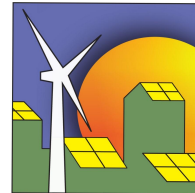
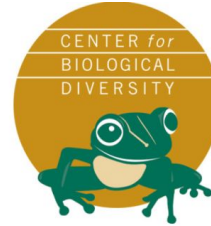
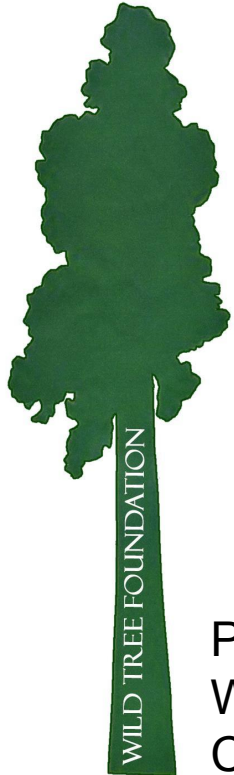


Toward a High DER Future: A Community Stakeholder-Focused Alternate Proposal



Presented by
Wild Tree Foundation and
California Alliance for Community Energy

Response to Gridworks “DSO White Paper” + Proposed Plan

The Paper – well-intended but flawed.

- Obstacles to community stakeholder understanding and engagement - language and concepts
- No recognition of CPUC’s Environmental and Social Justice commitments
- DSO objectives are assumed, not developed in proceeding workshops

Proposed process is antithetical to community stakeholder engagement

- Centers on consultants, not community stakeholders
- Process yields consultant reports not a stakeholder-informed record

Our Alternative Proposal Five Recommendations

Recommendation #1: Guiding Document

A NEW “White Paper” – to cover:

- The lived experience of frontline communities TODAY.
- The risk of the “no change” scenario to our communities
- What are DERs and their potential benefits to communities & state
- The existing barriers to DER regulatory framework: IOU grid control and operation
- This DSO Proceeding is an opportunity to remove barriers to equitable access to the benefits of DER.

Bottom line: High Stakes for Communities.

A new White Paper must convey the urgency and importance of this effort

Recommendation #2: Objectives

Track 2 should:

- Focus on Community stakeholder engagement
- Engage Communities to define DSO objectives to meet community needs
- Define the objectives in plain language with understandable, real-life terms

Recommendation #3: Improve California Process

- Models from outside California were inefficient and non-productive
- California can and needs to innovate in addressing community and public needs

Recommendation #4: Workshops and Topics

We recommend five workshops – that would engage both Stakeholders and Parties in order to:

Stakeholder Engagement:

- “Draft Community Stakeholder Engagement Plan” *with*
- Guiding Principles

#1 – Objectives:

- Societal goals and public policy objectives for High DER Future
- Identify current barriers to achieving these goals and objectives

#2 – Requirements to remove barriers and achieve these objectives

#3 – Essential operations and functions for meeting the requirements in #3

#4 – Roles and responsibilities of the grid operator and other parties needed to carry out essential operations

Recommendation #5: An Inclusive Record

The engagement of community stakeholders requires trust that their voices will be heard – not diluted or filtered by others.

- Record all workshop presentations and circulate transcripts
- Facilitator's report circulated for comments on the record
- Revised workshop report must be responsive to comments and placed on the record
- Following the workshops, invite on-the-record DSO proposals from all stakeholders
- On record comment and reply comment to follow exploration of DSO proposals
- Model process from other CPUC proceedings, e.g. R.20-08-022 (clean energy finance) and R.19-09-009 (microgrids)