

**DOCKETED**

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October 21, 2022

California Public Utilities Commission  
Energy Division  
505 Van Ness Avenue  
San Francisco CA 94102

**Re: Comment on Disadvantaged Communities Advisory Group Future Involvement in the Microgrid Incentive Program (R.19-09-009)**

To the CPUC Energy Division,

The SB 350 Disadvantaged Communities (“DAC”) Advisory Group (“DACAG”) provides the following comment regarding the Microgrid Incentive Program (“MIP”) in the CPUC’s Rulemaking 19-09-009. At our September 2022 meeting, the Joint IOUs presented background on the MIP, requesting that the DACAG provide input on its desired degree of involvement for future implementation of the program. Members of the Microgrid Equity Coalition (the California Environmental Justice Alliance, the Sierra Club, the Climate Center, Vote Solar and the Microgrid Resources Coalition, collectively “MEC”) provided public comment.

We provide the following comments concurring with recommendations from the MEC and request that Commissioner Shiroma and Administrative Law Judge Rizzo include the following recommendations in the implementation of the MIP.

**I. The CPUC Should Issue a Proposed Decision on MIP Implementation As Soon As Possible.**

As a preliminary matter, the DACAG underscores the importance of swift implementation of the MIP. Although the 2022 fire season is well underway, and DAC and other Environmental and Social Justice (ESJ) communities continue to face associated outages and their attendant harms, the MIP has stalled since its inception over a year and a half ago. The Joint IOUs’ proposal to not put any projects in the ground until potentially 2025 misses several opportunities to mitigate significant harms to DAC and other ESJ communities. The DACAG therefore requests that the Commission issue a proposed decision on MIP implementation as soon as possible.

**II. The DACAG Should Review and Provide Actionable Feedback on MIP Applications.**

Consistent with the duties detailed in the Charter of the DACAG,<sup>1</sup> the DACAG’s Equity Framework,<sup>2</sup> and the Goals of the CPUC’s Environmental and Social Justice Action Plan, the

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<sup>1</sup> DACAG Charter, available at [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/disadvantaged-communities/dacag-charter-updated-march-2020.pdf?sc\\_lang=en&hash=9237213411E88653040D370D055DC2C5](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/disadvantaged-communities/dacag-charter-updated-march-2020.pdf?sc_lang=en&hash=9237213411E88653040D370D055DC2C5). (“Increase access to and the benefits from clean energy resources in DACs.”)

<sup>2</sup> DACAG Equity Framework, available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/disadvantaged-communities/dacag-equity->

DACAG recommends that the CPUC incorporate the MEC's recommendations for DACAG oversight over MIP project selection, as detailed in the MEC's public comments at the DACAG September 2022 meeting. This oversight role is critical to ensure that implementation of the MIP adequately centers DAC and other ESJ communities, and overall, for the successful creation of DAC and ESJ community microgrids.

The DACAG proposes that the Joint IOUs engage in two future meetings with the DACAG to review MIP applications, and share a scored list of projects, as outlined below:

**First DACAG Meeting:** (First Joint IOU presentation). Approximately two to four weeks before the IOUs select projects, the IOUs provide a presentation at a DACAG meeting on the MIP's purpose and processes. This presentation should include a description of how projects will be scored and a timeline for when DACAG members will see a list describing projects and their scores. DACAG members can ask questions and share feedback at this meeting.

**Project Scores:** (IOUs share a scored list of projects with the DACAG). Two to four weeks after the First Joint IOU Presentation, the IOUs provide the DACAG with a list of MIP project applications, describing the proposed projects, their beneficiaries, high-level characteristics, and moderately detailed justifications of each score. We agree with the MEC's suggestion that the IOUs present the DACAG with a spreadsheet listing each project and its score, accompanied by a document describing each project and how it was scored, of no more than one page per project.

**Second DACAG meeting:** (Second Joint IOU Presentation). The Joint IOUs present applications proposed for awards at the next DACAG meeting. At this meeting, DACAG members may raise questions and provide feedback on the final project selection. The DACAG will also have the opportunity to raise questions and object to certain awards, if necessary. Project selection must be fair and consistent with MIP goals and include an adequate focus on DACs. If the DACAG identify any inconsistencies or inadequate focus on DACs, the DACAG may request that the IOUs correct those deficiencies and reconsider the ranking of projects. In the event that there is sustained disagreement between the DACAG and IOUs, the DACAG can request that Energy Division and/or the Assigned Commissioner's Office resolve the issue.

### III. Conclusion

The DACAG thanks the Energy Division and Joint IOUs for their time in implementing the MIP, and respectfully requests that the CPUC include the above recommendations for expeditious implementation of the MIP.

Sincerely,

The Disadvantaged Communities Advisory Group

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[framework.pdf?sc\\_lang=en&hash=130F6FD0AEA89095CD0EAC455D0C60EE](#). ("Prioritize health and safety of DACs and ensure the adequate deployment of clean energy resources in DACs.")