



September 21, 2022

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

**Re: Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies (19-09-009)**

Dear Commissioner Shiroma,

We are a group of 26 organizations interested in the equitable implementation of California’s energy programs, and specifically microgrids. With the 2022 fire season well underway, and many of our communities continuing to face outages and their attendant harms, it is extremely important that your agency ensures that the Microgrid Incentive Program (MIP) created in the Proceeding Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies (R. 19-09-009) is designed to be accessible and beneficial for disadvantaged vulnerable communities (DVCs). The Commission issued a Staff Proposal for the MIP which was based on a plan drafted by the state’s three big investor-owned utilities, and a coalition of nonprofits called the

Microgrid Equity Coalition (MEC) is pushing for changes in the proceeding to better enable communities and representative organizations to apply for funding and provide resilience to our community members. We urge you to implement the following key changes proposed in the MEC's most recent comments and request that you issue a proposed decision on MIP implementation as soon as possible. Continued delay is not an option, and ensuring the program is set up to function with our community's needs front and center is necessary for successful creation of community microgrids.

While some of our microgrid equity recommendations have been integrated into the program design, we have identified key aspects that still need to be addressed for it to truly benefit DVCs. We request that the Commission make the following changes to its Staff Proposal for the Microgrid Incentive Program:

1. MIP Application Development grants need to be provided to disadvantaged vulnerable communities (DVCs) at the beginning of the process to enable them to submit comprehensive, feasible applications. In order to be useful for DVCs, grants should be available at the initial phase of the MIP, so that DVCs can obtain the funding in time to retain the technical experts necessary to put together an application.
2. The scoring criteria need to be changed to ensure that projects from communities with limited financial resources are not disadvantaged. The MIP should aim to support community microgrids that meaningfully benefit people in disadvantaged communities, not just microgrids that happen to be located in DVCs and primarily serve corporate or industrial beneficiaries. Additionally, scoring must reflect the need for clean energy microgrids, rather than fossil fuel microgrids, by rewarding more points for projects that reduce emissions.
3. The Commission should reject the proposal to require a showing of long-term financial viability for the proposed project because it is onerous, uncertain, highly dependent on regulatory decisions and policy actions, and likely to prejudice projects that would benefit under-resourced communities.
4. The Commission should reject the proposal to award additional points to projects only when they already have outside funding, since this will discriminate against projects that are not otherwise already funded.

Our communities want to see a Microgrid Incentive Program that succeeds in its goal of enabling microgrid projects that benefit the most vulnerable disadvantaged communities. We support these changes proposed by the MEC and hope the Commission can move forward promptly to address these issues and achieve a program that can be an example for other states.

Signed,

Abbas Khalid, Movement Generation

Susan Silber, Collective Resilience

Stephanie Doyle, Vote Solar

Bethsaida Ruiz, Resilience Network

Tom Llewellyn, Shareable

Mari Rose Taruc, Reclaim Our Power: Utility Justice Campaign

Antonio Díaz, People Organizing to Demand Environmental and Economic Rights (PODER)

Leo Briones, Coalition for Environmental Equity and Economics (CEEE)

Bob Allen, Urban Habitat

Matt Leonard, Oil and Gas Action Network,

Kurt Johnson, The Climate Center

Bradley Angel, Greenaction for Health and Environmental Justice

Crystal Huang, People Power Solar Cooperative

Laima Diaz Vepstas, North Bay Organizing Project

Margi Clarke, Justice Affinity Group

Myrah Vivanco, Environmental Justice Coalition for Water

Destiny Rivas, San Juaquin Urban Native Council

Angel Luevano, Todos Unidos

Martha Camacho-Rodriguez, Socio Eco Education

Tyler Valdes, California Environmental Justice Alliance

Katherine Ramsey, Sierra Club

Pastor Ambrose Carroll, Green the Church

Sheela Gunn-Cushman, Electricity Equals Life

Emi Yoko-Young, Race Forward

Shina Robinson, Asian Pacific Environmental Network

Laura Neish, 350 Bay Area