

**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)

**REPLY COMMENTS OF THE CLIMATE CENTER AND VOTE SOLAR ON THE  
PROPOSED DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE  
MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

Lorenzo Kristov, Ph.D.  
Consultant to Vote Solar  
PO Box 927  
Davis, CA 95617  
Telephone: (916) 802 7059  
Email: [LKristov91@gmail.com](mailto:LKristov91@gmail.com)

Ed Smeloff  
Vote Solar  
360 22nd St. Suite 730  
Oakland, CA 94612  
Tel: (415) 817-5065  
Email: [ed@votesolar.org](mailto:ed@votesolar.org)

W. Woodland (Woody) Hastings  
Energy Program Manager  
The Climate Center  
PO Box 3785  
Santa Rosa, CA 95402  
Tel: (707) 829-3460  
E-mail: [woody@theclimatecenter.org](mailto:woody@theclimatecenter.org)

May 26, 2020

## TABLE OF CONTENTS

I.	Introduction.....	1
II.	The Commission Should Not Grant Exemptions To Individual IOUs From Requirements Placed On All IOUs. ....	1
III.	The Commission Should Not Relieve IOUs Of The Requirement To Hold Semiannual Workshops At The County Level With Local Government And Tribal Authorities. ....	2
IV.	The Commission should approve all requirements in the PD regarding IOU provision of data portals for access to electric infrastructure and investment data, and should not limit the scope of data the IOUs are required to post to distribution system work related to PSPS and wildfire mitigation only.....	3
V.	The Commission should require the IOUs to update portal data on individual projects on a continuing “real-time” basis.....	3
VI.	The Commission should not grant extensions for filing advice letters that reflect IOUs’ plans for implementing urgent Track 1 directives. ....	3
VII.	The Commission should require standardized single-line diagrams applicable to all the IOU service areas.....	4
VIII.	The Commission should not allow Tier 1 advice letters to substitute for Tier 2 or Tier 3 advice letters. ....	4
IX.	Conclusion .....	5

**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)

**REPLY COMMENTS OF THE CLIMATE CENTER AND VOTE SOLAR ON THE  
PROPOSED DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE  
MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), The Climate Center and Vote Solar respectfully submit these reply comments to the Opening Comments on the Proposed Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions dated April 29, 2020.

**I. Introduction**

The Climate Center and Vote Solar (referred to hereafter as “the Joint Parties”) respectfully submit these reply comments pursuant to Administrative Law Judge Rizzo’s April 29 Proposed Decision (“PD”) adopting short-term actions to accelerate microgrid deployment and related resiliency solutions. The Climate Center is a California 501(c)(3) nonprofit organization founded in 2001 with a mission to deliver rapid greenhouse gas (GHG) reductions at scale, starting in California. Vote Solar is a 501(c)(3) non-profit organization, working to lower solar costs and expand solar access. Vote Solar advocates for state policies and programs needed to repower our electric grid with clean energy.

**II. The Commission Should Not Grant Exemptions To SDG&E From Requirements Placed On All IOUs.**

SDG&E errs in its request for exemption from the proposed requirements to engage with local governments and tribal authorities based on its prior local engagement activities. As a general regulatory principle, SDG&E should not be granted a blanket exemption from a

regulatory requirement applicable to all IOUs. The Commission should adopt the Proposed Decision applying the requirements to consult with local and tribal governments to all three IOUs without exception. In the compliance process, an individual IOU can document how its current practices might already comply with the requirements. If the Commission determines the current practices are already fully or partially compliant, that IOU would be allowed to continue its current compliant practices or make modifications where needed. This approach to regulation and compliance ensures that all IOUs will be held to the same standards and requirements.

### **III. The Commission Should Not Relieve IOUs Of The Requirement To Hold Semiannual Workshops At The County Level With Local Government And Tribal Authorities.**

SCE errs in its request that the Commission eliminate the requirement for semiannual workshops and rely instead on the working groups and advisory boards established in the Public Safety Power Shutoff rulemaking ([R.18-12-005](#)). The Joint Parties oppose this substitution as inadequate to the Commission's goal of improved community resiliency and the commercialization of microgrids. PG&E errs in a similar request that would rely on Energy Division workshops instead of direct coordination and consultation meetings between IOUs and local and tribal agencies.

SCE and PG&E fail to show why the provisions of the PD that establish ongoing coordination workshops by each IOU at the county level throughout their service areas is not reasonable. Mitigation of PSPS events is only one rationale driving the need for commercializing microgrids and is only one of the issues to be addressed in this proceeding. The primary purpose of this proceeding is to accelerate commercial microgrid development, with one benefit being the increased local resilience during PSPS events. Accelerated commercialization of microgrid development will require increased transparency and collaboration between IOUs, local government and private stakeholders (developers and site owners). The Proposed Decision correctly assesses that a collaborative effort needs to begin at the earliest opportunity and will form the basis for creating a regulatory environment that achieves the highest level of cost-effective microgrid commercialization (i.e., development of microgrids on privately-owned sites and in communities by third party developers).

