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November 10, 2022

The Honorable Siva Gunda, Vice Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on October 28 Workshop on Reliability (21-ESR-01)

Dear Vice Chair Gunda,

The undersigned organizations appreciate the California Energy Commission launching its effort to develop clean energy alternatives for reliability, including the Clean Energy Reliability Investment Plan, as envisioned in Senate Bill 846, with the workshop held on October 28, 2022.

The Commission has generally identified the right qualitative and quantitative attributes in its presentation on the Clean Energy Reliability Investment Plan: Readiness, Permitting, Interconnection, Supply Chain, Customer Acceptance, Cleanliness, Dispatchability, Policy Alignment and Equity. In addition to these criteria, the undersigned organizations suggest that the Commission consider the direct cost reductions (if any) realized by customers from deployment of the resources funded by the CEC. Particularly in this time of high inflation and rising rates, cost-effective resources that provide direct bill relief for customers should be prioritized. We have provided a table as an appendix that summarizes community solar-plus-storage's strength across these attributes and look forward to providing more detailed responses to the recently released Request for Information.

A robust community solar-plus-storage program can cost-effectively deliver clean energy during the hours when the grid is dirtiest and the state faces the most significant risk of blackouts while providing access to clean energy and direct bill savings. This coalition is working to advance a community solar-plus-storage program at the California Public Utilities Commission (CPUC), in consolidated docket A.22-05-022, which would compensate community solar plus storage facilities for the avoided costs value of their generation as bill credits to subscribing customers. These values should be based on the Commission's tool for evaluating the benefits (avoided costs) of distributed energy resources: the Avoided Cost Calculator (ACC).

Utilizing the ACC will ensure project compensation is based on the value of the time and location of the generation, with the highest value being during summer evenings as the sun goes down and natural gas facilities ramp up to serve load. These times are precisely when the California grid is most constrained. Funding through the program in development at the CEC can leverage this new program being considered at the CPUC to enhance project benefits for reliability, equity and affordability.

Because community solar-plus-storage projects are relatively small, projects can be deployed quickly in time to meet 2024 and 2025 reliability goals and offset the need for the continued use of once-through-cooling plants. Community solar programs operate nationally in 22 states and the District of Columbia with over 4.4 GW of installed capacity so developers focused on this space have the expertise and experience necessary to bring projects online quickly.

Community solar+storage projects follow a faster distribution-level interconnection process and by deploying numerous, distribution-scale projects, the state will minimize the risk of a reliability shortfall if any single project fails to come online by the target date.

Finally, community solar-plus-storage presents a unique opportunity to maximize the use of brownfield development, landfill development, marginal and fallowed agricultural land, and industrial rooftops, thereby minimizing the land-use impacts of utility scale projects while advancing renewable development.

Beyond the contributions to reliability, community solar-plus-storage provides a unique opportunity to bring direct bill relief to Californians who subscribe, and ensure access to those historically left out of the clean energy transition including low-income communities and renters. To date, deployment of clean energy resources has primarily occurred through utility-scale solar farms and behind the meter solar. These pathways to decarbonization are important, but they are not sufficient because they leave millions of Californians without access to the economic, health, and resilience benefits of local clean and distributed generation. Not everyone owns their home or can install solar on their roof, so many Californians are effectively unable to participate in the state's primary mechanism for energy consumers to take action. Utility-scale projects often require transmission upgrades that have been subject to delays that are slowing the pace of development. To accelerate deployment in clean energy while addressing inequities, California needs to create a robust community solar plus storage program. Presently, over 13 gigawatts of rooftop solar have been installed in California. In contrast, all other voluntary programs seeking to expand access to renewable energy in vulnerable communities amount to less than 600 MW of program deployment. Not having a viable program has resulted in millions of Californians being locked out of the benefits of distributed energy resources even though they financially contribute to these programs in their rates. More can be done to ensure future programs result in more equitable outcomes.

Community solar-plus-storage can also increase energy equity by allowing renters, vulnerable households, and others who have been shut out of the benefits from deploying clean, distributed energy resources to access. Funding support from the Clean Energy Reliability Investment Plan will ensure projects are built in harder-to-develop areas of the state which will provide jobs while also supporting local and system-wide reliability. Any investment from the state will also support AB 2316 (Ward) which requires that at least 51% of a community renewable energy project's capacity serve low-income households, by doing the following:

- Support the participation of low-income households and low-income service organizations in new community renewable energy projects
- Direct financial benefits by providing meaningful bill savings to low-income participants.
- Support projects that demonstrate community engagement by coordinating with community-based organizations to educate and recruit participants.
- Through enhanced incentives, prioritize projects that include households living in disadvantaged communities, are located close to the low-income participants, and/or enable community ownership.

We must ensure that the state's most vulnerable households and communities gain access to the benefits of renewable energy, including much-needed utility bill savings and cleaner and healthier air to breathe. Including community solar plus storage in programs incentivizing the deployment of clean energy resources would help ensure that frontline communities are included, and in fact prioritized, in the clean energy transition.

Sincerely,

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Coalition for Community Solar Access

Amee Raval
Asian Pacific Environmental Network

Alexis Sutterman
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Merrian Borgeson
Natural Resources Defense Council

Stephanie Doyle
Vote Solar

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The Utility Reform Network

Appendix: Community Solar + Storage Excels in All of the Commission's Attributes

Attribute	**Community Solar + Storage ability**
Readiness	Community solar+storage has been deployed commercially at scale in multiple states around the country
Permitting	community solar+storage projects are smaller, and therefore simpler to deploy than utility scale projects due to faster permitting. In some cases projects can be permitted using the local government's building permitting process. Since many smaller community solar projects would be developed, the Clean Energy Reliability Investment Plan is not dependent on the

	speed of any one project or jurisdiction
Interconnection	community solar+storage projects can proceed through the distribution interconnection study process, completing studies in as soon as 2 months in the Fast Track process and 5 months in an independent study process. This process is much faster than the typical 20 month CAISO Queue Clusters interconnection process timeline
Supply Chain	Community solar+storage projects have not faced the delays in equipment that larger scale projects have
Customer Acceptance	Community solar+storage is a proven customer product that can be adopted by anyone who is a utility customer, regardless of their home or financial situation
Cleanliness	Community Solar+storage creates no emissions and can help reduce the dispatch of high emitting peaker resources in all times of the year, beyond reliability events
Dispatchability	The tariff developed in A.22-05-022 can focus compensation on the hours of highest need to provide system load reductions that meet peak events
Policy Alignment	Pursuant to AB2316, the CPUC is considering development of a new community solar+storage program in A.22-05-022 . Pursuant to the Inflation Reduction Act of 2022,there is federal funding for projects that serve disadvantaged communities.
Equity	All community solar+storage projects must serve at least 51% low income customers pursuant to AB2316. As stated above, the Coalition encourages the Commission to find ways to leverage the funding from its Clean Energy Reliability Investment Plan to enhance benefits to Underserved Communities
[Proposed attribute] Bill Relief	Community Solar + Storage provides bill credits to customers at a net savings to them. Federal and state incentives can be leveraged to deploy these projects and

	provide enhanced savings to customers.