

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

Petition to Adopt, Amend, or Repeal a  
Regulation Pursuant to Pub. Util. Code §  
1708.5.

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Petition 22-06-012  
(Filed June 23, 2022)

**RESPONSE OF THE CLEAN COALITION IN SUPPORT OF PETITION OF BLOOM  
ENERGY CORPORATION FOR RULEMAKING TO ADOPT A DISTRIBUTED ENERGY  
RESOURCE RELIABILITY & RESILIENCE TARIFF TO ADDRESS URGENT AND  
NEAR-TERM GRID RELIABILITY NEEDS**

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July 25, 2022

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**I. INTRODUCTION**

Pursuant to Rule 6.3(d) of the California Public Utilities Commission (“the Commission”) Rules of Practice and Procedure, the Clean Coalition respectfully submits this response in support of the Petition of Bloom Energy Corporation for Rulemaking to Adopt a Distributed Energy Resource Reliability & Resilience Tariff To Address Urgent and Near-Term Grid Reliability Needs, filed at the Commission on June 23, 2022.

**II. CLEAN COALITION INTEREST IN THE PROCEEDING**

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.

Given the reality that California has come to know very well over the last decade— a prolonged drought, increasing temperatures, a severe wildfire season that last for much of the year, and a need to transition rapidly to clean energy resources— the Clean Coalition is focused on ensuring that local resources and resilience are at the forefront of that transition. We believe that California should achieve 25% of clean energy locally by 2025 to maximize resilience benefits. We promote policies to increase community resilience, particularly through Solar Microgrids and Community Microgrids.

### **III. SUPPORT FOR BLOOM CORPORATION'S REQUEST**

The Clean Coalition supports the Commission working with stakeholders to design a program that optimally utilize Distributed Energy Resources (“DER”) for resiliency purposes. Given the need to rapidly increase capacity over the next few years to meet reliability needs, it is logical to consider using all the tools at the disposal of the state. DER also have the benefit of being more easily deployable than larger scale resources, meaning that effective price signals have the potential to stimulate growth.

While we support the idea of creating a Resiliency Tariff to value grid exports during emergency periods, the Clean Coalition recommends amending the parameters of the Rulemaking to promote renewable resources, including fuel cells run with green hydrogen. In addition, the Commission should lower the number of hours of continuous output necessary to participate in the program to 10 hours, which would allow renewable microgrids, such as Solar Microgrids, to participate. While extremely long-duration outages are possible, they should not be the baseline for eligibility, in order not to unnecessarily limit the number of clean DER that can participate.

### **IV. CONCLUSION**

The Clean Coalition appreciates the opportunity to submit this response and urges the Commission to approve this Petition for Rulemaking and begin the process of designing a resiliency tariff that incorporates the feedback we offer in these comments.

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