fifteen strategic directives to guide staff activities throughout the agency. This DER Action Plan furthers several of those directives. Specifically, accomplishing the vision described in the Action Plan will support the directives related to rates and affordability, climate change, environmental sustainability, economic prosperity, and coordination with other governmental entities.

Purpose

This DER Action Plan continues the Commission's support of DER, accomplishing four objectives:

- 1) **Provide a long-term vision** for DER and supporting policies;
- 2) **Identify continuing efforts** in support of the long-term vision;

¹ Public Utilities Code §769(c)

² See Appendix A, a matrix of existing DER sourcing mechanisms

³ Distributed Resource Plans: R.14-08-013; Integrated Distributed Energy Resources: R.14-10-003; Energy Efficiency: R. 13-10-005; Energy Savings Assistance Program: A.14-11-002; Demand Response: R. 13-09-011; Distributed Generation: R.12-11-005; Energy Storage: R.10-12-007; Alternative Fuel Vehicles: R. 13-11-007; Combined Heat and Power: R. 15-07-028; Renewable Portfolio Standards: R. 14-07-002; Time of Use: R.15-12-012; Residential Rate Reform: R.12-06-013; Net Energy Metering: R.14-07-002

⁴ Public Utilities Code §454.51 and §454.52



- 3) **Assess and direct further near-term *action needed*** to support long-term vision;
- 4) **Establish a DER steering committee *responsible for*** sustained coordination of DER activities.

This DER Action Plan will serve as a roadmap for decision-makers, staff, and stakeholders working in support of California’s DER future in order to facilitate proactive, coordinated, and forward-thinking development of related DER policy. This DER Action Plan is intended to guide development and implementation of policy related to DERs, not to determine outcomes of individual proceedings.

Scope and Structure

To accomplish the purpose, a strategic scope and structure are endorsed. The scope includes three groups of related proceedings or initiatives:

1. **Rates and Tariffs**
2. **Distribution Grid Infrastructure, Planning, Interconnection and Procurement**
3. **Wholesale DER Market Integration and Interconnection**

The DER Action Plan includes vision, continuing, and action elements for each proceeding grouping, detailed in the following section. The “continuing” elements are ongoing efforts that help achieve the vision. “Action” elements are additional efforts considered necessary for achieving the vision.

The scope and structure of this DER Action Plan are necessarily limited. Because of the sheer breadth of issues touching DER, this Action Plan may not necessarily include all affected major policy areas (e.g., integrated resource planning (R.16-02-007)). A primary focus is on DER strategies that are controllable by grid operators and/or targetable to geographic areas. Many worthy intermediate goals and milestones may be omitted. This reflects the practical limitations of this Action Plan effort, and the reality that although the Commission can reasonably identify the starting block and finish line for work on DER, the rest will be determined as we go. Following our identification of vision, continuing, and action elements we state more fully how we will support that process, including action needed to expand this scope to complement other state energy policy priorities.



Vision, Continuing, and Action Elements

The following table sets forth the elements identified for each grouping:

1. Rates and Tariffs

Vision Elements

- A. A continuum of rate options, from the simple to complex, is available for customers.
- B. Rates reflect time-varying marginal cost.
- C. Processes for adopting innovative rates and tariffs are flexible and timely.
- D. Rates and demand charges better reflect cost causation and capacity benefits of DERs.
- E. Rates remain affordable for non-DER customers.

Continuing Elements

- 1. Time of Use (TOU) Rulemaking (R.15-12-012), consideration of:
 - a. TOU time periods
 - b. Compendium of TOU rate designs.
- 2. Residential Rate Design (R.12-06-013), including the goal of default residential TOU by 2019, and implementation of:
 - a. Marketing, Education, and Outreach for TOU
 - b. TOU Pilots.
- 3. General Rate Case (GRC) Phase 2 (e.g., A.16-06-013) and Rate Design Window cases, consideration of: fixed charges, TOU periods and rates, nonresidential rate design, including enhancements to dynamic rates.
- 4. Appropriate rate designs to absorb renewables oversupply.
- 5. Consideration of Net Energy Metering (NEM) successor (R.14-07-002).
- 6. Possible new proceeding to consider changes to nonresidential rate design, including demand charge re-alignment.

