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*Comment Received From: Leading Edge Power Solutions  
Submitted On: 8/4/2020  
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**on IEPR Commissioner Workshop on Assessing the Future Role for  
Microgrids in California**

*Additional submitted attachment is included below.*



July 30, 2020

Honorable Janea Scott, Vice Chair  
California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

**RE: Docket 20-IEPR-04 Comments on IEPR Commissioner Workshop on Assessing the Future Role for Microgrids in California**

Dear Vice Chair Scott,

Leading Edge Power Solutions appreciates the California Energy Commission for its guidance in identifying the critical role microgrids play for the State's critical infrastructure. By using a portfolio of mixed resources including renewables, storage and clean natural gas engines, microgrids can provide flexible energy which can ramp up or down dependent on load thus providing the State with the reliable, resilient and long duration energy needed to meet the demands of California's clean energy economy and PSPS events.

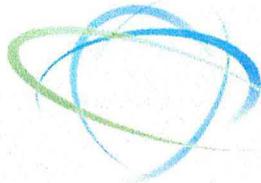
LEPS has developed a clean on-site natural gas generator that is automatically dispatched against customer load to maximize savings from both energy (kWh) and demand (kW). Its peak shaving dispatch algorithms are unique. It can automatically transfer to grid independent "backup" mode if it senses a grid outage.

Our customers are still tied into the utility power grid, using a combination of electricity from the utility and our LE-240 generator. LEPS will monitor savings via our advanced software's algorithms that select the most cost-effective power source for our customers, at any given time, during the day or night. Our equipment can run grid parallel and, as an extra benefit, provide emergency backup power.

With Leading Edge, you have an extremely stable, consistent, reliable and clean electricity source which can act as the resilience backbone of a robust microgrid with the ability to integrate higher levels of renewables and storage.

The Leading Edge 240 engine meets the most stringent SCAQMD III0.2 emissions standards based on their proprietary catalytic converter. Not only does it meet the standard, it is well under the standard by around 50% in CO, NOX, and VOCs. As for sound, the SPL testing revealed that noise emanating from the LE 240 adhered to OSHA Noise Standard for worker safety and below city ordinance levels. The system is also fully UL certified.

The biggest deterrent to providing critical infrastructure in the State, are Departing load charges (DLC). They are a significant regulatory barrier to deployment of any microgrid with a reliable natural gas backbone. Microgrids with a gas backbone can provide clean long duration resiliency and resource adequacy. However, the Departing Load Charge fee assessed by California utilities, into perpetuity and



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long past the life of the project, is outdated and needs to be reassessed. The cost shift of not deploying microgrids in High Fire Threat Zones appears to be over and above the cost of supplementing the utilities non-by passable charge program.

How valuable is long term reliability and resiliency to the State of California's critical infrastructure? The Commission should prioritize and support reliable, resilient long duration microgrids and reduce regulatory barriers.

Leading Edge Power Solutions (LEPS) looks forward to working with the Commission on providing reliable, resilience microgrids to support California's clean energy future while serving critical infrastructure.

Thank you,

David Walters  
CEO

Leading Edge Power Solutions, LLC