

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's  
Own Motion to Improve Distribution Level  
Interconnection Rules and Regulations for Certain  
Classes of Electric Generators and Electric Storage  
Resources

Rulemaking 11-09-011

Order Instituting Rulemaking to Consider  
Streamlining Interconnection of Distributed Energy  
Resources and Improvements to Rule 21.

Rulemaking 17-07-007

**PETITION OF THE CALIFORNIA SOLAR & STORAGE ASSOCIATION  
TO MODIFY RESOLUTION E-5357 TO ADOPT IEEE 2030.5.100 TEST  
PROCEDURE FOR SMART INVERTERS**

Dara Yung  
Director of Codes, Standards, and  
Permitting  
California Solar & Storage Association  
1107 9th St. #820  
Sacramento, California 95814  
949-407-9149  
dara@calssa.org

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**PETITION OF THE CALIFORNIA SOLAR & STORAGE ASSOCIATION  
TO MODIFY RESOLUTIONS E-5000, E-5036, AND E-5357 TO ADOPT IEEE  
2030.5.100 TEST PROCEDURES FOR SMART INVERTERS**

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the California Solar & Storage Association (CALSSA) submits this petition for modification (Petition) of Resolutions E-5000 (Appendix C), E-5036, and E-5357 to reflect the transition of the Common Smart Inverter Profile (CSIP) Implementation Guide responsibilities.

Resolutions E-5000 and E-5036 established SunSpec CSIP Test Procedures as the required pathway to demonstrate compliance with communications requirements.<sup>1</sup> Resolution E-5357 approved the request of the Large Investor-Owned Utilities (IOUs) to be relieved of the obligation to maintain the CSIP while requiring continued participation in relevant working groups and the Smart Inverter Working Group (SIWG).<sup>2</sup> The Resolution further determined that the Institute of Electrical and Electronics Engineers (IEEE) should manage near-term updates and ongoing maintenance of the CSIP Implementation Guide while the SunSpec Alliance (SunSpec) should continue to manage CSIP Test Procedures.

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<sup>1</sup> Resolution E-5000 found at:  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M309/K713/309713654.PDF>

Resolution E-5036 found at:  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M321/K596/321596742.PDF>

<sup>2</sup> Resolution E-5357 found at:  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M551/K523/551523428.PDF>

This Petition requests that IEEE 2030.5.100 Test Procedures be adopted in lieu of the SunSpec CSIP Test Procedures, in coordination with the transition from CSIP v2.1 to IEEE 2030.5.1.

## **1. Background**

In February 2015, under Rulemaking (R.) 11-09-011, the Smart Inverter Working Group (SIWG) developed standardized communication rules for smart inverters under Rule 21 to support interoperable integration of distributed energy resources (DERs).<sup>3</sup> The group recommended the IEEE 2030.5 standard as the default communication protocol, defining utility–DER communications.

These recommendations included the “California IEEE 2030.5 Implementation Guide,” subsequently renamed the Common Smart Inverter Profile (CSIP). Adopted in Rule 21 in 2016,<sup>4</sup> it required California’s Large IOUs to jointly develop and maintain CSIP to ensure consistent DER interoperability, with updates allowed as technology and regulations evolve.

Large IOUs and stakeholders developed CSIP in 2015–2016, which was further updated to its current version 2.1 in March 2018. CSIP v2.1 is based on IEEE 2030.5-2018.<sup>5</sup> SunSpec volunteered to host the document and, of their own accord, later developed and published CSIP Conformance Test Procedures (CSIP Test Procedures) in May 2018.<sup>6</sup>

In 2019, CPUC Resolutions E-5000 and E-5036 established and clarified testing requirements, designating SIWG as the implementation forum and defining an “Approved Testing Pathway,” including requiring Nationally Recognized Testing Laboratory (NRTL) testing using SunSpec CSIP Test Procedures.

