BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 and Resiliency Strategies.	Rulemaking 19-09-009 (Filed September 12, 2019)

REPLY COMMENTS OF MICROGRID RESOURCES COALITION TO ON TRACK 1 MICROGRID AND RESILIENCY STRATEGIES STAFF PROPOSAL

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Introduction

The principal goal of SB 1339 was to "facilitate the commercialization of microgrids for distribution customers of large electrical corporations."[1] The Track 1 proceeding is limited and overlaid by the urgency to bolster resilience arising from wildfires and PSPSs, but still seeks to "facilitate the commercialization of microgrids for distribution customers of large electrical corporations."[2] In reviewing the initial comments on the staff proposals, there is widespread agreement that microgrids are a primary tool in securing resilience for California communities. The Staff Proposals, however, represent a narrow sample of what could be achieved with tariff modifications alone,[3] but they do address two critical areas: interconnection and support for communities. The comments received by the Commission, while parties make various suggestions about the details, provide broad support for these proposals. The utility responses range from examples of real forward thinking to outright recalcitrance.

The MRC believes that *departing load charges and standby charges are the most significant barriers to "accelerating the deployment of microgrids" that can be addressed in the short-term*. As emphasized in the MRC Scoping Comments and Initial Comments, the CPUC Scoping Order, the Staff Proposals and the Utility Proposals fail to address these principal impediments to microgrid project development. The MRC believes these charges are neither just nor reasonable as currently implemented.

[1] SB 1339 (Stern 2018) at (1).
[2] Cite to CPUC Scoping Order at 1.
[3] We are hardly alone in making this observation. See e.g. the Comments of Camptonville: "CCP has found the focus of the staff proposal, and the following section relating to tariff improvements, exclusively focusing on NEM and battery storage. This narrow focus concerns the Partnership. We ask the Commission to take a wider view of the many CPUC programs, and renewable energy project types that could be used to support microgrids. . . ." CCP Comments at 5.

In addition, the MRC notes that among the Comments a critical dimension indirectly emerges that remains unaddressed in this proceeding: the capacity of the existing grid to incorporate and take advantage of additional microgrids. A number of the Commenters recognize that the existing queue process serves to allocate the cost of expanded grid capacity. Other Commenters address related grid design issues such as sectionalization, which allow the larger grid to take advantage of the services of microgrids in an emergency. Track 1 should explore the role of microgrids in providing services to the utilities in the event of an emergency in support of sectionalization. This is essential to the resiliency solutions sought by the Commission being able to extend beyond the load included within a microgrid to the broader community. Like departing load and standby charges, this can be addressed on a short-term basis in Track 1. In the future, we encourage the Commission to review how service agreements between microgrids and the utilites could include services under blue sky conditions. However, again, these agreements can play a central role in supporting sectionalization and community resiliency under emergency or PSPS conditions and are capable of being implemented in the short-term for such purposes.

Regarding the overall planning process for Track 1 and future tracks, many Commenters, including the MRC, agree that planning for resilience must be incorporated in the utilities' Integrated Resource Planning ("IRP") process taking community emergency and economic planning into account. This should be part of a larger state moderated process that integrates resilience and decarbonization goals. We recommended consultation with the state Emergency Services Office and note that SB 1339 requires consultation with the state Energy Resources Conservation and Development Commission. We support the allocation of the cost of system upgrades to meet uniform statewide resilience goals to all ratepayers. Overall, we believe that long-run resilience will be best served by co-operative relationships between the utilities, their customers, and communities on the one hand, and mutually reinforcing grid and microgrid operations on the other.

What follows below first addresses certain overarching questions raised by the Commenters:

- Goals and standards for the tariff; and
- California renewable energy goals.

It then discusses the critical gaps in the Staff Proposals:

- Standby Charges;
- Departing Load Charges; and
- Upgrading and rethinking the grid.

Finally, it discusses certain elements covered by the Staff Proposal

- Interconnection; and
- Tariff changes.

Attachment A contains a glossary of terms used in this filing.

