

DOCKETED

Docket Number:	22-ERDD-01
Project Title:	Community Energy Resilience Investment Program
TN #:	245301
Document Title:	PG&E Comments on Staff Workshop to Kickoff Development of the Community Energy Resilience Investment Program
Description:	N/A
Filer:	System
Organization:	PG&E
Submitter Role:	Public
Submission Date:	8/18/2022 1:24:33 PM
Docketed Date:	8/18/2022

*Comment Received From: PG&E
Submitted On: 8/18/2022
Docket Number: 22-ERDD-01*

**PG&E Comments on Staff Workshop to Kickoff Development of the
Community Energy Resilience Investment Program**

Additional submitted attachment is included below.



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August 18, 2022

California Energy Commission
Angela Gould, Deputy Director
Alex Horangic, Manager
Energy Research and Development Division
Community Energy Resilience Investment Program
Docket Number 22-ERDD-01
715 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on Staff Workshop to Kickoff Development of the Community Energy Resilience Investment Program (Docket Number 22-ERDD-01)

Dear Director Gould and Ms. Horangic,

Pacific Gas and Electric Company (PG&E) thanks the California Energy Commission (CEC) for hosting a workshop to kick off the development of the Community Energy Resilience Investment (CERI) program held on August 11, 2022, and appreciates the opportunity to provide written comment.

PG&E offers feedback on the following items related to the development of the Community Energy Resilience Investment (CERI) program:

- Program investments should firstly focus on areas in critical need of resilience measures, which can be best estimated by looking at the California Public Utilities Commission (CPUC)'s High Fire Threat District (HFTD) maps. The use of other geographic identifiers, like the CalEnviroScreen tool, should be a second-order determining factor.
- Grant opportunities should not be limited to activities that "go beyond current resiliency measures" and should instead be made available to any and all activities that can be demonstrated to improve grid resilience so long as they are consistent with the Infrastructure Investment and Jobs Act (IIJA) statute.

Focus should be on areas of highest resilience need

PG&E strongly supports the State's continued focus on investing in communities that have been historically underserved and are disproportionately burdened by multiple sources of pollution. PG&E continues to offer many programs that specifically target funding toward these communities to help address historic and continuing inequities. However, given that the IIJA specifically focuses on electricity grid resiliency, PG&E believes funding should first focus on areas of California that demonstrate the highest resiliency need.

PG&E recommends that the CPUC's High Fire Threat District maps¹ be primarily used to determine eligible areas of priority for CERI program grant funding opportunities. Should there be areas that fall within both the highest tier of HFTD maps and the most historically disproportionately pollution-burdened areas, PG&E believes these could receive first priority. However, if there is little cross-over between these areas, PG&E recommends that the HFTD maps take precedence for determining eligible geographies to ensure CERI funding is appropriately focused on enabling strong grid resilience measures in the areas such funding will have the greatest impact.

CERI should allow for a broad array of resiliency measures

Every activity listed in the IJJA statute is critical for increasing grid resiliency and mitigating risk, including risk from wildfires. As such, PG&E is actively undertaking these measures. Further information on how and why these activities are being done can be found in PG&E's 2022 Wildfire Mitigation Plan,² which has been added to the docket.

Federal funding through the CERI program can help accelerate and bolster what PG&E is already doing in all of these areas. Importantly, if these critical activities are eligible for federal funding via the CERI program administered by the CEC, this will reduce costs to PG&E's customers – a goal of not only PG&E but also the State of California, as evidenced by the letter sent from the CPUC to California utilities on January 24, 2022, which we added to the docket.³

PG&E has identified several extreme weather mitigation projects that are consistent with the IJJA statute and may merit funding through the new CERI program as well as through the Department of Energy (DOE)'s competitive grant program that PG&E will apply for once the opportunity arises. Examples of potential mitigation projects PG&E is considering include:

1. Installation of more weather stations to better understand real-time weather conditions. Such data and information is shared publicly, including with first responders.
2. Installation of more high-definition cameras to monitor real-time conditions and provide visibility for potential ignitions. These video feeds are also shared with the public and public safety agencies.
3. Undergrounding a section of powerlines in HFTDs which would not only eliminate the wildfire risk associated with a powerline ignition but also ensure customers are no longer subject to Public Safety Power Shutoffs (PSPS) events/outages.
4. Installation of one or more remote grid(s) to allow PG&E to remove powerlines that pass through HFTDs. This would both reduce wildfire risk and increase resiliency for customers on the remote grid.
5. Installation of additional distribution grid sectionalizing devices to reduce customer outages during Enhanced Powerline Safety Settings (EPSS) activation or PSPS events. These devices would reduce the number of customers impacted by outages during weather/wildfire-risk driven events.
6. Collaboratively supporting community fuel breaks from which PG&E, the grid, and customers could benefit.

¹ [Fire-Threat Maps and Fire-Safety Rulemaking \(ca.gov\)](https://www.cpuc.ca.gov/informational/energy_efficiency/fire-safety/Fire-Threat-Maps-and-Fire-Safety-Rulemaking)

² [Wildfire Mitigation Plan \(pge.com\)](https://www.pge.com/energy_services/wildfire_mitigation_plan)

³ [PG&E Comments - Jan 24 2022 Letter to California Utilities on Federal Funding through IJJA](#)

In addition to the above mitigation measures, PG&E also believes that distributed energy resources (DERs) can help play a major role in increasing energy resiliency and reducing the impacts of grid outages. For example, PG&E encourages customer adoption of energy storage⁴ and is helping to advance vehicle-to-grid (V2G) and vehicle-to-home (V2H) technology.⁵ Resources such as V2H and home batteries can serve resiliency in multiple contexts—not only if PG&E needs to de-energize, for example in the case of high wildfire threat conditions, but also to help system reliability during summer capacity events when these DERs can be used to essentially increase power on the grid. These resources can also help decarbonization efforts by eliminating the need for polluting diesel back-up generators. Therefore, PG&E encourages the CEC to ensure that customer batteries, V2H/V2G and other DERs that can help increase resiliency are eligible for grant funding through the CERI program.

PG&E recognizes that the scale of the climate challenge requires that we come together to find efficient and affordable ways of building resilient communities. PG&E looks forward to continued collaboration and further engagement with the CEC on the implementation of this program to bolster our joint efforts in building more resilient communities in California. Please feel free to reach out to me if you have any questions.

Sincerely,

Licha Lopez
State Agency Relations

⁴ See the Self-Generation Incentive Program here: https://www.pge.com/en_US/residential/solar-and-vehicles/other-solar-options/battery-storage-for-residential-customers.page or the Portable Battery Program here: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/Portable-Battery-Program-Fact-Sheet.pdf

⁵ [PG&E Corporation - PG&E to Launch New Pilots Studying Electric Vehicle Bidirectional Charging Technology at Homes, Businesses and with Microgrids \(pgecorp.com\)](https://www.pge.com/en_US/residential/solar-and-vehicles/other-solar-options/battery-storage-for-residential-customers.page).