

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

Application of Pacific Gas and Electric
Company (U 39 E) Proposing Framework for
Substation Microgrid Solutions to Mitigate
Public Safety Power Shutoffs.

Application 21-06-022
(Filed June 30, 2021)

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON
THE PROPOSED DECISION ADOPTING A FRAMEWORK FOR SUBSTATION
MICROGRID RESILIENCY SOLUTIONS TO MITIGATE PUBLIC SAFETY POWER
SHUTOFFS FOR PACIFIC GAS AND ELECTRIC COMPANY**

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”) hereby submits these reply comments on the *Proposed Decision Adopting a Framework for Substation Microgrid Resiliency Solutions to Mitigate Public Safety Power Shutoffs for Pacific Gas and Electric Company* (“PD”) issued by Administrative Law Judge (“ALJ”) Colin Rizzo on September 29, 2022.

I. INTRODUCTION.

In Opening Comments on the PD, many parties offered recommendations for modifications to the framework outlined by Pacific Gas and Electric (“PG&E”) in this Application and adopted in the PD. Once again, parties raised the drawbacks of using the cutoff of 10+ Public Safety Power Shutoff (“PSPS”) events with 100+ safe-to-energize (“STE”) customers in a 10-year Historical Lookback Analysis (“HLA”) to determine which microgrids should be considered for a microgrid solution. The use of this data and cutoff is unlikely to reflect future weather conditions and

likelihood of PSPS¹ and also does not consider the impact of PSPS events, which is largely driven by duration of outages and the number of customers affected.² This critique highlights the need for the Commission to adopt CESA’s first two recommendations in Opening Comments: 1. To allow parties to review the modeling and analysis results for the years PG&E does not release a solicitation, and 2. To require that PG&E provide the Aggregate PSPS Consequence Score (the Alternative Prioritization Metric) for substations assessed in this framework, at least on an informational basis. This will provide data to allow the Commission and parties to evaluate whether changes should be made to the analysis and screening criteria.

CESA also agrees with some of the recommendations made by parties in Opening Comments and offers support for the following items:

- Restrictions should be placed on PG&E’s sequential procurement of single-season solutions.
- Updates to this framework should be proposed via Tier 3 Advice Letter.

II. RESTRICTIONS SHOULD BE PLACED ON PG&E’S SEQUENTIAL PROCUREMENT OF SINGLE-SEASON SOLUTIONS.

In Opening Comments, Marin Clean Energy, Sonoma Clean Power Authority, and Redwood Coast Energy Authority (jointly, “the Joint CCAs”)³ and Small Business Utility Advocates (“SBUA”)⁴ raised concerns surrounding PG&E procuring single-season diesel solutions for multiple consecutive years, which would allow PG&E to avoid the emissions

¹ Public Advocates Office at the California Public Utilities Commission (“Cal Advocates”) Opening Comments at 2-5.

² Joint CCAs Opening Comments at 7.

³ Joint CCAs Opening Comments at 9-10.

⁴ SBUA Opening Comments at 1-3.

requirements of multi-season solutions. CESA believes that these successive procurements are even more likely if PG&E is required to pursue Applications for multi-season solutions since Application schedules could be extended, delaying approvals for multi-season microgrids, and creating a reliance on single-season solutions in the meantime. As highlighted by the Joint CCAs, “Unlimited single-season microgrid procurement could undermine the entire purpose of this proceeding by resulting in greater use of diesel generation and associated negative health impacts with no clean substations development even when justified by PG&E’s analysis.”⁵

To avoid this outcome, the Joint CCAs propose that the Commission require PG&E to file an Application for consideration of a multi-season microgrid for any substation for which PG&E has requested a single-season microgrid for three consecutive years.⁶ CESA largely supports this proposal, but we continue recommend that multi-season solutions be proposed and approved via Tier 3 Advice Letter instead of an Application. Therefore, we would modify the recommendation to require PG&E to conduct analyses and release RFOs for multi-season solutions to be approved via Tier 3 Advice Letter for substations at which PG&E has already requested single season microgrids for three consecutive years.

III. UPDATES TO THIS FRAMEWORK SHOULD BE PROPOSED VIA TIER 3 ADVICE LETTER.

In the PD, it was implicitly accepted that this framework for analyzing PSPS risk at substations would need to be updated regularly, and CESA also highlighted this in our Opening Comments.⁷ However, nowhere in the decision is it specified how updates would be proposed or integrated into the framework. In Opening Comments, PG&E requests that the Commission

⁵ Joint CCAs Opening Comments at 9.

⁶ Joint CCAs Opening Comment at 10.

⁷ CESA Opening Comments at 4.

authorize updates of this framework via Tier 3 Advice Letter, as was proposed in PG&E's original testimony.

CESA supports this request and agrees that a Tier 3 Advice Letter will be an appropriate vehicle to propose changes to the methodology. We anticipate that most changes will be proposed after results of the previous year's analysis is released and parties have had the chance to provide feedback on the methodologies and results of that analysis. To allow for timely updates to the framework between years, an Advice Letter should be the method of updating this framework. Having to approve updates via Application will likely lead to updates being incorporated into this framework 2-3 annual cycles after they were initially proposed, given the extended timelines of the Application process. On the other hand, a Tier 3 Advice Letter still gives the Commission significant oversight over any changes since resolutions must be voted on by the Commissioners.

IV. CONCLUSION.

CESA appreciates the opportunity to submit these comments and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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