1. Tariff Implementation

The MRC concurs with the premise of the CPUC Scoping Order that action is urgent to achieve as much as can be done before the next fire season, while not losing sight of longer-term objectives. However, the narrow focus of the Staff Proposals omits much that could be done quickly. A great many of the Commenters focus on the limited interconnection proposals relating to solar plus storage, and point to the exclusion of particular technologies or call for a level playing field for all.[4] Moreover, if the experience of SDG&E is any indication, these proposals already receive rapid approval. Also, as SCE notes, "SCE routinely receives thousands of NEM projects per month and these projects have been adequately streamlined into an 'assembly line' process that can handle this level of volume."[5]

The MRC strongly suggests that the focus of Track 1 be expanded in ways detailed below and concurs with at least six other parties[6] who suggest the Commission begin work immediately, either in Track 1 or concurrently, on a full-fledged microgrid tariff. This is what SB 1339 requires. If needed, this can be done serially, by adding additional provisions as the Commission proceeds.

The Administrative Law Judge's Ruling Requesting Comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal dated January 1, 2020 requested comments on whether rulemaking or legislation would be required for any proposals, and what standard should be applied to Commission actions. The MRC believes that all suggestions discussed below can be accomplished by revisions to existing tariffs. Other Commenters offered a variety of competing and incommensurate standards to be applied by the Commission.[7] The fundamental standard by which all tariffs must be judged, of course, is whether they are just and reasonable. For the tariffs, we suggest that the utilities "Procure well-defined grid services from end-use customers and third-party DERs", as the Climate Center puts it,[8] and that services from the grid to microgrids be equally well defined. Accurate definitions allow accurate costing and valuation. Further, whenever services can be procured through markets or competitive processes, they should be. Additionally, the tariffs should create a level technology playing field where outcomes are otherwise equivalent. Finally, except where state interests override, community-based decisions about what serves the community's interest should be respected.

2. Renewables and technology neutrality

[4] These include: FuelCell Energy, Doosan, Nevada CBT, SoCal Gas, Camptonville, DG Coalition, CHBC, Vehicle-Grid, Connect, Hydrogen Bus Council, Placer; and Cal ISO indicates that it can accommodate all technologies.
[5] SCE Comments at 27.
[6] Bloom, Nat. Fuel Cell, Doosan, Climate Center, GPI, CHBC
[7] *See e.g.* Comments of Clean Coalition,
[8] Climate Center Comments

As the CA Hydrogen Business Council put it, "A diverse array of technologies will be able to complement one another to supply maximum resiliency. Solar and batteries alone lack the ability to provide the long duration storage and generation that will be required during multi-day planned or unplanned outages."[9] While we support advances in biofuels and hydrogen and expect them (or other alternatives) to start to supplant natural gas over time, at this time these fuels either are not yet economic in many applications or locations or are in short supply or both. In addition to the its contribution to resilience, generation with the ability to load follow helps to integrate variable renewable resources. If natural gas is to be deployed in the electricity system, its highest and best use is assuring local resilience in lower capital cost installations that are highly efficient and can evolve with time. Those local resources can also support the grid during periods of normal operation.

Another great advantage of microgrids is their ability to integrate thermal and electric loads. From midsize buildings to large campuses and industrial operations, facilities need some combination of heat, cooling, process stem, and hot and chilled water. Most of that energy does not come from electricity, but rather natural gas and other thermal generation. Propane is also very common in rural areas of California. Thermal storage, principally ice or chilled water, can play the same role. This integration is comparatively complex, but it has the ability to substantially reduce carbon emissions through optimization of thermal, electric and cogeneration resources across multiple energy needs.

At least three Parties submitted comments suggesting that no fossil fuel be permitted in microgrids.[10] None of them addressed the problem of long-term resilience, and nor did they acknowledge that the suggestion is contrary to the policy expressed in SB 1339. A far larger group acknowledged that microgrids could encompass all resources certified by CARB,[11] and many went further to say that all Utility Proposals must meet the CARB requirements or even that Utility Proposals should not include fossil resources at all.[12] There is almost universal non-utility opposition to deployment of standard diesel-based temporary generation.[13]

3. Standby Charges

Even though standby charges were not raised in the Staff report, at least two other Parties, Mainspring and the National Fuel Cell, in addition to the MRC brought them to the Commission's attention. Steps to modernize standby charges to accurately reflect the

