

**SAN DIEGO GAS AND ELECTRIC (SDG&E) REPLY COMMENTS  
ON PROPOSED GO167-B REVISIONS**

**Date Submitted: April 9, 2024**

**I. RESPONSE TO GUIDING QUESTIONS**

**QUESTION 1**

How can the proposed changes to GO 167-B be improved to promote the safety and reliability of Energy Storage Systems (ESSs)? Are there other rules, codes, standards, and regulations that should be added to SED’s proposed changes to GO 167-B in implementing the requirements of SB 1383?

**RESPONSE 1**

SDG&E does not have a comment at this time.

**QUESTION 2**

Is the term “ESS” sufficiently defined and broad enough to capture all applicable utility-scale energy storage systems including current and emerging technologies?

- a. What could be added to the proposed definition to make it more consistent with SB 1383?
- b. Are the megawatt thresholds assigned in the proposed changes to GO 167-B (Large, medium, small) appropriately scaled for ES systems?

**RESPONSE 2**

SDG&E does not have a comment at this time.

**QUESTION 3**

What are the recommended timelines—which can include phased approaches or transition periods—to allow stakeholders sufficient time to comply with the new proposed regulatory requirements of GO 167-B? Please comment on the transition time period needed to implement the proposed Logbook Standards, Operation Standards, Maintenance Standards, Operation and Maintenance Compliance filings, Incident Reporting, and Outage Reporting requirements.

**RESPONSE 3**

To allow stakeholders sufficient time to comply with the new proposed regulatory requirements of GO 167-B/C, SD Generation recommends a full implementation date of February 1, 2026. This date will run concurrent with the Recertification of Compliance filing done annually.

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**QUESTION 4**

As ESS technology quickly changes and evolves, how can the proposed changes to GO 167-B ensure that ESSs use the best available technologies and controls and that the GO sufficiently accounts for these changes and updates? Is a Best Available Technology standard appropriate to capture future modifications and changes to ESSs' operations?

**RESPONSE 4**

SDG&E does not have a comment at this time.

**QUESTION 5**

What metrics or parameters should be used to monitor and evaluate the performance of ESSs deployed to ensure compliance with proposed changes to GO 167-B? (*e.g.* Roundtrip efficiency, C-rate, State of Charge or State of Health metrics, charging and discharging status, etc.). How does the ESSO ensure situational awareness, control, and operational coordination between ESSO and ESS operations, (as well as coordinating with the off-taker)?

**RESPONSE 5**

State of Health would be the most appropriate metric to use to monitor and evaluate the performance of a battery ESS. The other noted metrics are not indicative of the performance of the system. Non battery ESS system may not have a comparable SOH metric to use.

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**END OF RESPONSE**