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**RE: Clean Coalition comments in Response to PG&E Advice Letter 5918-E Pursuant to D. 20-06-017**

Dear Energy Division Tariff Unit,

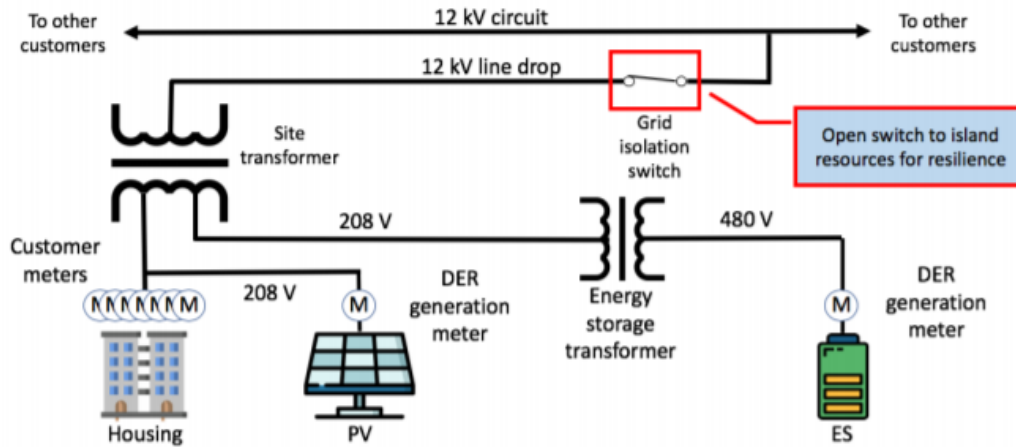
Pursuant to General Order 96-B, Section 7.4, the Clean Coalition respectfully submits these comments on PG&E Advice Letter 5918-E. This Advice Letter details PG&E’s Community Microgrid Enablement Program (CMEP), as issued in D. 20-06-017 by the Commission on June 17, 2020. The Clean Coalition strongly supports the initiative PG&E is taking to create a standard Community Microgrid development program, demonstrating the important role a utility can take as a partner, rather than a sole owner of a microgrid or a gatekeeper of the distribution grid. While many specific details will certainly need to be cemented, especially as the first couple of projects are completed, the Clean Coalition is in alignment with the strategy of a tariff that leaves options open rather than one that over-prescriptive or over-restrictive. This true for the type of resource deployed as well as the configuration of such solutions — PG&E only promotes renewable resources. The one constant in the process is the involvement of the relevant local government. Throughout the microgrid proceeding (R. 19-09-009), parties and local governments alike have rightfully argued that a community best understands how resilience solutions should be deployed locally; PG&E empowers governments to achieve the solutions they desire using utility resources as a guide. The CMEP creates a framework that provides communities the flexibility to prioritize their needs, promoting resilience and lowering barriers to entry through provisions in the CMET. Offsetting 100% of the cost associated with distribution upgrades and PG&E-owned-and-operated equipment, for example, incentivizes communities to maximize the number of facilities served by a Community Microgrid. The limit of 20 MW aggregate generation capacity also promotes the inclusion of as many customers as possible. With the MW limit, it is reasonable that PG&E streamlines the process with the requirement of CMG Aggregator, who acts as the point person with the utility (as the applicant) and can manage complicated economics that comes with the aggregation of DER. Importantly, because of the inclusion of a CMG, the tariff allows for situations where other resources or facilities might be added to a Community Microgrid after the initial design and Microgrid Interconnection Study is completed, lowering uncertainty related to expanding the microgrid.

The Clean Coalition appreciates the inclusion of a Tier 2 Advice Letter amendment process to add to the CMEP as changes are needed.<sup>2</sup> With it, the program is not static. The addition of other details not

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<sup>2</sup> CMEP, at footnote 23

currently included in the tariff is possible following a reasonable review process, with proper stakeholder involvement, allowing the program to evolve as regulation does. Take the current list of critical facilities listed in Appendix 5. The list is based on D.19-05-042, which parties in the microgrid proceeding have already agreed can — and should — be expanded. The COVID-19 pandemic has made it abundantly clear that foodbanks are critical facilities, and there is a very persuasive argument to be made that grocery stores, pharmacies, and other businesses are as well. Previous Clean Coalition comments in R. 19-09-009 have noted that with a recloser the Valencia Gardens Energy Storage project would become a Community Microgrid (see the block diagram below).

