

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

Application of Southern California Edison
Company (U338E) for Approval of the Results
of Its 2013 Local Capacity Requirements
Request for Offers for the Western Los
Angeles Basin

Application 14-11-012
(November 21, 2014)

**COMMENTS OF CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE PROPOSED AND ALTERNATE DECISIONS APPROVING RESULTS OF
SOUTHERN CALIFORNIA EDISON COMPANY LOCAL CAPACITY
REQUIREMENTS REQUEST FOR OFFERS FOR THE WESTERN LA BASIN
PURSUANT TO DECISIONS 13-02-015 AND 14-03-004**

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

Application of Southern California Edison
Company (U338E) for Approval of The
Results of Its 2013 Local Capacity
Requirements Request for Offers for the
Western Los Angeles Basin

Application 14-11-012
(Filed October 30, 2014)

**COMMENTS OF CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE PROPOSED AND ALTERNATE DECISIONS APPROVING RESULTS OF
SOUTHERN CALIFORNIA EDISON COMPANY LOCAL CAPACITY
REQUIREMENTS REQUEST FOR OFFERS FOR THE WESTERN LA BASIN
PURSUANT TO DECISIONS 13-02-015 AND 14-03-004**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits these comments on the *Proposed Decision of Assigned Administrative Law Judge Regina M. DeAngelis and Alternate Decision of Assigned Commissioner Michel Florio*

¹ The California Energy Storage Alliance consists of 1 Energy Systems Inc., Advanced Microgrid Solutions, AES Energy Storage, Alton Energy, American Vanadium, Amperex Technology Limited, Aquion Energy, ARES North America, Beacon Power, LLC, Bosch Energy Storage Solutions Company LLC, Bright Energy Storage Technologies, Brookfield, CALMAC, Chargepoint, Clean Energy Systems, Coda Energy, Consolidated Edison Development, Inc., Cumulus Energy Storage, Customized Energy Solutions, Demand Energy, DN Tanks, Duke Energy, Eagle Crest Energy Company, EaglePicher Technologies, LLC, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, Enersys, EnerVault Corporation, EV Grid, FAFCO Thermal Storage Systems, FIAMM Energy Storage Solutions, Flextronics, Foresight Renewable Solutions, GE Energy Storage, Green Charge Networks, Greensmith Energy, Gridscape Solutions, Gridtential Energy, Inc., Halotechnics, Hitachi Chemical Co., Hydrogenics, Ice Energy, Imergy Power Systems, ImMODO Energy Services Corporation, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Invenergy LLC, K&L Gates, KYOCERA Solar, Inc., LG Chem, LightSail Energy, LS Power Development, LLC, Mitsubishi International Corporation, NEC Energy Solutions, Inc., NextEra Energy Resources, NRG Solar LLC, OCI, OutBack Power Technologies, Panasonic, Parker Hannifin Corporation, PDE Total Energy Solutions, Powertree Services Inc., Primus Power Corporation, Recurrent Energy, Renewable Energy Systems Americas Inc., Rosendin Electric, S&C Electric Company, Saft America Inc., Samsung, SEEO, Sharp Electronics Corporation, SolarCity, Sony Corporation of America, Sovereign Energy, STEM, Stoel Rives LLP, SunEdison, SunPower, TAS Energy, Toshiba International Corporation, Trimark Associates, Inc., Tri-Technic, UniEnergy Technologies, LLC, and Wellhead Electric. 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>.

Approving, in Part, Results of Southern California Edison Company Local Capacity Requirements Request for Offers for the Western LA Basin Pursuant to Decisions 13-02-015 and 14-03-004 (“Proposed Decisions”).

I. INTRODUCTION.

Both of the Proposed Decisions find many of Southern California Edison Company’s (“SCE’s”) decisions and procured contracts (“Contracts”) to be reasonable and consistent with the guidance of D.13-02-015 AND D.14-03-004. Both Proposed Decisions identify several shortcomings or concerns with the Contracts. First, SCE’s procurement plan falls short of the required minimum amount of 1900 MWs stipulated by D.13-02-015 and D.14-03-004. CESA understands that SCE plans to remedy this procurement shortfall through further solicitations. Second, potentially adding to this shortfall, both of the Proposed Decisions deny approval of six contracts with NRG Distributed Generation PR, LLC and one contract with NRG Curtailment Solutions based on similar reasoning about the fit of these contracts with the defined procurement categories or with concerns over contractual terms and conditions. These seven contracts total 75 MWs. The Proposed Decisions differ regarding whether SCE must backfill this procurement, if ultimately denied. CESA’s comments relate only to the Contracts with counterparties for energy storage

II. ENERGY STORAGE PROJECTS PROVIDE VALUABLE AND VIABLE LCR SOLUTIONS.

Energy storage can provide an array of cost-effective services across the grid, including in customer, distribution, transmission, or generation ‘functions.’ Energy storage is widely expected to play a large role in ‘smart grid,’ smart planning, Distributed Energy Resources, and in renewables-integration efforts underway at the Commission. Overall, Commission decisions

finding energy storage procurement for LCR purposes to be reasonable are an important step in advancing the California grid's capabilities and incorporation of energy storage technologies. CESA thus strongly supports SCE's selection of energy storage resources and of Commission approval energy storage Contract to fulfil LCR needs.

III. THE COMMISSION SHOULD GUARD AGAINST POTENTIALLY UNREASONABLE GOING-FORWARD DISCRIMINATION AGAINST NEWER TECHNOLOGIES.

In both Proposed Decisions, the Commission reviews SCE's limitations on customer-sited energy storage proposals, finding SCE's actions in this instance to be reasonable. CESA applauds SCE's selections, and the urges the Commission's approval, of energy storage procurement that went well beyond the minimum required amount required by D.13-02-015 and D.14-03-004. However, CESA asks the Commission to make it clear that its final decision approving this targeted procurement process does not establish any precedents that could limit future energy storage procurement.

IV. CONCLUSION.

CESA thanks the Commission for its consideration of these comments and recommendations set forth herein.

Respectfully submitted,



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