

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

Order Instituting Rulemaking to Establish  
Policies, Processes, and Rules to Ensure  
Reliable Electric Service in California in the  
Event of an Extreme Weather Event in 2021.

Rulemaking 20-11-003

**CLEAN COALITION OPENING COMMENTS ON PROPOSED DECISION  
DIRECTING PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIA  
EDISON COMPANY, AND SAN DIEGO GAS & ELECTRIC COMPANY TO SEEK  
CONTRACTS FOR ADDITIONAL POWER CAPACITY FOR SUMMER 2021  
RELIABILITY**

/s/ BEN SCHWARTZ

Ben Schwartz  
Policy Manager  
Clean Coalition  
1800 Garden Street  
Santa Barbara, CA 93101  
Phone: 626-232-7573  
[ben@clean-coalition.org](mailto:ben@clean-coalition.org)

January 28, 2021

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

Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Reliable Electric Service in California in the Event of an Extreme Weather Event in 2021.

Rulemaking 20-11-003

**CLEAN COALITION OPENING COMMENTS ON PROPOSED DECISION  
DIRECTING PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIA  
EDISON COMPANY, AND SAN DIEGO GAS & ELECTRIC COMPANY TO SEEK  
CONTRACTS FOR ADDITIONAL POWER CAPACITY FOR SUMMER 2021  
RELIABILITY**

**I. INTRODUCTION**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) the Clean Coalition respectfully submits these opening comments in response to the Proposed Decision (“PD”) Decision Directing Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company to Seek Contracts for Additional Power Capacity for Summer 2021 Reliability, issued at the Commission on January 8, 2021. The Clean Coalition supports the creation of procedures to ensure that rotating outages caused by extreme weather events in 2020 are not repeated again. We feel that it is important to balance the state decarbonization goals with the need for increased reliability during the summer months. The solutions that are deployed should not — and need not — lead the state away from a clean energy future, especially since such a large amount of additional capacity is being solicited. Therefore, the Commission should revise the Proposed Decision to prioritize the type of bilateral contract that each of the three IOUs can seek, with energy storage at the top of the list. Two of the other three options call for the investment of capital into resources that are proverbially on their way out the door, either literally because they are being retired or due to be retired in the next five years. Note, there were available plants during the 2020 blackouts that were not used, meaning that transmission congestion should be more of a concern than using outdated gas generation. Of the four solutions, energy storage is the most dispatchable and offers additional grid services, including a layer of resilience that the other resources cannot match.

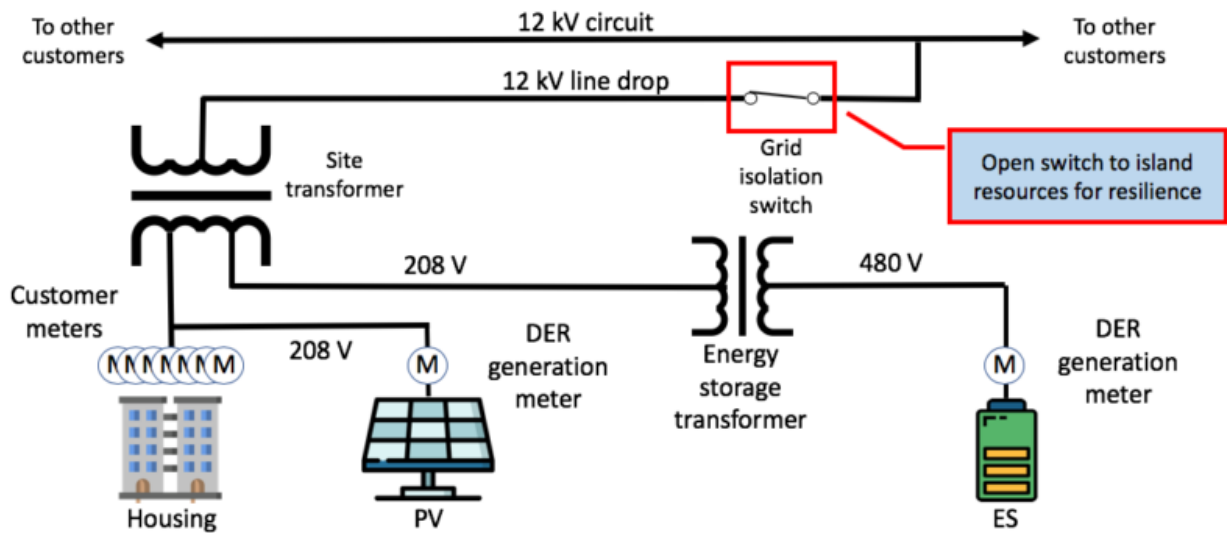
## **II. DESCRIPTION OF PARTY**

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, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER. We also work with utilities to develop community microgrid projects that demonstrate that local renewables can provide at least 25% of the total electric energy consumed within the distribution grid, while maintaining or improving grid reliability.

## **III. COMMENTS**

### **a. Energy storage is the most beneficial of the four solutions offered in the PD.**

Energy storage offers the most cost-effective reliability since it can also be used for a series of other grid services. Energy storage technologies can provide essential reliability services, including frequency regulation, voltage support and ramping needs in addition to time-of-use bill management. Energy storage systems can help balance electricity supply and demand on multiple time scales (by the second, minute, or hour). Fast-ramping batteries are particularly well-suited to provide ancillary services such as frequency regulation, which helps maintain the grid’s electric frequency on a second-to-second basis. Moreover, installing energy storage at strategic locations, at potentially lower cost, enables utilities to manage growing demand while deferring large grid investments. The Clean Coalition has a front-of-meter (“FOM”) energy storage being developed in partnership with the California Energy Commission.



*Valencia Gardens Energy Storage Diagram*

The project, called Valencia Gardens Energy Storage is being deployed in the center of the mission district in San Francisco to provide resilience to the solar already deployed on the low-income Valencia Gardens Apartments. However, the energy storage is increasing the hosting capacity on the local distribution feeder by at least 25%, allowing for the deployment of more solar and other renewable resources.

California already has an increased demand for energy storage, which has led for multiple RFOs from CCAs and other LSEs in the past year to deploy incremental and long-term storage. Taking the need for additional capacity to meet the need by the summer of 2021 would only bring the state closer to achieving storage goals.

#### IV. CONCLUSION

For the reasons stated above, the Clean Coalition respectfully submits these opening comments on the Proposed Decision. We urge the Commission to focus on energy storage as the priority for meeting California's additional capacity needs.

Respectfully submitted,

/s/ BEN SCHWARTZ  
Ben Schwartz  
Policy Manager

Clean Coalition  
1800 Garden Street  
Santa Barbara, CA 93101  
Phone: 626-232-7573  
[ben@clean-coalition.org](mailto:ben@clean-coalition.org)

Dated: January 28, 2021