



August 23, 2019

The Honorable Bruce J. Walker
Assistant Secretary, Office of Electricity
U.S. Department of Energy
Washington, DC

RE: Request for Information on Codes, Standards, Specifications and Other Guidance for Enhancing the Resilience of Electric Infrastructure Systems Against Severe Weather Events

Dear Assistant Secretary Walker:

I am writing on behalf of the Business Council for Sustainable Energy (BCSE) regarding the Request for Information related to Codes, Standards, Specifications and Other Guidance for Enhancing the Resilience of Electric Infrastructure Systems Against Severe Weather Events (Federal Register Number: 2019-14547).

The BCSE is a coalition of companies and trade associations from the energy efficiency, natural gas and renewable energy sectors. The coalition includes independent electric power producers, investor-owned utilities, public power, manufacturers, commercial end users and service providers in energy and environmental markets. Founded in 1992, the coalition's diverse business membership works to build a strong economy and clean, safe, resilient and affordable energy systems. Since 2017, the BCSE is also home to the Clean Energy Business Network (CEBN), which represents small- and medium-size businesses providing clean energy technologies and services. Together, the BCSE and the CEBN represent a broad range of the U.S. clean energy economy, from small businesses working in all 50 states to Fortune 200 companies. It should be noted that as diverse coalitions the views expressed in this submission are not endorsed by all BCSE and CEBN individual members.

The BCSE is working to promote federal action to assist communities with risk identification, planning and the creation of investment incentives to enhance the resilience of infrastructure, including energy systems and the power sector.

The BCSE appreciates the Department of Energy (DOE)'s interest in this topic and believes that the DOE has a critical role to play in assisting states, municipalities and tribes in identifying risks and hazards, as well as opportunities to enhance the resilience of the U.S. energy and electricity systems infrastructure. As resilience risks and hazards can vary per locality, DOE's technical assistance should acknowledge this variability and incorporate local needs and conditions into the development of appropriate incentives for investment into resilient infrastructure.

The BCSE was active in the development of the Disaster Recovery and Reform Act (DRRA). The BCSE is working with its members and partners to ensure the DRRA's effective implementation, the foundation of which is strong and continued coordination and collaboration between the public and private sector, and among federal government agencies. In particular, the BCSE urges the Department of Energy to engage and share its energy systems expertise with the Federal Emergency Management Agency (FEMA) as the DRRA programs are implemented. This expertise includes the views and work of the Office of Electricity and the Office of Energy Efficiency and Renewable Energy and the Office of Fossil Energy, among others. Further, government agencies should engage with the private sector, to gain expertise and to leverage and expand financial and human capital resources.

As BCSE considers the topic of resilient infrastructure, it offers the following perspectives.

1. The Energy System Is Critical Infrastructure

Reliable and secure energy systems power the U.S. economy and sustain other critical infrastructure systems, such as transportation, water, waste, and the built environment. The following [case studies](#) illustrate projects that demonstrate the role that energy plays in creating more resilient infrastructure.

2. Consider Microgrids and Community Renewable Grids as Important Options

Consideration of the current and future role of microgrids and community renewable grids is important, especially as they can provide electricity and other energy services when portions of the grid are disabled. The Department of Energy should leverage the resilience expertise, lessons and performance outcomes that can be learned from the utilization of microgrids and community renewable grids in Florida, Texas, New Jersey, New York, Louisiana, Hawaii and Alaska.

3. Ready for Resilience Case Studies Demonstrate Innovative Approaches

In buildings, campuses, micro grids, and cities, multiple energy technologies are being used to enable more efficient production, distribution, and use of energy, with information and communications technology (ICT) being a key bridge to the integration of technology and energy management.

The [project examples](#) mentioned earlier in these comments demonstrate innovative, clean and resilient approaches that will improve the reliability and operability of electricity when grid disruptions occur, and which will reduce power transmission losses in the communities where they are deployed. Many states and localities will need technical expertise to deliver these innovative technologies and the Business Council for Sustainable Energy would be pleased to work with the DOE, FEMA and other agencies to demonstrate the latest examples and best practices to communities through community workshops or outreach.

The Council has been working in partnership with the Smart Cities Council, Qualcomm, National Association of State Energy Officials (NASEO), and Texas A&M to develop long-term community resilience, primarily through workshops held in the past year in Texas and Puerto Rico. This project, [Readiness for Resilience](#),¹ has been aimed at developing Smart Technology Roadmaps for these regions, and brings together community leaders, stakeholders, and technology partners to discuss regional project directions, partnerships and funding opportunities to re-build their communities with enhanced resilience

The BCSE appreciates the DOE's consideration of these private sector case studies and of the coalition's views expressed in this letter. Please feel free to reach out to contact me (ljacobson@bcse.org) to discuss the BCSE's work further.

Sincerely,



Lisa Jacobson, President
Business Council for Sustainable Energy

¹ For more information on *Readiness for Resilience* please see: <https://www.bcse.org/readiness-for-resilience-project-hosts-workshops-in-texas-july-9-2019/>