

Communication from Public

Name:

Date Submitted: 06/11/2024 03:47 PM

Council File No: 23-1333

Comments for Public Posting: Attached is a letter regarding LADWP's Report Addressing Motion CF# 23-1333 to Enable Use of Meter Socket Adapters.



June 11, 2024

Chair Yaroslavsky
Vice Chair McOsker
Councilmember Raman
Councilmember Blumenfield
Councilmember De Leon

Re: LADWP's Report Addressing Motion CF# 23-1333 to Enable Use of Meter Socket Adapters

Chair Yaroslavsky, Vice Chair McOsker and members of the Energy and Environment Committee:

We are writing express our concerns with the recent report submitted by the Los Angeles Department of Water and Power (LADWP) in response to Motion CF# 23-1333. This Motion, adopted by the City Council in February, directed the Department to provide a report to City Council on the processes it uses to review and adopt new technologies that advance the deployment of residential solar and battery systems and, specifically, on ways to improve those processes for enabling technologies like meter socket adapters (MSAs), which are currently prohibited by the utility. MSAs are a behind-the-meter technology that reduce costs and save time -- a critical enabling technology to accelerate the deployment of distributed energy resources as Los Angeles seeks to achieve our LA 100 goals.

The context and history around this issue is important, recognizing the extensive engagement that members of our coalition have undertaken with LADWP over the past several years on the issue of MSAs. Despite years of efforts to work collaboratively with LADWP, little to no progress has been made

to evaluate these technologies, much less approve them for use. It's notable that over this same timeframe, numerous utilities have moved forward with authorizing the use of MSAs, including the Sacramento Municipal Utility District, Pacific Gas and Electric, San Diego Gas and Electric, Arizona Public Service, Tucson Electric Power, Salt River Project and NV Energy to name a few. Southern California Edison is expected to authorize use of certain third-party MSAs in July. Beyond these municipal and investor-owned utilities, numerous others have also approved the use of MSAs for some time. As a result, there are now tens of thousands of MSAs that have been installed across the country. Simply put, MSAs are no longer a new or novel technology and we question LADWP's long-standing resistance to approving the use of this widely-accepted technological solution for City residents.

The [Department's response](#) to City Council lacks any substantive content regarding ways in which the existing review process can be improved and/or streamlined. By simply describing LADWP's existing processes, the report appears to completely disregard [City Council's request](#) to specifically "report back on meter socket adaptors, and **to provide recommendations to make this review process quicker and more transparent**" (emphasis added). Accordingly, the Department refuses to acknowledge that there are simple, inexpensive, and readily available technological solutions that will facilitate progress towards the LA 100 goals. This is disappointing as it indicates both a broken system and disregard for sustainability measures.

To the degree LADWP has an earnest interest in establishing a reasonable process to review MSAs, there are several examples that could be used as models and which we encourage LADWP to consider, including the review frameworks adopted in Colorado and Arizona. These frameworks establish technical and other criteria that ensure that MSAs are certified to all relevant and applicable standards and abide by all permitting and installation requirements. These frameworks also provide an objective and systematic pathway through which MSAs can be reviewed and approved in a timely manner. Notably, these approaches successfully navigate the concerns that LADWP raises regarding access to the "sealed section" which houses the utility's meter. Contrary to DWP's characterization, this section is, in fact, customer-owned equipment and while DWP has a legitimate interest in ensuring access to this area is subject to appropriate rules and requirements, this implicit assertion of ownership should not serve as a pretext for denying customers the ability to deploy certified equipment. We want to underscore that we are not asking for a blanket approval of MSAs. We understand that the utility has a legitimate interest in assessing these devices, and making sure they are compatible with their safety, reliability and other operational requirements. However, the current process is completely opaque, and, as demonstrated by our collective experience trying to work with the Department for the past several years on this issue, it is anything but timely.

We appreciate this Committee's and City Council's leadership to push LADWP to clarify and improve its processes to support the use of critical enabling technologies like MSAs. Unfortunately, as reflected in the recent report the Department submitted, it does not appear that the Department takes these concerns seriously and continues to believe that business-as-usual approaches are sufficient. We respectfully disagree and ask that the Committee and City Council take additional action to motivate LADWP to amend its processes and provide customers access to time and money-saving solutions that are now widely available outside of its service territory.

Sincerely,

/s/Jon Knauer

VP Policy and Product Strategy
ConnectDER
jknauer@connectder.com

/s/Andy Schwartz

Senior Managing Policy Advisor
Tesla, Inc.
anschwartz@tesla.com

/s/Erin Weber Kiel

Senior Manager of Government Affairs
Sunnova Energy Corporation
erin.weberkiel@sunnova.com

/s/Mary Leslie

President
Los Angeles Business Council
mleslie@labusinesscouncil.org

/s/Kevin Luo

Interconnection Policy Advisor
California Solar & Storage Association
kevin@calssa.org

/s/Scott Murtishaw

Executive Director
California Energy Storage Alliance
scott@storagealliance.com

/s/Lauren Nevitt

Senior Director, Public Policy
Sunrun
lauren.nevitt@sunrun.com

/s/Ben Lochtenberg

CEO

Xero Solar
blochtenberg@xerosolar.com

/s/Arno Aghamalian
CEO
Solar Optimum
arno@solaroptimum.com

/s/Sarah Delisle
Vice President, Government Affairs & Communications
Swell
sdelisle@swellenergy.com

/s/ Patrick Sterns
Director, Policy and Strategy, Western States
SunPower Corporation
Patrick.Sterns@sunpower.com