In June 2024, the Large IOUs requested to be relieved of responsibility for maintaining CSIP, citing the need for broader technical expertise and closer alignment

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<sup>3</sup> SIWG Phase 2 communications recommendations [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/rule21/smart-inverter-working-group/siwg\\_phase\\_2.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/rule21/smart-inverter-working-group/siwg_phase_2.pdf)

<sup>4</sup> Decision 16-06-052 found at

<https://docs.cpuc.ca.gov/publisheddocs/published/g000/m164/k376/164376491.pdf>

<sup>5</sup> CSIP IEEE 2030.5 Implementation Guide for Smart Inverters v2.1

<https://sunspec.org/wp-content/uploads/2019/08/CSIPImplementationGuideV2.103-15-2018.pdf>

<sup>6</sup> SunSpec CSIP Conformance Test Procedures

<https://sunspec.org/wp-content/uploads/2019/08/SunSpecCSIPConformanceTestProceduresV1.2.pdf>

with international standards development organizations.<sup>7</sup> At that time, CSIP had not been updated since 2018. Stakeholders identified a need to revise the specification to align with newer standards, including IEEE 1547-2018 and IEEE 2030.5-2023, address existing technical issues, and support increasing adoption beyond California at both national and international levels. SIWG discussions throughout 2024 reinforced the importance of updates and the expansion of testing pathways.

Resolution E-5357 granted the IOUs' request to step back from maintaining CSIP and requested IEEE to assume responsibility for the CSIP Implementation Guide, while SunSpec retained responsibility for CSIP Test Procedures. The Resolution also required the Large IOUs to continue participating in SIWG and stakeholder engagement.

At the time Resolution E-5357 was adopted, IEEE had not yet established a project to develop test procedures for IEEE 2030.5 or CSIP, leaving SunSpec as the only viable testing framework. However, with IEEE now developing standardized test procedures, with publication expected June 2028, it is reasonable to transition to IEEE's standard.

## **2. Timing of this Petition**

The Resolutions were issued on July 12, 2019, December 6, 2019, and December 27, 2024, respectively. Rule 16.4 states that a petition must justify lack of timeliness if more than one year has passed since a decision was issued. CALSSA could not have issued this Petition within one year of any of these Resolutions being issued because at the time the Resolutions were issued IEEE had not yet begun the process of standardizing test procedures for IEEE 2030.5 and associated profiles. Therefore, at the time of the Resolution, the IEEE testing protocol that CALSSA is proposing the Commission to adopt did not yet exist and was not in development.

Since the issuance of Resolution E-5357, the Project Authorization Request (PAR) for IEEE P2030.5.1 was approved by the IEEE Standards Association Standards Board. IEEE has therefore formally committed to and is developing IEEE 2030.5.1 as the successor to CSIP v2.1. In December 2025, IEEE initiated a project (IEEE P2030.5.100) to standardize test procedures for IEEE 2030.5 and associated profiles, including IEEE

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<sup>7</sup> Joint PG&E Advice Letter 7305-E, et al.  
[https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\\_7305-E.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_7305-E.pdf)

2030.5.1 (CSIP).<sup>8</sup> Although this project initiation was two weeks less than one year after issuance of Resolution E-5357, two weeks was not enough time for CALSSA to have the conversations with experts that informed the content of this Petition.

### **3. Assignment of CSIP Test Procedures to an SDO**

IEEE is an accredited standards development organization (SDO). Accredited SDOs, like IEEE, follow formal, transparent processes to develop standards through balanced participation, public review, and consensus—not dominated by paid stakeholders. This reduces bias and increases trust across utility and industry stakeholders.

Resolution E-5357 recognized that SunSpec is not an accredited SDO and recommended improvements to its governance. Specific recommendations included asking SunSpec to open participation so that stakeholders may participate without becoming paid members. The Resolution also recommended that SunSpec publish a guide on its operating procedures, including rules for participation and balloting. To date, it does not appear that SunSpec has implemented these changes.

Participation in SunSpec remains membership based.<sup>9</sup> In a June 18, 2026, email, the SunSpec Alliance reiterated that organizations "must become a Contributing Member of the SunSpec Alliance in order to participate." Except for nonprofits, researchers, and educators, Contributing Member status requires payment of membership dues. In addition, prospective members must complete an application process, and the criteria used to evaluate and approve applications are not publicly documented, limiting transparency into how participation decisions are made.

Additionally, SunSpec's Reasonable and Non-Discriminatory (RAND) framework and Intellectual Property Rights (IPR) agreement applies only to members, creating potential barriers and legal risks for non-members seeking to comply with Commission requirements.

