

DOCKETED	
Docket Number:	21-ESR-01
Project Title:	Energy System Reliability
TN #:	248831
Document Title:	Joint comments on the Clean Energy Resilience Investment Plan
Description:	N/A
Filer:	System
Organization:	Joint/Tyler Tratten
Submitter Role:	Public
Submission Date:	2/16/2023 5:18:49 PM
Docketed Date:	2/16/2023

*Comment Received From: Tyler Tratten
Submitted On: 2/16/2023
Docket Number: 21-ESR-01*

Joint comments on the Clean Energy Resilience Investment Plan

Submitted on behalf of:
Asian Pacific Environmental Network
California Environmental Justice Alliance
Natural Resources Defense Council
Vote Solar
GRID Alternatives
Central Coast Alliance for a United Economy

Additional submitted attachment is included below.



Clean Energy Reliability Investment Plan

February 16, 2023

Re: Equity advocates urge inclusion of community solar and storage within CERIP

California Energy Commissioners and Staff,

Thank you for the opportunity to submit comments concerning the Clean Energy Reliability Investment Plan (CERIP).

The undersigned organizations urge the inclusion of funding through CERIP for community solar+storage projects and equity program administration to ensure that California's implementation of AB 2316 through A.22-05-022 meaningfully expands community solar for Californians while maximizing equity benefits. Community solar+storage is a critical pathway to expanding solar access in California, especially for low-income customers and housing providers who cannot access existing programs. Community solar+storage is also one of the fastest options California has available to meet "California's... needs for near and mid-term reliability," as SB 846 requires for consideration in the CERIP.

Our organizations have reviewed current proposals within A.22-05-022 and have determined that state investment is essential to ensure the implementation of AB 2316 centers equity and brings meaningful benefits to frontline communities. We support a strong base tariff that enables broad community solar access in California, such as the Net Value Billing Tariff proposed by CCSA¹, which aligns with the requirements of AB 2316 to establish a community renewable energy program that does not impact ratepayers who do not participate in the program. However, in our assessments, state resources will be an essential pairing to the base tariff in order to enable deep and meaningful benefits for low-income and disadvantaged Californians

¹ Please see CCSA's testimony January 20, 2023 CPUC testimony at <https://drive.google.com/drive/folders/1O6ft5TnLfnBgyIHxAYyp3VESJ2v7zJDZ>

through community solar access. This is especially important as there are likely acute financial barriers² to the deployment of projects in the State's most disadvantaged communities.³

CERIP resources can help ensure equitable implementation of AB 2316 by supporting projects that maximize benefits for frontline communities. For one, resources could support greater financial savings for participating low-income households who face the highest levels of energy burden. Resources could also support projects located in or near low-income and disadvantaged communities, which would increase local reliability and diminish the need for polluting gas. In addition, resources could support projects that demonstrate clear pathways for leadership and ownership by communities in addition to workforce development opportunities. Altogether, state resources would support projects that maximize economic, health, and resilience benefits for communities historically left out of the clean energy transition. By resourcing the AB 2316 program in this way, California will also be better positioned to apply for competitive federal funds.

Equitable implementation of community solar in California also requires a program administrator to ensure that benefits are prioritized for low-income customers and vulnerable communities. An equity-focused community solar PA could coordinate available state or federal funding through the Inflation Reduction Act and prioritize low-income customer benefits, maximize bill savings, support participation by community-based organizations, provide technical assistance and implement other policy preferences which maximize equity outcomes, such as community-based projects, minority contracting and ownership opportunities. This equity-focused community solar PA would also coordinate and align with existing multifamily solar programs so that there would be continuity between existing low-income income and disadvantaged community focused programs to maximize existing program efficiency and impact. This strategy will ensure a coherent and cohesive approach to expanding solar access in California.

CERIP investment is essential to ensure that community solar is implemented equitably in California and to provide limited seed funding for a program administrator role which will responsibly manage state and federal funds.

At least \$400M of state funding should be dedicated to at least 400 MW community solar + storage resources for 2024 and 2025 combined, whereby a program administrator can ensure at least 51,000 low-income customers and vulnerable households benefit from the multiple equity goals outlined above. This funding amount could lead to community solar + storage resources serving at least 100,000 total households.

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.

² Please see the CEC's SB 350 Low-Income Barriers Study at: <https://www.energy.ca.gov/rules-and-regulations/energy-suppliers-reporting/clean-energy-and-pollution-reduction-act-sb-350>

³ Disadvantaged communities represent the 25% highest scoring census tracts in CalEnviroScreen 4.0. Please see the CalEnviroScreen 4.0. Mapping Tool at <https://oehha.ca.gov/calenviroscreen/sb535>

- **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.

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

Sincerely,

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