



## **Tesla, Inc.'s Comments Regarding the Issue 19 Proposals of CALSSA, GPI and the Clean Coalition**

Tesla, Inc. (Tesla) appreciates this opportunity to comment on the Issue 19 proposals developed by the California Solar and Storage Association (CALSSA), the Green Power Institute (GPI) and the Clean Coalition. In these brief comments we address each of the proposals in turn.

### *CALSSA:*

Overall Tesla strongly supports CALSSA's proposal to facilitate and streamline the interconnection process for new construction. The proposal offers some fairly common sense solutions to address the challenges that new construction faces, particularly in the context of volume builders where current processes, designed primarily for one-off interconnection requests associated with a given project and known end-use customer, fall short.

Of the various components of CALSSA's proposal, all of which Tesla supports, we want to underscore the importance of the first element under which CALSSA proposes allowing builders to submit an interconnection request in their name, based on street address rather than requiring the application to be associated with a meter or account number. Absent a means of doing this, the ability to comply with the state's solar mandate and support the state's ZNE goals in an efficient manner will be severely challenged. Ideally a builder would be able to complete the interconnection process through PTO prior to close of escrow. Regardless, there needs to be straightforward and seamless means of transitioning the counterparty to an interconnection agreement, regardless of where in the review process an interconnection request stands, from the builder to the ultimate homeowner without disrupting the review process or timeline.

Tesla would also like to call out the third element of CALSSA's proposal pursuant to which a builder would be allowed to submit a single application for developments involving five or more units. This or other means of batch submission would represent a significant step forward by reducing the administrative burden under existing processes which require a developer to submit a separate interconnection agreement for each solar system being deployed. Tesla is similarly in agreement with the notion that changes to the system sizes reflected in that application should be allowed to be modified post submission within reasonable margins, recognizing that changes may be unavoidable for various reasons, including equipment availability, design changes, etc.

### *GPI:*

Tesla also supports GPI's push for automating many of the steps within the interconnection process. While we don't have specific feedback regarding the details of GPI's proposal, Tesla agrees that there are significant opportunities to automate and accelerate interconnection application submission review and associated studies.

Tesla is concerned, however, that many of the proposals being put forward by GPI are very similar to the proposals that stakeholders considered as part of Working Groups 2 and 3. For example, the ability to leverage information from the integration capacity analysis maps to reduce the need for studies or mitigations as proposed by GPI in the subsection "Automating (at least partially) Initial Review" was among the specific topics within scope for Working Group 2. This is not meant as a critique of GPI's proposal which we believe has significant merit. Nonetheless, in the interest of ensuring that



stakeholders aren't asked to rehash issues that were already discussed in a prior working group, we ask that GPI, perhaps working with Gridworks and Energy Division staff, to clarify which of the proposals it is making are new relative to what was previously explored in the prior working groups. Notably, we understand that a proposed decision will be forthcoming which will address both the Working Group 2 and Working Group 3 Final Reports.

*Clean Coalition:*

Similar to Tesla's perspective regarding GPI's proposals on automation, Tesla also strongly supports the notion of using template-based system designs in lieu of requiring developers to submit a bespoke single-line diagram for each and every project submitted. Being able to pull from a drop down menu within the utilities' application portals of pre-defined and approved designs (while retaining the ability to submit non-conforming designs in the event that the existing menu of templates does not cover a given project) would dramatically reduce the percentage of applications that are found deficient and kicked back to a developer for correction and resubmission. Tesla notes that in the context of the Microgrid Proceeding (R.19-09-009) Tesla was one of the leading proponents of this idea. Tesla representatives made a presentation detailing this concept at the Interconnection Discussion Forum held on December 16, 2019. This concept was further incorporated into the staff proposal "Short-Term Actions to Accelerate the Deployment of Microgrids and Related Resiliency Solutions" issued by ruling on January 21, 2020, which specifically discussed the idea of using pre-approved designs in the application process. Tesla and a number of other parties also provided detailed comments in response to this proposal on January 30 and February 6, 2020. And earlier this week, on March 24, the CPUC Executive Director, as a follow-up to the staff proposal issued a letter directing the utilities to "[meet and confer] with other industry stakeholders to standardize the single line diagrams used to illustrate interconnection applications."<sup>1</sup>

Given the procedural history above, it's not clear if there is a need to develop additional record in this docket on what appears to be the same proposal, albeit framed within the context of Zero Net Energy buildings. Tesla therefore asks that Clean Coalition, working with Gridworks and Energy Division, clarify if there are new issues that should be considered as part of this working group. We also ask the Commission to clarify if the concept of using template based approaches will be further addressed in the Microgrid Proceeding given the record development that has already occurred there, and recent action by the CPUC's Executive Director, or if that issue is being shifted into this docket for further resolution.

---

<sup>1</sup> CPUC Executive Director Alice Stebbins' letters Directing PG&E, SCE, and SDG&E to take steps to implement resiliency solutions can be found here: <https://www.cpuc.ca.gov/General.aspx?id=6442463482>