[9] CHBC Comments at 5. Their comments focus on hydrogen and other non-carbon fuels, but the quote is a succinct statement of a general problem. See also, Comments of
[10] *See,* Comments of Clean Coalition, Wild Tree, and Joint CCAs.
[11] Including for example Doosan, Sierra Club, Tesla, Center for access to Technology, CA EJ, CA Clean DG, Mainspring and Climate Center.
[12] *See e.g.,* Sierra Club at __.
[13] *But see,* Comments of Rural Customers, CA EJ. We suspect that this reflects a justifiable concern that the customers who have the least will get nothing. We hope California can do better than that.

operational capabilities of today's microgrids can easily be a "short-term action" that the MRC believes will substantially "accelerate the deployment microgrids." Microgrid providers have advanced multi-resource solutions available for rapid deployment that reflect the state's environmental and grid modernization goals. The modernization of standby charges should be included in Track 1, and we believe there is a straightforward fix.

In the MRC Initial Comments, we suggested that "standby charges should be based, at a maximum, on the expected imports, if any, that a microgrid would require to sustain its operations while deploying its exempt resources and its internal load shedding capabilities to their full capacity." To clarify, the MRC's view is that standby charges should be based, at a maximum, on the expected incremental imports, if any, that a microgrid would require to sustain its operations during periods while its non-exempt microgrid generation resource capacity is offline, but while deploying its exempt resources and its internal load shedding capabilities to their full capacity. Amending the tariffs to accomplish this result would be short work.

4. Departing Load Charges

Departing load charges are one of the two largest impediments to development of multi-resource microgrids. They severely impact the economics of projects and distort the incentives to deploy highly efficient co-generation[14] to meet thermal loads in the state. As we argued in the MRC Initial Comments, as well as in the MRC Scoping Comments, these are backward looking charges that are an impediment to California's immediate resilience needs, its renewable energy goals and the implementation of the grid of the future.

Departing load charges originated in the in the original move to deregulate California Utilities in the 1990s.[15] Many other states adopted these "stranded asset charges" in connection with deregulation as well, where they served as a transition to a competitive future. We know of no other state that has continued this practice once the transition was complete. California never completed the transition to competition, and the departing load charge now serves as the single largest impediment to competition that would enable communities to meet resilience needs at reasonable prices.

As discussed above in Section 2 (Renewables and Technology Neutrality), generating resources with the ability to operate in island mode for days and even weeks are critical to resilience. Renewable energy and storage resources are currently exempt from departing load charges, and SB 1339 requires that all resources in a microgrid meet CARB standards.[16] Above and beyond those standards, we believe that microgrids can reasonably be obligated to help progress toward state renewable energy goals, without interfering with their contribution to resilience.

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[14] Modern co-generation is over 80 percent efficient as compared with around 35 percent grid average for fossil resources and a little over 50 percent for highly efficient generation only resources.

[15] MCE Clean Energy, White Paper on the Evolution of Non–Bypassable Charges on Community Choice Aggregation, available at https://cleanpowerexchange.org/wp-content/uploads/2018/02/MCE-NonBypass-Charges_Whitepaper_2017-Update-2.1.18.pdf

[16] We believe that this applies to utility microgrids as well.

The California grid is short on capacity. The state's decarbonization plans call for increasing electrification of the transportation and residential energy sectors. State policies may have made existing fossil generation or power purchase arrangements obsolete, but Microgrids are not displacing them. Asking communities and private investors to pay a departing load charge when they are reducing the utility capital cost of meeting renewable energy and resource adequacy goals is a massive cost shift from the utilities and their investors to the sectors that are solving the resilience problem. The Commission should put a stop to this.

5. Rethinking the grid

In its thoughtful and eloquent Comments, the Climate Center stated, "We propose a complete restructuring of the top-down command and control distribution service system to an open access model." It went on to add, "We view the emergence of a decentralized electricity system as an opportunity for communities and the local governments that serve them to enjoy many benefits, including safety and resilience, that can be obtained in such a system. We also view a robust local government role in energy planning as a key means of achieving State clean energy and climate policy goals."[17] The MRC supports this vision, but also believes that there are important and ongoing roles for the utilities.

