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CCSA Comments on Draft Clean Energy Reliability Investment Plan (CERIP) in docket 21-ESR-01

Additional submitted attachment is included below.

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February 16, 2023

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

Re: <u>Comments on Draft Clean Energy Reliability Investment Plan (CERIP) submitted February 8, 2023 in docket 21-ESR-01</u>

The Coalition for Community Solar Access (CCSA) appreciates the California Energy Commission's (CEC) and staff engagement developing the Clean Energy Reliability Investment Plan (CERIP) pursuant to Senate Bill 846 (Dodd 2022). We continue to believe the CERIP can and should include community solar+storage as part of the resources it funds in 2024 and 2025. These are resources that can be developed in a short period of time to address near-term system reliability needs and through state funding, provide meaningful incentives to low-income and communities of concern.

I. Community Solar+Storage: Current Status of Market Development and Potential

California has pursued community solar in various forms over the past decade with minimal success. At the same time, gigawatts of community solar and community solar+storage has been deployed around the country. In 2022, AB 2316 (Ward) was signed into law. The law directs the PUC to review existing community solar programs and consider establishing a new program. The PUC has begun this process, on an expedited schedule, in A. 22-05-022 et al with the goal of having a

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proposed decision issued this summer. CCSA has, with the support of a diverse set of parties, proposed the Net Value Billing Tariff which would compensate resources for the value of the generation based on CAISO and CPUC-Avoided-Cost-Calculator values. The tariff is a way to bring bill savings to Californians while ensuring that compensation for DERs is based on the grid value of those resources and that those resources are operating in a way that is responsive to grid needs.

CCSA outlined the capabilities and cost of community solar+storage resources in depth in its November 30th 2022 response to the Commission's Request for Information in docket 21-ESR-01. As the RFI response discusses in depth, CCSA believes over 1 gigawatt of new resources could be deployed in the first two years of the market to meet reliability needs.

II. Community Solar+ Storage as a reliability asset that meets other state and energy commission goals simultaneously

As stated in the written comments in the CERIP proceeding submitted by CCSA and members of the coalition that supported AB2316 on November 10, 2022, we believe community solar+storage addresses several goals the state and CEC have identified for these reliability programs as well as achieving other broader goals:

- **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.

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- **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.

Thank you for your consideration of these comments

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