

**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

**JOINT RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E),  
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), AND PACIFIC GAS &  
ELECTRIC COMPANY (39-E) ON THE CALIFORNIA SOLAR & STORAGE  
ASSOCIATION'S PETITION TO MODIFY RESOLUTION E-5357 TO ADOPT IEEE  
2030.5.100 TEST PROCEDURES FOR SMART INVERTERS**

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September 14, 2026

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Pursuant to Rule 16.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Pacific Gas and Electric Company (PG&E), collectively, the investor-owned utilities (IOUs), respectfully submits this response to the Petition for Modification of Resolutions E-5000, E-5036, and E-5357 filed by the California Solar & Storage Association (CALSSA), dated July 24, 2026 (PFM). SDG&E submits this response pursuant to Energy Division's email instructions dated August 13, 2026, which established the date for responses of September 14, 2026.<sup>1</sup>

**I. INTRODUCTION**

The Commission should deny CALSSA's Petition. To a large extent, the Petition repeats issues that CALSSA and other parties raised in response to PG&E's Advice Letter 7305-E, SCE's

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<sup>1</sup> Pursuant to Rule 1.8 of the Commission's rules, counsel for SCE and PG&E have authorized SDG&E to submit this joint response on their behalf.

Advice Letter 5323-E, and SDG&E's Advice Letter 4462-E (Joint Advice Letter), which requested the IOUs to be relieved of the obligation to maintain the Common Smart Inverter Profile (CSIP). The Commission reviewed party positions and addressed them directly in Resolution E-5357.<sup>2</sup> In Resolution E-5357, the Commission adopted a thoughtful division of responsibilities. IEEE was directed to manage near-term updates to and ongoing maintenance of the CSIP Implementation Guide, while SunSpec was to continue managing the CSIP Test Procedures.<sup>3</sup> The Commission expressly found that both organizations should play key roles, and that allocating responsibility by document and function was preferable to an either-or approach.<sup>4</sup> The Petition identifies no basis to replace the Commission's considered allocation of responsibilities with CALSSA's proposed alternative.

Additionally, CALSSA's concerns conflate two distinct questions: whether SunSpec may revise procedures that it developed and maintains, and whether any such revision should become part of California's Rule 21 testing and certification requirements. Neither the IOUs nor the Commission can prevent SunSpec from updating its own materials. Resolution E-5357 nevertheless preserves California's control over its interconnection requirements by directing the IOUs to monitor developments, determine whether a California-specific version of CSIP is needed, work through the Smart Inverter Working Group (SIWG), and submit Tier 3 advice letters when changes to Rule 21 are required.<sup>5</sup>

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

<sup>3</sup> *Id.* at 2.

<sup>4</sup> *Id.* at 13, 24.

<sup>5</sup> *Id.* at Ordering Paragraphs (OP) 5 and 6.

The same framework is adequate if IEEE ultimately develops test procedures associated with IEEE 2030.5.1. At that time, the IOUs may evaluate the resulting procedures and any additional California technical requirements, consult with Energy Division and stakeholders, and seek Commission approval through the processes already established in Resolution E-5357. The Commission need not modify the Resolution now based on a possible future development.

## **II. BACKGROUND**

On June 25, 2024, the IOUs jointly submitted the Joint Advice Letter requesting relief from the obligation to maintain the CSIP I and recommending a pathway for future maintenance. UL Solutions filed a timely protest, CALSSA filed a timely response, and the IOUs filed a reply on July 22, 2024. The Energy Division also accepted several late protests and responses, to which the IOUs replied on August 5, 2024.

The record presented two principal questions: whether the IOUs should be relieved of the obligation to maintain CSIP and, if so, which organization or organizations should manage near-term updates and ongoing maintenance. Parties offered competing positions favoring IEEE, SunSpec, or a collaborative allocation of responsibilities between them.

On December 19, 2024, the Commission adopted Resolution E-5357, which was issued on December 27, 2024. The Resolution approved the IOUs' request for relief, held that relief in abeyance until another organization formally committed to and commenced work on the CSIP Implementation Guide, and established responsibilities for IEEE, SunSpec, the IOUs, Energy Division, and the SIWG.<sup>6</sup>

Among other things, Resolution E-5357: (1) asks IEEE to manage near-term updates to and ongoing maintenance of the CSIP Implementation Guide; (2) asks SunSpec to continue

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<sup>6</sup> *Id.* at OPs 1, 2 and 3.

managing and maintaining the CSIP Test Procedures; (3) requires the IOUs to participate in relevant working groups and SIWG meetings; (4) requires the IOUs to maintain public instructions concerning testing and certification requirements; and (5) directs the IOUs to monitor whether a California-specific CSIP version is needed and to submit Tier 3 advice letters when Rule 21 revisions are required.<sup>7</sup>

On July 24, 2026, CALSSA filed its Petition seeking modification of Resolution E-5357.

