

DOCKETED

Docket Number:	19-IEPR-01
Project Title:	General/Scope
TN #:	230878
Document Title:	Chuck Rosselle Comments - Microgrids Are Essential to Climate Change Response
Description:	N/A
Filer:	System
Organization:	Chuck Rosselle
Submitter Role:	Public
Submission Date:	11/27/2019 10:46:03 AM
Docketed Date:	11/27/2019

Comment Received From: Chuck Rosselle
Submitted On: 11/27/2019
Docket Number: 19-IEPR-01

Microgrids Are Essential to Climate Change Response

Additional submitted attachment is included below.

Public Response to 19-IEPR-01

Chuck Rosselle
2092 Leimert Blvd
Oakland, CA 94602
crosselle@gmail.com
510-206-4412

There has been much discussion in California regarding the role of microgrids in California's energy future. Most believe that microgrids are an expensive, evolving technology that might have a place one day in a not yet certain distributed power environment. The state's Investor Owned Utilities (IOU's), the historical drivers of California's electric power infrastructure, have a business incentive to slow walk the implementation of microgrids. IOU's understand that their vertically integrated business model is challenged as power generation moves to local Community Choice organizations. Microgrids will impact their remaining power delivery business by reducing the need for Transmission, the most profitable aspect of their future portfolio. As a result they have slowed microgrid development.

California can no longer afford the luxury of a leisurely transition to a mature and robust microgrid architecture. The current climate crisis has fully energized the state to the need for solutions that don't involve the severe economic dislocation created by Public Safety Power Shutoffs. Indeed, many California businesses are even re-evaluating whether they should locate elsewhere given the power uncertainties. California cannot be viewed as having a third world power infrastructure if it intends to retain its status as one of the world's leading economies. The realities of changing climate highlight the reality that the state, as a result of its unique geography and climate environment, is not well suited to remotely generated power delivered to coastal population centers over long transmission networks that traverse regions of the state susceptible to damage and fire.

Fortunately, Distributed Energy Resources (DER) provide the means to reduce the dependence upon such a network. While some believe this to be a distant future, current reality belies that view. Over 1,000,000 households in California currently receive all or most of their electricity from rooftop solar. That is potentially 10% of the state's population. As noted above, local public Community Choice Energy suppliers currently exist in over 19 locations across the state serving an additional 20% of the state's population. Direct Access, which affords businesses the opportunity to reduce costs by having control over their own corporate microgrids is growing quickly within the state. The last auction was significantly over-subscribed. In short, the framework for a publicly owned, locally directed DER infrastructure is already well-underway. Unfortunately, it is not well planned and coordinated.

The CEC, as part of this Proceeding should take the lead in promoting the rapid and efficient transition to an effective distributed energy environment. I strongly urge you to take the following steps:

- a. Immediately direct the deployment of state funding, potentially under the existing SGIP program to local communities to provide education and seed money for the creation of local community microgrids that support essential power for safety services in isolated communities. This is a high priority effort that should be completed within three years.
- b. Support the replacement of vulnerable wiring by deploying insulated and strengthened wiring in aged Transmission and Distribution Networks. Support on-going research and deployment of

protective relays that rapidly de-energize failed power lines in order to ensure they do not spark and cause fires. Such equipment is currently under testing and deployment by SDG&E. Support standards of best practice for SCADA equipment used by the state's utilities in order to ensure uniform quality in managing the state's Transmission and Distribution Network.

- c. Support the development of rules that create public control of Distribution Networks by local communities. Working with their local Community Choice partners, these communities are best placed to make the decisions necessary for the effective deployment of Community Microgrids. They can also support the development local Community Solar in order to more widely spread the benefits of local solar, especially for low income and disadvantaged communities.
- d. Support an overhaul of the rules governing the power delivery tariff structure (e.g. Transmission Access Charges). Working with CAISO, develop an overall plan to re-structure the grid by reducing the dependence upon remotely generated power and replacing it with locally generated power. Such a network would reduce transmission requirements to the minimum necessary to support emergency back-up services. Access charges would be reduced and/or eliminated in order to provide an economic incentive for local generation.