

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies

Rulemaking 19-09-009

**COMMENTS OF THE INSTITUTE OF ELECTRICAL AND ELECTRONICS
ENGINEERS STANDARDS ASSOCIATION (IEEE SA)**

**ON THE PETITION OF THE CALIFORNIA SOLAR & STORAGE
ASSOCIATION (CALSSA) TO MODIFY RESOLUTION E-5357 TO ALLOW
IEEE 2030.5.100 TEST PROCEDURE FOR SMART INVERTERS**

11 September 2026

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I. INTRODUCTION

The Institute of Electrical and Electronics Engineers Standards Association (“IEEE SA”) submits these comments in response to the Petition of the California Solar & Storage Association (“CALSSA”) to modify Resolutions E-5000 (Appendix C), E-5036, and E-5357 to allow, upon publication, the use of IEEE 2030.5.100 test procedures in lieu of the SunSpec CSIP Test Procedures, in coordination with the transition from CSIP v2.1 to IEEE 2030.5.1.

IEEE SA appreciates the Commission’s continued leadership in supporting interoperable distributed energy resource (“DER”) integration and the Commission’s interest in maintaining robust, transparent, and scalable compliance pathways for communications requirements.

II. IEEE SA CONFIRMS IEEE P2030.5.1 AND IEEE P2030.5.100 ARE APPROVED PROJECTS IN DEVELOPMENT

IEEE SA confirms that **IEEE P2030.5.1** and **IEEE P2030.5.100** are **IEEE standards projects currently in development**. IEEE P2030.5.1 is intended to succeed the CSIP v2.1 implementation guide and support alignment with contemporary requirements and broader adoption. IEEE P2030.5.100 is underway to standardize test procedures for IEEE 2030.5 and associated profiles, including IEEE P2030.5.1.

III. IEEE SA'S OPEN, CONSENSUS-BASED PROCESS SUPPORTS TRANSPARENCY AND BROAD STAKEHOLDER CONFIDENCE

IEEE is an **ANSI-accredited standards developer** and operates under an **open, transparent, and consensus-based** standards development model. IEEE standards are developed through due process, including balanced participation, documented consideration of comments, and consensus-based approval. This governance model is designed to support broad stakeholder confidence and facilitate scalable implementation.

IV. TRANSITION CONSIDERATIONS

IEEE SA recognizes the importance of predictability for manufacturers, utilities, and testing laboratories and agrees that any publication of test procedures should be coordinated with the approval and publication of IEEE 2030.5.1, while allowing reasonable time for implementation readiness.

V. CONCLUSION

IEEE SA appreciates the opportunity to provide these comments and looks forward to continued engagement with California stakeholders as IEEE P2030.5.1 and IEEE P2030.5.100 progress through development and submission for IEEE SA Standards Board approval.

Respectfully submitted,

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Dated: 11 September 2026