

DOCKETED	
Docket Number:	21-ESR-01
Project Title:	Energy System Reliability
TN #:	248819
Document Title:	California Solar & Storage Association Comments - Comments on Draft CERIP
Description:	N/A
Filer:	System
Organization:	California Solar & Storage Association
Submitter Role:	Public
Submission Date:	2/16/2023 4:35:46 PM
Docketed Date:	2/16/2023

*Comment Received From: California Solar & Storage Association
Submitted On: 2/16/2023
Docket Number: 21-ESR-01*

Comments on Draft CERIP

Additional submitted attachment is included below.



February 16, 2023

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Comments on Draft Clean Energy Reliability Investment Plan, Docket No. 21-ESR-01

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide input on the California Energy Commission (CEC) Draft Clean Energy Reliability Investment Plan (CERIP), prepared pursuant to Senate Bill 846 (Dodd 2022).

The CEC's proposed CERIP funding initiatives were presented at a workshop on January 20, 2023. The draft plan is largely consistent with the proposals at the workshop. CALSSA's comments on the workshop, submitted on February 2, remain relevant to the draft CERIP. We offer some additional brief comments here.

CALSSA agrees with the CEC that greater and faster expansion of demand-side resources is needed, and attention and financial support would assist in accelerating this expansion. The direct benefits to customers include more than reductions in utility bills, and also extend to resiliency, reduced air pollution, and other non-economic benefits.

We support the proposal to prioritize scaling demand-side clean energy resources and to focus policy attention on developing virtual power plants (VPPs). VPPs are a key pathway to integrate customer-sited resources into California's electricity system, maximizing the potential of these resources to provide reliability and other grid services.

We also support the draft plan's proposal to support existing programs in the Strategic Reliability Reserve, including the Distributed Electricity Backup Assets (DEBA) and Demand Side Grid Support (DSGS) programs, as well as developing new programs to increase demand flexibility and address net peak needs. The draft plan states that the first-year funding allocation for extreme event support (see Table 3), proposed at \$33 million, would fund resources to be deployed and available by June 2024. Adding funding to DSGS and DEBA would supplement the budgets for these two emergency reliability programs, and could increase their ability to provide incentives to resources that can install and interconnect quickly to meet this timeline goal, such as behind-the-meter resources. We also agree that additional funding for these programs in 2024-25 and 2025-26 is a wise use of CERIP funding. We urge the CEC to consider increasing the proportion of the CERIP funding allocated to DEBA and DSGS, to leverage the agency resources already invested, and to be invested, in the development of those programs.

CALSSA also supports the CEC's proposed focus on scaling the deployment of demand-side resources in CERIP years 2 and 3. We recommend that the final CERIP more clearly state that end customers to whom incentives would be provided will include all commercial customers (including small and medium commercial) and residential customers. The listed demand-side initiatives should also explicitly include aggregations of resources through virtual power plant models. VPPs are an efficient way to include residential customers, and thereby draw on the considerable energy capacity from BTM resources at residential sites.

The CERIP offers considerable potential for increasing the state's grid reliability resources and our ability to meet future extreme events with a robust clean energy portfolio. It is important that reliability challenges do not lead the state to retreat from the necessary transition to clean energy. While the draft CERIP is a solid beginning, significant work remains to develop specific funding priorities. CALSSA looks forward to providing input as the CEC continues to develop the CERIP.

Sincerely,

/s/ Kate Unger
Kate Unger
Senior Policy Advisor
California Solar & Storage Association