



Commissioner Liane M. Randolph
California Public Utilities Commission
Via email
June 9, 2020

RE: R 19-09-009 – Proposed Decision Microgrid Deployment

Dear Commissioner Randolph,

The California Alliance for Community Energy is a statewide organization that advocates for Community Choice energy programs that advance local clean energy development for the environmental, economic, and social justice benefit of our communities. SB 1339 and the subsequent CPUC proceedings are important first steps in opening distribution grids to local community ownership and control of resilient energy resources such as microgrids. We are writing to suggest two important revisions to strengthen the proposed decision.

The Alliance appreciates the work of the Commission in the Proposed Decision for Track 1 of the Microgrid Deployment proceeding, Rulemaking 19-09-009. However, we urge Commissioners to include measures to ensure that investor-owned utilities comply with the communication and cooperation requirements in Proposals 1-5. We suggest amending the proposed decision to include a grievance process for Community Choice energy agencies to address potential investor-owned utility non-compliance. We join many of California's Community Choice agencies and local governments in calling for the Commission to rescind aspects of section 5.1, which give PG&E too much control over microgrid development.

Furthermore, we urge rejection of PG&E's proposed Temporary Generation Program. The Alliance supports arguments made by MCE in its letter to Commission, January 7, 2020. Allowing the investor-owned utilities to establish "temporary" emergency microgrids is an encroachment on Community Choice programs' authority to serve their customers' power needs. The use of diesel fueled generators not only increases California GHG emissions, but also burdens communities with unnecessary additional pollution. This program also represents a gross conflict of interest for PG&E; allowing the company responsible for the power shutoffs to profit from providing temporary generation facilities to address those events.

The Alliance asks the Commissioners to consider in their final decision a crucial difference in priorities between the investor-owned utilities and Community Choice energy programs. PG&E and the other two investor-owned utilities have a fiduciary responsibility to maximize shareholder profit. The distribution system must appear to them as an untapped opportunity for new profit. Meanwhile, Community Choice programs, as public entities, are focused on maximizing community welfare. As resilient, decentralized energy resources expand, we see an effort by the investor-owned utilities to guarantee monopoly control and ownership of these resources. We turn to the Commission to ensure that does not happen.

Sincerely,



Al Weinrub
Coordinator, California Alliance for Community Energy

Copies to (via email):

Commission President Marybel Batjer

Commissioner Martha Guzman Aceves

Commissioner Clifford Rechtschaffen

Commissioner Genevieve Shiroma

06112020VotingMeeting@cpuc.ca.gov