

**DOCKETED**

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## **Microgrid Resources Coalition Comments on CERI Program**

*Additional submitted attachment is included below.*

**August 18, 2022**

California Energy Commission  
Docket Unit MS-4  
715 P Street  
Sacramento, CA 95814



**RE: Docket 22-ERDD-01**

**Microgrid Resources Coalition Comments on Community Energy Resilience Investment Program**

The Microgrid Resources Coalition (“MRC”) commends the California Energy Commission (“Commission”) for its leadership in creating the Community Energy Resilience Investment Program to distribute Grid Resilience Formula Grants authorized under the Infrastructure & Investment Jobs Act (IIJA) and Section 40101(d).

**Introduction**

The MRC is a national association of leading microgrid owners, operators, developers, suppliers, and investors dedicated to the advancement of microgrids through education, policy advocacy and other development activities. The MRC endeavors to ensure non-discriminatory market access and a level playing field for deployment and operation of diverse microgrid configurations and business models. Committed to empowering energy customers and communities, the MRC generally supports disaggregated, fair pricing for well-defined services, both from the grid to microgrids as well as from microgrids to the grid. We promote community-based resilience standards and support utilities and business models that accurately value resilient distributed resources. MRC members have deployed sophisticated microgrids throughout the United States for several decades and are at the cutting edge of microgrid technology and development.

**Comments**

The MRC applauds the Commission for taking proactive steps to apply for funding on behalf of the state of California and respectfully provides these recommendations for consideration as the Commission looks to create the CERI program:

- A pathway for local governments and communities to receive the funding directly should be created by the Commission in its program development efforts and prioritization should be given to non-utility entities when distributing funding.
  - The Commission can create an application for funding that is specific for local governments and communities and give priority to applications that are serving critical facilities, vulnerable populations, and areas that are especially prone to grid outages or wildfire risk.
- Eligible activities under the program should include planning, feasibility assessments, and other pre-development activities so that local governments and communities have the proper resources and capacity to develop comprehensive microgrid and resilience projects that meet local needs.
- Development of microgrids and clean energy resilience projects for local governments and communities, especially projects that are not already eligible for inclusion in the utilities’ rate base or other programs, should be given priority among the eligible activities in the CERI program.

- In particular, undergrounding, vegetation management, hardening of power lines, and other utility activities are already being funded through other mechanisms in California and should not be eligible for this program.
- Stakeholder engagement activities should include the participation of microgrid and clean energy developers, technology providers, technical consultants, and other stakeholders with professional expertise in developing clean energy projects, in addition to local governments, tribes, community-based organizations, and representatives of vulnerable communities.
- The MRC requests clarification from the Commission on the timeline for program implementation and when stakeholders can expect funding to become available under CERI.

### **Conclusion**

The MRC appreciates the opportunity to provide comments on the CERI workshop and looks forward to collaborating with the Commission on this crucial program to achieve greater community energy resilience and electricity system reliability through the deployment of microgrids and distributed energy resources in California.

Respectfully submitted,



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