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**on Microgrid Equity Coalition Comments on Community Energy Resilience Investment Program**

*Additional submitted attachment is included below.*



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## Comments on Proposed New Community Energy Resilience Investment Program August 18, 2022

~~Thank you for the opportunity to provide comments regarding the CEC's proposed new Community Energy Resilience Investment (CERI) program.~~

The Microgrid Equity Coalition (MEC) was formed in 2020 to advocate for funding to accelerate clean energy-based energy resilience for frontline communities. MEC members include the following: California Alliance for Community Energy, California Environmental Justice Alliance, Grid Alternatives, Microgrid Resources Coalition, Reclaim our Power: Utility Justice Campaign, Sierra Club, The Climate Center, and Vote Solar.

MEC members applaud the CEC for initiating the CERI program to obtain Department of Energy formula grants and allocate the funds for energy resilience projects for under-resourced and tribal communities across California. Energy resilience is an urgent need for communities across the state due to the accelerating frequency and severity of climate-related disasters and the large number of communities that lack energy resources that can power essential services during grid outages, or that have only diesel or other fossil-fuel polluting back-up generators.

The main purpose of these brief comments is to inform the CEC of the substantial resources the MEC has developed and submitted to the CPUC regarding best practices for reaching the target communities and supporting them in developing successful energy resilience proposals that best meet their needs and priorities. Over the past two years, the MEC has filed multiple comments with the CPUC regarding the CPUC Microgrid Incentive Program. **Many of the MEC recommendations to the CPUC related to its Microgrid Incentive Program are applicable to the proposed new CERI Program.** For example, the following recommendations to the CPUC were contained in the most recent MEC [August 5, 2022](#) filing with the CPUC:

- Grants need to be provided to disadvantaged vulnerable communities at the beginning of the process to enable communities to submit applications
- Project scoring needs to ensure that projects from communities with limited financial resources are not disadvantaged
- The Commission must proceed forward without delay, so that frontline communities in most need of clean energy-based energy resilience can get these projects on the ground

These recommendations are equally applicable to the proposed new CERI program.

Additional detailed program recommendations are available in prior MEC filings to the CPUC from [January 28, 2022](#) and [January 14, 2022](#) as well as in the MEC Microgrid Incentive Program Workshop summary document from [October 20, 2021](#).

**We particularly recommend that the CEC review the MEC summary principles document, “Proposed Grant Program Criteria and Process: Energy Resilience and Microgrid Development in Disadvantaged and Vulnerable Communities” (50 pages) dated [March 10, 2022](#), which provides a robust summary and documentation of the MEC’s suggestions for grant program criteria and processes for programs like the CERI**

Key to the above recommendations are eligibility criteria that encourage and promote participation by frontline communities. Hence, the CERI program should assure that community-based energy resources, such as solar, storage and microgrid facilities developed by governments and community-based organizations in disadvantaged communities, qualify as “Subgrant Eligible Entities” for supported projects. Excluding these local entities from being subgrantees severely limits—or altogether undermines—the ability of the grant program to meet equity objectives.

As the CERI program is developed further, we look forward to the opportunity to provide additional comments and support equitable program design and implementation in other ways.

Respectfully submitted,

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