

**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)

**UL SOLUTIONS 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**

September 14, 2026

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Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), UL Solutions 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).

UL Solutions appreciates the effort that the CPUC has put into CSIP test procedures requirements and fostering adoption of smart inverters. Rule 21 and CPUC efforts have led to significant advancements in the safety and reliability of distribution and transmission systems.

The interoperability requirements for Distributed Energy Resources (DERs) are crucial for the reliability and safe operation of the power grid. The critical importance of these interoperability requirements, including how they are developed, balloted, and maintained warrants a robust standard development process. This work needs to be performed by an ANSI-accredited SDO, following defined consensus development procedures including balanced membership, review, and ballot protocols.

Respectfully submitted,

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