Action Elements

- 1.1. By 2017, complete a review of non-residential demand charges and recommend alignment of pricing with DER vision elements.
- 1.2. By 2017, develop methodology for setting TOU periods.
- 1.3. By 2017, complete review of opt-in TOU residential pilots.
- 1.4. By 2018, start study of residential default TOU rates through pilots.
- 1.5. By 2018, ensure that analytical tools to assess the value of DERs support the review of NEM successor tariff (D.16-01-044).
- 1.6. By 2018, establish clear marketing, education and outreach plans that maximize the take-up of



time-varying rates by customers able to take advantage of them with DERs.

1.7. By 2018, establish a forum for considering innovative rates and tariffs.

1.8. By 2019, meet statutory requirements to default residential customers to TOU rates.

2. Distribution Planning, Infrastructure, Interconnection, and Procurement

Vision Elements

- A. DERs meet distribution grid needs through a transparent, seamless planning and sourcing process, resulting in increased DER deployment and grid reliability with decreased cost.
- B. Investor-owned utilities (IOUs) are motivated to accelerate deployment of DER regardless of the impact on distribution capacity investment opportunities.
- C. DER sourcing mechanisms are restructured to ensure that they are technology-neutral and competitively procured, where appropriate. Utility or affiliate ownership of DERs is also considered where it may be necessary to achieve market transformation or other public policy goals.
- D. Cost effectiveness and valuation frameworks accurately and impartially reflect the full grid services, renewables integration, and GHG value of DERs.
- E. Interconnection is facilitated by improving DER hosting capacity estimates to minimize the need for interconnection studies, and by making interconnection costs transparent, accessible and public.
- F. Sophisticated DER Growth Scenarios are regularly updated and inform proactive investments designed to strengthen DER hosting capacity and the efficiency of the distribution grid in identified growth areas and lower the cost to ratepayers of accommodating high penetrations of DERs.

Continuing Elements

- 1. Distributed Resource Plans (DRP) (R.14-08-013) proceeding, including consideration of:
 - a. DRP demonstrations including establishing and testing integrated capacity and locational net benefit methodologies
 - b. DER data needs
 - c. Distribution infrastructure deferral framework, including reforms to consider DRP results in GRC Phase 1 proceedings (e.g., A.16-09-001)
 - d. Grid modernization definition and characterization
 - e. DER growth scenario forecast methodologies, including implementation risk assessments as inputs to integrated resource planning.
- 2. Integrated Distributed Energy Resources (R.14-10-003) proceeding, including consideration of:



- a. Competitive Solicitations Framework
 - b. Integrated DER valuation and cost-effectiveness framework
 - c. Utility incentive mechanism pilot.
3. Rule 21 Interconnection (R.11-09-011) proceeding, including evaluating the effectiveness of interconnection reforms and pilots to provide cost certainty and improve data collection.
 4. Energy efficiency (R.13-11-005), including locational targeting to avoid or defer grid upgrades, and normalized metered energy consumption evaluation methods to increase visibility.

Action Elements

- 2.1. Periodic collection and review of demonstration activities, including enhancements, redirection, and augmentations where needed.
- 2.2. By 2016, begin Commission consideration of the use of a societal cost test in DER valuation.
- 2.3. By 2017, consider how existing DER sourcing mechanisms (e.g., programs and tariffs) should reflect location value and/or be transitioned to a competitive sourcing mechanism already reflecting locational value.
- 2.4. By 2017, the Commission concludes consideration of an independent distribution planning review process to ensure that DERs are being adequately evaluated in the context of utility distribution planning
- 2.5. By 2017, the Commission will conclude consideration of a grid modernization framework that shall set basic functionalities and interoperability requirements for utility grid investments
- 2.6. By 2018, the Commission will consider the use of Integration Capacity Analysis to streamline utility interconnection processes to accelerate DER deployment.
- 2.7. By 2018, consider developing guidelines to clarify the circumstances in which utility or affiliate ownership of DERs is appropriate.
- 2.8. By 2020, fully operationalize advanced smart inverter functionalities to enhance the integration of DERs into the grid.
- 2.9. By 2020, consider the role of Distributed Energy Resource Management Systems to enhance grid management and maximize the value of DER deployment.



