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February 23, 2021

Energy Division  
Attention: Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Southern California Edison Company's Reply to Protest of Local  
Government Sustainable Energy Coalition to Advice 4260-E-A

Dear Energy Division Tariff Unit:

In accordance with Section 7.4.3 of General Order (GO) 96-B, Southern California Edison Company (SCE) hereby replies to the Local Government Sustainable Energy Coalition's (LGSEC's) protest to SCE's Advice 4260-E-A.

On July 17, 2020, SCE submitted Advice 4260-E, describing SCE's organizational structure that meets the requirements to have dedicated staff to assist local and tribal governments to develop microgrid and resiliency solutions, as required by Ordering Paragraph 10 of Decision (D.) 20-06-017 (The Decision). At the request of the CPUC's Energy Division, SCE filed Supplemental Advice 4260-E-A on January 27, 2021, adding new text to SCE's Advice 4260-E. On February 16, 2021, LGSEC protested Advice 4260-E-A, arguing that, based on a survey of LGSEC members, SCE's organizational structure does not meet the requirement for SCE to have dedicated staff to assist local and tribal governments in the the development of microgrid and resiliency solutions. In this reply, SCE reiterates that it does indeed have dedicated staff as previously described in Advice 4260-E and Supplemental Advice 4260-E-A, and as required by the Decision. The Commission's approval of Advice 4260-E-A should be conditioned on SCE's ability to prove that it has dedicated staff who can assist local and tribal governments with resiliency projects, and not on a survey of anonymized LGSEC members.

### **THE COMMISSION SHOULD APPROVE SCE'S ADVICE 4260-E-A**

LGSEC's protest of SCE's Advice 4260-E-A appears to be predicated entirely on a survey LGSEC conducted of its members, that was not based on new circumstances or issues in the proceeding.<sup>1</sup> Through SCE's comments and reply comments on the Microgrid Track 1 Staff Proposal, SCE's Advice 4260-E, and its supplemental Advice

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<sup>1</sup> LGSEC Protest to SCE's Advice 4260-E-A, p. 1.

4260-E-A, SCE has continuously shown that it has dedicated representatives for local and tribal governments to assist those entities with developing microgrid and resiliency solutions.<sup>2</sup> For example, Advice 4260-E-A details how SCE's Business Account Managers advise and guide local and tribal government entities through project prioritization, pre-application processes, permitting and utility interconnections, connect them with SCE resources and subject matter experts, and maintain up-to-date knowledge on microgrids, resiliency solutions, and other matters.<sup>3</sup> Selective responses from LGSEC's internal survey should not supersede the robust evidence SCE has put forth demonstrating it has dedicated staff to assist local and tribal governments with developing microgrid and resiliency projects.

Further, LGSEC's membership is not restricted to local and tribal governments in SCE's territory, nor local and tribal governments at all. Rather, LGSEC's membership includes several entities that are neither local nor tribal governments, such as clean energy coalitions, waste reduction agencies, and climate advocacy groups.<sup>4</sup> LGSEC did not provide any data on what the specific survey questions were, which member organizations replied to the survey, or what percentage of members responded, making it unclear whether the respondents are actually local or tribal governments in SCE's territory. As such, it is inappropriate to rely on LGSEC's survey results to determine that SCE has not complied with Ordering Paragraph 10 of the Decision. Regardless, SCE welcomes the local and tribal government LGSEC members to provide SCE feedback related to discussing the development of microgrid and resiliency solutions or suggestions to improve communication and engagement.

While the Commission's disposition of SCE's Advice 4260-E-A should not be conditioned on LGSEC's survey, SCE responds to each challenge identified by LGSEC in the following section.

