

**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
(Filed September 22, 2011)

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

Rulemaking 17-07-007
(Filed July 13, 2017)

**AMERICAN NATIONAL STANDARDS INSTITUTE (ANSI) RESPONSE TO THE
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**

Mary Saunders
Senior Vice President for Government
Relations and Public Policy
American National Standards Institute
1899 L Street NW
Washington, D.C. 20036
202-331-3610

September 8, 2026

**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
(Filed September 22, 2011)

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

Rulemaking 17-07-007
(Filed July 13, 2017)

**AMERICAN NATIONAL STANDARDS INSTITUTE (ANSI) RESPONSE TO THE
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(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the American National Standards Institute (ANSI) submits this response in support of the California Solar & Storage Association's (CALSSA) Petition to adopt IEEE 2030.5.100 Test Procedures for Smart Inverters (petition).



The American National Standards Institute¹ (ANSI) welcomes the opportunity to provide information to the Public Utilities Commission of the State of California. We support and encourage reliance on voluntary consensus standards and offer ANSI's assistance in helping to educate the public and government users about the value and availability of such standards, including American National Standards (ANS).

U.S. Standardization System

ANSI is a federation whose members are government agencies, trade associations, standards developing organizations, professional societies, companies, academic and international bodies, and consumer organizations. ANSI represents the interests of more than 270,000 companies and organizations and 30 million professionals worldwide. As the voice of the U.S. standards and conformity assessment system, ANSI empowers its members and constituents to strengthen the U.S. marketplace position in the global economy while helping to assure the safety and health of consumers and the protection of the environment.

Voluntary consensus standards for products, processes, and services are at the foundation of the U.S. economy and society. The United States has a proud tradition of developing and using voluntary standards to support the needs of our citizens and the competitiveness of U.S. industry in world markets.

ANSI oversees the creation, promulgation, and use of thousands of norms and guidelines that directly impact businesses in nearly every sector: from acoustical devices to construction equipment, from dairy and livestock production to energy distribution, and many more. Through its affiliate, the ANSI National Board (ANAB), the Institute is also actively engaged in accreditation – assessing the competence of organizations determining conformance to standards.

The Institute promotes the use of U.S. standards internationally, advocates U.S. policy and technical positions in international and regional standards organizations and encourages the adoption of international standards as national standards where they meet the needs of the user community.

ANSI is the sole U.S. representative and dues-paying member of the two major non-treaty international standards organizations, the International Organization for Standardization (ISO), and, via the U.S. National Committee (USNC), the International Electrotechnical Commission (IEC). As a founding member of the ISO, ANSI plays a strong leadership role in

¹ www.ansi.org

its governing body and U.S. participation, via the USNC, is equally strong in the IEC. For more detailed information about ANSI's roles, please visit www.ansi.org.

ANSI Accreditation and ANSI Essential Requirements for Due Process

IEEE is an ANSI-Accredited Standards Developer (ASD) and has held this status since 1982. With respect to the American National Standards (ANS) process, ANSI accredits some 235 standards developers (www.ansi.org/asd) whose procedures meet the *ANSI Essential Requirements: Due process requirements for American National Standards* (www.ansi.org/essentialrequirements). These organizations seek and maintain accreditation by ANSI voluntarily. In this context, ANSI serves as a facilitator, providing an infrastructure and process by which proposed ANSs may be vetted. ANSI's role is to safeguard the integrity of this system, which by design, is based on a private-public partnership that is driven by the needs of the range of markets in this country and by the public interest. ANSI's role in the standards development process is a procedural, not technical one. ANSI's process allows for public input and consideration of all timely and properly submitted public comments.

ANS meet the procedural criteria reflected in [OMB Circular A119](#) and the definition of voluntary consensus standards outlined in Federal law and policy, as well as similar criteria at the state level. The ANS process includes a robust series of checks-and-balances that provide comprehensive due process safeguards overseen by ANSI, a neutral party. Due process is key to ensuring that ANSs are developed in an environment that is equitable, accessible and responsive to the requirements of various stakeholders.

ANSI's procedural requirements include (but are not limited to) the following:

- Equal access to voting member status on ANS consensus bodies (voting groups) without any undue financial or other barriers to participation;
- Public notice at various phases in the development cycle, including an opportunity for public review and comment on all substantive drafts of the proposed standard – as well as any substantive changes to an ASD's accredited procedures;
- Good faith and documented efforts to seek balance on an ANS consensus body;
- Consideration of all timely comments received whether from a voting member of a consensus body or a public review commenter;
- Regular maintenance of a document, once approved as an ANS;
- Appeals process relating to the ANSI-accredited status of an ASD as well as an appeal of the consensus process by which a particular ANS was developed; and
- A unique, mandatory procedural audit of ANSs sponsored by ANSI-Accredited Standards Developers (ASDs) as a condition of maintaining accreditation.

This voluntary consensus standards process is time-tested and has been relied on by many government agencies to the benefit of the public, government, industry and many other stakeholders.

Additional Reference Links

The following links may also be helpful as reference:

- What is ANSI?: www.ansi.org
- American National Standards (ANS) Value: www.ansi.org/ansvalue
- American National Standards Key Steps: www.ansi.org/anskeysteps
- ANSI Essential Requirements: www.ansi.org/essentialrequirements
- ANS Process Explanation including a list of ANSI-Accredited Standards Developers (ASD) and lists of proposed and approved ANS:
<https://www.ansi.org/american-national-standards/ans-introduction/overview#introduction>

Respectfully submitted,

By: /s/ Mary Saunders

Mary Saunders
Senior Vice President for Government
Relations and Public Policy
American National Standards Institute
1899 L Street NW
Washington, D.C. 20036
202-331-3610

September 8, 2026