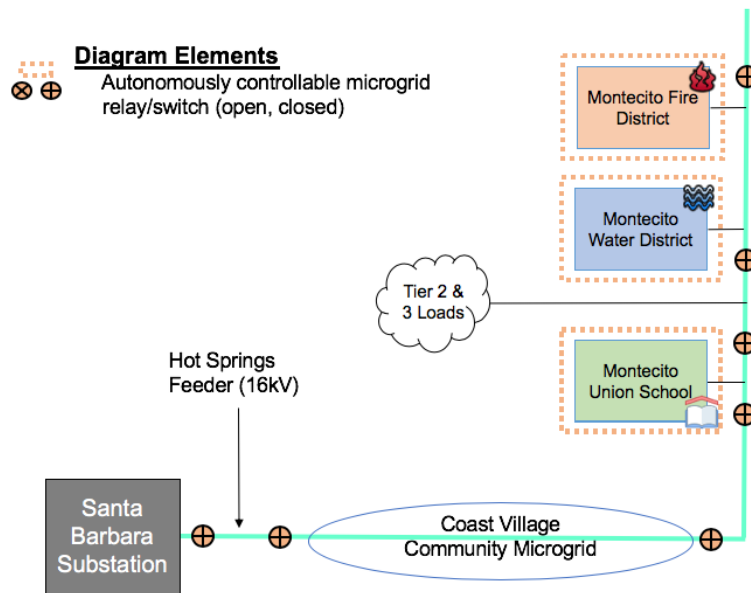


Potential long-term VGES resilience design

Included on the same feeder (delineated as “housing”) is the Valencia Gardens Apartment complex, which is low-income senior housing. Since housing hundreds of units comprised of senior citizens with unique medical needs in place is much more effective than taking up hundreds of beds in emergency shelter sites, while it might not be expressly included on the existing list, the apartment complex is certainly an example of a critical community facility. More importantly, if a community values something as a critical facility, it is important to have an appeal process to ensure a Community Microgrid can be deployed to meet those needs.

The Clean Coalition would like to suggest a few small inclusions to increase the efficiency of the CMEP and maximize the time of additional staff PG&E is hiring. First, it will benefit both PG&E staff and interested communities to have a quick way to verify eligibility for the CMEP. The Advice Letter lists three factors: areas that have experienced a PSPS event, areas in High Fire Threat Level 2 and 3 areas, and areas that are in the top 1% worst-performing circuits in PG&E service territory. While the first two metrics are searchable, it would optimize the process to either have a list or a map of all qualifying regions. Making all these metrics easily accessible in the interim before such a map is created is a simple solution. Second, once the data starts becoming available, the Clean Coalition suggests that PG&E make fees available as soon as possible, or at least provides some sort of relative estimate. Since this is all new, everything is being created as it happens; since PG&E is creating a role for itself as a community-partner, the more transparent data is, the better off everyone will be.

The Clean Coalition has often included comments about the Montecito Community Microgrid Initiative (MCMi), a project the Clean Coalition is developing in SCE service territory. The microgrid includes three critical community facilities, only two of which are contiguous properties, though all are sited on the same feeder.



*Block diagram for the Montecito Community Microgrid*

The CMEP would enable the MCMI to be deployed with the proper grid isolation switches, making it a true Community Microgrid capable of utilizing both BTM and FOM renewable resources. With the way that Track 2 is proceeding, the Clean Coalition is hopeful that the Community Microgrid programs similar in nature to the CMEP might be created in the other two IOU service territories. The Clean Coalition appreciates the thought PG&E has put into the CMEP and looks forward to the first projects that are deployed.

Sincerely,

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