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<sup>8</sup> Standard Conformance Test Procedures for IEEE Std 2030.5  
<https://standards.ieee.org/ieee/2030.5.100/12340/>

<sup>9</sup> SunSpec 2030.5 Test Procedures Work Group states under "Participations" that "You must be a Contributing Member of the SunSpec Alliance to participate in this Work Group."  
<https://sunspec.org/sunspec-ieee-2030-5-conformance-profiles-work-group/#1732867623183-de65c852-f92cd898-ee93>

The Commission has consistently recognized “the value of nationally recognized standards, test procedures, and certifications” and expressed a “wish to leverage them wherever possible.”<sup>10</sup> Now that an SDO-developed CSIP Test Procedures is expected to be available June 2028,<sup>11</sup> it follows that the Commission should transition its requirements from a non-SDO-developed procedure to the SDO-developed procedure.

#### **4. National and International Alignment**

As IEEE 2030.5 is increasingly adopted outside California, the development of standardized, globally applicable test procedures has become necessary. IEEE P2030.5.100 is intended to provide common testing across all IEEE 2030.5 profiles, including IEEE P2030.5.1 (CSIP) and IEEE P2030.5.2 (DER Direct).

Continued reliance on SunSpec-specific procedures risks divergence from broader industry standards, particularly in jurisdictions where such regulation requires standards to be developed by accredited SDOs. This may increase compliance complexity and costs for manufacturers.

Centralizing both the standard and its test procedures within IEEE improves coordination, reduces duplication, and lowers participation burden across multiple organizations, states, and countries.

#### **5. Timing of Transition**

While Resolution E-5357 determined that IEEE is responsible for the ongoing maintenance of the CSIP Implementation Guide, it did not address the implementation timeline for transitioning to IEEE 2030.5.1. Publication of the IEEE 2030.5.100 Test Procedures is a prerequisite to adoption of IEEE 2030.5.1, as conformance cannot be consistently demonstrated or verified without an approved test procedure. Accordingly, once the IEEE 2030.5.100 Test Procedures are published, an eighteen-month transition period should be provided before compliance with IEEE 2030.5.1 is required. This approach is consistent with the established process for adopting new standards.

Aligning these transition periods would allow the migration from the SunSpec CSIP Test Procedures to IEEE 2030.5.100 to occur in coordination with the transition

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<sup>10</sup> Resolution E-5000, pg 31.

<sup>11</sup> IEEE 2030.5.100 PAR Details found at <https://development.standards.ieee.org/myproject-web/public/view.html#pardetail/13164>

from CSIP v2.1 to IEEE 2030.5.1. This is necessary to enable manufacturers to implement and comply with the new standard, while providing manufacturers, test laboratories, and utilities with a predictable and coordinated implementation timeline.

## **6. Conclusion**

For the reasons stated above, this Petition demonstrates that material developments have occurred since the adoption of Resolution E-5357, including IEEE's formal initiation of IEEE P2030.5.1 and IEEE P2030.5.100.<sup>12</sup> These developments establish a clear, standards-based pathway for both the CSIP Implementation Guide and associated test procedures to be maintained within an accredited standards development organization. CALSSA respectfully requests that the Commission adopt IEEE 2030.5.100 Standard Conformance Test Procedures to replace SunSpec CSIP Test Procedures.

Respectfully submitted,

By: /s/ Dara Yung  
Dara Yung

Dara Yung  
Director of Codes, Standards, and Permitting  
California Solar & Storage Association  
1107 9th St. #820  
Sacramento, California 95814  
Telephone: 949-407-9149  
Email: [dara@calssa.org](mailto:dara@calssa.org)

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<sup>12</sup> IEEE project designations carry a "P" prefix only while the project is in development; the prefix is dropped on publication.

