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CERI Program Comments - Center for Strategic Policy Innovation

Additional submitted attachment is included below.

CENTER FOR STRATEGIC
POLICY INNOVATION

5000 Birch Street, Ste. 3000
Newport Beach, CA. 92660

August 18, 2022

Via Email: docket@energy.ca.gov
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket Number 22-ERDD-01
Community Energy Resilience Investment Program (CERI)
Comments from: Kevin Daehnke, Center for Strategic Policy Innovation

Dear California Energy Commission Staff:

On behalf of the *Center for Strategic Policy Innovation,* a 501(c)(3) California nonprofit corporation, I am pleased to submit this letter in response to the California Energy Commission's *request for comments* relating to the Community Energy Resilience Investment (CERI) Program. I understand that CERI will be the California program that implements and provides subgrants to utilities within the State of California, pursuant to and based on Section 40101(d) of the Infrastructure Investment and Jobs Act (IIJA), also known as the ***"Preventing Outages and Enhancing the Resilience of the Electric Grid*** Formula Grants to States and Tribes" program.

My comments go to the substance of the activities for which eligible utilities will be required to spend **subgrant** monies received from the CEC and its CERI program. In particular, I am commenting to propose that utilities be required to commit to spending significant portions of their subgrant monies to encourage solar PV-anchored distributed energy "microgrids," and also for the purpose of hardening the grid against potential "solar weather" and other such events.

I attended the CEC's August 11, 2022 CERI program workshop and have subsequently reviewed the powerpoint slides provided at that workshop. Slide 10 of the powerpoint presentation lists eligible subgrant activities, including (1) the use or construction of distributed energy resources for enhancing system adaptive capacity during disruptive events, including *microgrids and battery-storage subcomponents, (2) adaptive protection technologies, and (3) the hardening of power lines, facilities and substations, of other systems.* In support and furtherance of these requirements, we suggest the following.

First, in order for in-city *distributed energy* **microgrids** to become more widespread and provide significantly more resiliency benefits, utilities receiving CERI subgrant monies should be required to adopt modified rules and regulations so that community solar microgrids and other "in front of the meter" distributed energy microgrid systems can proliferate within the region serviced by the subgrantee utility.

Second, each utility receiving subgrant monies from CERI should be required to commit to spending a significant amount (perhaps 30-40% or more) of the subgrant monies on "adaptive protection technologies" and for the "hardening of power lines, facilities and substations". Of these monies, subgrant recipients should be required to spend a substantial portion (at least 10-15%) of such grid hardening monies on equipment and strategies designed to minimize the risks associated with *solar weather* and other electromagnetic pulse events, including the installation of faraday cages, capacitor banks, EMP-rated surge arresters, electromagnetic-hardened digital protective relays for substations, neutral ground blockers for transformers, series capacitors and EMP-hardened battery charger and generator controls. Subgrant recipients should be required to stockpile replacement transformers and other parts that might be impacted by such solar events, to allow for timely and orderly grid repair and redeployment, even after a catastrophic solar flare/weather event.

Numerous studies quantify the potential disruptions associated with a major solar weather event. Our Center would be glad to provide whatever information would be helpful to quantify the potential for serious consequences in the event of such a significant solar weather event. A recent article from Wired discusses the issue and some of the literature:

https://www.wired.com/story/sun-storm-end-civilization/

Thank you for allowing us to comment on this RFI. Please put me on your mailing list for updates as the CERI subgrant program proceeds forward.

Sincerely,

Kevin J. Daehnke
Founder and President
Center for Strategic Policy Innovation