

DOCKETED

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California Communities Against Toxics
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RE: Docket #: 22-ERDD-01
Community Energy Resilience Investments (CERI)
California Energy Commission
August 18, 2022

On behalf of *California Communities Against Toxics*, we are pleased to submit this letter in response to the California Energy Commission's information request (RFI) relating to the Community Energy Resilience Investment (CERI) Program. We 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.

Our comments relate to the criteria for eligible activities for which utilities will be required to spend subgrant monies received from the CEC and its CERI program. In particular, we are commenting to ensure that utilities will be required to commit to making substantial investments of subgrant monies initiating the use of solar PV-anchored "microgrids," and also for the purposes of hardening the grid against potential "solar flare" weather events.

According to the presentation the California Energy Commission during its recent workshop on this matter, grants are to be used for (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.

We believe that in order to meet the resiliency needs of environmental justice communities that distributed energy microgrids must become more widely available, especially for critical services such as fire stations, community centers, fair grounds, city centers hosting emergency operations infrastructure, wastewater treatment plants and drinking water facilities. To meet this goal, utilities receiving CERI subgrant monies should be required to adopt modified requirements which result in community solar microgrids and other "in front of the meter" microgrid systems becoming much more widespread.

As well, we remain increasingly concerned about shocks to California's electrical infrastructure and believe that each utility receiving subgrant monies from CERI should be required to commit to spending a substantial amount of the subgrant monies on "adaptive protection technologies" and for the "hardening of power lines, facilities and substations". Of these funds, subgrant recipients should be required to spend a substantial portion of such grid-hardening monies on equipment and strategies designed to minimize the risks associated with solar

weather events, including the installation of faraday cages, capacitor banks, EMP-rated surge arresters, and EMP-hardened battery charger and generator controls. Subgrant recipients should also be required, as part of these grants, to stockpile replacement equipment which is necessary to keep the electricity system operational and other key electrical components that might be impacted by destructive events, to allow for timely and effective electrical repair and quick redeployment after catastrophic solar flares, weather events, wildfires, or earthquakes.

We look forward to working with the California Energy Commission as this process moves forward and we thank you for the opportunity to comment on this issue of such great importance to the residents of California.

Cordially,

Jane Williams

Jane Williams
Executive Director