**DECLARATION OF DARA YUNG PURSUANT TO RULE 16.4(b) OF THE  
CPUC’S RULES OF PRACTICE AND PROCEDURE GOVERNING NEW OR  
CHANGED FACTS**

I, Dara Yung, Director of Codes, Standards, and Permitting at the California Solar & Storage Association (“CALSSA”), declare under penalty of perjury under the laws of the State of California that the following is true and correct to the best of my knowledge and belief:

1. The Project Authorization Request (PAR) for IEEE P2030.5.1, Standard for Common Smart Inverter Profile of IEEE Std 2030.5, was approved on February 13, 2025, authorizing development of the standard.
2. The PAR for IEEE P2030.5.100, Standard Conformance Test Procedures for IEEE Std 2030.5, was approved on December 10, 2025, authorizing development of the test procedures.
3. IEEE Std 2030.5.1 Standard for Common Smart Inverter Profile of IEEE Std 2030.5 was expected to be submitted to the IEEE Standards Review Committee (RevCom) for approval and publication in June 2026. However, this has not occurred. Members of the Common Smart Inverter Profile Working Group now anticipate that a more realistic timeframe is for the standard to be approved by RevCom for publication in June 2028.
4. IEEE P2030.5.100 Standard Conformance Test Procedures are currently expected to be approved by RevCom for publication in June 2028.

/s/ Dara Yung  
Dara Yung

Dara Yung  
Director of Codes, Standards, and Permitting  
California Solar & Storage Association  
1107 9th St. #820  
Sacramento, California 95814  
Telephone: 949-407-9149  
Email: dara@calssa.org

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## Appendix

### Recommended Language Changes to Resolution E-5000, “Appendix C: Approved Testing Pathway,” page 50

For inverters that are not certified to IEEE 2030.5 at the level of the inverter or the ICU, each inverter model or family of models will demonstrate compliance with the Phase 2 communications requirements via compatibility testing in conjunction with a CSIP-certified gateway (aggregator or EMS). In this testing, a NRTL should perform the following SunSpec CSIP test procedures, until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5, on the aggregator or energy management system while it is connected to the inverter or inverter control unit: After that date, IEEE 2030.5.100 Test Procedures should be used.

### Recommended Language Changes to Resolution E-5000, “Appendix C: Approved Testing Pathway,” page 51

The NRTL should test conformance gateways to IEEE 2030.5 in accordance with the SunSpec CSIP Test Protocols, until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5. After that date, IEEE 2030.5.100 Test Procedures should be used. This testing may be carried out without regard to what is connected on the far end of the gateway. However, the entity under test may connect a specific inverter model to the gateway. If a specific inverter model is used, the testing lab may note the inverter model in the test results or in a letter associated with the test results.

Following the above tests, the NRTL should produce two reports. The test report should state that the gateway conformed to IEEE 2030.5 and CSIP. This may be certified by the SunSpec Alliance, until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5. After that date, the tests should be performed by a NRTL. A separate letter should state the inverter models that were connected to the gateway for compatibility testing, as outlined above. The CEC or another list-maintaining entity will receive that letter and use these documents as the basis for a list of compliant inverter models. The IOUs shall draw from that list to populate the list of eligible inverters in their interconnection application portals.

### Recommended Language Changes to Resolution E-5036, page 13

4. The communications testing that is described by Resolution E-5000’s Appendix C may be carried out by an Occupational Safety and Health Administration (OSHA)-recognized Nationally Recognize Testing Lab (NRTL) or a SunSpec Authorized Testing Laboratory (SunSpec ATL), until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5. After that date, the tests should be performed by a NRTL.

**Recommended Language Changes to Resolution E-5036, “Attachment D: Modifications to Appendix C of Resolution E-5000, issued July 12, 2019,” page 23, 24**

For inverters that are not certified to IEEE 2030.5 at the level of the inverter, each inverter model or family of models will demonstrate compliance with the Phase 2 communications requirements via compatibility testing in conjunction with a CSIP-certified gateway. In this testing, a NRTL should perform the following SunSpec CSIP test procedures, until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5, on the gateway while it is connected to the inverter or inverter control unit. After that date, IEEE 2030.5.100 Test Procedures should be used.

**Recommended Language Changes to Resolution E-5036, “Attachment D: Modifications to Appendix C of Resolution E-5000, issued July 12, 2019,” page 24, 25**

The NRTL should test conformance gateways to IEEE 2030.5 in accordance with the SunSpec CSIP Test Protocols, until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5. After that date, IEEE 2030.5.100 Test Procedures should be used. This testing may be carried out without regard to what is connected on the far end of the gateway. However, the entity under test may connect a specific inverter model to the gateway. If a specific inverter model is used, the testing lab may note the inverter model in the test results or in a letter associated with the test results.