Utilities should determine the system upgrades needed to provide interconnection capacity for microgrids serving critical facilities across their service territories and make those upgrades. They need to sectionalize their distribution systems and deploy semiautonomous distributed energy resource management systems (DERMS) that allow them to reconfigure the distribution system in emergencies and take advantage of included microgrids and other DERs. They need to establish more flexible markets and procurement processes to acquire the services of those resources to meet renewable energy and resource adequacy needs as well as energy and ancillary services. No utility proposal in this proceeding fully contemplated the transformation that is required. The Commission should encourage utility proposals that lead in this direction and reject those that do not.

6. Interconnection

There is almost universal support among non-utility comments that address the matter at all for expediting interconnection,[18] though emphasis varies. Moreover, Tesla suggests that "utility costs to expedite through IT investment and clarifying policies and procedures will actually be more than made up for via reduced staffing costs as result of significantly reducing the rate of application deficiency and the back-and-forth between utility staff and applicants to resolve those issues."[19]

While the MRC generally does not have objections to the preapproved designs components of the Staff Proposal, we believe that for two important reasons larger, more complex microgrids

[17] Climate Center Comments at 5, 7.
[18] *But see,* Utility Employees Comments.
[19] Tesla Comments at 5.

should be the primary focus of Track 1 attention. First, this is the area where delays occur. In contrast to NEM projects, SGD&E states, "Non-NEM projects have much more variety and complexity to them, and the complexity requires substantially more interaction with SGD&E resources to intake, manage, technically evaluate, negotiate, design/engineer, construct, and so forth."[20] This is, they indicate, where delay is a serious problem. Moreover, we believe that the balance of application types would shift significantly (especially measured in aggregate MW) if the barriers discussed in our various filings were eliminated. Second, as discussed above, we believe that multi-technology microgrids are the ones that provide meaningful longer-term resilience. We believe that the principal immediate solutions are to improve utility staffing and impose meaningful scheduling targets.

Utility responses to ALJ Rizzo's questions on staffing are quite informative. In spite of appearing to recognize the problem (above) SDG&E dismisses additional staffing as follows: "Oppose; unnecessarily increases fees for customers adding PV." [21] PV, of course, is not the problem nor even the subject of this proceeding. SCE "agrees that some aspects of the interconnection process could be improved with increased staff and investment in IT (Option #3) but does not support a specific mandate requiring utilities to implement such changes."[22] Its further discussion of staffing increases is an exercise in "can't-do" thinking.[23] By contrast, PG&E proposes, "development of a PSPS Resiliency Intake Team to expedite the application review process for identified critical customers and/or facilities."[24] That seems worth exploring. In particular we hope the Commission will encourage utilities to hire in personnel with experience with sophisticated customer microgrids from industry. Re-evaluating the protocols for review of microgrids based on their (i) integrated control capabilities, (ii) diversity of resources, and (iii) expected aggregate net import and export (rather than the nameplate capacity of individual resources) as discussed in our prior comments would also help.

We also continue to suggest that establishing mandatory aggregate processing times with rate incentives attached would be the best medicine. At the very least, utilities should be required to report on their times to complete more complex interconnections, and numbers of requests for additional information per application, both in this proceeding and on an ongoing basis.

Finally, the MRC concurs with several comments that point to the link between queue position and cost allocation for system upgrades.[25] However we draw a different conclusion. As indicated in the Introduction and discussed further below in Section 5 (Information and Community Support), the MRC believes that implementing statewide resilience is a state planning process as well as a process of eliminating market barriers. We have recommended a state enabled process for communities to identify critical facilities on a uniform basis. Once those needs have been identified, utilities should determine the system upgrades needed to provide interconnection capacity for microgrids serving critical facilities across their service

[20] SDG&E Comments at 27.
[21] SDG&E Comments, Attachment A at 1.
[22] SCE Comments at 6.
[23] SCE Comments at 28-33.
[24] PG&E Comments at 23.
[25] *See e.g.,* Comments of CAISO, Tesla, and SCE.

territories, and those upgrades, as needed, should be made at ratepayer expense. This is not a case of cost shifting, but a case of equal treatment of all ratepayers. We particularly support the calls of GRID and CA Justice to prioritize disadvantaged and vulnerable communities and assure system capacity for those communities.[26]

7. Existing tariffs

In addition to Standby Charges and Departing Load Charges, the narrow focus of the Staff Proposal omits numerous other improvements and opportunities to remove barriers.

