September 8, 2020

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

Subject: Rulemaking 19-09-009; Microgrids

Dear Commissioner Shiroma,

On behalf of the American Lung Association, I am writing comment on proceeding Rulemaking 19-09-009 related to microgrids and resiliency. As California continues to suffer through increasingly destructive climate-driven wildfires, the Commission's work to enhance the deployment of clean, reliable microgrid solutions remains an important element of protecting public health.

The American Lung Association supported Senate Bill 1339 (Stern, 2018) and encourages the Commission to move forward with a clear pathway to clean backup power generation. Californians face the most difficult air quality challenges in the United States, with 98 percent of Californians living in a county affected by poor air quality according to the American Lung Association’s State of the Air 2020 report. As you and your fellow Commissioners consider rules that will ultimately determine the state’s framework for microgrid adoption, we ask that you prioritize policies that will increase access to clean microgrid technologies that support a shift away from reliance on polluting diesel-powered generators.

As California works toward solutions that protect public health by reducing emissions, while enhancing community resiliency and choice, it is critical that the Commission’s efforts include a standardized, technology-neutral tariff that would support immediate deployment of clean, customer-owned power solutions that support clean air goals. Rather than employing old, dirty backup power sources that can negatively impact the health of children, seniors and others more vulnerable to harmful air pollutants, we hope that your Commission will enable access to the clean energy solutions that support and protect public health.

Thank you for considering our comments, and please feel free to contact me with any questions at william.barrett@lung.org.

Sincerely,

Will Barrett
Clean Air Advocacy Director

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