

**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  
(Filed September 12, 2019)

**CLEAN COALITION REPLY COMMENTS IN RESPONSE TO THE PROPOSED  
DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE MICROGRID  
DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

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**I. INTRODUCTION**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) the Clean Coalition submits these reply comments on the Proposed Decision (“PD”) regarding Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Strategies issued in the above captioned proceeding on April 29, 2020. The Clean Coalition supports the Proposed Decision with modifications listed below. Those modifications include methods to ensure that the utilities only use temporary fossil fuel generation for the 2020 fire season and create a transition plan to renewables-driven resilience and additional transparency methods that will guarantee resilience is achieved with stakeholder participation, collaboration, and information sharing.

**II. DESCRIPTION OF PARTY**

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”) — such as local renewables, advanced inverters, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions. The Clean Coalition also collaborates with utilities and municipalities to create near-term deployment opportunities that prove the technical

and financial viability of local renewables and other DER.

### iii. COMMENTS

#### a. **The PD should reflect the desire of parties for greater transparency.**

The current version of the Proposed Decision grants the utilities too much leeway in making important decisions, without putting in place the proper accountability mechanisms to ensure transparency through stakeholder input and direct responses to the Commission. The Clean Coalition agrees with the Sierra Club comments, requesting that the Commission mandate Tier 2 Advice Letters – or another process allowing stakeholder comments – for, “(1) the 2021 report detailing use of diesel generators during the 2020 fire season, (2) PG&E’s action plan to incorporate clean energy into its Temporary Generation Program, and (3) the report evaluating the results of the Clean Generation Request for Information.”<sup>1</sup> Revealing this information to the public is the only way to guarantee that temporary fossil fuel generation is only used as a last resort and that IOU-resilience strategies are used to reduce the need to PSPS, in addition to reducing the impact of future PPS.

Increased transparency by the IOUs will create a public roadmap of what is needed to make each section of the ratepayers resilience; since this PD is focused on short-term resiliency strategies, it is understandable that there is a focus on high fire risk areas, but in the long-term, a public map will create a foundation for what is needed. Requiring the utilities to plan a transition from temporary fossil fuel generation contracted for resilience to DER within five years is a tangible method to achieve this goal.

The Clean Coalition believes that the Commission should consider arguments from the Microgrid Resources Coalition that the creation of Single Line Diagrams could take the IOUs, “beyond the role of support, and into the realm of project design decisions... Utilities are often not familiar with the varieties of technology available to be deployed in microgrids and they are probably incapable in their position as a competing seller of power, even if well intentioned, to provide unbiased advice.”<sup>2</sup> Part of the answer to that assertion is increased transparency, which will ensure that the final product that the IOUs submit to the Commission is produced with stakeholder participation.

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<sup>1</sup> Sierra Club Opening Comments on PD at Pages 1-2

<sup>2</sup> Microgrid Resources Coalition Opening Comments on PD at Page 7

**b. Interconnection needs to be expedited more quickly than existing NEM timelines.**

In opening comments, the Clean Coalition pointed out that due to social distancing practices as well as for more prompt interconnection, more of the interconnection process needs to be automated. This should include inspections and the process of transferring an application between departments. Thus, the Clean Coalition supports the Green Power Institute’s interconnection proposals, many of which come from the Working Group Two Final Report (for R. 17-07-007), authored by the GPI and the Clean Coalition. The Joint CCAs astutely makes the suggestion that, “the Decision should clearly outline the timelines expected from the IOUs for interconnection processing, including ‘expedited interconnection process’ timelines that are more aggressive than the existing Rule 21 timelines,” which the Clean Coalition believes should be done as much as possible.<sup>3</sup> Specifically, the Clean Coalition believes that the PD should reflect the Green Power Institutes recommendation to reduce the Rule 21 timeline to three business days (or less).<sup>4</sup> Considering that the PD only requests SLDs for four situations, this should be possible to achieve in the short term.

SCE is incorrect in its assertion that the SLDs should not be applicable to FERC-jurisdictional projects.<sup>5</sup> In opening comments, the Clean Coalition remarked that the PD should order the IOUs to consider WDAT and rule 21 export configurations to give Community Microgrids the opportunity to tap into the wholesale market.

**c. Portals must be made available to third parties.**

Despite what was said by the SCE, a portal and stakeholder meetings are important mechanisms to hold the IOUs accountable for sharing critical data related to resilience with the parties that can best use the information. Despite additional costs to the IOUs, stakeholder meetings and the creation of an online portal will net additional resilience that will make it more than cost-neutral.

**IV. CONCLUSION**

The Clean Coalition appreciates the opportunity to submit these reply comments in response to the Proposed Decision. It is critical that the Commission promotes renewables-driven

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<sup>3</sup> Join CCA Opening Comments on PD at Page 1

<sup>4</sup> Green Power Institute Opening Comments on PD at Pages 2-3

<sup>5</sup> SCE Opening Comments on PD at Page IV.

resilience, in the SLDs adopted by the utilities and in the deployed critical facility and Community Microgrids. The most important mechanism to ensure that transition is keeping the IOUs accountable through increased transparency. The resilience needs of a community is critical information for local government, tribal government, CCAs, Community Benefit Organizations, and third parties. That being said, the Commission needs to that resilience is only truly possible when there is accompanying grid isolation technology that allows generation to continue during an outage. Parties mentioned that islanding could – in some cases – be achieved with existing inverter functions, which should be promoted. However, before widespread islanding is considered to be “too expensive”, the Commission should mandate a value of resilience. The Clean Coalition supports other parties in requesting modification of the Proposed Decision as described above in support of true microgrid commercialization with clear standards and procedures, and a relatively seamless permitting and approval process.

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