

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

Order Instituting Rulemaking Regarding
Microgrids Pursuant to Senate Bill 1339 and
Resiliency Strategies.

Rulemaking 19-09-009

**JOINT PARTIES MOTION TO INCLUDE MARCH 26 WORKSHOP ON THE
RECORD AND FOR AN ADDITIONAL WORKSHOP ON TECHNICAL ISSUES**

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April 9, 2024

JOINT PARTIES MOTION TO INCLUDE MARCH 26 WORKSHOP ON THE RECORD AND FOR AN ADDITIONAL WORKSHOP ON TECHNICAL ISSUES

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Green Power Institute (“GPI”), the Center for Biological Diversity (“Center”), The Climate Center, PearlX Infrastructure, (“PearlX”), the Local Government Sustainable Energy Coalition (“LGSEC”), Sunnova Energy Corporation, and the Microgrid Resources Coalition (“MRC”) (collectively, “Joint Parties”) respectfully submit this motion to add the recording of the March 26, 2024, workshop into the record and to schedule one additional workshop on technical issues regarding community microgrids.

I. Description of Joint Parties

The Green Power Institute is the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, a non-profit environmental and social advocacy group. Under the direction of Dr. Gregory Morris, the Green Power Institute performs research and provides advocacy on behalf of renewable energy systems and the contribution they make to reducing the environmental impacts of fossil-based energy systems.

The Center for Biological Diversity is a non-profit membership organization advancing the conservation of endangered species and the protection of their habitats against the climate emergency. As part of that mission, the Center strives to reduce the environmental impacts of energy policy and development, including greenhouse gas emissions and harm to imperiled plants and wildlife. The Center’s Energy Justice Program advocates for and educates the public about renewable energy, including the need to maximize distributed energy resources and other aspects of the transition from fossil fuels.

The Climate Center is a non-profit organization working to rapidly reduce climate pollution at scale. The Climate Center’s Community Energy Resilience Program is working to accelerate development of clean energy resilience in disadvantaged communities that suffer the most from air pollution and power outages.

LGSEC represents 17 cities and 23 counties, jurisdictions that govern almost three-quarters of the state’s population, and close to two-thirds of California’s electricity demands. LGSEC members serve as administrators, designers and lead implementers of a host of community choice aggregator, energy efficiency, demand response, building decarbonization, transportation electrification and other energy supply, demand, and management programs.

The MRC is a national association of leading microgrid owners, operators, developers, suppliers, and investors formed to promote microgrids as energy resources by advocating for policy and regulatory reforms that recognize and appropriately value the services that microgrids offer, while ensuring non-discriminatory access to the grid for various microgrid configurations and business models. The MRC works for the empowerment of energy customers and communities.

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”) — such as local renewables, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other

stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

Sunnova (SCMC) is a limited liability company organized under the laws of California. SCMC's principal place of business is 6531 Irvine Center Drive, Suite 200, Irvine, CA 92618. SCMC is an indirect whollyowned subsidiary of Sunnova Energy International Inc., a leading residential solar and energy storage service provider listed on the New York Stock Exchange with approximately 200,000 customers across the United States and its territories.

PearlX's mission is to deliver cutting edge clean energy infrastructure to the entire multifamily and rental housing market space, and in doing so, solve the affordability, access, justice and equality problems associated with the energy transition. PearlX executes its mission by providing renters, including lower and middle income renters, with energy protection and low-cost power. Core to its business is the recognition that rental commercial properties represent heretofore untapped flexible grid assets, especially in the multifamily space.

II. Motion to include workshop in record and for an additional workshop on technical issues

1. The March 26 workshop should be entered into the record

The Joint Parties appreciated the opportunity to present and discuss the IOUs' and other parties' tariff proposals on March 26, 2024. The workshop was the only opportunity in this Track 5 for stakeholders to ask clarifying questions and discuss elements of the various proposals for a multi-property microgrid tariff. The discussion was helpful and it would benefit the Commission and other policymakers to have the discussion on the record. Without being on the record the Commission will not be able to issue a fully informed proposed decision. Given the effort over

the last three years by many parties to create detailed tariff proposals, and given the robust and helpful discussion had on the various proposals, it would be prudent for the Commission to include the workshop in the record of this proceeding. This record would consist of the recording of the Zoom workshop, a transcript if available, and all party presentations. The Joint Parties hereby move that this be done.

2. An additional workshop on technical issues should be held

The Joint Parties also request that one additional workshop be held to discuss technical issues surrounding community microgrids. These technical issues, which were touched upon but not discussed in any detail at the March 26 workshop, include:

- The role of smart meters in allowing IOUs or other community MG operators in billing customers and/or limiting power delivery in defined MG areas
- The impact of community MGs islanding, and mitigation options, on downstream utility customers (if a community MG islands on a radial circuit all customers downstream would, all else equal, also lose power from the utility)
- Reconciling costs and timelines for microgrid island studies (at this juncture, each utility has proposed very different details on this important aspect of community MG development)

Regardless of what tariff(s) the Commission adopts, these issues should be discussed further since they will affect all community MGs, including MIP, CMET and other MGs.

III. Conclusion

For the foregoing reasons, the Joint Parties respectfully request that the Commission grant this Motion.

Dated: April 9, 2024

Respectfully submitted,

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