Arbitrary Interconnection Rules

Enchanted Rock points out an inconsistency in interconnection requirements:

> "Customer resiliency microgrids that can provide on-site power during extended PSPS events may be comprised of a resource mix that includes natural gas generation. These natural gas- powered microgrids have the capability of providing two services:
>
> - Extended duration resiliency for the end-use customer; and
> - grid services, such as resource adequacy (RA) and energy.
>
> Currently, these "co-located" natural gas microgrids can provide these two functions, but are required to have two separate interconnection points: one behind the customer's meter to be used to island the customer in isochronous operations during grid outages or PSPS events and an additional interconnect in front of the customer's meter to become a wholesale generator. This "dual interconnect" is both costly and inefficient."[27]

Microgrids can typically perform over a seamless spectrum of demand response and energy export. Tariffs should take advantage of this flexibility, not hamstring it.

Carefully Defined Services

TURN encourages installation of new storage facilities (in a narrow window) but comments that:

> "the Commission should require all storage systems eligible for these new tariffs to be centrally dispatchable. By dispatchable, TURN means that the units can be remotely directed by a Commission-authorized entity to charge and discharge when most beneficial to the grid with the system owners receiving corresponding financial compensation for this service."[28]

The MRC agrees with the premise that privately-owned storage can have great value to the grid, but unless the storage owner is compensated for the entire capital cost of its battery, this is an unjust taking. The benefit of private investment in microgrids is that customers and communities

[26] Comments of GRID and CA Justice.
[27] Enchanted Rock Comments (unpaginated).
[28] TURN Comments at 5.

invest for their own purposes but can provide services to the grid at below grid cost with capacity that is either permanently or temporarily excess to their needs. Utilities or CAISO can procure these excess capabilities through long-term procurements or short-term markets. They then have the ability to dispatch what they pay for.

As discussed above in Section 5 (Rethinking the Grid), disaggregating and carefully defining services allows for pricing that reflects the value to the grid of particular services. If blanket dispatch authority is the service, the only bidders will be merchant facilities in front of the meter. More granulated services allow for collaborative grid optimization with accurate incentives.

Definition of Critical Facilities

Numerous parties weighed in on the definition of critical facilities.[29] While the MRC continues to believe that a comprehensive statewide enumeration on a consistent basis is the right eventual solution, we support interim use of the list provided by Mainspring which is based on customer types identified in the R. 18-12-005 de-energization rulemaking.[30] The identified customers include:

- Emergency Services Sector
  - Police Stations
  - Fire Stations
  - Emergency Operations Centers
- Government Facilities Sector
  - Schools
  - Jails and prisons
- Healthcare and Public Health Sector
  - Public Health Departments
  - Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers and hospice facilities
- Energy Sector
  - Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly-owned utilities and electric cooperatives
- Water and Wastewater Systems Sector
  - Facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, divert, transport, store,

[29] *See e.g.,* Comments of Climate Center and SCE.

[30] R. 18-12-005 Assigned Commissioner Ruling D.19-05-042 Adopting De-Energization (PSPS Phase 1 Guidelines). Appendix A5. June 4, 2019.

treat and deliver water or wastewater

- Communications Sector
  - Communication carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites
- Chemical Sector
  - Facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals

Further, as noted above at note 35, we support prioritization of disadvantaged and vulnerable communities, and we also support giving priority to high fire risk zones.

Conclusion

As the Commission explores changing existing tariffs and creating new ones for microgrids, it should consider the long-term view of how California can achieve a more transactive, diversified, *sustainable* energy system. A 21st century energy system that *customers are incentivized to stay connected to* and collaborate with the grid. Wildfires and PSPS are paramount today but cannot be the sole focus. This proceeding needs to look forward and make shorter-term decisions about microgrids today that will be consistent with our grid of the future. The state needs to embrace innovation and technological advancement and facilitate the commercialization of microgrids as envisaged by SB 1339.