Following the above tests, the NRTL should produce two reports. The test report should state that the gateway conformed to IEEE 2030.5 and CSIP. This may be certified by the SunSpec Alliance, until eighteen months after the publication of IEEE 2030.5.100 Standard Conformance Test Procedures for IEEE Std 2030.5. After that date, the tests should be performed by a NRTL. A separate letter should state the inverter models that were connected to the gateway for compatibility testing, as outlined above. The CEC or another list-maintaining entity will receive that letter and use these documents as the basis for a list of compliant inverter models. The IOUs shall draw from that list to populate the list of eligible inverters in their interconnection application portals.

**Recommended Language Changes to Resolution E-5357, page 2**

We ask IEEE, a third-party international Standards Development Organization (SDO), to commit to being responsible for near-term updates and ongoing maintenance of the CSIP Implementation Guide, as well as the CSIP Conformance Test Procedures (CSIP Test Procedures) through IEEE 2030.5.100

~~Standard Conformance Test Procedures. We ask that the SunSpec Alliance (SunSpec) continue to steward its CSIP Conformance Test Procedures (CSIP Test Procedures) first developed in 2018.~~ This Resolution requires the Large IOUs to participate in IEEE ~~and SunSpec~~ working groups to update and maintain the CSIP Implementation Guide and CSIP Test Procedures.

### **Recommended Language Changes to Resolution E-5357, page 17**

Issue 2: If the IOUs are relieved of the obligation to maintain CSIP, which organization(s) should manage near-term updates and ongoing maintenance?

Commission Determination: We find that it is prudent and reasonable for both IEEE and SunSpec to participate in managing CSIP, with IEEE managing the near-term updates to and ongoing maintenance of the CSIP Implementation Guide and SunSpec ~~continuing to manage~~ managing the near term updates to the CSIP Test Procedures, until the publication of IEEE 2030.5.100 Standard Conformance Test Procedures, at which time ongoing maintenance of the CSIP Test Procedures should transition to IEEE.

### **Recommended Language Changes to Resolution E-5357, page 20, 21**

SunSpec Should Continue to Manage Near-Term Updates to ~~and Ongoing Maintenance of~~ the CSIP Test Procedures, until the publication of IEEE 2030.5.100 Standard Conformance Test Procedures. Upon publication, responsibility for ongoing maintenance should transition to IEEE.

We agree with Kitu Systems' recommendation regarding allocating responsibilities to both organizations and acknowledge that SunSpec has been the owner and maintainer of the CSIP Test Procedures since 2018. We ask that SunSpec continue to manage the CSIP Test Procedures, including any near-term updates. ~~and ongoing maintenance. Furthermore, we find that this will best ensure continued conformance with the testing specifications in Appendix D of Resolution E-5036.~~

We find that it is prudent and reasonable for IEEE to take over management of the CSIP Test Procedures once IEEE 2030.5.100 is published, SunSpec to continue to manage the CSIP Test Procedures due to the above statements regarding ~~separating powers,~~ the speed to perform overall CSIP updates, as well as the following reasons:

**1. SunSpec already manages the CSIP Test Procedures and is well positioned to update and maintain them as needed in the near-term.** Since 2018, SunSpec has updated the CSIP Test Procedures using its working group process, most recently completing an update in October of 2023. IEEE would likely need to start from scratch in creating CSIP test procedures. ~~Furthermore, SunSpec authorizes testing laboratories to provide IEEE 2030.5/CSIP testing services and reviews the test reports to certify equipment. SunSpec offers Public Key Infrastructure (PKI)~~

~~testing certificates free of charge, and offers the only production IEEE 2030.5 PKI in the world. As the CSIP Implementation Guide is updated, SunSpec is well-positioned to continue updating the CSIP Test Procedures accordingly.~~

~~**2. Resolution E-5036 designates SunSpec CSIP Test Procedures in the Approved Testing Pathway to implement Phase 2 communications requirements and verify CSIP compliance.** As stated in Appendix D, “The NRTL should test conformance gateways to IEEE 2030.5 in accordance with the SunSpec CSIP Test [Procedures].” We continue to align with this direction.~~

**2. With the transition from CSIP v2.1 to IEEE std 2030.5.1, it follows that the ongoing maintenance of the CSIP Test Procedures should transition to IEEE.**

As an accredited Standards Development Organization (SDO), IEEE is the appropriate steward of standards and related conformance testing requirements. IEEE has already established and openly published comprehensive working group operating procedures, including clear rules governing membership, document review, and balloting. These procedures are designed to provide transparency, due process, and broad stakeholder participation, allowing interested parties to engage in standards development activities without requiring paid IEEE membership.

