

DOCKETED

Docket Number:	19-IEPR-01
Project Title:	General/Scope
TN #:	230897
Document Title:	Kurt Johnson Comments - Comment of the Climate Center on the Draft IEPR Report
Description:	N/A
Filer:	System
Organization:	Kurt Johnson
Submitter Role:	Public
Submission Date:	11/27/2019 2:44:48 PM
Docketed Date:	12/2/2019

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

Comment of the Climate Center on the Draft IEPR Report

The Climate Center lauds the work the CEC has done on the draft IEPR Report and is writing to underscore the importance of a recommendation on page 134 of the draft report, as follows:

"Identify resources needed to support enhanced technology and knowledge transfer between local jurisdictions and utilities to reduce emissions and enhance resilience. As noted in the August 8, 2019, IEPR workshop on Climate Adaptation in California's Energy Sector, local jurisdictions face several challenges in planning for energy sector resilience. The California Energy Commission, in partnership with the Integrated Climate Adaptation and Resilience Program, should work to develop guidance and resources to support successful engagement of local government and utility stakeholders in energy sector resilience planning. Guidance and resources should align with state priorities and goals, identify replicable examples, and leverage lessons learned from prior launches of innovative technologies."

The Climate Center strongly agrees with this recommendation. California's pathway to sustainable and resilient energy must involve local government energy initiatives that address local priorities while supporting the safe and reliable operation of the state's electric power system. Following up on similar comments filed by the Climate Center on August 22nd and on the recommendation in the draft report as noted above, the Center urges the CEC to create an "Energy Resilience Planning Handbook for Local Governments." Such a handbook would compile guidelines, best practices, templates and technical information covering both the process of participatory local resilience planning and the technical aspects of designing critical-facility microgrids and other DER-based resilience projects. The Center believes this handbook would be a valuable resource for local governments, and that the CEC, in collaboration with ICARP staff, is well suited to create it.

Currently there is a disconnect between local government planning and electricity system planning. Cities and counties develop general plans and climate action/adaptation plans, typically with little consideration of the electricity grid and no involvement with the electric utility (unless they are municipal electric utilities). Investor-owned utility distribution planning and integrated resource planning do not currently engage with local governments. If they proceed in isolation from an understanding of local grid capabilities and constraints, customer solar and electric vehicle adoption can drive grid operating challenges and potentially costly infrastructure upgrades. But technologies such as dynamic load management, dispatchable microgrids and "vehicle-to-everything" (V2X) capabilities can be designed and implemented to operate within local grid constraints and even provide real-time services to support grid operation.

The proposed "Energy Resilience Planning Handbook for Local Governments" would build upon existing state initiatives and publications (e.g., related to climate change adaptation, electric vehicle charging infrastructure, microgrids, etc.). It could include practical design templates and technical guidance for critical-facility microgrids as well as participatory planning

approaches to identify local needs and priorities, thus providing a clearinghouse for best practices in local government energy planning. The handbook should also include case studies (e.g., including CEC-supported microgrid and community energy projects) that address technical aspects as well as financing models and financial incentives for property owners who can provide large rooftops, parking lots and brownfield areas to generate, store and/or shift energy supplies and uses.