

DOCKETED

Docket Number:	22-OII-01
Project Title:	Order Instituting Informational Proceeding on Distributed Energy Resources in California's Energy Future
TN #:	243600
Document Title:	Long Beach Alliance for Clean Energy Comments - LB ACE Comments DER
Description:	N/A
Filer:	System
Organization:	Long Beach Alliance for Clean Energy
Submitter Role:	Public
Submission Date:	6/17/2022 5:02:15 PM
Docketed Date:	6/17/2022

*Comment Received From: Long Beach Alliance for Clean Energy
Submitted On: 6/17/2022
Docket Number: 22-OII-01*

LB ACE Comments DER

Additional submitted attachment is included below.

LONG BEACH ALLIANCE FOR CLEAN ENERGY

Friday, June 17th, 2022

VIA ELECTRONIC MAIL

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: CEC Docket #: 22-OII-01 - Order Instituting Informational Proceeding on Distributed Energy Resources in California's Energy Future (OIIP)

Thank you for the opportunity for written public comment on your draft rule-making on the California Energy Commission (CEC) Order Instituting Informational Proceeding on Distributed Energy Resources in California's Energy Future Proceeding, Docket #22-OII-01.

Long Beach Alliance for Clean Energy (LB ACE) is a climate science education and action nonprofit serving the Greater Long Beach area – a geographical extent roughly from Western to Warner Avenues, south of the 91 Freeway. We are a BIPOC-led group of university professors, educators, workers, businesses, and advocates that formed in late 2017 after Lead was found in the drinking water at the California State University Long Beach¹. We incorporated in 2018 with the mission to “educate, activate, and transform Long Beach along science based and equity focused climate stabilization pathways to ensure a third century for everyone in our fair town”. In addition to our work specific to the City of Long Beach and climate and environmental planning locally, we also provide analysis and assessment of public policies and agency decisions of import to our area.

LB ACE is grateful the CEC has opened this public proceeding on the role of distributed energy resources (DER) in California, and for their lead role in the June 1st Lead Commissioner Workshop along with the California Public Utilities Commission (CPUC) and the California Independent System Operator (CAISO) on this important form of locally-driven, community-centered, concrete action on decarbonizing the electricity content of homes, businesses, institutions and industry, along with some of the energy content of the transportation and goods movement between. This proceeding is of interest to our organization, as DER have already proven to be a critical practical component part of climate action on the State of California's climate goals, including SB 100.

1

<https://www.presstelegram.com/2017/11/08/lead-concerns-prompt-cal-state-long-beach-to-shut-down-water-fountains/>

Briefly at this stage, we wish to relay the following:

- 1) The Joint Agency Report on SB100 is clear that California can eliminate all reliance on fossil fuels by 2045²;
- 2) Distributed energy resources (DER) were not considered in the Joint Agency Report, but increasingly are a part of California's clean energy economy growth in real time, and at increasing scale and scope³;
- 3) DER projects can and should be given California State priority in funding, as they can be rapidly deployed where existing utility infrastructure build-out has been centered on the wrong incentives – for instance expanding long-distance high-powered transmission lines and usages thereof, like those on the Eastside of Long Beach connected to the Silverado Fire in October-November 2020;
- 4) DER can be quickly tailored to meet thornier targets of the state of California's climate and equity goals, such as meeting our electricity generation need without reliance on natural gas-fired peaker facilities, as currently identified by the California climate science and climate justice community as wholly inadequate⁴;
- 5) High-DER scenarios are the only ones of interest to us locally.

Thanking You,

Dave Shukla
6333 E. Eliot St.
Long Beach, CA 90803

on behalf of:

² P. 93 of SB 100 2021 Joint Agency Report,
<https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percentclean-electricity>

³
https://www.valdostadailytimes.com/news/business/collaborating-for-a-clean-energy-future-california-s-first-100-renewable-multi-customer-microgrid-is/article_849ef8fd-cfdf-526c-884e-29396fb1d7dc.html

⁴ Letter: "128 Scientists and Academics Urge Governor Newsom and the California Air Resources Board to Fix Flawed Scoping Plan That Sets Back California's Climate Goal"
<https://caleja.org/2022/06/press-release-128-scientists-and-academics-urge-governor-newsom-carb-to-fix-flawed-scoping-plan/>

Long Beach Alliance for Clean Energy
3636 Atlantic Ave, #333
Long Beach, CA 90807