

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



January 11, 2021

**Re: Frontline Community Priorities for Proposed Decision on Track 2 of the Commercialization of Microgrids (SB 1339)**

Dear CPUC Commissioners and Administrative Law Judge Rizzo,

The Reclaim Our Power Campaign brings together Californians that have been burdened with the impacts of a dirty, dangerous energy system: frontline communities who are poisoned by dirty gas-fired power plants, elderly and medically vulnerable who most depend on reliable electricity, low-income households who can least afford skyrocketing electric bills, and immigrant workers and residents displaced by recent wildfires. We write to you with our community priorities in response to the Proposed Decision (PD) in Track 2 of the Microgrid Proceeding, R. 19-09-009 to implement SB 1339's mandate to promote commercialization of microgrids for California communities.

Black, Indigenous and people of color (BIPOC) communities in California are deeply invested in developing energy resiliency in our neighborhoods. We value energy as a human right to power our lives. Developing microgrid projects for buildings that serve our community energy needs are critical now and through the climate crisis. From this perspective we are concerned that instead of creating conditions for community owned and controlled microgrids, the PD expands the investor-owned utilities (IOUs) stranglehold on our energy system by facilitating development of complex microgrids to be owned and controlled by the utilities.

We urge these changes in the PD to move us toward community-driven energy resilience:

- **Invest in disadvantaged communities.** The proposed prioritization of \$200 million in microgrid incentives for “vulnerable communities” is a good start. Find even more funds to reverse historic disinvestment in our communities that have made it challenging to access financing to develop microgrid and other energy projects. Ensure that these funds explicitly serve disadvantaged and vulnerable communities because the loose language in the PD could allow affluent areas to drain these funds. (We echo comments by California Environmental Justice Alliance and GRID Alternatives).
- **Critical facilities should be defined by the public.** Frontline communities know which buildings are critical to protect against power shutoffs. The definition of “critical facilities”—those eligible for the Microgrid Incentive Program—in the PD includes facilities that do not serve critical resilience needs of our communities, while excluding those that do. Use definitions that will include the type most urgently needed by our communities: customer-side microgrids at hospitals, community centers, nursing homes, schools, churches, foodbanks, and other facilities for essential services. Instead of putting the IOUs in control of setting these criteria, open a meaningful public workshop process to set the scoring prioritization of the facilities. (We echo comments by California Environmental Justice Alliance, Sierra Club, Vote Solar and The Climate Center).

- **Encourage community development with a new microgrid tariff.** To implement the commercialization of microgrids mandated by SB 1339, a differentiated tariff structure to address historical inequities that have impeded microgrid development in our communities is needed but absent from the PD. We need to see standards set that would facilitate community development of microgrids independent of the IOUs. (We echo comments by Microgrid Resources Coalition, Vote Solar and The Climate Center).
- **Clean microgrids, not dirty.** Permitting the IOUs to expand diesel generation at IOU substations under the microgrid program is preposterous and runs counter to climate, environmental justice and public health goals. Do not authorize continued IOU diesel generation that will be paid for by ratepayers beyond the 2021 fire season. We remind the CPUC of its repeated assurances that diesel was to be a short-term solution to be followed by a transition to clean generation. (We echo comments by California Environmental Justice Alliance and Sierra Club).
- **Provide opportunities for community ownership.** Do not undermine community-based microgrid development by putting increased control and ownership of these systems in the hands of the IOUs. IOUs like PG&E are the corporate entities whose failures on public health and safety are the reason why we need to build microgrids in the first place. The PD should empower communities to invest in their own energy futures—to pursue microgrid development that meets community needs, rather than, as the PD proposes, forcing them to work through utilities that represent an outmoded and problematic energy model.

We call for the Commission to carry out the mandate of SB 1339 in a manner that supports the needs of frontline communities to develop a sustainable and resilient energy future. Utility-caused wildfires and power shutoffs have created an urgency for community-based resilience centers and community-designated critical facilities to mitigate these impacts. We look forward to your adoption of our priorities for microgrid development that charts a path for community-driven energy resilience.

Sincerely,



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CC: R. 19-09-009 Service List Members  
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