

DOCKETED

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Comments of the Center for Sustainable Energy regarding the Draft Scoping Order for the 2020 IEPR Update

Additional submitted attachment is included below.

January 31, 2020

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 20-IEPR-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 20-IEPR-01– Comments of Center for Sustainable Energy® regarding the Draft Scoping Order for the 2020 Integrated Energy Policy Report Update

I. INTRODUCTION

The Center for Sustainable Energy® (CSE) appreciates the opportunity to comment on the Draft Scoping Order for the 2020 Integrated Energy Policy Report Update (2020 IEPR Update). CSE is a 23-year-old national nonprofit driven by one simple mission – decarbonize. We provide program administration, technical assistance, and policy advisement, and serve as a trusted and objective resource helping government agencies implement successful sustainable energy programs. Our vision is a future with sustainable, equitable, and resilient transportation, buildings, and communities, and, as such, we support holistic and long-term planning with an integrated approach.

CSE commends the California Energy Commission’s (Energy Commission) leadership in developing and updating the Integrated Energy Policy Report, which provides essential information for policymakers and stakeholders on the current and forecasted state of the energy sector. Regularly updated reports allow for more efficient planning of clean energy strategies, and the comprehensive scope of the IEPR provides greater opportunity to integrate these strategies and measure progress toward state climate goals. CSE supports the three key topics proposed for the 2020 IEPR Update and is pleased to offer the following comments on the Draft Scoping Order.

II. TRANSPORTATION

California’s transportation sector comprises the largest single source of greenhouse gas (GHG) emissions in the State. CSE commends the Energy Commission’s leadership in developing a diverse array of policies and programs to reduce emissions from this sector and facilitate California’s decarbonization goals. CSE supports the continued investments in the Clean Transportation Program. In addition to providing funding for the California Electric Vehicle Infrastructure Project (CALeVIP), which is implemented by CSE on behalf of the Energy Commission, this program recently increased the funding available for medium- and heavy-duty (MD/HD) electric vehicle charging infrastructure. Medium- and heavy-duty fossil fuel vehicles constitute a significant source of GHG emissions and criteria air pollutants, and CSE applauds Commissioner Monahan and Energy Commission staff for committing additional investments in this electric vehicle sub-sector.

CSE supports the transportation topics outlined in the Energy Commission's Proposed Scope of the 2020 IEPR Update. Specifically, CSE is eager to see the results of the Energy Commission's evaluation of the level of charging infrastructure necessary to meet the State's target of deploying 250,000 ZEV charging stations by 2025. In addition, CSE supports the Energy Commission's efforts to develop the Vehicle Grid Integration (VGI) Roadmap Update. VGI will play an increasingly important role in enabling smart charging behavior, providing grid benefits, and utilizing renewable energy. CSE commends the Energy Commission's leadership in coordinating across agencies and ensuring the holistic integration of new clean energy and transportation technologies.

III. ELECTRICITY AND NATURAL GAS DEMAND FORECAST

Regularly updated data is essential for maintaining the accuracy and value of energy forecasts. As such, CSE strongly supports the proposal to update the 2019 California Energy Demand forecast with the most recent available data. Moreover, an emphasis on updating projections for distributed energy resources, including photovoltaics and storage, is critical for understanding these technologies' potential impact on California's load profile and helping inform strategies for managing the grid to maximize their benefits, such as GHG emissions reductions.

IV. MICROGRIDS

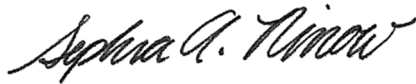
Previous Energy Commission research, including the 2015 *Microgrid Assessment and Recommendations to Guide Future Investments Report* and lessons learned from seven microgrid research and development projects funded by Electric Program Investment Fund (EPIC) grants (PON-14-301), has been essential for informing discussions related to the value of microgrids. In light of disruptive events caused by the worsening impacts of climate change and Public Safety Power Shutoffs (PSPS), increased deployment of microgrids will be a key strategy for providing grid resiliency. CSE strongly supports the Energy Commission's proposed review of the value of microgrids to enhance grid reliability and maintain critical services and believes such research will help inform current State policy efforts, such as the California Public Utilities Commission's (CPUC) open *Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies* (R.19-09-009).

In addition to the important value of resiliency during grid disruption events, microgrids have the potential to provide additional benefits to the grid and help meet other State goals. Between "islanding" events, microgrids can provide day-to-day value, such as GHG emissions reductions, peak demand reductions, and ancillary services to the grid. CSE encourages the Energy Commission to consider expanding the scope of its microgrid review to include potential value streams and benefits beyond mitigating the impact of PSPS and other disruptive events. Such research and corresponding policy recommendations will help unlock the potential of microgrids that utilize clean technologies by making them more financeable for developers and communities.

V. CONCLUSION

CSE appreciates the opportunity to provide these comments regarding the Draft Scoping Order for the 2020 Integrated Energy Policy Report Update. We look forward to continued collaboration with the Energy Commission and stakeholders in updating the IEPR to help inform future energy policy and planning efforts.

Sincerely,

A handwritten signature in black ink that reads "Sephra A. Ninow". The signature is written in a cursive, flowing style.

Sephra A. Ninow, J.D.

Director, Regulatory Affairs

Center for Sustainable Energy®

3980 Sherman St., Suite 170

San Diego, CA 92110

Tel: (858) 244-1186

sephra.ninow@energycenter.org