



February 15, 2021

Pennsylvania Public Utility Commission
Attn: Rosemary Chiavetta, Secretary
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Policy Proceeding—Utilization of Storage Resources as Electric Distribution Assets
Docket No. M-2020-3022877

Dear Secretary Chiavetta:

POWER Interfaith is pleased to offer comment on the Pennsylvania Public Utility Commission's (PUC) Policy Proceeding - Utilization of Storage Resources as Electric Distribution Assets, Docket No. M-2020-3022877. We believe that electric storage has the potential to substantially improve the reliability and the resiliency of Pennsylvania's current power distribution system. Furthermore, as the effects of climate change are increasingly apparent, electric storage is an essential component of a necessary and urgent transition to renewable energy. We strongly believe that the exploration of this technology would be a perfect complement to PECO's increased use of renewable energy sources.

POWER Interfaith represents over 100 congregations in Philadelphia and throughout southeastern and central Pennsylvania. We work for racial and economic justice on a livable planet and as such would like to highlight environmental justice issues related to the use of electric storage as a distribution asset.

- 1) The use of electric storage as part of distribution infrastructure would decrease dependence on fossil fuel peaking power plants when energy demands are high by helping integrate distributed generation such as local solar into the grid. Peaking power plants are primarily located in or near Environmental Justice (EJ) Areas which suffer disproportionate exposure to air pollution. The increased use of electric storage can contribute to cleaner air and therefore improved public health particularly in EJ Areas.
- 2) Electric storage deployed as a distribution asset can contribute to the reliable and resilient distribution of electricity, preventing or reducing blackouts. With climate change, risks of extreme weather are increasing, making distribution grid resiliency critical to consider.
- 3) Plans for the implementation of electric storage facilities should ensure equitable access to EJ Areas. Environmental justice communities already bear the brunt of many of the impacts of climate change, and they should have equitable access to resources for resiliency such as electric storage.

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- 4) The use of electric storage can provide savings to electrical distribution companies by allowing them to defer infrastructure improvements. These savings should be passed onto customers in the form of stable or reduced utility bills. This is particularly helpful for low income customers who spend a greater percentage of their budget on utility bills.

In summary, POWER strongly supports the consideration of adding electric storage capabilities to Pennsylvania's distribution system. It has the potential to increase reliability and resiliency and can facilitate the necessary transition to renewable energy with benefits for all Pennsylvanians, particularly for those who reside in EJ Areas[DM1].

Sincerely,

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