

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



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Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009

**SIERRA CLUB COMMENTS ON THE PROPOSED DECISION ADOPTING SHORT-
TERM ACTIONS TO ACCELERATE MICROGRID DEPLOYMENT AND RELATED
RESILIENCY SOLUTIONS**

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Dated May 19, 2020

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Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission, Sierra Club files these comments on the Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions (“Proposed Decision” or “PD”), filed April 29, 2020.

Sierra Club supports the Commission’s efforts to improve California’s resiliency for the 2020 fire season through both programmatic efforts and specific projects. Sierra Club generally supports the Proposed Decision, particularly the programmatic changes to accelerate interconnection of resiliency projects, modernizing tariffs to maximize resiliency benefits, and promoting collaboration between investor-owned utilities and local and tribal governments. However, Sierra Club recommends the following changes to the final decision’s section on PG&E’s proposal.

I. The Commission should include additional direction to PG&E in order to ensure that its reliance on temporary diesel generation does not continue beyond the 2020 fire season.

Sierra Club supports the Commission’s measures to ensure PG&E’s accountability for the use of diesel generators, but the final decision should include further direction to ensure that temporary diesel generation “is not a long-term resiliency strategy.”¹ The Proposed Decision requires PG&E to submit a report detailing the 2020 fire season temporary generation, an action plan to integrate clean generation, and a report evaluating the results of PG&E’s recent request

¹ PD at 72.

for information (“RFI”).² These requirements present important accountability and oversight over PG&E’s temporary generation program and should be retained in the final decision. However, the final decision should go further in ensuring PG&E’s accountability.

First, the final decision should direct PG&E to include additional data in its 2021 report on the location and run-time data of the temporary diesel generation that it deploys for the 2020 fire season. This will help keep PG&E accountable to the Commission and stakeholders regarding the actual deployment of its diesel generators. It is critical that diesel generators are used only when absolutely necessary to maintaining service, and without information regarding where and when the diesel generation is actually deployed, it will be impossible to ensure that their use is kept to a minimum. Therefore, the Commission should require PG&E to include this information in its report.

Second, the final decision should ensure the ability of parties to review and comment on (1) the 2021 report detailing use of diesel generators during the 2020 fire season, (2) PG&E’s action plan to incorporate clean energy into its Temporary Generation Program, and (3) the report evaluating the results of the Clean Generation Request for Information. The Proposed Decision currently envisions the action plan and RFI report as a compliance filing, but the Commission should build into the proceeding schedule an opportunity for parties to provide comments on these documents as part of this proceeding. Alternatively, the Commission could direct PG&E to file these documents as a Tier 2 advice letter, subject to responses from other parties. Creating an opportunity for parties to comment on PG&E’s actions to date would provide both PG&E and the Commission to consider improvements or opportunities to change course in future planning or RFIs. The timeline for generating proposals in time for the 2020 fire season was compressed and challenging, and this proceeding presents an opportunity for both the Commission and the investor-owned utilities to learn from and to ensure that future proposals do not rely on fossil-fuel-fired generation.

Third, the Commission should expressly inform PG&E and the other investor-owned utilities that diesel generation will not be approved for resiliency measures in future fire seasons. California’s wildfire risk is directly related to climate change and decades of burning fossil fuels.

² PD at 73.

Further reliance on diesel and gas generation only further entrenches those impacts. The Commission should be clear that it is approving PG&E's temporary diesel generation due to the dire need to address the 2020 fire season and that such approval will not be granted in future years. The Proposed Decision's reporting and action plans hint at this intention, but it is not enough to ensure that future PG&E proposals are not similarly reliant on diesel. The final decision should include clear, unequivocal direction that there is no place for fossil-fuel generation in future resiliency efforts.

Conclusion

Sierra Club appreciates the opportunity to comment on these issues, and we look forward to engaging further as the proceeding continues.

Respectfully submitted,

Dated May 19, 2020

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