

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

Order Instituting Rulemaking to Implement
Senate Bill 520 and Address Other Matters
Related to Provider of Last Resort.

Rulemaking 21-03-011
(Filed March 18, 2021)

**CLEAN COALITION OPENING COMMENTS IN RESPONSE TO RODER
INSTITUTING RULEMAKING TO IMPLEMENT SENATE BILL 520 AND ADDRESS
OTHER MATTERS RELATED TO PROVIDER OF LAST RESORT**

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April 26, 2021

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I. INTRODUCTION

Pursuant to Rule 6.2 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 “Order Instituting Rulemaking to Implement Senate Bill 520 and Address Other Matters Related to the Provider of Last Resort, issued at the Commission on March 18, 2021. The Clean Coalition supports a conversation on this subject, which is particularly pertinent, given the outages in summer 2020, the reliability issues in Texas, and the prevalence of Public Safety Power Shutoff beginning in 2019. With more people working and staying at home during the COVID -19 pandemic, uninterrupted service is more valuable than ever.

Since the utilities are currently designated as the Provider of Last Resort (“POLR”) by Senate Bill (“SB”) 520, there is value in creating a framework to govern the way in which reliable service is ensured. To take that conversation a step further in Track 2, considering other LSEs that might assume the role of POLR in other situations raises the question of costs versus service. If an LSE can ensure reliability a higher percentage of the time than a utility, should the role POLR be transferred to them automatically? Or is the designation based on the lowest-cost reliability a provider can offer?

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.

III. COMMENTS

a. Schedule

The Clean Coalition believes the schedule is appropriate, though it may have to be expanded if a significant number of proposals are submitted. We believe that the CPUC suggestions for a series of workshops coordinated with the CEC are the best option before proposals can be submitted.

b. Inter-agency cooperation

We believe that a few basic guiding principles and the schedule for cooperation with CAISO, the CEC and any other relevant agencies should be discussed at the PHC and finalized within 30 days following it.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these opening comments and looks forward to further discussing an issue so pertinent to the energy landscape in California. We look forward to how this framework might be applied to Community Microgrids.

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