

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

Order Instituting Rulemaking Regarding  
Policies, Procedures and Rules for  
Development of Distribution Resources Plans  
Pursuant to Public Utilities Code Section 769

Rulemaking 14-08-013

---

**COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION  
ON DRAFT GUIDANCE FOR DEVELOPING DISTRIBUTION RESOURCES PLANS**

Jody London  
P.O. Box 3629  
Oakland, California 94609  
510-459-0667  
[jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)

For the Local Government Sustainable  
Energy Coalition

December 12, 2014

## **I. INTRODUCTION**

In accordance with the November 17 Ruling of Commissioner Picker, the Local Government Sustainable Energy Coalition<sup>1</sup> (“LGSEC”) submits these comments on the Draft Guidance for the investor-owned utilities as they develop Distribution Resources Plans (“Plans”). In Reply Comments submitted in October, the LGSEC outlined the interests of local governments in these Plans, and the opportunities they present to complement ongoing local government work on emergency preparedness and climate change adaptation. Our comments on the Draft Guidance are focused for now on two areas: data access and coordination.

## **II. ACCESS TO DATA IS CRITICAL**

The LGSEC was an active participant in the Commission’s longstanding work in R.08-12-009 to develop policies on access to energy usage data. The Draft Guidance rightfully recognizes that data will be important in the development and use of Distribution Resources Plans. The Commission should continue to push to make as much data easily accessible in public venues, in formats that can be accessed and manipulated electronically.

It is worth noting that some of the data listed in the Draft Guidance are data that local governments possess, for example, locations of electric vehicle infrastructure and combined heat and power installations, and demographics. This is an opportunity for the Commission to highlight the importance of coordination between the utilities and local governments, thereby simplifying access to data that is important to developing the Distribution Resources Plans.

The Commission no doubt recognizes that the data needs identified in the Draft Guidance are congruent with the opportunity the Commission has discussed to establish a statewide energy

---

<sup>1</sup> The LGSEC is a statewide membership organization of cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities. Each of these organizations may have different views on elements of these comments, which were approved by the LGSEC’s Board. A list of our members can be found at [www.lgsec.org](http://www.lgsec.org).

data repository.<sup>2</sup> The LGSEC encourages the Commission to consider the value that a data repository would offer California in the context of distribution resources plans.

The LGSEC reserves the opportunity to comment in greater detail on data access after the utilities submit their proposals in this area.

### **III. COORDINATION WITH LOCAL GOVERNMENTS**

As indicated above, data access is one area where coordination between utilities and local governments will be mutually beneficial. The Draft Guidance also emphasizes iterative planning and coordination between utilities and other actors on the grid. This too provides an opportunity for the utilities to coordinate with local governments and related entities. The inclusion of environmental, economic, and social equity benefits in the required analysis of the locational value of distributed energy resources provides a specific opportunity to drive integration of Distribution Resource Plans with local Climate Action Plans or similar local planning processes where the potential benefits of distributed energy resources have already been documented. We note that local governments also are actively working on resiliency plans in response to climate change and other natural disasters and emergencies. This is another area where utility coordination with local governments will help ensure that Distribution Resources Plans reflect locally determined priorities. The Commission should be more explicit in its direction to the utilities to coordinate with local governments as partners in the deployment of far greater quantities of distributed energy resources, as anticipated in Assembly Bill 327. The Guidance the Commission provides should reflect this priority.

---

<sup>2</sup> The Commission hosted a workshop on this opportunity on October 28, 2014.

December 12, 2014

Respectfully Submitted,

A handwritten signature in blue ink that reads "Jody London". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jody London  
P.O. Box 3629  
Oakland, California 94609  
510-459-0667  
[jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)

For the Local Government Sustainable  
Energy Coalition