

# DOUGLASS & LIDDELL

AN ASSOCIATION OF  
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January 17, 2017

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CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102

**Re: Protest of the California Energy Storage Alliance to  
Advice Letter 2993-E of San Diego Gas & Electric Company**

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits this protest to the above-referenced *Supplement to Advice 2993-E-A Modifications to San Diego Gas & Electric Company’s Net Energy Metering (“NEM”) Tariffs to Implement Requirements to NEM-Paired Storage Pursuant to Decision (D.) 14-05-033 and D. 16-04-020*, submitted on December 29, 2016 (“Supplemental Advice Letter”).

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<sup>1</sup> 8minutenergy Renewables, Adara Power, Advanced Microgrid Solutions, AES Energy Storage, Amber Kinetics, Aquion Energy, Bright Energy Storage Technologies, Brookfield, California Environmental Associates, Consolidated Edison Development, Inc., Cumulus Energy Storage, Customized Energy Solutions, Demand Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, Electric Motor Werks, Inc., ElectrIQ Power, ELSYS Inc., Energy Storage Systems Inc., Enphase Energy, GE Energy Storage, Geli, Gordon & Rees, Green Charge Networks, Greensmith Energy, Gridscape Solutions, Gridtential Energy, Inc., Hitachi Chemical Co., Ice Energy, IE Softworks, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Invenergy LLC, Johnson Controls, K&L Gates, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Mercedes-Benz Research & Development North America, National Grid, Nature & PeopleFirst, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy LLC, OutBack Power Technologies, Parker Hannifin Corporation, Powertree Services Inc., Qnovo, Recurrent Energy, RES Americas Inc., Saft America Inc., Samsung SDI, Sharp Electronics Corporation, Skylar Capital Management, SolarCity, Southwest Generation, Sovereign Energy, Stem, Sunrun, Swell Energy, Trina Energy Storage, Tri-Technic, UniEnergy Technologies, Wellhead Electric, Younicos. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

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## **I. BACKGROUND AND INTRODUCTION.**

San Diego Gas & Electric Company (“SDG&E”) submitted their Supplemental Advice Letter to further modify their NEM tariff pursuant to D.14-05-033 and D.16-04-020. Specifically, SDG&E revised their Schedule NEM and Schedule NEM-MT to state that “complex metering includes any configuration other than the standard equipment” wherein “standard metering equipment for this purpose is comprised of single, self-contained, single-phase, meter.” CESA finds that SDG&E’s position that standard metering equipment only apply for NEM paired storage configurations with a single meter to be overly restrictive and an unnecessary barrier particularly for cost-effective DC-coupled NEM paired storage systems, which should qualify for standard metering equipment and therefore the metering cost caps.

## **II. DISCUSSION.**

D.14-05-033 determined that NEM paired storage systems larger than 10 kW are required to meter their systems using one of the three options:

1. Install a non-export relay on the storage device(s)
2. Install an interval meter for the NEM-eligible generation, meter the load, and meter total energy flows at the point of common coupling
3. Install an interval meter directly to the NEM-eligible generator(s)

However, SDG&E’s Supplemental Advice Letter would essentially preclude DC-coupled systems from having their metering fees capped by requiring them to have complex metering equipment. DC-coupled systems use a single inverter that manages both the NEM generation and energy storage with a primary output to protected loads and a secondary output to the grid. Most DC-coupled systems should be able to provide SDG&E with full visibility of the NEM generation and the load served by the NEM generation with a meter on its two AC outputs (Option 2 above). Requiring DC-coupled systems to have a single self-contained meter on the NEM generator would prevent them from qualifying for the metering fee cap.

CESA therefore recommends that SDG&E’s Supplemental Advice Letter be revised to consider complex metering equipment for NEM paired storage systems that utilize more than two-self-contained meters.

## **III. CONCLUSION.**

In D.14-05-033, the Commission recognized the benefits of NEM paired storage systems to provide a number of benefits, including but not limited to providing backup power during grid

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outages, reducing or shifting a customer's load, and supplying grid reliability services. CESA believes that DC-coupled NEM paired storage systems have certain advantages that provides benefits to the customer and the grid to help California achieve its energy and environmental goals. The marginally added complexity of DC-coupled system configurations are manageable within the metering options made available in D.14-05-033 and therefore CESA recommends that the Commission reject SDG&E's Advice Letter to modify the NEM tariff to consider all NEM paired storage systems that utilize more than one self-contained meter to be "complex."

Very truly yours,



Donald C. Liddell

DCL/md

cc: Megan Caulson, SDG&E ([MCaulson@semprautilities.com](mailto:MCaulson@semprautilities.com))  
Service Lists R.14-07-002, R.12-11-005 and R.11-09-011