COALITION FOR CLEAN AIR

August 18, 2020

Ms. Genevieve Shiroma, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 95814

Re: Resiliency and Microgrids Proceeding, R19.09.009

Dear Commissioner Shiroma:

As California's only statewide organization working exclusively on air quality issues, the Coalition for Clean Air submits these comments on proceeding R19.09.009 related to microgrids and resiliency. For the past 50 years, the Coalition for Clean Air has advocated for innovative policy solutions to air pollution. These solutions include encouraging the adoption of new technologies to advance clean air practices in California. Air quality has been greatly impacted by increasingly destructive wildfires in our state. This week California abandoned clean air legal and regulatory requirements to allow high-polluting diesel backup generators to operate beyond operational time limits in permits to help address peak demand electricity shortages resulting from a record-setting heat wave. When you add to this an ongoing global pandemic and preliminary research findings pointing to a direct connection to particulate pollution exposure and COVID-19 health outcomes, it is has become more critical than ever to support the near-term deployment of clean, reliable microgrid solutions to protect the health and safety of Californians.

We ask the Commission to consider rules to enable clean microgrid technologies and empower businesses to adopt these innovative solutions that benefit air quality and enhance resiliency. Please prioritize policies that lift regulatory barriers and increase access to clean microgrid technologies, which allow us to shift away from reliance on diesel backup generators.

Exposure to diesel exhaust significantly decreases lung function. It causes headaches, fatigue, nausea, increased coughing, labored breathing, chest tightness, wheezing, eye irritation, nasal irritation, chronic bronchitis, reduced pulmonary function, inflammation of lung tissue, type II epithelial cell proliferation, focal fibrosis, thickening of the alveolar walls, lung cancer, cardiopulmonary death, and other adverse health impacts.

The California Air Resources Board (ARB) estimates that about 730 people die prematurely each year in California from heart attacks and other cardiopulmonary health impacts from exposure to

diesel exhaust. ARB and the California Office of Environmental Health Hazard Assessment listed diesel exhaust as a toxic air contaminant in 1998. The World Health Organization's International Agency for Research on Cancer concluded that diesel exhaust causes lung cancer in 2012.

Diesel exhaust contains more than 40 separate cancer-causing organic chemicals. As with other air pollutants, diesel exhaust disproportionately impacts children and the elderly. Most highly concentrated in California's low-income communities of color, diesel exhaust has the notorious distinction of being one of our most challenging environmental justice problems.

Our goal is to continue to work for socially and environmentally responsible air quality policies in California. Clean microgrid deployment protects public health by reducing emissions and eliminating air pollution while enhancing community resiliency and choice. It is important that the Commission's efforts include a standardized, technology-neutral tariff that would support the immediate deployment of clean, customer-owned power solutions that can operate consistently with California's clean air and climate protection goals.

We believe increased deployment of clean microgrid technologies can replace our reliance upon dirty diesel backup power sources. Thank you for your ongoing commitment to increasing Californians' access to clean energy in a safe, reliable, and resilient way.

Sincerely,

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Cc: Marybel Batjer, President, California Public Utilities Commission
        Martha Guzman Aceves, Commissioner
        Liane Randolph, Commissioner
        Clifford Rechtschaffen, Commissioner

VIA ELECTRONIC MAIL