



Senator Hueso  
State Capitol  
Sacramento, CA. 95814

RE: SB 1088 – OPPOSE

Dear Senator Hueso:

The undersigned environmental organizations work to protect California’s air, water and its citizens’ health and wellness. We strongly support making Californians harmed by the fires whole and taking steps to prevent future forest fires, but, as currently written, we oppose SB 1088. There are several concerning provisions, but specifically there are sections of the bill that will hurt the state's ability to generate and store electricity from distributed resources.

There is no doubt that climate change is happening. The past fourteen years have been hotter than the last. We have experienced devastating droughts, fires are raging hotter and more fiercely and now massive rain storms are causing mudslides destroying homes and entire communities. The impacts of a warming climate are not a concern to worry about in the future. It is happening now and we need all the tools in the tool box to stave off the worst impacts of climate change.

We support the bill’s intent to require that the Public Utilities Commission (PUC) establish fire risk reduction and mitigation standards. That part makes sense.

However, the language used to do so does not. If we are going to achieve an economy with 100% clean energy California’s energy portfolio must be a thoughtful blend of both utility scale and distributed energy to achieve the state’s climate goals. Your bill (as currently written) cripples the distributed energy resources industry, and the state’s ability to meet its climate change objectives in some of the lowest cost, safest ways possible.

Distributed resources include distributed renewable generation resources, energy efficiency, energy storage, electric vehicles, and demand response technologies – technologies that California has grown to know, love, and rely upon. For example, rooftop solar energy plays a critical role in our state’s electrical grid and is helping us to improve our local air quality and cut our global warming pollution. According to the California Energy Commission:

*As of November 1, 2017, almost 10,520 MW of distributed generation capacity was operating or installed in California, with an additional 440 MW pending. The data include about 5,900 MW of*

*behind-the-meter solar, which far exceeds the state's California Solar Initiative (CSI) goal of 3,000 MW on residential and commercial sites by the end of 2016.*

Rooftop solar is not the only technology that is critical to California's economic and clean energy growth. Battery storage, including in electric vehicles, will allow Californians to capture the power of the sun during the day and use it in the evening. Energy efficiency helps to reduce the need for transmission lines, fossil fuel power plants, and keeps people's bills low. These are the kinds of signature, innovative technologies that we need to be encouraging to meet California's clean energy future and lead the world to avoid the most devastating effects of climate change.

Specifically, we have the following concerns with your bill, as they relate to distributed clean energy:

- 1. Section 2899.3 (b) and section 2899.3 (c) prohibits electric utilities from contracting to provide distribution safety and reliability obligations.*
- 2. Section 1(v) finds that the CPUC should not "rely" on unregulated utilities to provide electric safety and reliability.*
- 3. Section 2899.3 (a) defines the "distribution safety or reliability obligations" of electrical corporations broadly as "owning, controlling, operating, managing, maintaining, planning, engineering, designing, investing in and constructing" the distribution system.*

California is a world leader when it comes to clean technologies and it is this sense of optimism, vision, and industry leadership that is going to help us reduce the horrible impacts we are seeing from the changing climate. We need to maintain the ability to innovate in ways that are safe, clean, and reliable.

I hope that we can work with you to achieve the goals you have set out in this bill and to keep a clean energy future growing here in California for current and future generations.

Sincerely,

Rebecca Saltzman  
California League of Conservation Voters

Lauren Navarro  
Environmental Defense Fund

Dan Jacobson  
Environment California

Cc: Senator Dodd and members of Senate Energy Committee