



March 15, 2021

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Ave
San Francisco, CA 94102

Subject: CALSSA Protest of PG&E Advice Letter 6093-E, SCE Advice Letter 4422-E and SDG&E Advice Letter 3702-E

With this letter, the California Solar & Storage Association (CALSSA) protests Pacific Gas and Electric (PG&E) Advice Letter 6093-E, Southern California Edison (SCE) Advice Letter 4422-E, and San Diego Gas & Electric (SDG&E) Advice Letter 3702-E (ALs).

The ALs set a compliance date of January 1, 2022 for systems to be certified to IEEE 1547.1. Normally, manufacturers are allowed 12-18 months to comply with new standards. Time is needed to conform product design with the final details of standards, perform testing, and manufacture and ship products.

In this case, there are several obstacles.

- The SunSpec Modbus 700 series final documents are not final. Some manufacturers will need to get SunSpec certification on Modbus to be used for IEEE 1547 interoperability.
- A UL 1741SB task group is working on cleaning up some concerns with incorporating IEEE 1547.1-2020 into UL 1741.
- Test labs do not all have automated testing in place. Lab capacity may be backed up during the last half of this year.

Since last June, all interconnection applications have included inverters that have the required functionality, yet the utilities are not making use of the function with the exception of rare pilot programs. CALSSA does not have any objection to changing compliance from attestation to testing at nationally recognized testing laboratories, but there does not seem to be any urgency. CALSSA recommends a compliance date of March 1, 2022.

Respectfully,

/s/ Brad Heavner

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Policy Director

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Service lists of R.17-07-007 and R.11-09-011