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 19, 2019)

REPLY COMMENTS OF PENINSULA CLEAN ENERGY AUTHORITY, CENTRAL COAST COMMUNITY ENERGY, PIONEER COMMUNITY ENERGY, SONOMA CLEAN POWER AUTHORITY, AND EAST BAY COMMUNITY ENERGY ON POLICY QUESTIONS AND AN INTERIM APPROACH FOR MINIMIZING EMISSIONS FROM GENERATION DURING TRANSMISSION OUTAGES

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October 2, 2020

On Behalf Of:
Peninsula Clean Energy Authority
Central Coast Community Energy
Pioneer Community Energy
Sonoma Clean Power Authority
East Bay Community Energy
REPLY COMMENTS OF PENINSULA CLEAN ENERGY AUTHORITY, CENTRAL COAST COMMUNITY ENERGY, PIONEER COMMUNITY ENERGY, SONOMA CLEAN POWER AUTHORITY, AND EAST BAY COMMUNITY ENERGY ON POLICY QUESTIONS AND AN INTERIM APPROACH FOR MINIMIZING EMISSIONS FROM GENERATION DURING TRANSMISSION OUTAGES


I. REPLY TO COMMENTS ON EMERGING ENERGY RESOURCE ALTERNATIVES

A. The CCAs Support Requests For A Technologically-Neutral Framework That Prioritizes Preferred Resources And Utilizes Complementing Capabilities

The CCAs strongly agree with the broad group of stakeholders who, in opening comments, called for a reorientation of this docket towards a technology-neutral framework that prioritizes the use of preferred resources first with diesel filling in the gaps left behind. In particular, the CCAs agree with California Energy Storage Alliance (“CESA”) that the IOUs
must be required to give first priority to green multi-technology solutions with complementing capabilities.¹

It is critical that the IOUs prioritize preferred resources and remain open to a range of green technologies in selecting temporary generation solutions. The CCAs agree with the Bioenergy Association of California’s (“BAC”) observation that renewable fuels and clean technologies are available now that can provide dispatchable power, baseload generation, and long duration energy storage for microgrids.² In opening comments parties identified a number of specific technologies that have the potential to provide these benefits, while also, in some cases, potentially being mobile enough to act as temporary generation. The IOUs should be required to fully explore these and all other potentially viable non-diesel temporary generation alternatives and prioritize the procurement of preferred temporary generation resources.

Preferred temporary generation resources should be deployed in conjunction with complementing resources and capabilities whenever possible. The CCAs strongly support the operationalization of customer-sited resources and “shaping” the underlying resiliency need to support optimal solutions by reducing the amount of temporary generation needed by a given substation. In particular, the CCAs support Vote Solar and the Climate Center’s (“VS/TCC”) recommendation that temporary generation be deployed in conjunction with battery energy storage systems, incremental demand response, and energy efficiency in an islanded network.³

The CCAs further agree with those parties that stressed the importance of using diesel generation as a last resort only, to fill in any gaps left after preferred temporary generation alternatives are fully pursued. However, to the extent that diesel generation is used, the CCAs

¹ CESA Opening Comments at 4.
² BAC Opening Comments at 2.
³ VS/TCC Opening Comments at 4.
believe that the IOUs should be required to implement comprehensive mitigation measures to offset the impacts of diesel generation. The Commission should consider imposing penalties or requiring that the IOUs provide reparative funding to individuals and/or communities if emissions from IOU temporary generators using fossil diesel exceed community air pollution thresholds or cause measurable harm to vulnerable community members or marginalized communities.

B. The CCAs Agree That Action Must Be Taken To Avoid Duplicative Investments

The CCAs agree with the significant number of parties that identified a serious risk of duplicative spending and overlap among dockets. This risk that must be addressed to conserve party and commission resources, avoid duplication of expenditures, and arrive at solutions that are lowest cost and supported by the impacted communities. In opening comments, the CCAs noted a number of dockets – including the utilities’ General Rate Case proceedings; the Wildfire Mitigation Plan Rulemaking; and the De-Energization rulemaking – that include the consideration of projects and investments that may render some utility proposals in this docket unnecessary or duplicative. Similar concerns regarding some or all of these dockets were raised by the Microgrid Resource Coalition (“MRC”); San Diego Gas & Electric Company (SDG&E); Southern California Edison Company (“SCE”). The CCAs support the general party consensus that the Commission should monitor all related dockets and ensure that resiliency projects are necessary and non-duplicative. As part of this effort, the CCAs support BAC’s recommendation that a full list of related proceedings be developed, although the CCAs

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4 MRC Opening Comments at 7.
5 SDG&E Opening Comments at 5-7.
6 SCE Opening Comments at 4.
think that it may be more reasonable and efficient for the Commission to instruct the IOUs to prepare the list as part of a regular reporting requirement rather than preparing the list itself.\textsuperscript{7}

The CCAs further agree with the Green Hydrogen Coalition’s (“GHC”) identification of a number of additional dockets may provide venues for the further development and consideration of non-diesel generation options.\textsuperscript{8} The Commission should coordinate its efforts in this Rulemaking with these dockets.

II. CONCLUSION

The CCAs thank the Commission for their consideration of the matters discussed herein.

Dated: October 2, 2020

Respectfully submitted,

/s/David Peffer

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\textsuperscript{7} BAC Opening Comments at 3.
\textsuperscript{8} GHC Opening Comments at 3-4.