

Framing Questions for CPUC re Distribution Resources Plans

October 23, 2015

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Introduction

The Local Government Sustainable Energy Coalition (“LGSEC”),¹ the Southern California Regional Energy Network (“SoCalREN”), and the San Francisco Bay Area Regional Energy Network (“BayREN”)² are pleased to have the opportunity to help frame the upcoming workshops on utility applications for Distribution Resources Plans (“DRP,” R.14-08-013, et al.). We respectfully suggest that the DRPs developed by the utilities do not adequately account for actions occurring in the markets, outside the control of the utilities, which could significantly impact future distribution system investments. Our comments are driven by the responsibility local governments have for the well-being of our communities. Below we suggest additional issues for the CPUC to consider at the workshop on November 10.

A Functioning Distribution Grid is Essential to Local Government Core Functions

Local governments must be included as active participants in the distributed resource planning process. Local government participation ensures that appropriate energy systems will be deployed to support the community’s resilience to the consequences of climate change.

Local governments are responsible for ensuring the social, economic, environmental, and cultural well-being of their communities. Climate change presents risks to local government

¹ Across California, cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities are members of the LGSEC. Each of these organizations may have different views on elements of these comments, which were approved by the LGSEC’s Board.

² The BayREN is a collaboration of the nine counties that make up the Bay Area. Led by ABAG, the BayREN implements effective energy saving programs on a regional level and draws on the expertise, experience, and proven track record of Bay Area local governments to develop and administer successful climate, resource, and sustainability programs.

functions, including water supply, wastewater treatment and disposal, transportation, flood and coastal management, waste management, providing and maintaining social infrastructure, civil security responsibilities, and community support. These challenges mandate local governments to undertake climate change mitigation and adaptation, as well as requiring others to manage the associated risks.

A common denominator underlying all of the above risks is the energy system's vulnerabilities to a variety of climatic changes, including impacts from more frequent and severe extreme heat waves and the prolonged drought throughout the state. The impacts of climatic change on the energy system are numerous: heat waves decrease the efficiency of thermal power plants and substations, and reduce power carrying capacity of transmission and distribution lines during peak electricity demand. Sea level rise, coastal flooding, and wildfires increase risks to energy infrastructure. Protracted drought results in less reliable hydropower resources.

Within their jurisdictions, local governments are on the front line and are responsible for taking a wide range of decisions that can make or break the success of any strategy on climate change. Local governments must evaluate physical vulnerabilities, identify population segments that are most susceptible to climate change, and prioritize where actions are most needed. These activities lead to the identification of regional needs and development of local projects that are essential to effective planning and implementation of any future energy system.

Local Governments Should Be Partners in Developing DRPs

Local governments are essential key partners in the local level planning that is occurring. In our survey of LGSEC members, **not a single local government** was consulted by the utilities as the utilities developed their DRPs. There is no accounting, for example, of the end-use cluster model being deployed in Santa Clara County for grid resiliency, which looks at how to avoid cross-sector impacts in the event of an electricity outage. Another example: it is not clear if and how the DRPs consider population growth scenarios.

Suggested Issues for November 10 Workshop

As the CPUC evaluates the DRPs, we suggest the Commission ensure that local government plans and policies are incorporated into growth scenarios. The Commission also should consider a pilot on locational benefits that has as its goal the development of a methodology to measure whether and how the DRPs are helping local government achieve their locally adopted goals for addressing climate change.

The LGSEC, SoCalREN, and BayREN suggest the CPUC consider the following questions to assist in this task:

- What roles should local governments play in the DRP to support local community safety and resilience?
- How should the utility DRP be integrated with specific local government policies, ordinance and/or projects that support local energy system reliability, community resilience and sustainability?
- What is the requirement for utilities to engage in a collaborative process with key players in local jurisdiction responsible for climate action/adaptation planning?
- What roles should local governments play in defining and expanding the use of DERs that support customer choices and community needs?
- How can local community cost and benefits (i.e. health, safety, resilience, local economy, etc.) be captured in the cost-benefit evaluation protocol for valuing DERs?