

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's own motion to consider alternative-fueled vehicle tariffs, infrastructure and policies to support California's greenhouse gas emissions reduction goals.

Rulemaking 09-08-009
(Filed August 20, 2009)

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON
PROPOSED DECISION AUTHORIZING SHORT-TERM EXTENSION
OF LIMITED PROVISIONS REGARDING ELECTRIC
TARIFF RULES 15 AND 16**

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In accordance with the provisions of Rule 4.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits these reply comments *On the Proposed Decision Authorizing Short-Term Extension Of Limited Provisions Regarding Electric Tariff Rules 15 And 16*, issued by Assigned Commissioner Carla J. Peterman on May 28, 2013 (“Proposed Decision”).

¹ The California Energy Storage Alliance consists of A123 Systems, AES Energy Storage, Alton Energy, American Vanadium, AU Optronics, Beacon Power, Bright Energy Storage, CALMAC, Chevron Energy Solutions, Christenson Electric Inc., Clean Energy Systems Inc., CODA Energy, Deeya Energy, Demand Energy, DN Tanks, East Penn Manufacturing Co., Energy Cache, EnerVault, FAFCO Thermal Storage Systems, Flextronics, Foresight Renewable Systems, Greensmith Energy Management Systems, Growing Energy Labs, Gridtential Energy, Halotechnics, Hecate Energy LLC, Hydrogenics, Ice Energy, Innovation Core SEI, Invenenergy, KYOCERA Solar, LG Chem, LightSail Energy, NextEra Energy Resources, Panasonic, Parker Hannifin, PDE Total Energy Solutions, PowerTree Services, Primus Power, RedFlow Technologies, RES Americas, Saft America, Samsung SDI, Sharp Labs of America, Silent Power, SolarCity, Stem, Sovereign Energy Storage LLC, Sumitomo Corporation of America, TAS Energy, UniEnergy Technologies, and Xtreme Power. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. <http://storagealliance.org>

I. INTRODUCTION.

CESA hereby responds to certain of the Opening Comments filed by parties on the Proposed Decision to extend through June 30, 2016 the “common facility treatment” for residential Plug-In Electric Vehicle (“PEV”) charging-related distribution system interconnection costs in excess of the current established Rules 15 and 16 allowances. CESA’s reply comments support the reply Comments filed today by its member company, PowerTree Services, Inc. More generally, these reply comments: (a) focus on the most efficient way for the Commission to address integration of grid-connected energy storage with PEVs, and (b) recommend that the Commission should require a workshop to be scheduled no later than one year from now (not 18 months as called for in the Proposed Decision) to take stock of trends in residential PEV charger usage data.

II. THE COMMISSION SHOULD ADDRESS INTEGRATION OF GRID-TIED ENERGY STORAGE WITH PEVS IN THE ENERGY STORAGE PROCEEDING.

CESA agrees with the Opening Comments filed by the NRDC, Plug-In America, and PowerTree that the subject of grid-connected energy storage integrated with PEVs should be addressed by the Commission, and submits that the active Energy Storage Rulemaking is the best place to bring the best evidence and analysis to bear on the key policy implications of such a pairing of rapidly advancing technologies that is already happening in California today. Integrating energy storage with PEV chargers is the surest way to achieve NRDC’s concisely stated policy goal: “rather than arguing about who should pay for adverse impacts to the electrical grid, the Commission should focus its efforts on preventing such impacts from

occurring.”² Integration of grid-connected energy storage is exactly what NRDC and others are arguing for, albeit implicitly:

“Under current service planning protocols, the diversity benefit of PEV charging is not valued. Even if a customer never charges his or her vehicle during peak events, the utility will upgrade the distribution system assuming the worst case scenario. As a result, costs may be incurred that could be avoided. An intelligent load management program is needed exploit the diversity benefit provided by PEV charging and to ensure unnecessary costs are avoided.” (pp. 2-3).

Many considerations go into determining the best forum for issues as cross-cutting as PEVs, and there is no clear single answer as to which is the best proceeding, but CESA submits that one sensible way to solve for inability to capture the diversity benefit of PEV chargers referred to by NRDC is simply to group them within the general topic of energy storage - and the Energy Storage Rulemaking is currently focused on exactly that solution.

III. THE COMMISSION SHOULD REQUIRE A WORKSHOP NO LATER THAN ONE YEAR FROM NOW.

CESA agrees with PG&E, NRDC, Plug-In America, and Tesla that scheduling a workshop 18 months in the future is simply too long a time to take stock of residential PEV charger usage data. CESA agrees specifically with Plug-In America:

“Based on the load studies produced by the IOUs in late 2012, the incidence of EV charging installations that required utility upgrades was a very small number. Over the next 18 months leading up to the stakeholder workshop more supporting data will be collected. PIA requests that data collected include details on necessitated upgrades such as the specific charge rates and number of vehicles purchased by customers who required upgrades. Given the small number of anticipated upgrades the collection of this data will not be a burden, however the value to the decision making process will be high. We believe that this will drive informed and constructive dialog across stakeholders and at future workshops.” (p. 3).

² NRDC Comments, p. 1.

CESA therefore respectfully disagrees with SDG&E's apparent apprehension that the burdens of collecting and reporting PEV charger usage data will outweigh the value in tracking as much data as possible in the near term and on an ongoing basis. CESA instead argues that capturing emerging trends early and continually provides the greatest value to informing the Commission's interconnection policy, and outweighs the burdens of collecting and reporting data.

IV. CONCLUSION.

CESA appreciates the opportunity to provide these reply comments for the Commission's consideration.

Respectfully submitted,



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