### **III. THE PETITION SHOULD BE DENIED**

#### **A. The Petition Largely Repeats Issues Already Raised and Resolved**

CALSSA's Petition should be denied because it largely repackages issues that the Commission already considered. During review of the Joint Advice Letter, CALSSA and other parties argued that IEEE's status as an American National Standards Institute (ANSI) accredited standards development organization (SDO), its international recognition, its role in publishing IEEE 2030.5, and the value of separating standards development from testing and certification supported an IEEE role. Other parties emphasized SunSpec's experience with CSIP, its existing test procedures, its speed, and its familiarity with IEEE 2030.5 implementation.

Resolution E-5357 did not overlook those concerns. Rather, it summarized the parties' competing positions at length and expressly agreed with several arguments favoring IEEE management of the CSIP Implementation Guide. It also found that SunSpec should continue managing the CSIP Test Procedures because SunSpec created those procedures, had maintained them since 2018, and was positioned to update them in response to revisions to the CSIP Implementation Guide.<sup>8</sup>

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<sup>7</sup> *Id.* at 2.

<sup>8</sup> *Id.* at 17-18.

The Petition's disagreement with that balance is not a sufficient reason to modify the Resolution. CALSSA has not shown that the Commission failed to consider the subject matter of the Petition. Instead, the relief sought by the Petition amounts to asking the Commission to reweigh considerations already before it and reach a different policy outcome.

**B. Resolution E-5357 Thoughtfully Divides Responsibilities Between IEEE and SunSpec**

The Commission's allocation of responsibilities was deliberate and well supported. Resolution E-5357 found that it was prudent and reasonable for both IEEE and SunSpec to participate in managing CSIP. It assigned IEEE responsibility for the CSIP Implementation Guide and SunSpec responsibility for the CSIP Test Procedures.

The Commission specifically agreed that having both organizations play key roles was better than an either-or proposition. It nevertheless declined to divide responsibility by near-term and long-term phases. Instead, it divided responsibility by subject matter. This approach avoids transferring the CSIP Implementation Guide from one organization to another and permits work on the Implementation Guide and Test Procedures to proceed in parallel.

The Commission also accounted for coordination. Resolution E-5357 encourages IEEE and SunSpec to collaborate, including sharing information about items that should be updated.<sup>9</sup> It requires IOU participation in both organizations' relevant working groups and preserves the SIWG as the California forum for interoperability, communications, testing, certification, and Rule 21 implementation issues.

CALSSA's preferred framework may differ, but the existence of another possible allocation does not establish that the Commission's chosen allocation should be modified. The Resolution reflects a reasoned compromise based on the record and should remain in place.

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<sup>9</sup> *Id.* at 22.

**C. Resolution E-5357 Preserves the Utilities' Ability to Evaluate California Requirements**

Resolution E-5357 already protects against the possibility that a third-party CSIP update may not align with California's needs. The Commission recognized that CSIP may incorporate requirements beyond those needed in California after transitioning to a third-party manager. It therefore ordered the IOUs to monitor whether a California-specific version of the CSIP Implementation Guide is needed.<sup>10</sup>

If a California version is needed, the IOUs must work with the SIWG to determine which requirements should be incorporated and, in consultation with Energy Division, submit a joint Tier 3 advice letter proposing the California version. The Resolution also permits the IOUs to seek designation of an appropriate standards-making body if one is best suited to develop that California version.

Separate provisions govern changes to Rule 21. If revisions are required to accommodate an updated CSIP Implementation Guide, updated Test Procedures, a California-specific CSIP version, or other testing and certification changes, the IOUs must consult with Energy Division and propose necessary Rule 21 revisions through Tier 3 advice letters.<sup>11</sup>

These provisions give the IOUs an appropriate evaluative role without returning to them the obligation to maintain CSIP. They also preserve stakeholder participation through the SIWG and Commission review through the advice letter process. CALSSA has not shown that additional directives are needed.

If IEEE ultimately develops test procedures associated with IEEE 2030.5.1 (expected to be referred to as IEEE 2030.5.100), the IOUs can evaluate the final work product, its relationship to

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<sup>10</sup> *Id.* at 3, 17, 24-26.

<sup>11</sup> *Id.* at 3, 17, 26.

the CSIP Implementation Guide and existing SunSpec procedures, and any California-specific technical requirements. The IOUs can then consult with the SIWG and the Energy Division and submit a request for Commission approval to incorporate IEEE 2030.5.100 into Rule 21 through the applicable Tier 3 advice letter process.

That approach is consistent with Resolution E-5357's broader structure. It allows California to consider an actual completed proposal and a developed stakeholder record rather than modifying the Resolution based on assumptions about future IEEE activity. The Commission should allow the existing process to operate.

#### **IV. CONCLUSION**

For the foregoing reasons, the Joint IOUs respectfully request that the Commission deny CALSSA's Petition for Modification of Resolutions E-5000, E-5036 and E-5357. The Petition largely repeats issues that the Commission previously considered and resolved. Resolution E-5357 establishes a thoughtful division of responsibilities between IEEE and SunSpec, recognizes the limits of Commission and utility control over SunSpec's independent procedures, preserves Rule 21's primacy, and provides sufficient mechanisms to address future California-specific needs or IEEE testing procedures if and when they arise.

Respectfully submitted,

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