

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-IEPR-05
<b>Project Title:</b>	Accelerating Distribution Grid Connection
<b>TN #:</b>	250416
<b>Document Title:</b>	Defenders of Wildlife Comments - Defenders of Wildlife Comments on IEPR Electric Distribution System Workshop Docket 23-IEPR-05
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Defenders of Wildlife
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/31/2023 4:11:42 PM
<b>Docketed Date:</b>	5/31/2023

*Comment Received From: Defenders of Wildlife  
Submitted On: 5/31/2023  
Docket Number: 23-IEPR-05*

**Defenders of Wildlife Comments on IEPR Electric Distribution  
System Workshop Docket 23-IEPR-05**

*Additional submitted attachment is included below.*



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May 31, 2023

California Energy Commission

Docket Unit - MS-4

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Sent via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: IEPR Workshop on Identifying Barriers and Solutions in the Electric Distribution System  
(Docket Number 23-IEPR-05)

Dear Commissioners:

Thank you for holding this public workshop on ways to overcome existing barriers and solutions to accelerate the deployment of electricity derived from clean energy sources by way of electric distribution grids in California. This comment letter is submitted by Defenders of Wildlife (Defenders) on behalf of its 2.1 million members in the U.S., including over 316,000 in California.

Defenders has a long history of advocating for generation and delivery of electricity from renewable energy sources to customers with the least impact on the environment. We consider generating electricity from renewable energy sources at the local level and delivering to existing distribution grids among the most environmentally suitable options for delivering clean electricity at lower cost to customers.

We have long been concerned over large-scale impacts to natural lands from the traditional model involving remote, utility-scale electricity generation projects and delivering it long distances over high-voltage transmission systems. This model has resulted in the loss of thousands of acres of relatively undisturbed land in the California desert and other sensitive ecosystems that support numerous threatened and endangered species of plants and animals. For example, over 43,000 acres of BLM land in the California desert have been converted to solar energy development resulting in the loss of habitat that supported a diverse mix of threatened, fully protected and sensitive wildlife and plants. Further, remote generation is more costly to consumers who bear the burden of paying for the repair, upgrade, and construction of regional and bulk high-voltage transmission lines.

Overcoming existing barriers and developing solutions to accelerate the deployment of community-scale distributed generation from clean energy sources by way of electric

distribution grids should rank among the highest priorities of not only the California Energy Commission (CEC) but also the California Public Utilities Commission (CPUC) and the California Independent System Operator (CAISO). [Assembly Bill 2316](#), the “Public Utilities Commission: Customer Renewable Energy Subscription Programs and the Community Renewable Energy Program,” was signed into law by Governor Newsom in 2022. This bill:

- Directs the CPUC to create a community renewable energy program that prioritizes access for renters, low-income households, and those who cannot install on-site solar and storage for technical or cost-related reasons.
- Pairs community-scale renewable generation with storage to address net-peak loads and provide grid benefits to all customers when the system is most strained.
- Provides project subscribers, more than half of whom must be low-income families, bill credits for the energy generated based on the benefits of distributed energy resources to all customers, and will not lead to cost-shift.
- Ensures community renewable energy projects will comply with California’s building code standards.
- Requires the CPUC to evaluate and consolidate or eliminate existing community renewable programs that are not achieving their stated goals and provides the CPUC with the flexibility to design program parameters.
- Enables California to receive funding under the Inflation Reduction Act to support community-scale renewable energy programs and projects.

### **Using the Distribution Grid to Accelerate the Deployment of Distributed Electrical Resources Derived from Clean Energy Sources**

California has made significant progress in moving away from the traditional model of generating electricity far from load centers with utility-scale generation projects and delivering it over long distances through high voltage transmission infrastructure. Distributed electrical resources (DER) from renewable energy sources at or near the point of consumption has multiple benefits: much lower environmental impact, significant greenhouse gas reduction, electricity resiliency, community benefits, and lower electricity cost to consumers. Last year’s IEPR correctly recognized the need to reform and increase the pace of clean energy DER deployment. We ask that this year’s IEPR include using the distribution grid to accelerate clean energy microgrid development and deployment.

California communities – large and small, rural and urban – increasingly face energy reliability issues from wildfires and extreme weather events. High clean energy DER supported by neighborhood and community-level microgrids, including battery storage, can provide much-needed reliability during power safety shutoffs and extreme weather events. The resiliency

provided by the microgrids at Redwood Coast Airport and at Blue Lakes Rancheria are good examples of the value microgrids provide their communities.

High clean energy DER and microgrids also reduce the need and ratepayer costs from bulk grid transmission and remote generation. Taken together, high DER and microgrids would provide significant co-benefits of resiliency, reduced need for land-intensive remote generation and supporting transmission, and reduced ratepayer costs for bulk grid improvements.

The IEPR should recommend ambitious goals for clean energy DER and microgrid development and deployment and needed upgrades to the distribution grid to support clean energy DER and microgrids. We recommend the CEC hold a workshop and develop further recommendations to accelerate clean energy front-of-the-meter DER and community-level microgrids.

## Conclusion

Thank you for the opportunity to comment on this important issue. Defenders urges the CEC to prioritize working with the CPUC and CAISO to resolve existing barriers and develop solutions to accelerate the deployment of community-scale distributed generation from clean energy sources through electric distribution grids. Please contact us if you would like to discuss our recommendations or have questions.

Respectfully submitted,



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