

DOCKETED

Docket Number:	21-ESR-01
Project Title:	Energy System Reliability
TN #:	248647
Document Title:	AB 2316 coalition Energy Reliability Workshop comments on CERIP funding
Description:	Comments by Coalition for Community Solar Access, Asian Pacific Environmental Network, California Environmental Justice Alliance, Natural Resources Defense Council and Vote Solar
Filer:	System
Organization:	Coalition for Com. Solar Access, Asian Pacific Environmental Network, Calif. Environmental Justice Alliance, NRDC & Vote Solar
Submitter Role:	Public
Submission Date:	2/2/2023 3:04:58 PM
Docketed Date:	2/2/2023

Comment Received From: Tyler Tratten
Submitted On: 2/2/2023
Docket Number: 21-ESR-01

**AB 2316 coalition Energy Reliability Workshop comments on
CERIP funding**

Additional submitted attachment is included below.

February 2, 2023

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 (CEC) continuing its effort to develop clean energy alternatives for reliability, including the Clean Energy Reliability Investment Plan (CERIP), as envisioned in Senate Bill 846, with the workshop held on January 10, 2023. We also appreciate the recommended budget allocation to address barriers such as permitting, siting, and interconnection, in addition to recognizing that community-scale renewables should be considered under CERIP. The coalition recognizes that the state is facing shortfalls in 2023-2024 and thanks the Governor and the CEC for keeping the commitment to the \$1B proposed CERIP funding.

We encourage the CEC to continue evaluating stakeholder proposals in response to the Request for Information during the workshop hosted on October 28, 2022. While we understand the rationale to expand the scope beyond what was originally considered under SB 846 to encompass planning and long lead-time resources, it is imperative that the state invests in near-term solutions that will maintain reliability while also advancing our renewable energy and equity goals.

As stated in the written comments submitted by the coalition on November 10, 2022, we believe community solar+storage addresses several goals the state and CEC have identified.

- **Reliability** - Projects will be co-located with storage to ensure dispatchability during the peak hours during summer months when the grid is most strained and reliance on fossil-fuels is high.
- **Equity and Access** - Subscribers to projects will receive guaranteed savings at a time when the energy burden is highest for low-income and disadvantaged communities. Program funding should promote projects that build community wealth and economic development in communities that have been unable to benefit from distributed energy resources, while faced with historical burdens.
- **Job growth** - AB 2316 requires all projects use prevailing wage and coupled with incentives at the federal level, community solar+storage supports high quality job growth that pays livable wages.
- **Land use** - [Executive Order N-82-20](#) and [AB 2278](#) (Kalra, 2022) established and enshrined in statute the goal of preserving 30% of state lands and waters by 2030. Community solar+storage in unique insofar as it can maximize landfill and brownfield development, in addition to fallowed agricultural land and industrial rooftops.

- **Speed and scale of renewable energy development** - Community solar+storage has proven effective in markets across the country and states such as New York have managed to install nearly 1 GW in a short period of time. California has enough infrastructure and an established interconnection process, should outpace other markets and bring projects online within a year of the community renewable energy program establishment.

The Inflation Reduction Act (IRA) offers a unique opportunity for the State of California to maximize the availability of federal funding to scale community solar quickly. Community solar and storage is uniquely suited to take advantage of the up to a potential 70% Investment Tax Credit (ITC) for qualified projects because they will utilize key provisions such as the use of prevailing wage, serving low and moderate income subscribers, and projects developed in Energy Communities. We encourage the CEC to prioritize funding that achieves 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.

For all of these reasons, the coalition strongly encourages the CEC to recommend community solar+storage as a priority investment to the joint legislative budget committees.

Sincerely,

Derek Chernow
Coalition for Community Solar Access

Amee Raval
Asian Pacific Environmental Network

Alexis Sutterman
California Environmental Justice Alliance

Lauren Kubiak
Natural Resources Defense Council

Stephanie Doyle
Vote Solar

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

	<p>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.</p>
<p>Equity</p>	<p>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</p>
<p>[Proposed attribute] Bill Relief</p>	<p>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.</p>