

Recommended Elements of an Executive Order Related to Clean Energy Resources in Response to Electricity Shortfalls

The most difficult barrier to the increased installation of local clean energy is the timeline of the approval process. This includes time from city and county governments to approve permits, time from utilities to approve interconnection, and time from the administrators of incentive programs to approve applications. Reducing these timelines will have immediate benefits in the expansion of local clean energy.

In the medium term, it is essential that we enable utilities to tap into the power stored in local batteries when energy is in short supply statewide. The current barrier that customer-sited batteries cannot be compensated to export power to the electric grid during energy emergencies is unnecessary and outdated.

1. Appoint a Senior Advisor for Clean Energy to oversee efficient administration of incentive programs, expedite utility approval of the interconnection of customer-sited battery energy storage systems, and work with local governments to streamline permit approval for customer-sited battery energy storage systems. The Senior Advisor for Clean Energy shall focus on the following goals:
 - A. Local permitting authorities shall provide for on-site or virtual inspection during the next business day after notification that installation of a residential customer-sited energy storage or solar plus storage system is complete. If next business day is not possible, inspection shall occur within five days.¹
 - B. If automatic approval of applications for installation of residential customer-sited energy storage systems and solar plus storage systems is not available through online software, jurisdictions must approve an application or notify an applicant of deficiencies in an application within a maximum timeframe of 1-3 business days.²
 - C. The program administrators of the Self-Generation Incentive Program shall approve or send a notice of deficiency for all submitted documents within five business days.
 - D. For distributed energy resources that need service disconnections as part of the installation process, the interconnecting utility shall perform service disconnections within 5 business days of the request.

¹ This mirrors language in the OPR Solar Permitting Guidebook.

² This mirrors language in the OPR Solar Permitting Guidebook.

- E. Utilities shall respond to questions from interconnection applicants about pending applications for interconnection of customer-sited distributed energy resources within two business days.³
 - F. All local permitting authorities shall consider adopting the Solar Automated Permit Processing platform immediately.⁴
2. The California Public Utilities Commission, in consultation with the California Independent System Operator, shall adopt rules that allow customer-sited energy storage systems to export energy to the distribution system for participation in demand response and related programs, and shall assign full capacity value for firm commitments to export under resource adequacy contracts.⁵
 3. The California Energy Commission will work with the National Renewable Energy Laboratory and interested stakeholders to develop an energy storage component to the Solar Automated Permit Processing platform that has been developed by NREL.^{6 7}

³ PG&E recently committed to a 1-3 day turnaround time and SDG&E states that it strives for same business day.

⁴ Solar APP was rolled out in June for pilot use by several jurisdictions and is now ready for widespread deployment.

⁵ It may fail to express urgency to include a date in this item, but CALSSA believes a reasonable target is January 31, 2021.

⁶ OPR effectively oversaw creation of the Solar Permitting Guidebook, but has struggled to maintain it. The Energy Commission has a clearer ongoing mandate on energy issues and should take over both the Guidebook and work on Solar APP.

⁷ It may fail to express urgency to include a date in this item, but CALSSA believes a reasonable target is February 28, 2021.