Even with respect to the promotion of resiliency at the critical facilities contemplated in Track 1, semiannual workshops will be needed to establish and maintain a platform for ongoing

collaboration which should result in dedicated resources for those jurisdictions needing assistance. Such a collaborative dynamic will be even more critical when Track 2 takes up more complex matters of community microgrid development, operation and revenue generation through tariffs. Of course, the IOUs can use these workshops to also inform any needs identified in the PSPS rulemaking and any other relevant proceeding.

**IV. The Commission should approve all requirements in the PD regarding IOU provision of data portals for access to electric infrastructure and investment data, and should not limit the scope of data the IOUs are required to post to distribution system work related to PSPS and wildfire mitigation only.**

SDG&E's and SCE's requests to drop the requirement for a portal for local governments to access IOU electric infrastructure and investment data, and PG&E's request to limit the scope of data posted in the proposed data portals are not reasonable when taking into account the broader goal of microgrid commercialization that will provide local resilience against all forms of disruption, not just wildfires, as well as advancing a broad range of objectives in service to California's bigger goals for decarbonization and social equity.

**V. The Commission should require the IOUs to update portal data on individual projects on a continuing "real-time" basis.**

PG&E requests that they be allowed to update data in the portal on individual projects in development on a quarterly "snapshot in time" basis, as the work schedules for these projects change frequently due to permitting and other reasons. Quarterly snapshots will not suffice to enable local governments to keep pace with project development. Updating on a "real-time" basis should not require a major effort for the IOUs once linked updating protocols are established between the portal and underlying analytic sites such as SCE's Distribution Resources Plan External Portal (DRPEP) website. The Proposed Decision anticipates that the need for IT specialists, in coordination with existing electrical engineering staff will help create a new and improved process that leverages information technologies to accelerate permitting and interconnection.

**VI. The Commission should not grant extensions for filing advice letters that reflect IOUs' plans for implementing urgent Track 1 directives.**

The IOUs have invested significant time developing their proposals in the weeks and months leading up to their January 2020 filings. Where the Commission approves elements of

the IOU proposals, even if there are modifications, it is not unreasonable that they file compliant advice letters within the time frames specified in the PD. For example, PG&E requests an extension from 60 days to 120 days for filing its advice letter describing its plan to implement the CMEP. PG&E has provided no plausible reason for such an extension for a proposal it has been developing for at least six months already.

**VII. The Commission should require standardized single-line diagrams applicable to all the IOU service areas.**

Unnecessary differences in the requirements of different IOUs add complexity for all parties seeking to develop microgrids expeditiously. Single-line diagram (SLD) templates for the most common microgrid types likely to be implemented in the near term are a valuable tool for reducing unnecessary complexity. SLDs are about the electrical design and characteristics of common microgrid arrangements and should not need to differ among the IOUs. Moreover, these standard SLDs should be readily documented based on current knowledge and experience and should facilitate rather than delay microgrid development. SCE errs in arguing for requiring the three IOUs' SLDs to be "consistent" rather than "identical" because mere consistency will still allow unnecessary differences to complicate and slow microgrid development in contradiction to the goals of Track 1.

**VIII. The Commission should not allow Tier 1 advice letters to substitute for Tier 2 or Tier 3 advice letters.**

The Joint Parties support allowing each IOU to consolidate their required advice letters where the timing and subject matter make sense, but we oppose re-categorizing Tier 2 or Tier 3 advice letter requirements to Tier 1 as SCE proposes. As prescribed in CPUC General Order 96-B, Tier 1 advice letters are not appropriate in areas where utilities are required to implement new authorities. The Track 1 PD advances important new requirements on the IOUs to establish a workable framework for coordination and consultation with local and tribal authorities, and empowerment of those authorities with accurate and timely information to enable them to plan and implement microgrids for resilience and other local benefits. The implementation plans and details the IOUs must include in advice letters will be pivotal to determine the success of this proceeding's objectives, and must therefore be subject to approval so that any concerns raised by parties must be considered and addressed by the Commission.

## IX. Conclusion

The Climate Center and Vote Solar value the Commission's leadership on the important goal of accelerating microgrid deployment through effective collaboration and consultation between the utilities and the local governments, tribal authorities and communities who need and will benefit from microgrids. We appreciate the opportunity to submit these comments on the PD.

Dated: May 26, 2020

Respectfully submitted,

\_\_\_\_\_  
/s/

Lorenzo Kristov, Ph.D.  
Consultant to Vote Solar  
PO Box 927  
Davis, CA 95617  
Telephone: (916) 802 7059  
Email: LKristov91@gmail.com

Ed Smeloff  
Vote Solar  
360 22nd St. Suite 730  
Oakland, CA 94612  
Tel: (415) 817-5065  
Email: [ed@votesolar.org](mailto:ed@votesolar.org)

W. Woodland (Woody) Hastings  
Energy Program Manager  
The Climate Center  
PO Box 3785  
Santa Rosa, CA 95402  
Tel: (707) 829-3460  
E-mail: [woody@theclimatecenter.org](mailto:woody@theclimatecenter.org)