



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
(Filed September 12, 2019)

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**OPENING COMMENTS OF
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON
PROPOSED DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE
MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

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Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Opening Comments on the Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions mailed in this proceeding on April 29, 2020. These Opening Comments are timely filed and served pursuant to Rules 1.15 and 14.3 of the Commission's Rules of Practice and Procedure and the instructions accompanying the Proposed Decision.

**I.
BACKGROUND.**

CEERT is a nonprofit public-benefit organization founded in 1990 and based in Sacramento, California. CEERT is a partnership of major private-sector clean energy companies. CEERT designs and fights for policies that promote global warming solutions and increased reliance on clean, renewable energy sources for California and the West. CEERT is working toward building a new energy economy, including cutting contributions to global warming and reducing dependence on fossil fuels. CEERT has long advocated before the Commission for increased use of preferred resources and for California to move towards a clean energy future.

II.
THE PROPOSED DECISION STREAMLINES CUSTOMER-INITIATED INTERCONNECTIONS AND SHOULD ALSO BE APPLIED TO THE INTERCONNECTION PROCESSES OF OTHER DISTRIBUTED ENERGY RESOURCES.

CEERT recognizes and appreciates the sense of urgency from the California Public Utility Commission (“The Commission”) as the 2020 fire season rapidly approaches. Furthermore, the need for effective mitigation of Public Safety Power Shutoffs (PSPS) has only increased with the onset of the COVID-19 pandemic. CEERT believes that, while the proposed decision puts in place appropriate reforms to streamline customer-initiated interconnections, these reforms should be also be used in other distributed energy resource (DER) interconnection projects beyond fire mitigation efforts. One such reform is the allowance of virtual inspection on a project-by-project basis. Especially with the advent of virtual workplaces as a result of the ongoing public health crisis, remote technologies are quickly developing and improving. Therefore, inspection via video and photographs should be accessible for interconnection projects across the board. CEERT recommends similar streamlining efforts be carried out for all DER interconnection projects, in turn encouraging the breakdown of barriers that prevent California’s grid from evolving. CEERT hopes that the reports to be filed by the utilities on February 15, 2021 will be used constructively and allow these measures to apply to the interconnection processes for other DER projects outside of fire mitigation issues.

CEERT appreciates the Proposed Decision ensuring that there is closer advance coordination and real input on design and operation from local government, tribal government, and local community choice aggregators (CCAs) through workshops, resiliency interconnection guides, dedicated resiliency project teams, and access-restricted data portals.¹ These mechanisms will ensure transparency between the utilities and local and tribal governments, which CEERT

¹ Proposed Decision, at pp. 38-59

believes is of highest priority and essential to the success of California's resiliency efforts. This collaboration must be two way without regard as to whether the project is initiated by either the IOU or the local entity.

In addition to microgrid development, CEERT encourages the utilities to incentivize demand-side load management as a viable resiliency strategy. Specifically, CEERT sees a large role for demand response (DR) to reduce load requirements and thus correctly size microgrid capacity during PSPS outages through paid voluntary load shed of non-critical loads. Furthermore, CEERT believes redoubled focused energy efficiency (EE) measures in the load pocket served by the microgrid is an effective load management strategy as an adder to normal EE benefits. CEERT requests that the utilities consider these demand-side technologies as resiliency solutions in addition to or in conjunction with microgrids.

**III.
PG&E MUST BE HELD ACCOUNTABLE TO THE CONDITIONS OF APPROVAL OF
ITS TRACK 1 PROPOSALS OUTLINED IN THE PROPOSED DECISION.**

Of major concern to CEERT during Track 1 of this proceeding has been PG&E's proposals and the lack of commitment from PG&E on ensuring that the use of diesel fuel is temporary and that there will be an expeditious transition to clean generation. Therefore, CEERT appreciates the proposed decision approving PG&E's Temporary Generation Program only for the 2020 fire season and conditionally upon PG&E submitting an action plan to the Commission that includes "a plan and schedule for continued testing and demonstration of technology alternatives to diesel".²

² Proposed Decision, at p. 73.

CEERT recognizes that the 2020 fire season is approaching rapidly and understands the need to implement PSPS mitigation measures quickly to prevent dangers such as “potential loss of, or damage to, life, health, property, or essential public services”³. However, CEERT’s concern was that these quick mitigation efforts would lock in fossil generation without planning for or committing to early conversion to clean generation. CEERT appreciates the Commission recognizing the adverse and harmful effects of localized diesel generation⁴ in weighing the immediate wildfire risk with these damaging factors. Going forward, CEERT respectfully urges the Commission to use the required compliance filings from PG&E⁵ in a constructive manner and hold PG&E accountable for ensuring that clean solutions will be implemented to replace fossil generation after this 2020 fire season to align with California’s air quality and climate goals.

To that end, CEERT recommends that all temporary gas generation be hybridized with short duration batteries to allow seamless transfer and spinning reserve, so that the gas is not just operating at idle in anticipation of a PSPS. This would include favoring internal combustion engines with silicon-controlled rectifier controls to minimize NOx emissions. Finally, CEERT is very skeptical that most “renewable natural gas” (RNG) injections are truly incremental to injections that would occur in the absence of microgrid development. Thus, RNG should not be considered as a viable PSPS mitigation strategy.

IV. CONCLUSION

CEERT appreciates the opportunity to comment the above on the Proposed Decision.

³ Proposed Decision, at p. 72.

⁴ Proposed Decision, at p. 72.

⁵ Proposed Decision, at p. 73.

May 19, 2020

Respectfully submitted,

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