### **SCE HAS STAFF DEDICATED TO LOCAL AND TRIBAL GOVERNMENTS WHO CAN ASSIST IN THE DEVELOPMENT OF MICROGRID AND RESILIENCY PROJECTS**

Each city, county, and tribe in SCE's territory has a dedicated Government Relations Manager and Business Account Manager. The role of the Government Relations Manager is to manage relationships with local and tribal governments, which includes outreach and education related to SCE activities, such as wildfire mitigation and PSPS impacts, and education on state-mandated policy initiatives such as energy efficiency, renewable energy sources, distributed generation, transportation electrification, community resiliency, and other programs.<sup>5</sup> The role of the Business Account Manager

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2 SCE's Comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal, pp. 48-50; SCE's Reply Comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal, p. 11; SCE's Advice 4260-E, pp. 1-2; and SCE's Advice 4260-E-A, p. 2.

3 SCE's Advice 4260-E-A, pp. 2-5.

4 LGSEC's Coalition Members, accessible at: <https://www.lgsec.org/about/our-members/>

5 SCE's Advice 4268-E, p. 2.

is to assist local and tribal governments with everything from education and guidance on viable technology strategies to project installation, including microgrid and resiliency project assessment and development, application and interconnection agreement support, enrollment in SCE's programs, rates, and more.<sup>6</sup> SCE clarifies, however, that the sole function of these Business Account Managers is not just to assist on the development of microgrid and resiliency projects. These representatives have multi-faceted roles and it would be an inefficient use of customer funds to dedicate staff to solely assisting local and tribal government with microgrid and resiliency projects.

In addition, and as discussed in Advice 4260-E-A, 4259-E, and 4259-E-A, in 2020, SCE deployed its [Microgrids for Developers web page](#) with the specific objective of assisting entities such as local and tribal governments with microgrid and resiliency project development.<sup>7</sup> Further, and as discussed in Advice 4258-E-A, the workshops mandated by this proceeding, as well as the PSPS Working Groups, will provide additional opportunities for local and tribal governments to engage with SCE on microgrids, resiliency, PSPS impacts, and much more.<sup>8</sup>

SCE works with local and tribal government representatives and seeks feedback from them to improve communication processes, decrease organizational siloes, and engage other SCE subject matter experts as needed. As discussed in Advice 4260-E-A, SCE Business Account Managers and their leadership consistently seek feedback during their discussions with local and tribal governments.<sup>9</sup> Satisfaction surveys are routinely circulated to SCE customers, including local and tribal governments, for feedback. SCE will also use the workshops mandated by this proceeding to provide an additional avenue for feedback regarding SCE's outreach practices, including on microgrid and resiliency projects, electric grid and infrastructure plans, weather forecasting, and PSPS events.

Lastly, SCE supports continuous improvement in its communication with local and tribal governments and encourages LGSEC members to attend the workshops mandated by this proceeding and the PSPS Working Groups for additional opportunities to discuss SCE's work related to resiliency, microgrids, and PSPS. The Microgrid workshops will include a Collaborative Planning Session to improve engagement with local governments and tribal governments.<sup>10</sup> Finally, SCE has a Government Advisory Panel, made up of representatives of local and tribal governments, whom SCE meets with regularly to provide updates and receive feedback on the company's initiatives and programs such as wildfire mitigation, PSPS impacts, clean energy resources, and economic development programs.

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<sup>6</sup> *Id.*, pp. 2-3.

<sup>7</sup> SCE's Advice 4260-E-A, p. 2; SCE's Advice 4259-E, p. 2; SCE's Advice 4259-E-A, pp. 2-3.

<sup>8</sup> SCE's Advice 4258-E-A, pp. 2-5.

<sup>9</sup> SCE's Advice 4260-E-A, p. 4.

<sup>10</sup> SCE's Advice 4258-E-A, pp. 4-5.

**CONCLUSION**

SCE appreciates the opportunity to submit this reply to LGSEC's protest. For the foregoing reasons, SCE recommends that the Commission approve SCE's Advice 4260-E-A.

Sincerely,

/s/ Gary A. Stern, Ph.D.  
Gary A. Stern, Ph.D.

GAS:ea/jp:jm

cc: Edward Randolph, Director, CPUC Energy Division  
Steven Moss, LGSEC  
Service List R.19-09-009