

**DOCKETED**

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*Comment Received From: Valley Clean Energy  
Submitted On: 9/29/2023  
Docket Number: 22-ERDD-01*

**Valley Clean Energy Comments - 22-ERDD-01**

*Additional submitted attachment is included below.*



Board of Directors

**September 29, 2023**

Will Arnold  
*Davis City Council*

California Energy Commission  
Submitted Electronically

Albert Vallecillo  
*Winters City Council*

**Re: Community Energy Resilience Investment Program**

Lucas Frerichs  
*Yolo County Board of Supervisors*

California Energy Commission Staff,

Jesse Loren  
*Winters City Council*

Valley Clean Energy (VCE), is the not-for-profit public electricity provider serving over 120,000 customers in unincorporated Yolo County and the cities of Woodland, Davis, and Winters. As a locally governed public entity we are focused on providing cost effective, reliable clean electricity while improving the communities we serve through local reinvestment of our revenues.

Tom Stallard  
*Chair  
Woodland City Council*

Bapu Vaitla  
*Davis City Council*

VCE is encouraged that the CEC has established the Community Energy Resiliency Investment (CERI) program and we support the objectives as outlined in the September 12<sup>th</sup> CERI Workshop presentation (Slide 8):

Mayra Vega  
*Woodland City Council*

CERI will prioritize projects that:

- Generate the greatest community benefit
- Reduce magnitude, frequency, duration, and consequences of outages
- Improve capacity to mitigate impact of outages
- Enhance ability of community to function during an outage

While we support the program objectives, VCE is concerned that the list of eligible entities on slide 13 of the Workshop presentation does not include Community Choice Aggregation agencies (CCAs). We request that CCA's be included in the list because arguably CCA's, with their formation by the very communities targeted for these investments, are often in the best position to identify and lead efforts outlined as the priorities for this program. For example, VCE is currently engaged in the planning and design of a multi-community microgrid that will serve critical resilience facilities (e.g. rural fire stations, medical clinic), along one of the least reliable circuits in PG&E's service territory. Funding through a program like CERI would help support this effort and compliment the long-term PPA VCE has signed for the 13MW solar + 13 MW 5hr battery energy storage system that will serve as the grid-forming resource for the microgrid. Furthermore, as local public entities, CCA's not only have deep connections and insight into the energy related issues faced by their customers and communities, they have greater direct accountability to them as well.

We believe that the CERI program will receive a greater diversity of strong proposals that are more connected to the communities and priorities this program is designed to achieve if CCA's are included as eligible entities. Thank you for considering our comments and we look forward to continuing to work with the CEC to achieve better energy resiliency outcomes for California's communities.

Sincerely,

Mitch Sears  
Executive Officer  
Valley Clean Energy