3. Wholesale DER Market Integration and Interconnection

Vision Elements

- A. DERs participate robustly as grid resources through progressively greater visibility, dispatchability, and profitability in wholesale grid operations.
- B. DERs are appropriately enabled to earn multiple revenue streams by delivering multiple services to the wholesale market, distribution grid and end-users (“stacking value”).
- C. Wholesale market rules and interconnection tariffs support behind-the-meter DERs.
- D. Electric vehicle charging systems, and mobility and driving behaviors, can be predicted and overseen in the grid operations.
- E. Non-discriminatory market rules and regulations for mobile electric transportation resources (addressing registration, interconnection, and physical connectivity) are established to support customer mobility.

Continuing Elements

1. Storage (R.15-03-011) proceeding and California Independent System Operator (CAISO) stakeholder processes, including consideration of market rules and regulatory policies for DER Multi-Use Applications.
2. Demand Response (R.13-09-011) proceeding and CAISO stakeholder processes, including consideration of IOU transition of demand response programs into the wholesale market.
3. Enhancement of demand response products and Proxy Demand Resource, including participation in ancillary services markets, viability of “reverse” demand response, and growth of third-party demand response aggregator participation in wholesale markets.

Action Elements

- 3.1. By 2017 consider issues regarding use of DER to meet both transmission and distribution system needs (e.g., optimizing dispatch) and related Federal Energy Regulatory Commission (FERC) jurisdictional issues.
- 3.2. By 2018 consider eligibility of NEM resources in wholesale markets.
- 3.3. By 2018 assess regulatory options to streamline Commission jurisdictional interconnection rules (Rule 21) and FERC interconnection rules such as Wholesale Distribution Open Access Tariff for behind-the-meter DERs
- 3.4. By 2018 complete research critical to vehicle-grid integration and incorporate results into transportation electrification policy.
- 3.5. Develop policies that ensure that transportation electrification infrastructure and rates avoid unreasonable cross-subsidies.



Implementation

To further the DER Action Plan, the Commission will establish the following ongoing oversight mechanisms:

- **Steering Committee** – A committee of staff will be constituted and given responsibility to oversee development of intermediate steps of this DER Alignment – those necessary to see the Action elements lead to the Vision elements. Among the tasks will be to coordinate implementation of the plan, facilitate communication across proceedings, periodically report to the Commission on current status, and prepare revisions to this action plan for subsequent consideration by the Commission. Another task will be to provide information to the Administrative Law Judge (ALJ) Division about development of these steps, and seek ALJ Division advice on appropriate procedural vehicles. The Steering Committee shall be supported by an analyst from the Energy Division.
- **Commission briefings** – Periodic briefings on the status of implementation will be provided at Commission meetings.
- **Future Revisions** – Staff may suggest revisions to the plan, as necessary, to respond to new legislation, technological developments, and other changes in circumstances.

Conclusion

Through this DER Action Plan the Commission reaffirms its commitment California's clean energy future. We must continue to develop the market opportunities and remove unnecessary barriers to unleash the full value that DERs can provide. The Commission must coordinate its efforts, both internally and with our sister agencies, to push efficiently toward these goals. This Action Plan reflects the Commission's vision for achieving its DER goals.

Appendix A: Distributed Energy Resources (DER) Sourcing Mechanisms

(Acronym / abbreviations list provided below)