Respectfully submitted,

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By: /s/ *C. Baird Brown*
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Glossary

Short Form	**FULL NAME OF ORGANIZATION OR GROUPING**
AT&T Corp.	AT&T Corp.
AT&T	AT&T Mobility Wireless Operations Holdings, Inc.
Bioenergy	Bioenergy Association of California
Bloom	Bloom Energy
Bright	Bright Canyon Energy Corporation
Cable	CA Cable
Cal Advocates	Cal Advocates/R. O'Hara/CPUC
DG Coalition	California Clean DG Coalition
CESA	California Energy Storage Alliance
FuelCell Energy	FuelCell Energy, Inc.
CA Justice	California Environmental Justice Alliance
CHBC	California Hydrogen Business Council
Cal ISO	California Independent System Operator Corporation
CLECA	California Large Energy Consumers Association
CSSA	California Solar & Storage Association
Camptonville	Camptonville Community Partnership
CAT	Center for Accessible Technology
CEERT	Center for Energy Efficiency and Renewable Technologies
Citizens	Citizens Telecommunications Company of California Inc.
Clean Coalition	Clean Coalition
CPA	Clean Power Alliance
CPUC / Commission	California Public Utilities Commission
CPUC Scoping Order	The Assigned Commissioner's Scoping Memo and Ruling For Track 1 dated December 20, 2019
CCUE	Coalition of California Utility Employees
CAC	Cogeneration Association of California
Commenters / Parties	The interested parties that provided formal comments to the Administrative Law Judge's Ruling Requesting Comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal dated January 1, 2020.

Short Form	**FULL NAME OF ORGANIZATION OR GROUPING**
Connect	Connect California LLC
CTIA	CTIA
Doosan	Doosan Fuel Cell America, Inc.
East Bay CE	East Bay Community Energy
Enchanted Rock	Enchanted Rock LLC
Enel X	Enel X North America, Inc.
Frontier CA	Frontier California Inc.
Frontier	Frontier Communications of the Southwest Inc.
GPI	Green Power Institute
GRID	GRID Alternatives
Lancaster	Lancaster Choice Energy
Utilities or utilities	Investor-Owned Utilities
LGSEC	Local Government Sustainable Energy Coalition
Mainspring	Mainspring Energy, Inc.
Marin CE	Marin Clean Energy
MRC	Microgrid Resources Coalition
MRC Initial Comments	The Microgrid Resources Coalition's formal comments filed on the Administrative Law Judge's Ruling Requesting Comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal dated January 1, 2020
MRC Scoping Comments	The Microgrid Resources Coalition's formal comments filed on October 21, 2019 to the Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 filed September 19, 2019 and to the Preliminary Scoping Memo
Monterey Bay CP	Monterey Bay Community Power
National Fuel Cell	National Fuel Cell Research Center
Nevada CBT	Nevada County Business Taskforce
Cingular	New Cingular Wireless PCS, LLC
Pacific Bell	Pacific Bell Telephone Company
PG&E	Pacific Gas and Electric Company
Peninsula	Peninsula Clean Energy
Pioneer	Pioneer Community Energy

Short Form	**FULL NAME OF ORGANIZATION OR GROUPING**
Placer	Placer Air Pollution Control District
Redwood CEA	Redwood Coast Energy Authority
Rural CRC	Rural County Representatives of California
SDG&E	San Diego Gas & Electric
San Jose CE	San Jose Clean Energy
Santa Barbara CS	Santa Barbara Cellular Systems, LTD.
Shell	Shell Energy North America (US) L.P.
Sierra Club	Sierra Club
Staff Proposals	Short-Term Actions to Accelerate the Deployment of Microgrids and Related Resiliency Solution, California Public Utilities Commission Staff Proposal dated January 21, 2019
SBUA	Small Business Utility Advocates
SEIA	Solar Energy Industries Association
Sonoma CE	Sonoma Clean Power
SCE	Southern California Edison Company
SoCal Gas	Southern California Gas Company
Climate Center	The Climate Center
TURN	The Utility Reform Network
UCAN	Utility Consumers' Action Network
Utility Proposals	The various Investor-Owned Utility Proposals filed on January 21, 2020
Vehicle-Grid	Vehicle-Grid Integration Council
Vote Solar	Vote Solar
Wild Tree	Wild Tree Foundation