

**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

**CLEAN COALITION REPLY COMMENTS IN RESPONSE TO PROPOSED DECISION
ADOPTING MICROGRID AND RESILIENCY SOLUTIONS TO ENHANCE SUMMER
2022 AND SUMMER 2023 RELIABILITY**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission (“the Commission”) Rules of Practice and Procedure, the Clean Coalition respectfully submits these reply comments in response to opening comments on the *Proposed Decision Adopting Microgrid and Resiliency Solutions to Enhance Summer 2022 and Summer 2023 Reliability*. In opening comments parties were clear in their opposition of the use of fossil fuels and advocacy that the Commission reconsider its analysis of the vast majority of party proposals that were submitted. CESA underscores this sentiment in opening comments, stating, “Yet, without duplicating efforts in other and more appropriate proceedings, CESA was hopeful that the Commission would truly “turn over every rock” and seek capacity through new and innovative means, many of which were proposed by CESA and a number of other stakeholder.”¹ Unfortunately, this was not even the case with all of the utility proposals. Despite the fact that only utility proposals were approved, it was surprising that SCE’s behind-the-meter (“BTM”) microgrid proposal was rejected.

Among a variety of value-adding proposals, other parties concurred with the Clean Coalition that the proposal made by the County of Los Angeles directly offers Community Microgrids to be deployed for reliability purposes, in addition to resilience benefits. Clean Coalition takes this opportunity to reiterate the need to continue to meet the requirements of SB 1339 by creating new pathways to commercialize microgrids and benefit ratepayers across the state.

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.

¹ CESA Opening Comments on PD at 2

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. This PD does not take any substantial steps to commercialize microgrids.

In opening comments, the Center for Sustainable Energy effectively iterates that because much of the past three tracks of this proceeding have focused on short-term goals, it is important that the commercialization of microgrids remains a priority.² The Governor’s Emergency Proclamation may have displaced a portion of the original proceeding schedule, but the framework listed in SB 1339 still remains. As CESA suggests, “Broader solicitations for third-party microgrid solutions should be pursued to meet the Governor’s mandate to address emergency reliability needs from all available resources.”³ If other proposals are approved, such as the proposal made by the County of Los Angeles, the Commission can use the rationale that reliability offers another pathway for the cost-effective deployment of microgrids and should be pursued. However, the current version of the PD sends no such signal, nor does it attempt to qualify microgrids as a technology that can offer reliability benefits.

B. The proposal by the County of Los Angeles should be viewed as valuable community input.

A theme throughout the proceeding has been the importance of including local and tribal communities in the planning process, a concept which appears to have been forgotten during Phase 1 of Track 4. County of Los Angeles’ proposal represents the culmination of planning and discussions by county governments about resilience needs, with a particular focus on Critical Community Facilities. Based on the prior rationale of the Commission — about the importance of community planning — working with public agencies to pursue microgrids and other resilience projects appears to be a perfect match. Rather than relegating the proposal to the MIP, Clean Coalition urges the Commission to jump at the opportunity to create a deterministic pathway to

² CSE Opening Comments at 3-4

³ CESA Opening Comments at 2,

deploying cost effective microgrids.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments and urges the Commission to reconsider the PD. The proposal by the County of Los Angeles is an important opportunity to help commercialize Community Microgrids throughout the state.

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