Sourcing Mechanism	Brief Description	Applicable DER(s)	Applicable Customer Segment(s)	Proceeding(s)
TARIFFS				
NEM tariff	<ul style="list-style-type: none"> •Customers receive a full retail rate bill credit for energy they generate and export to the grid •Net surplus compensation at wholesale generation rate for annual true-up •Variations: V-NEM, NEM-A, FC-NEM 	RPS eligible resources; AES coupled w/ renewables	All sectors	R.14-07-002
FiT [e.g., WATER biogas, CREST, ReMAT, CHP, AB 1613]	Customer and utility enter into a long term contract to purchase wholesale power generation from clean energy resource	Varies	Varies; WATER FiT is for W and Wastewater (WW) agencies	R. 14-07-002 R. 15-06-028
RATES				
TOU rate	<ul style="list-style-type: none"> •Customers charged rate based on time of day that electricity is used •TOU period/rate design varies by IOU 	All DERs	<ul style="list-style-type: none"> •Mandatory for all non-residential + NEM customers •Opt-in for residential 	R.12-06-013; R.15-12-012; A.15-04-012; A.16-06-013
CPP rate	Default rate for all commercial and industrial customers. Customers pay peak pricing on event days and lower pricing on other days	DR, AES	<ul style="list-style-type: none"> •Default for all non-residential •PG&E has opt-in for residential 	GRC Phase 2; RDW
EV rates	<ul style="list-style-type: none"> •Customer rates exclusively for EV charging on a separate meter. All are TOU. •SDG&E VGI pilot examining "grid optimal" EV charging •SCE V2G LA AFB pilot examining optimal EV discharge for CAISO A/S frequency regulation 	EV	Residential and non-residential	R.13-11-007

Sourcing Mechanism	Brief Description	Applicable DER(s)	Applicable Customer Segment(s)	Proceeding(s)
INCENTIVE PROGRAMS				
IOU DR programs - various rate schedules [e.g., AC Cycling, TOU-BIP, API, CBP, DBP]	<ul style="list-style-type: none"> •Customers agree to lower demand during called events. Incentives may be offered to offset upfront costs or as reduced rates or both •Capacity payments + penalties for non-performance in certain programs (e.g., CBP) 	DR, AES	All sectors	R.13-09-011
Utility DR programs [e.g., PLS]	Load modifying DR program to incentivize mature TES technologies	Permanent Load Shifting (PLS)	Mostly non-residential	R.13-09-011
CSI	Incentives to customers installing eligible solar	Solar (PV and thermal)	Effectively only SDG&E non-residential (wait list)	R.12-11-005
SGIP	Incentives to customers installing eligible DERs	AES, wind, fuel cells, CHP	Residential (mostly AES), and non-residential (all technologies)	R.12-11-005
IOU EE Programs (mass market)	Deemed <i>upstream</i> incentives to manufacturers for lighting, etc.	EE	All sectors	R.13-11-005
Utility EE Programs	<ul style="list-style-type: none"> • Deemed <i>midstream</i> incentives (to distributors) and <i>downstream</i> incentives (to customer) for HVAC, lighting, appliances, etc. • Custom incentives for more complex projects 	EE	All sectors	R.13-11-005
Third-Party Implemented IOU EE Programs	• IOU EE portfolio implemented by third-parties, procured through competitive solicitations	EE	Mostly non-residential	R.13-11-005
TPA EE Programs	• Pilots administered by third-parties, such as MCE, SoCal REN, and BayREN	EE	Specialize in hard-to-reach segments (MF, small C&I)	R.13-11-005
ESA	<ul style="list-style-type: none"> • Free installation of approved weatherization and EE measures for qualifying low-income customers • Downstream delivery model via program contractors 	EE	Low-income residential	R.13-11-005

