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SCPPA Comments on CERI Program Development

Additional submitted attachment is included below.



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September 29, 2023 | [Submitted electronically](#)

California Energy Commission
Docket No. 22-ERDD-01
715 P Street
Sacramento, CA 95814-5512

RE: Community Energy Resilience Investment Program Comments

The Southern California Public Power Authority¹ (“SCPPA”) is pleased to provide feedback on the Community Energy Resilience Investment Program workshop held on September 12, 2023.² With few funding sources directly supporting grid infrastructure, SCPPA is encouraged and grateful for the upcoming grant solicitation focused on resilience of the electrical grid against disruptive events.

SCPPA appreciates the opportunity to work with CEC staff on this program and, in response to CEC questions presented at the workshop, SCPPA provides the following responses:

Question: Should the proposed minimums and maximums be increased, decreased, or remain the same? (Large LSEs: \$15 million minimum, \$25 million maximum, 109% match requirement. Small LSEs: \$4 million minimum, \$9.5 million maximum, 33% match requirement.)

The minimum and maximum award amounts should prioritize parity of impact to small and large LSEs. The ranges of available dollar amounts seem appropriate for achieving that parity. SCPPA understands and agrees with CEC staff’s prioritization of getting funds out quickly and minimizing administrative burden. However, SCPPA also notes that the small and large LSEs are competing for a similar number of awards, although there are five large LSEs in the state and dozens of small LSEs.

Question: Proposed scoring formula includes outage risk, high-heat risk, and wildfire risk to determine resiliency impact. Do you agree or disagree with this approach?

With regard to outage risks, SCPPA asks the CEC to consider the implications of the data available on historic outages. There are instances where outages are intentional, to safely perform maintenance and scheduled upgrades to electrical infrastructure. Additionally, we request that outage maps not disincentivize the utilities who have proactively maintained and upgraded their systems to avoid outages, as they could potentially receive grant funds to continue this important proactive work that prevents outages in their service territories. Factors other

¹ SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly owned electric utility (POU) governed by a board of local officials. Our Members collectively serve nearly five million people throughout Southern California. Together they deliver electricity to over two million customers throughout Southern California, spanning an area of 7,000 square miles.

² <https://www.energy.ca.gov/event/workshop/2023-09/staff-workshop-community-energy-resilience-investment-ceri-program>

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than past outages, such as equipment age, the amount of load on a circuit, or forecasted load growth, play a key role in maintaining reliability. SCPPA asks the CEC to accept narrative explanation of outage risk/avoidance associated with the proposed grant project, in place of or as supplement to the Eagle-I data the CEC may be reviewing.

With regard to wildfire risk, SCPPA recommends consulting the Fire and Resource Assessment Program (FRAP) map from CalFire to determine wildfire risk.³ The CPUC's High Fire-Threat District (HFTD) map would not be the most comprehensive map to us, as it considers only utility-associated wildfires. CalFire's resources account for wildfire risk more generally and are a more appropriate metric because all fires in a utility's territory are a threat to grid resiliency.

SCPPA supports the CEC enhancing scores of proposed projects taking place in disadvantaged communities (DACs), as identified in California Environmental Protection Agency's CalEnviroScreen map. Applicants should be encouraged to provide confirmation of being in or providing direct benefits to DACs.

Question: Will technical assistance be needed in the application phase to ensure equitable participation and project success? If so, what type of assistance?

SCPPA Members may seek technical assistance to complete their applications. Many SCPPA Members are staff constrained, and unable to justify spending their time on grant applications considering the risk of not being awarded the grant funds if not selected. In providing technical assistance, SCPPA encourages CEC to pilot and test their methods of providing direct services to applicants, as it provides an opportunity to identify valuable lessons learned for future offerings.

As a joint powers authority, SCPPA provides its Members with a master services agreement with a consulting group that has established the administrative framework for expediting the execution of a grant writing services agreement with SCPPA Members, should they take advantage of it. Of course, any process CEC could establish to allow for a "heads up" ahead of formal announcements would be greatly appreciated and would expedite the response time by SCPPA Members. A SCPPA Member that has not previously engaged in grant writing services but does have access to SCPPA's existing resources can take longer to go through the budget approval process to create a task order to fund the work.

SCPPA is grateful that the CEC is considering the capacity of all stakeholders to navigate the challenges of seeking state grants. SCPPA encourages CEC to apply these considerations throughout the grant award process and streamline wherever possible throughout the project reporting process as well.

Question: What program criteria should be required to ensure meaningful community engagement?

³ <https://34c031f8-c9fd-4018-8c5a-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/what-we-do/fire-resource-assessment-program---frap/pdf-maps/california-fire-threat-2019.pdf?rev=39cd6afe6b424a78b86a1321417f7c45&hash=E418EFB64B8D55A9608B6A25B6F732D1>

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SCPPA recommends that the CEC give preference to projects that offset the use of public funds. Giving priority to projects that otherwise would need to be paid for with public funds will help to ensure that project funds provide maximum benefits to the community. Applicants should be encouraged to show direct and indirect benefits to the community through their projects. For example, the applicant should be asked to show the community need for the project that would be funded by the grant. Additionally, the applicant could explain indirect benefits from having received the grant funds to complete that project with state assistance, and if they'll have public funds available now to provide other community benefits.

In addition to the responses to CEC staffs' questions above, SCPPA also provides the following comments and recommendation for the CEC to consider:

The CERI Program was described as having at least two solicitations through the life of the CERI Program. SCPPA asks the CEC to limit changes between solicitations. Many small and medium-sized utilities do not have internal grant writers and often do not have the staffing resources to respond quickly to solicitations. Depending on the length and complexity of the application requirements, applications can take a minimum of 90-120 days from announcement to submittal date. POU's must be able to justify spending public dollars on the application effort, for example, when they have a higher chance of being awarded grant funds. Limiting changes between solicitations could allow applicants an opportunity to minimally update and resubmit their applications, reducing the administrative cost and burden.

SCPPA encourages CEC to allow applicants to propose multiple types of projects, activities, and sites within a single application and provide flexibility for LSEs to tailor grant-funded activities to new forecasts and situations that arise during implementation. Work accomplished through the CERI Program as well as the POU's and state's other investments in outage prevention provides a valuable opportunity to not only identify where outages are occurring, but to also develop a deeper technical understanding and ability to forecast future outage risk.

Thank you for the opportunity to provide comments on the Community Resilience Investment (CERI) Program.

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