Consistent with the transition from CSIP v2.1 to IEEE Std 2030.5.1, the CSIP Test Procedures should likewise transition to IEEE 2030.5.100 to maintain alignment between the standard and its associated conformance testing framework. The SunSpec CSIP Test Procedures will remain the Commission-approved conformance test procedures until eighteen months after the publication of IEEE Std 2030.5.100. On that date, compliance with IEEE Std 2030.5.1 will become mandatory, and IEEE Std 2030.5.100 will replace the SunSpec CSIP Test Procedures as the Commission-approved conformance test procedures.

We ask that SunSpec commit to continue managing and maintaining the CSIP Test Procedures in the interim period. This commitment may be via email to Energy Division staff and the SIWG service list, or as otherwise agreed upon between SunSpec and the Energy Division.

We ask IEEE, upon the publication of IEEE Std 2030.5.100, to commit to being responsible for ongoing maintenance of the CSIP Test Procedures.

~~If industry members opine that changes to the CSIP Test Procedures are necessary to ensure consistent interoperability of DER systems with the Large IOUs’ systems, we recommend that SunSpec gather stakeholder comments and create implementation plans to improve the procedures. This work may be accomplished through the SIWG and/or SunSpec working groups. Should the industry request other changes to the compliance testing paradigm, we recommend that further discussion be had through the SIWG.~~

~~We encourage IEEE and SunSpec to collaborate as needed to support updates to the CSIP Implementation Guide and adjustments to the CSIP Test Procedures;~~

~~including sharing any information regarding items that need to be updated between the organizations.~~

~~We recognize that this division of responsibilities will require parties interested in both the CSIP Implementation Guide and CSIP Test Procedures development to be involved with both IEEE and SunSpec. For this reason, we recommend that both IEEE and SunSpec, if they have not already done so, develop an option for interested stakeholders to participate in their respective processes without becoming paid members. This participation may be in a non-voting fashion. We recommend that SunSpec provide a public meeting or webinar on the policies involved in participating in a SunSpec working group when it becomes necessary to update the CSIP Test Procedures, such as in response to CSIP Implementation Guide updates. We further encourage SunSpec to, if it has not already done so, openly publish a clear guide to its working group operating procedures, including rules for membership, review, and balloting.~~

#### **Recommended Language Changes to Resolution E-5357, page 24**

23. It is reasonable for SunSpec to continue to update and maintain the CSIP Test Procedures in the near-term, including updating them to reflect the updated CSIP Implementation Guide.

24. We ask that ~~SunSpec~~ IEEE commit to ~~continue~~ managing and maintaining the CSIP Test Procedures upon the publication of IEEE 2030.5.100 Standard Conformance Test Procedures.

~~25. We recommend that both IEEE and SunSpec have an option for interested stakeholders to participate in their respective processes without becoming paid members, albeit perhaps in a non-voting fashion.~~

~~26. We recommend that SunSpec provide a public meeting, such as a webinar, on the policies involved in participating in a SunSpec working group when the time comes to update the CSIP Test Procedures pursuant to CSIP Implementation Guide updates.~~

~~27. We further encourage SunSpec to, if it has not already done so, openly publish a clear guide to its working group operating procedures, including rules for membership, review, and balloting.~~

#### **Recommended Language Changes to Resolution E-5357, page 24**

28. We find that SunSpec is the appropriate organization to manage changes to the CSIP Test Procedures if updates are needed in the near term, until the publication of IEEE 2030.5.100 Standard Conformance Test Procedures. At that time, ongoing maintenance of the CSIP Test Procedures should transition to IEEE to ensure consistent interoperability of DER systems with the Large IOUs' systems.