



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

11/16/21
12:41 PM

Order Instituting Rulemaking to Establish
Policies, Processes, and Rules to Ensure
Reliable Electric Service in California in the
Event of an Extreme Weather Event in 2021.

Rulemaking 20-11-003
(Filed November 19, 2020)

**REPLY COMMENTS OF
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON
PROPOSED PHASE 2 DECISION DIRECTING PACIFIC GAS AND ELECTRIC
COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND SAN DIEGO GAS &
ELECTRIC COMPANY TO TAKE ACTIONS TO PREPARE FOR POTENTIAL
EXTREME WEATHER IN THE SUMMERS OF 2022 AND 2023**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

November 16, 2021

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Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits these Reply Comments on the Proposed Decision Directing Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company to Take Actions to Prepare for Potential Extreme Weather in the Summers of 2022 and 2023, mailed in this proceeding on October 29, 2021. These Reply Comments are timely filed and served pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure and the instructions accompanying the Proposed Decision.

I.

CEERT AGREES WITH CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE AND SIERRA CLUB THAT THE PROPOSED DECISION ERRS BY ALLOWING MORE GAS PROCUREMENT

In its Opening Comments, CEERT again urged the Commission to prohibit procurement of fossil fuel and gas procurement.¹ CEERT once more recommends that the Commission take the position it took in the integrated resources planning (R.20-05-003) when it specifically banned procurement of incremental capacity from fossil-fueled resources.² Furthermore, the

¹ CEERT Opening Comments, at pp. 2-5.

² D.21-06-035, at pp. 2-3.

lessons learned from the California Energy Commission’s Midterm Reliability Analysis indicate that there is no need to procure fossil-fueled resources and that “[a] portfolio of preferred resources can provide equivalent system reliability to gas resources.”³

As such, CEERT agrees with California Environmental Justice Alliance (CEJA) and Sierra Club’s arguments “that procurement of incremental capacity from existing power plants through efficiency upgrades is in error.”⁴ CEJA and Sierra Club set forth numerous compelling reasons why this procurement should not be permitted, including but not limited to that it is inconsistent with climate mandates, policies and rulings; recent analyses confirm there is no need for additional gas procurement; preferred resources provide the necessary reliability; and procurement of gas resources will increase emissions in air basins with the most exiting pollution.⁵ Furthermore, CEERT shares CEJA and Sierra Club’s concerns that “reliance on gas puts Californians at risk from dangerous, uncontrolled methane leakage that can cause severe health impacts.”⁶

As such, CEERT recommends that the Commission modify the Proposed Decision to ban procurement from gas power plants.

II. CEERT SUPPORTS THE RECOMMENDATIONS MADE BY THE NUMEROUS DEMAND RESPONSE PARTIES

Throughout this proceeding, CEERT has supported the recommendations made by the many demand response (DR) parties.⁷ The California Efficiency + Demand Management Council (Council); CPower and Enel North America, Inc. (Joint DR Parties); Google; Leapfrog

³ CEC Lead Commissioner Workshop – Midterm Reliability Analysis & Incremental Efficiency Improvements to Natural Gas Power Plants, presented on August 30, 2021, at Slide 41 which can be found here: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-ESR-01>.

⁴ CEJA and Sierra Club Opening Comments, at p. 7.

⁵ CEJA and Sierra Club Opening Comments, at pp. 7-8.

⁶ CEJA and Sierra Club Opening Comments, at p. 8.

⁷ *See, e.g.*, CEERT Phase 2 Opening Brief, at pp. 4-5.

Power, Inc. (Leap); OhmConnect; Polaris Energy Services, TeMix Inc., and Valley Clean Energy Alliance (Pilot Team) submitted Opening Comments on the Proposed Decision.⁸ They each provided several recommendations and proposed modifications to the Proposed Decision.

While CEERT does not address the DR parties' proposals and recommendations specifically, it encourages the Commission to continue to adopt any input from these parties in order to further advance DR. As such, CEERT continues to support the recommendations made by these parties in their Opening Comments on the Proposed Decision.

III. CONCLUSION

CEERT appreciates the opportunity to submit these Reply Comments and urges the Commission to make the modifications addressed here and in Opening Comments and included in CEERT's Proposed Modifications to the Proposed Decision's Findings of Fact, Conclusions of Law, and Ordering Paragraphs attached hereto as Appendix A.

Respectfully submitted,

November 16, 2021

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⁸ See, e.g., Opening Comments of the Council, Opening Comments of the Joint DR Parties, Opening Comments of Google, Opening Comments of Leap, Opening Comments of OhmConnect, and Opening Comments of the Pilot Team.