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CCSC Comment on EPIC 5

Additional submitted attachment is included below.

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To whom it may concern

The California Center for Sustainable Communities (CCSC) at UCLA is pleased to provide comments on CEC's EPIC 5 Investment Plan and are gratified by the direction of the Commission. Some of the comments below come from the recommendations in the report resulting from our facilitation of the California Public Utilities Commission (CPUC) Data Working Group (R22-11-013), which is attached along with this letter.

Transportation Electrification: CCSC urges the Commission to pursue the development and deployment of bi-directional EV charging solutions by working with the CPUC and the state's electrical utilities to facilitate this process. Bi-directional charging can provide resilience to the grid, increase the utilization of intermittent renewable generation capacity, shave peak electricity demand, and maximize the life cycle value of vehicle battery energy storage systems. Of course, the utilities will have to develop clear and transparent protocols for this to be achieved, and the questions of distribution grid infrastructure remain a black box as the utilities have little incentive to clarify its status nor their decision making about bi-directional energy flow.

DER: We strongly urge the CEC to coordinate with the CPUC to centralize agency-hosted data tools and systems. For instance, while CEC hosts the majority of datasets and analysis products related to California's energy industry, demand, and prices, the CPUC hosts a limited set, including CEDARS and DGStats. The CEC should explore with the CPUC whether there may be opportunities to streamline jurisdiction over data hosting and tools to minimize upgrades needed by CPUC.This recommendation also includes seeking to standardize temporal and spatial data reporting geographies used to develop publicly accessible data products such as DGStats and others.

The CEC, in close coordination with CPUC, CAISO, DER providers, and IOUs, should work toward standardizing DER telemetry data formatting and access to improve visibility for energy forecasting and grid operations, as new types of DER devices (e.g. smart thermostats, HVAC, etc.) and their proprietary communication protocols proliferate.

Finally, CEC and CPUC should explore the costs and benefits of establishing a statewide DER device registry to record data on DER asset locations, types, nameplate ratings, and other relevant technical capabilities. The statewide DER registry should capture device nameplate data and program enrollment information, but should not be responsible for collecting dynamic device telemetry. A statewide DER registry would build upon the existing data collection processes and platforms with expanded data collection and access capabilities, and could be implemented and administered by a qualified neutral third-party data steward responsible for defining user roles and access levels and establishing protocols for automated data transfers and updates.

Building Electrification: Electrification measures should only be considered after the implementation of whole home energy efficiency retrofits. Without better performing buildings, the state's residents will incur higher electricity costs which many can't afford, particularly in DACs. We recommend a rigorous study to identify the worst thermally performing buildings in the state (building age, building construction type and end use), and systematic program targeting of thermal improvements to gradually bring the state's building stock into better performance. Longitudinal energy consumption data will be critical to understanding the cumulative load reduction benefits of Title 24 requirements. There is insufficient documentation of the scale of the need of whole home retrofits, hence policy levers to address the problem.

The problem of split incentives remains a clear obstacle to many programs. Here it is likely that the state will need to impose mandates, starting with home retrofits, accompanied by no-interest revolving fund loans to support the financial cost of implementation. There is certainly insufficient funding for the state to fully subsidize these costs, but it is essential to the future habitability of the state, and especially for people living in older multifamily housing. It will also reduce energy demand and enable people to use cooling affordably. Programs could be rolled out sequentially, starting with the most vulnerable populations subject to highest heat, now and into the future.

CEC should also work to better understand the potential contribution of balcony solar arrays coupled to small batteries in facilitating net-load reductions and bill savings for different classes of customers that have otherwise not benefited from the adoption of rooftop solar and net-metering tariffs. These systems are becoming more available on the market and could also be subsidized if they receive legislative approval for installation.

Energy System Reliance: Demand response is a key element that can be leveraged to support energy system reliability as an alternative to traditional, highly expensive, pole and wire utility infrastructure capacity investments. Greater insight into the potential for demand response programs to achieve peak load reductions at the circuit level is undervalued and understudied. CEC could fund this type of analysis with a focus on commercial and industrial end uses.

Building Community Energy Resilience and Reliability: This area is also closely related to wildfire planning and calls for a strong deployment of community solar systems and micro-grids. The development of these types of alternative energy system configurations are currently very difficult to advance given CPUC rules and IOU opposition. Yet, for the state to achieve equity, resilience, reliability and fire response, these are necessary. Community solar systems and micro-grids can reduce the impacts of PSPS events on diverse communities. Current IOU risk management practices are primitive and reactionary, causing significant impacts on communities,

putting vulnerable people who rely on electricity for life saving needs in harm's way. Micro-grids and community solar could also mitigate the need for Big Wire transmission by generating local energy.

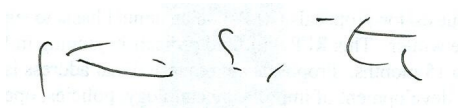
Life Cycle Accounting: CCSC would also like to support CEC's interest in Life Cycle Accounting of energy system technologies as LCAs can reveal unintended greenhouse gas emissions from the extraction, manufacturing, transportation and installation of equipment. No energy system physical infrastructure is without impacts, but this information is critical in evaluating alternative pathways for ongoing decarbonization efforts.

Commercial and Industrial Decarbonization: The decarbonization of these sectors is complex and differentiated in many regards – end uses, equipment, size of firm, age of equipment, building construction, to name a few. We suggest that CEC and CARB more clearly align their research such that there is better information sharing and, also, potentially scope for funding bigger more substantive projects. A great deal of work is being done, but it seems scattered across these agencies with insufficient information sharing and research planning coordination.

A further area which is not addressed in the EPIC 5 is the complex relationship between CEC and CPUC. Each agency has a different history, set of mandates, and regulatory authorities, but as the state's desires for decarbonization and electrification evolve there are a growing number of instances where these agencies have been working at cross-purposes. CCSC recommends the creation of a commission that facilitates the examination of how these agencies interact to better identify and support the resolution of conflicting mandates through the establishment of clear and transparent protocols.

We are grateful for CEC's leadership and commitment to a just energy future and for the opportunity to comment.

On behalf of the California Center for Sustainable Communities,



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