

DOCKETED

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**Scale Microgrid Solutions Comments to 19-TRAN-02 Zero-Emission
Transit Fleet Infrastructure Deployment**

Additional submitted attachment is included below.

24 April 2020

FROM: Shea Hughes
Director, Business Development
Scale Microgrid Solutions, LLC

TO: California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

SUBJECT: Docket 19-TRAN-02 Request for Comments
Zero-Emission Transit Fleet Infrastructure Deployment

Scale Microgrid Solutions, LLC (SMS) respectfully submits the following responses to the CEC staff in connection with Docket 19-TRAN-02 and topic “DER Strategies for MDHD BEV Charging Infrastructure” specific to the *Zero-Emission Transit Fleet Infrastructure Deployment* webinar and future solicitation *Concept for Medium-and-Heavy-Duty Zero-Emission Transit Fleet Infrastructure Deployment*.

Scale Microgrid Solutions Comments:

- Given California's ongoing threat of wildfires and the utility response of widespread Public Safety Power Shutoffs (PSPS), resilient infrastructure is more important than ever. Estimates from top officials at the CPUC and the state's largest investor owned utilities estimate the current wildfire mitigation strategies including PSPS could last up to 10 years or more while grid infrastructure is modernized¹.
- A critical component of grid modernization is distributed generation and microgrids. Microgrids ensure a more economic, reliable, resilient, and sustainable electric supply for Californians through the reduced need for transmission and distribution upgrades as well as the incorporation of local on-site renewable generation. Additionally, SMS and others have developed more standardized, modular microgrids in recent years that allow for rapid deployment in under one year.
- As California public transit authorities prepare to implement CARB's Innovative Clean Transit (ICT) program towards 100% electric vehicle transit fleets by 2040, resiliency should be considered as a critical element in the design of any new EV fleet infrastructure.
- A prolonged multi-day outage event similar to those experienced during the 2019 wildfire season would leave transit authorities crippled when they are needed most. Traditional backup power options including standby diesel generators would exacerbate existing air quality issues, particularly in low income or disadvantaged communities. Solar and storage microgrids typically only offer limited protection from long duration outages similar to those seen in the PG&E public safety power shutoff events of 2019. However, solar and storage microgrids paired with ultra-efficient, clean power generation technologies can provide the right combination of environmental, economic, and resiliency benefits.

¹ <https://www.wsj.com/articles/pg-e-ceo-says-it-could-impose-blackouts-in-california-for-a-decade-11571438206>

- As a part of this solicitation the Commission should consider resiliency as a critical criterion when evaluating proposals. Not doing so would result in foregoing a massive opportunity to provide a model for a sustainable, resilient transit fleet for other agencies to build upon. The Commission could consider a ‘resiliency standard’ such as 5 days of independent operation in the event of a grid outage.

Scale Microgrid Solutions Questions:

- As a part of the proposed solicitation the Commission is requiring that submissions serve low income or disadvantaged communities and result in tangible air quality improvements. The Commission elaborates to mention that projects with a larger benefit to the LI/ DAC communities will be prioritized, but notes that the LI/DAC population does not need to constitute the entire population served. SMS respectfully requests that the Commission elaborate on the evaluation criteria related to LI/ DAC populations, and specifically to define the threshold in terms of percentage of total population served to be eligible for this award?
- SMS expects that many submissions will also be applying to receive other state incentives such as the Self Generation Incentive Program (SGIP). Does this award affect eligibility for other state funding?

Respectfully,



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