

February 16, 2021

Communications Division – Advice Letter Coordinator
California Public Utilities Commission
505 Van Ness Ave., 3rd Floor
San Francisco, CA 94102-3298

Re: ADVICE 4260-E-A (U 338-E): Supplement to Advice 4260-E, Southern California Edison Company's Dedicated Staff for Local and Tribal Government Projects

Dear Communications Division,

The Local Government Sustainable Energy Coalition (LGSEC) hereby protests Southern California Edison Company's (SCE) Advice Letter (AL) 4260-E-A. LGSEC members include municipalities, regional energy networks, community choice aggregators, school districts and civically engaged nonprofits. The Coalition represents 14 cities and 23 counties, which have jurisdiction over almost three-quarters of California's population and reflect two-thirds of the state's electricity demand. LGSEC membership extends to 76 of California's State Assembly districts; 36 of 40 State Senate districts.

In its AL SCE generally asserts that its organizational structure meets California Public Utilities Commission (Commission or CPUC) requirements to have dedicated staff to assist local and tribal governments in the development of microgrid and resiliency solutions, as stipulated in Ordering Paragraph 10 of Decision 20-06-017, Decision Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions. Based on a survey of LGSEC members, SCE's assertion is not supported by local government's (LG) actual experience. For example,

- The majority of respondents either did not believe or were unaware that SCE offered them a dedicated individual to discuss microgrid development or resiliency.
- None of the respondents were satisfied with their ability to communicate with and receive information and assistance from SCE related to microgrid development and resiliency. Many were concerned with Public Safety Power Shutoff impacts, anxious to engage in discussions with the investor-owned utility related to climate mitigation, community resiliency and microgrid development.
- Respondents identified weaknesses in SCE's organizational structure and staff deployment, including: the prevalence of organizational siloes, which makes it challenging to engage necessary staff in conversations; difficulty accessing data; a lack of imagination/innovation; long delays in receiving responses to requests for information or assistance; and minimal outreach to LGs. One respondent summed things up with, "they are very bureaucratic."

Respondents pinpointed possible ways for SCE to improve its performance, such as: launching a committee or working group with LGs to determine ways to increase awareness of available utility resources; proactively meeting with LGs to discuss resiliency goals; and collaborating with LGs to develop plans and strategies to achieve state and local resiliency and climate-related goals, including as reflecting in microgrid deployment.

LGSEC requests that the Commission order SCE to incorporate these or other steps to improve its performance in a revised AL.

Respectfully,

Steven Moss
Regulatory Consultant