

**DOCKETED**

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*Comment Received From: Microgrid Resources Coalition  
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**Microgrid Resources Coalition Comments on Reliability Workshop**

*Additional submitted attachment is included below.*

**May 27, 2022**

California Energy Commission  
Docket Unit, MS-4  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814



## **Docket 21-ESR-01 Energy System Reliability**

### **RE: Comments of the Microgrid Resources Coalition on 5/23 Reliability Workshop**

#### **Introduction**

The Microgrid Resources Coalition (MRC) respectfully submits these comments on the California Energy Commission (“Commission”) Energy System Reliability Workshop held via Zoom on May 23, 2022.

The MRC is a consortium of leading microgrid owners, operators, developers, suppliers, and investors formed to advance microgrids through advocacy for laws, regulations and tariffs that support their access to markets, compensate them for their services, and provide a level playing field for their deployment and operations. In pursuing this objective, the MRC intends to remain neutral as to the technology deployed in microgrids and the ownership of the assets that form a microgrid.

The MRC’s members are actively engaged in developing microgrids in many regions of the United States including many in California. MRC members have also been operating sophisticated microgrids over an extended period of time (some for over 30 years). They are at the cutting edge of microgrid technology.

The mission of the MRC is to promote microgrids as energy resources by advocating for policy and regulatory reforms that recognize and appropriately value the services that microgrids offer, while assuring non-discriminatory access to the grid for various microgrid configurations and business models. We generally support disaggregated, fair pricing for well-defined services both from the grid to microgrids as well as from microgrids to the grid. We promote community-based resilience standards and support utilities that are working toward new business models that value resilient distributed resources. We work for the empowerment of energy customers and communities.

#### **Comments on the Workshop**

It seems there is a disproportionate focus on utility-scale resources for capacity, which are time and resource intensive to build. Transmission will realistically take a decade or longer to build and will be incredibly expensive for ratepayers. Microgrids, especially those with mixed resources, can provide both firm capacity when called upon by the grid operator, as well as backup power for customers. They can be interconnected more quickly on the distribution system instead of needing to wait for transmission capacity and have a more manageable impact on the grid than larger generators at any given location.

The MRC submitted a detailed proposal for capacity services in the CPUC’s microgrid docket (R.19-09-009) and emergency reliability docket (R.20-11-033). The microgrid industry believes that it could supply as much as 1,000 MW of firm capacity from distributed microgrids. The Commission took no action on our proposals or indeed any non-utility proposal in the R.19-09-009 docket.

[MRC Reliability Services Proposal in R.19-09-009 \(Microgrids & Resiliency\)](#)

[MRC Reliability Services Proposal in R.20-11-003 \(Emergency Reliability\)](#)

We strongly encourage the CEC to explore with the CPUC ways to incorporate Distributed Energy Resources (DERs) in general, and microgrids in particular, in capacity and resilience planning. We need a functional tariff that applies to all microgrids and DERs. The microgrid and DER industry is ready to provide firm capacity to help address our reliability needs immediately, if the CPUC can develop a broad-based microgrid tariff for customers, as contemplated under SB 1339 (Stern, 2018).

Thank you for your time and consideration of these comments.

Best regards,

A handwritten signature in black ink, appearing to read "Allie Detrio".

**Allie Detrio**  
**Senior Advisor**  
**Microgrid Resources Coalition**