RE:  SB 1215 (Stern) – SUPPORT

Dear Senator Hueso,

The California Alliance for Community Energy (the Alliance) writes to urge you and the Committee to vote strong support for Senator Stern’s bill, SB 1215. This bill lifts restrictions that impede the development of resilient local, clean energy infrastructure by municipal jurisdictions and others, by repealing definitions and prohibitions that no longer serve ratepayers' best interests.

The Alliance is a statewide network of individuals and organizations committed to advancing a more decentralized, resilient, responsive and clean electricity system. SB 1215 moves policy further in the direction of these solutions; as such, the Alliance supports this bill for the following reasons:

- California needs to expedite the development of enhanced electric system resilience at the fastest pace consistent with public safety. Recent damage from wildfires and power shutoffs, compounded by future climate-related disasters, demonstrate that the current grid's ability to withstand these shocks is insufficient and not improving.
- SB 1215 empowers communities to take the lead in this change. Communities have the strongest capability to address the impacts of power shutoffs and other disruptions of essential energy services. SB 1215 enables allows communities to develop resilient energy solutions without running afoul of unnecessary CPUC regulation as an “electrical corporation”.
- SB 1215 mandates that investor-owned utilities (IOUs) cooperate with the creation of local microgrids, by, among other ways, requiring the infrastructure necessary to ensure that microgrids can supply local customer load during periods of line shut down.

In addition, we offer two specific comments on arguments that will come before the Committee in its May 26 hearing on this bill:

- SB 1215's exemption of microgrids from definition as an “electrical corporation” does not bestow the freedom feared by IOUs to violate other important state laws and regulations governing safety and consumer protections. We expect the CPUC will ensure such obligations are carried by microgrids albeit regulated through other mechanisms.
- We support provisions in Section 2 (f) (l) of SB 1215, exempting from definition as an “electrical corporation” any entity that has been funded by the Self-Generation Incentive Program or Electric Program Investment Charge for the purposes of demonstrating and enhancing local resilience through the funded project. To strike this language, causing program awardees to be defined as “electrical corporations” by virtue of their resilience project, is counter to SGIP &/or EPIC intent.

In short, we join many others in considering SB 1215 an essential complement to the CPUC's current proceeding R.19-09-009, implementing 2019 legislative direction to support and advance the development of microgrids and electrical system resilience.

We thank you and the Committee for your consideration of these comments.
Sincerely,

Al Weinrub, Coordinator
California Alliance for Community Energy

cc:
Nidia Bautista, Chief Consultant, Senate Committee on Energy, Utilities and Communication
Members of the Senate Committee on Energy, Utilities and Communications
Senator John Moorlach, Vice Chair
Senator Steven Bradford
Senator Ling Ling Chang
Senator Brian Dahle
Senator Bill Dodd
Senator Robert M. Hertzberg
Senator Jerry Hill
Senator Mike McGuire
Senator Susan Rubio
Senator Nancy Skinner
Senator Henry I. Stern
Senator Scott D. Wiener