

**Business Council for Sustainable Energy (BCSE) Comments in Response
to the U.S. Department of Energy Request for Information on the
Grid Resiliency and Innovation Partnerships Program**

October 14, 2022

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to respond to the Request for Information (RFI) from the U.S. Department of Energy (DOE) regarding issues related to the development of a funding opportunity announcement related to the Grid Resiliency and Innovation Partnerships Program (GRIP), #DE-FOA-0002827.

The focus of the GRIP is to enhance grid flexibility and improve the resilience of the power system against growing threats of extreme weather and climate change. Through three initiatives, Grid Resilience Grants, Smart Grid Grants and the Grid Innovation Program, DOE's Grid Deployment Office will provide \$10.5 billion in support to states, tribes, communities, utilities, project developers, and other key stakeholders for transformative projects that will help to ensure the reliability of the power sector's infrastructure. These projects will also work to ensure that all American communities have access to affordable, reliable, clean electricity at any time, and will also help achieve our power sector decarbonization goals.

BCSE commends Congress and the Biden Administration for enactment of the Infrastructure Investment and Jobs Act (IIJA) and supports its significant funding for grid resilience investments.

In this submission, BCSE provides general views on development of the funding opportunity announcement, but for detailed responses to the questions provided by DOE in the RFI, BCSE would like to acknowledge the submissions made by the Alliance to Save Energy, the AnnDyl Policy Group and the Energy Efficiency Strategy Group. BCSE encourages the thoughtful consideration of the issues and recommendations included in these submissions.

About the BCSE

The BCSE, founded in 1992, is a clean energy trade association, spanning a broad spectrum of industry sectors, including energy efficiency, energy storage, natural gas, renewable energy, sustainable transportation and emerging decarbonization technologies. BCSE also has an independent small- and medium-size businesses initiative under its banner, the Clean Energy Business Network (CEBN). Together, the BCSE and CEBN represent the full range of the clean energy economy, from Fortune 100 companies to small businesses working in all 50 states supporting over 3 million U.S. jobs. As a diverse set of members, please note that not all members take a position or endorse the recommendations in this submission.

The Need for Grid Resiliency Investment

According to the [2022 Sustainable Energy in America Factbook](#), published by BloombergNEF in partnership with the BCSE, the U.S. experienced 20 climate disasters causing at least \$1 billion in damage in 2021 individually. These events, made up of tropical cyclones, severe storms, droughts and wildfires, are estimated to have cost \$145 billion, the third most costly year on record after 2005 and 2017. In 2022, hurricanes Fiona and Ian alone caused massive devastation in Puerto Rico and Florida and related rebuild costs is likely to set a new year-end record.

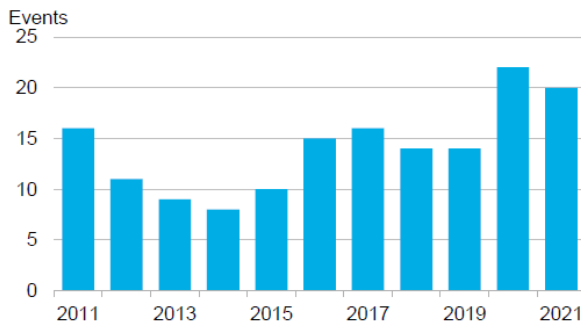
Resiliency investments are also taking place at the local level – by customers, communities, city and state governments. For example, in California, utility customers installed more than 19,607 residential energy storage systems in the first three quarters in 2021, motivated by policy incentives and concerns about grid reliability. This number of systems is 66% greater than the first three quarters of 2020 and 152% higher than in 2019. Further, microgrids, primarily comprised of batteries, solar, and combined heat and power (CHP) systems, are also growing in deployment, primarily in Texas, California and New York. In 2020, 35 new microgrids came online, with 108MW of new capacity installed.

The GRIP programs have the opportunity accelerate deployment of grid resilience technologies and ensure that underserved, disadvantaged and tribal communities receive significant benefit from these efforts.

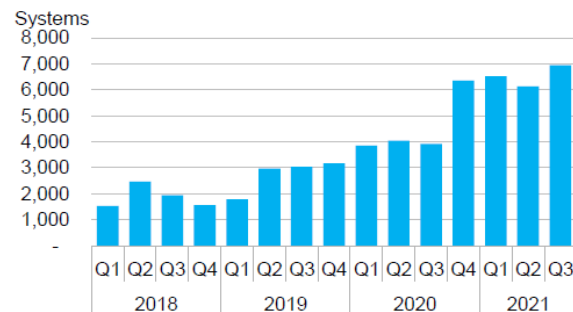
Policy: Infrastructure and resilience



U.S. billion-dollar weather and climate disasters



Quarterly residential energy storage systems installed in California



Source: 2022 Sustainable Energy in America Factbook, p. 30

Advanced Technology Integration is Needed for Grid Resiliency

GRIP should support on-site deployment of the entire portfolio of clean energy and energy storage at substations and along power lines. These technologies address line voltage congestion and power line voltage augmentation. They also can enable power segmentors utilizing multi-technology microgrids that can seamlessly detach from the grid or add to the grid. These technologies are being utilized in certain locations throughout the country, but deployment needs to be accelerated to meet the growing challenges and stresses facing today’s grid.

General Views on Implementation of the Grid Resiliency and Innovation Partnership Program

Related to the implementation of the GRIP, BCSE offers the following perspectives.

GRIP Projects Should Fund Demand-Side Investments

Grid Resilience Grants, Smart Grid Grants, and Grid Innovation Program, as defined by statute, all either allow or specifically refer to the use of demand-side measures to improve grid resiliency and operations. BCSE urges DOE to dedicate significant funding towards grid-interactive efficient building (GEB) technologies that will allow buildings to participate in grid management and resiliency.

For the Grid Resilience Grants and the Grid Innovation Program, we recommend that project proposals include consideration of demand-side energy use reduction efforts. For the Smart Grid Grants, we urge that at least a third of the funding be dedicated to in-building demand-side reduction measures, either as a part of larger projects and/or as stand-alone applications.

Increase the Focus on Demand Flexibility under GRIP

Noting the DOE's publication [A National Roadmap for Grid-Interactive Efficient Buildings](#), demand flexibility offers significant potential and is under-recognized in planning processes, despite its tremendous value to the grid and to end-use customers. In considering investments under the GRIP, the BCSE recommends increasing the focus on demand-side management in support of GRIP's objectives.

Data Access and Security

BCSE affirms DOE's requirement that Smart Grid Grant projects support data standards, interoperability, and non-discriminatory data access on a real time basis as part of the Smart Grid Grants program. Further, the costs of these data provisions should be eligible for funding under the GRIP program.

Thank you for the opportunity to share the Council's views on this RFI. Should you wish to discuss these comments further, please contact BCSE President Lisa Jacobson via email at ljacobson@bcse.org.