Sourcing Mechanism	Brief Description	Applicable DER(s)	Applicable Customer Segment(s)	Proceeding(s)
COMPETITIVELY PROCURED (RFOs)				
PRP + All-Source RFOs [e.g., SCE and SDG&E LCR]	CPUC-directed RFO process to meet need specified in LTPP. Follows IOUs' new generation procurement processes. RFO overseen by PRG. Contracts submitted by application.	EE, DR, RPS	Non-residential	A.14-11.012
SCE PRP	SCE voluntary initiative to procure (smaller) preferred resources projects in the West L.A. local area. Follows new generation RFO process, with refinements from LCR RFO experience.	EE, DR, RPS, AES	Mostly non-residential	A.15-12-013
Resource -specific_competitive procurement [e.g., AES RFOs, SCE PV RFO, DRAM pilot]	<ul style="list-style-type: none"> •Third-party or aggregator bids for specific DERs, as directed by CPUC decision (e.g., AES RFOs or DRAM pilot) or on IOUs' own motion (e.g., SCE PV RFO) •Resources bid into wholesale markets (except SCE PV) • DRAM provides capacity payment; third-party Demand Response Providers bids energy or A/S into CAISO market 	AES, PV, DR, EV (in DRAM)	Res. and Non-residential. DRAM has residential set-aside	R.13-09-011 A.08-03-015
WHOLESALE MARKET PRODUCTS AND SERVICES				
Proxy Demand Response (PDR)	Market platform for <i>economically-triggered</i> load to participate in day-ahead and real-time energy and A/S markets	DR, AES	All	CAISO initiatives
Reliability Demand Response Resource (RDRR)	Market platform to provide CAISO visibility to <i>reliability-triggered</i> DR as administered through CAISO markets. CAISO rules require bidding at 95% of bid price ceiling.	DR, AES	Mostly non-residential	CAISO initiatives
NGR/ DERP	<ul style="list-style-type: none"> • Market platform for DERs to participate in day-ahead and real-time energy and A/S markets through the NGR model • New DERP enables aggregations of DERs at sub-load aggregation point (sub-LAP) level 	All DERs (but focused on AES)	All	CAISO initiatives

Abbreviations:

A/S: Ancillary Service
AC: Air Conditioning
AES: Advanced Energy Storage
AFV: Alternative Fuel Vehicles
ALJ: Administrative Law Judge
API: Agricultural and Pumping Interruptible
BayREN: Bay Area Regional Energy Network
C&I: Commercial and Industrial
CAISO: California Independent System Operator
CARB: California Air Resources Board
CBP: Capacity Bidding Program
CEC: California Energy Commission
CREST: California Renewable Energy Small Tariff
CHP: Combined Heat and Power
CPP: Critical Peak Pricing
CPUC: California Public Utilities Commission
CSI: California Solar Initiative
DBP: Demand Bidding Program
DER: Distributed Energy Resources
DERMS: Distributed Energy Resource Management Systems
DERP: Distributed Energy Resource Provider
DR: Demand Response
DRAM: Demand Response Auction Mechanism
DRP: Distributed Resources Plans
EE: Energy Efficiency
ESA: Energy Savings Assistance
ESAP: Energy Savings Assistance Program
EV: Electric Vehicle

FC NEM: Fuel Cell Net Energy Metering
FERC: Federal Energy Regulatory Commission
FiT: Feed-in-Tariff
GHG: Greenhouse Gas Emissions
GRC: General Rate Case
HVAC: Heating, Ventilation and Air Conditioning
IDER: Integrated Distributed Energy Resources
IOU: Investor Owned Utility
IRP: Integrated Resource Plan
LA AFB: Los Angeles Air Force Base
LCR: Local Capacity Resource
LTPP: Long Term Procurement Plan
MCE: Marin Clean Energy
MF: Multi-Family
MUA: Multi-Use Application
NEM: Net Energy Metering
NEM A: Net Energy Metering Aggregation
NGR: Non-Generator Resource
PDR: Proxy Demand Response
PG&E: Pacific Gas and Electric
PLS: Permanent Load Shifting
PPA: Power Purchase Agreement
PRG: Procurement Review Group
PRP: Preferred Resources Pilot
PV: Photovoltaic

RDRR: Reliability Demand Response Resource
RDW: Rate Design Window
ReMAT: Renewable Market Adjusting Tariff
RFO: Request for Offer
RPS: Renewable Portfolio Standards
RRR: Residential Rate Reform
SCE: Southern California Edison
SDG&E: San Diego Gas and Electric
SGIP: Self-Generation Incentive Program
SoCalREN: Southern California Regional Energy Network
Sub-LAP: Sub-Load Aggregation Point
TES: Thermal Energy Storage
TOU: Time of Use
TOU-BIP: Time of Use Base Interruptible Program
TPA: Third Party Administered
V2G: Vehicle-to-Grid
VGI: Vehicle Grid Integration
VNEM: Virtual Net Energy Metering
W: Water
WDAT: Wholesale Distribution Open Access Tariff
WW: Waste Water