

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE TO
COMMENTS AND PROPOSALS FILED ON SEPTEMBER 17, 2019**

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and the *Assigned Commissioner’s Phase 2 Scoping Memo and Ruling* (“Scoping Memo”), issued by Assigned Commissioner Michael Picker on August 14, 2019, the California Energy Storage Alliance (“CESA”) hereby submits our response to the Phase 2 Track 1 Proposals filed and served on September 17, 2019. CESA is timely submitting its response here in accordance with the *Email Ruling Changing Comments Process and Due Date for Phase 2 Track 1* (“Email Ruling”), issued by Administrative Law Judge (“ALJ”) Melissa Semcer on September 26, 2019 that modified the comment process and deadline set forth in the Scoping Memo. CESA was granted party status in Rulemaking (“R.”) 18-12-005 on February 19, 2019 at the prehearing conference¹ by virtue of filing comments on *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions* (“OIR”) on February 8, 2019.²

¹ See *Reporter’s Transcript* at p. 17.

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M268/K444/268444747.PDF>

² *Comments of the California Energy Storage Alliance to the Order Instituting Rulemaking*, filed on February 8, 2019. <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M265/K165/265165647.PDF>

I. INTRODUCTION.

CESA observes that many parties submitted Phase 2 Track 1 proposals and comments on September 17, 2019 expressing support for an expansion of the coverage of Public Safety Power Shutoff (“PSPS”) notification and communication to a broader set of customers, including the transportation sector. Consistent with CESA’s proposal to consider how PSPS notification, communications, and other protocols affect electric vehicle (“EV”) charging infrastructure, we support the proposal from Tesla, which similarly advocates for “critical facility” designation for EV charging infrastructure given that EV drivers may be disproportionately impacted by PSPS events. To successfully achieve the state’s transportation electrification goals, EV drivers and operators need to be prepared for outages and be included in resiliency planning. Importantly, in the recent PSPS events experienced across the broader Bay Area from October 9-11, 2019, the long lines at gas stations³ highlighted how it will be critical for customers to be able to ensure mobility and a “mobile” backup power source (*e.g.*, to power phones), where incorporating EV charging infrastructure in the critical facility designation will support customer needs and planning.

Furthermore, in this response, we focus on our support for the proposal by the Direct Access Customer Coalition (“DACC”) around the need to consider the impact of increased localized emissions and carbon dioxide emissions from the use of backup generators in response to PSPS events.⁴ While DACC’s proposal is concerned with compliance risk of commercial and

³ “PG&E outages: Long lines for gas, stations are closing.” *San Francisco Chronicle* published on October 9, 2019. <https://www.sfchronicle.com/business/article/Gas-another-worry-as-PG-E-shuts-off-power-14504278.php>

⁴ DACC’s Phase 2 Track 1 Proposal at pp. 2-3.

industrial customers subject to emissions standards, CESA agrees that broader consideration of this issue needs to be incorporated in the Phase 2 scope.

II. PHASE 2 REQUIRES CONSIDERATION OF ALTERNATIVE MITIGATION OPTIONS TO ADDRESS THE POTENTIAL EMISSIONS IMPACT RESULTING FROM THE INCREASED RELIANCE ON BACKUP GENERATORS IN PREPARATION FOR AND RESPONSE TO DE-ENERGIZATION EVENTS.

To achieve the state’s decarbonization and disadvantaged community (“DAC”) goals, Phase 2 of this proceeding needs to focus on mitigation measures that address the potential for increased reliance on backup generators and pursue alternative measures that provide customers with clean resiliency. Clean alternatives such as solar-plus-storage resources would ensure that the state does not pursue enhanced customer resiliency that is contrary to the state’s clean energy and environmental policy objectives.

To its credit, the Commission has taken some important policy actions in creating a new Equity Resiliency Budget category in the Self-Generation Incentive Program (“SGIP”) with the adoption of Decision (“D.”) 19-09-027.⁵ While an important initial step, CESA believes that the Commission needs to take broader consideration of the emissions impact of the increased use of backup generators in preparation for and response to PSPS events. Absent specific and targeted efforts to educate customers regardless of socioeconomic status, on clean alternatives to conventional backup generation, it is almost guaranteed that customers will rush out to buy conventional generators, to the detriment of the state’s clean energy goals and potentially adding to the fire risk. This inquiry can also inform a broader range of deployment programs to support

⁵ *Decision Establishing a Self-Generation Incentive Program Equity Resiliency Budget, Modifying Existing Equity Budget Incentives, Approving Carry-Over of Accumulated Unspent Funds, and Approving \$10 Million to Support the San Joaquin Valley Disadvantaged Community Pilot Projects*, D.19-09-027, issued on September 18, 2019 in R.12-11-005.

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M313/K975/313975481.PDF>

clean distributed energy resource (“DER”) alternatives but also inform how the state should incorporate DERs into the communication, notification, and marketing/outreach protocols. Furthermore, the specific reforms made to the SGIP program are focused on eligible Equity customers, who deserve immediate and special consideration in the near term, but the potential wide-scale deployment of backup generators points to a need to focus on mitigation measures for non-Equity customers as well who may be impacted by PSPS events, to address resulting emissions impacts.

Building off DACC’s proposal, CESA recommends that in addition to generally scoping in the issue of addressing increased emissions associated with greater reliance on backup generators, the Commission should also create or work in coordination with the Air Resource Board and Air Management Districts on a reporting and evaluation framework to assess and measure the localized and GHG emissions impact of backup generators in preparation for and response to PSPS events. Additionally, by incorporating operational DERs in PSPS-related communication and notification protocols, these programs and frameworks can also be designed to support the operations of DERs – *e.g.*, ensuring sufficient state of charge of energy storage systems with day-ahead notification to ride through some expected duration of PSPS outage. Additionally, as part of these discussions, the Commission should also consider ideas to incorporate clean DER alternatives as a mitigation option in customer marketing and educational materials. By not including these clean DER alternatives and their related deployment programs (*e.g.*, SGIP incentives), customers may not be informed of all the options available to them to address their resiliency needs.

III. CONCLUSION.

CESA appreciates the opportunity to submit this response to the Phase 2 Track 1 proposals and comments and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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