Public Comment for JPA CCA Workshop 111619

Jay Powell, speaking on behalf of Community Energy Action Network a cooperation promoting local clean energy in San Diego.

**We have a Choice of who will be our primary provider of electricity and you have made that choice. But we have another choice to make. Where will that energy come from?**

**Do we import electricity and export jobs and money or do we invest in our communities by generating energy and jobs and reinvesting funds generated in these communities?**

**"Community Energy" means generating renewable energy from within the local communities and benefiting those communities through local jobs and businesses participation --**

**And it means engaging residents, businesses and stakeholders in helping shape the policies to achieve that kind of an energy future. It is a COMMUNITY DEVELOPMENT approach.**

I serve as the Environmental Advocate member on an 11 member Sustainable Energy Advisory Board established by the City of San Diego in 2003 with a diverse stakeholder representation.

SEAB advises Mayor and City Council on energy policies to achieve the City's Climate Action Plan goals. (The City Sustainability Department, which is providing support for the JPA formation provides the staff support for SEAB and information about SEAB is available through links on the City's Sustainability website.)

**RECOMMENDATION**: I urge you to consider formation of a similar Sustainable Energy Advisory Board with constituent community and technical advisory standing committees called out in your formation resolutions documents.

**GUIDING PRINCIPLES**: I have provided a two sided one page copy of the Guiding Principles recommendation adopted by SEA Board in 2015 for evaluation and implementation of a CCA program.

I have highlighted some of the recommendations that I would like to bring to your attention which emphasize **local distributed energy generation systems.**

--( # 5. ) **local implementation** such that the CCA Program should promote and enhance consumers' ability to meet their own energy needs through investment in building and site-based renewable energy and energy storage on homes, businesses, (and institutions that are) integrated into the utility distribution system.

-- (# 6) **local renewables**... "make San Diego a net energy producer"

- "distributed energy generation ( ie, PV panels on roof tops and parking lot and structures and storage are heavily promoted to push electricity up and out of the neighborhoods into the rest of the local grid, storage systems and eventually out of the city."

- "ensure incentives and resources are provided equitably to all communities"

(# 7) "(adopt a) phase in (plan) to achieve the goal of producing all CCA energy from renewables generated within and on developed land or land designated for urban development".

Note that the DER potential on just commercial properties in the City as identified by The Clean Coalition for the City of San Diego participation in the national Solar Energy Innovation Network project was identified at over 500 mws for large sites and estimated at over 2 Gigiwatts if smaller commericial sites were included.

2 gigiwatts is enough to power average energy needs of over 500,000 homes during peak hours - when the sun is shining bright and air conditioning loads are building.

2 gigiwatts is equivalent to the rated capacity of the San Onofre Nuclear facility shutdown in 2012...

The Clean Coalition has also proposed a wholesale FEED IN TARIFF that gets that commercial site generated power into the local electrical system economically.

**RECOMMENDATION** Encourage you to direct your staff to engage consultants necessary to complete studies like that completed by the Clean Coalition for commercial sites and feed in tariffs for all the jurisdictions in the JPA constituent territories.

**USE of the PUBLIC RIGHT of WAY**.

The rapidly changing energy landscape including the proliferation of CCAs has forced IOUs including SDGE to reassess their role and business model. SDGE has decided to get out of the business of electricity procurement AND focus on transmission and distribution facilities.

A key component of any electrical system is of course the poles and wires now provided by SDGE. They use the Public Right of Way to transmit and distribute their energy product now and they will use it to distribute the energy the new CCAs will procure.

We need a fully functional two way system to support locally generated electricity organized into what are called microgrids.

City of San Diego has authorized consultants to assist in review of the 50 year old Franchise Agreement for transmission of gas and electricity which expires in Jan 2021.

These consultants will review and advise on legal options, strategic approaches, and provide an assessment of value of the assets installed in PROW by SDGE.

**RECOMMENDATION:** I encourage JPA and each of constituent entities to establish liaisons with City SD on this effort...

THANK YOU FOR YOUR CONSIDERATION.

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Excerpt from The Clean Coalition website regarding Sam Diego Solar Siting Survey

The San Diego Solar Siting Survey identified approximately 500 megawatts (MWac) of technical solar siting potential for large commercial-scale solar on built environments within the City. The survey pinpointed the location and estimated project sizing for over 120 prospective solar sites that could host solar PV systems of at least 1 MWac.

While a portion of the solar siting potential is on large rooftops, more than 75% is on parking lots and parking structures, which are often overlooked as siting opportunities for clean local energy. In total, this survey identified enough local solar capacity to fulfill the average power needs of about 500,000 homes during peak solar production hours.

San Diego has even more commercial-scale solar siting potential than was identified in this survey, which focused on large solar projects because they are more cost-efficient than smaller projects and therefore have greater potential to attract project developers and investors. If a smaller minimum project size of 500 kilowatts (kW) were considered, the Clean Coalition expects that the technical solar siting potential in San Diego would increase by a factor of two to about 1 GW; this would double again to 2 GW if considering projects as small as 100 kW.

SOLARSD/JPA CCA Public Comment for 111619