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Southern California Edison Company (SCE) appreciates the opportunity to provide the California Energy Commission (CEC) comments on their Electric Program Investment Charge (EPIC) interim Investment Plan covering the period of 2021-2022. SCE supports the CEC's Interim Plan to include "a set of research initiatives that build on the previous EPIC 3 Investment Plan and are focused on a limited set of specific, near-term needs that can feasibly be pursued through EPIC-funded projects for the first year of EPIC 4." The CEC's interim investment plan's research themes of decarbonization, resilience, reliability, and entrepreneurship, identifies the following nine key research initiatives:

1. Advanced Prefabricated Zero-Carbon Homes
2. Energy Efficiency and Demand Response in Industrial and Commercial Cold Storage
3. Energy Efficiency and Load Shifting in Indoor Farms
4. Optimizing long Duration Energy Storage to Improve Grid Resiliency and Reliability in Under-resourced Communities
5. The Role of Green Hydrogen in a Decarbonized California –A Roadmap and Strategic Plan
6. Valuation of Investments in Electricity Sector Resilience
7. Vehicle-to-Building for Resilient Back-up Power
8. Offshore Wind Technologies
9. Entrepreneurial Ecosystem

These CEC research initiatives align with SCE's Pathway to 2045¹ and support the California Public Utilities Commission (CPUC) toward achieving California's energy and environmental policy goals for a clean energy future. As a fellow EPIC Administrator, SCE and collectively the Investor Owned Utilities (IOUs)² are uniquely poised to support the CEC's interim Investment Plan. The IOUs and the CEC have shared goals of striving to achieve carbon neutrality, which is key to mitigating climate change, such as extreme weather events (e.g., catastrophic wildfires), and improving customer equity for low-income communities and communities of color, which have been disproportionately impacted by the effects of a fossil-fuel powered economy. SCE finds all of the CEC's key research initiatives to have value toward advancing changes in electric power supply and customer use of energy. The IOUs' EPIC administration complements the CEC's Investment Plan by enabling the efficient integration of these clean resources and customer electric use changes, while ensuring adaptation and broader resilience for the grid.³ The synergies between the IOUs' and CEC's respective investment plans help to facilitate California's clean energy transformation.

SCE finds the CEC's Initiative 4: *Optimizing long Duration Energy Storage to Improve Grid Resiliency and Reliability in Under- resourced Communities* to be closely aligned with SCE's existing work and focus. SCE's EPIC III Wildfire Prevention & Resiliency Technologies Demonstration⁴ and Smart Cities project,⁵ as well as the Wildfire Mitigation Plan pilots, are helping to test distributed energy resources, including energy storage as a means of resilient power to critical facilities in communities at risk of extreme weather conditions, such as wildfires. As the CEC continues to plan this initiative, SCE requests to partner with the CEC and build on SCE's and the CEC's EPIC III projects through a future joint project. A joint project between SCE and the CEC would help support the CEC to demonstrate how critical communities' facilities can modulate facility demand, energy storage output, and renewable power to achieve optimal resiliency for these communities and the grid as a whole. SCE as a project partner could help to ensure smart inverters, energy management systems, or a microgrid controller with energy storage all in concert are optimized for grid resiliency. A joint project would thus enrich the lessons learned by better understanding the performance needs for critical loads at these facilities and grid resiliency needs arising from these facilities.

Another of the CEC's key initiatives that SCE is particularly interested in is Initiative 6: *Valuation of Investments in Electricity Sector Resilience*. SCE supports the CEC conducting research to evaluate the types of impacts that could be valued in the context of climate resilience by state and local governments, as well as the distribution and impacts of these events among ratepayers, especially on Disadvantaged Communities. SCE agrees with the CEC that "clarifying the public benefits of resilience investments is critical to properly incentivizing deployment of customer and grid resilience measures."⁶ SCE looks forward to closely collaborating with the CEC under this initiative to help the CEC create a conceptual framework that most appropriately values "resilience

¹ [Pathway 2045](#). Southern California Edison. (2019).

² SCE, Pacific Gas & Electric, San Diego Gas & Electric .

³ [Reimagining the Grid](#). Southern California Edison (2020).

⁴ Research Administration Plan Application (A).19-04-028 at E-1 & E-2.

⁵ SCE EPIC III Investment Plan Application (A.)17-05-005.

⁶ CEC 2021-2022 EPIC Investment Plan at p. A-50.

investments that captures public benefits on time scales relevant to GRCs and longer-term (20-30 years) adaptation planning.”⁷

SCE looks forward to continue working with the CEC on planning and implementing their full EPIC 4 Investment Plan of research initiatives. Furthermore, SCE will continue to incorporate lessons learned from CEC EPIC projects and identify future opportunities to partner and conduct joint projects, in order to support customers, the CPUC, and California achieve our collective clean energy future.

⁷ CEC 2021-2022 EPIC Investment Plan at p. A-50 & A-51.