

August 19, 2020

Commissioner Genevieve Shiroma  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Commissioner Shiroma:


I am writing to you to provide comments on R.1909009, the microgrid proceeding. Equinix appreciates the Commission's effort to address regulations to accelerate the use of microgrid technologies in the state.

Our company is interested in investing in microgrids to maintain operations for our communities. As a leading California colocation provider, it is imperative that we are available to the businesses and residents we serve. We encourage the Commission to create a standardized, technology-neutral tariff to enable the rapid development and deployment of clean, customer-owned power solutions that can operate reliably. Additionally, the Commission should create policies to enable and encourage private investment. Regulations should enable technologies to be deployed without endless red tape and costs associated with delays. California can and should be a leader in utilizing these technology solutions to increase their resiliency.

In addition, we ask that data centers and colocation providers be deemed "Essential" by the Commission. As we have seen during this recent pandemic, without data centers, the 'work from home' option that many companies have leveraged to keep people safe and employed, would not be possible. The digital economy relies greatly on data center operations, and microgrids provide us another tool that we can leverage to deliver the reliable power that is demanded of our services.

We want to invest in technology that provides clean and consistent power. It is our hope that the regulations will reflect this. Customers such as Equinix need standardized rules, terms, and conditions to allow microgrids to go forward on a more widespread basis. The Commission can create the rules of the road that would help businesses like ours and thereby provide many benefits which extend to the environment, the economy, and assure resiliency.

Sincerely,



Scott Hettema  
Vice President, Legal  
Equinix, Inc.

cc. Marybel Batjer, President, California Public Utilities Commission  
Martha Guzman-Aceves, Commissioner  
Liane Randolph, Commissioner  
Clifford Rechtschaffen, Commissioner