

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

Order Instituting Rulemaking Regarding Policies,  
Procedures and Rules for the California Solar Initiative,  
the Self-Generation Incentive Program and Other  
Distributed Generation Issues.

RULEMAKING 08-03-008  
(Filed March 13, 2008)

**Comments of the California Center for Sustainable Energy and the  
California Energy Storage Alliance regarding the Proposed Decision  
Modifying Decision 08-11-044 revising the Technical Parameters for  
Advanced Energy Storage Systems Coupled with Fuel Cells**

**California Center for Sustainable Energy**

**California Energy Storage Alliance**

**February 1, 2010**

Andrew McAllister  
Director of Programs  
California Center for Sustainable Energy  
8690 Balboa Ave., Suite 100  
San Diego, CA 92123  
Tel: (858) 244-7282  
Fax: (858) 244-1178  
[andrew.mcallister@energycenter.org](mailto:andrew.mcallister@energycenter.org)

Donald C. Liddell  
DOUGLAS & LIDDELL  
2928 2<sup>nd</sup> Avenue  
San Diego, CA 92103  
Tel.: (619) 993-9096  
Fax: (619) 296-4662  
[liddell@energyattorney.com](mailto:liddell@energyattorney.com)  
Counsel for the  
**CALIFORNIA ENERGY STORAGE  
ALLIANCE**

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

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues.

RULEMAKING 08-03-008  
(Filed March 13, 2008)

**Comments of the California Center for Sustainable Energy and the California Energy Storage Alliance regarding the Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells**

**I. INTRODUCTION**

The California Center for Sustainable Energy (CCSE) and the California Energy Storage Alliance (CESA)<sup>1</sup> (together, the “Joint Petitioners”) welcome the opportunity to offer these Comments regarding the *Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells* (Proposed Decision). The Joint Petitioners are pleased to see that the California Public Utilities Commission (Commission) has found that “[t]he multiple daily discharge requirement in [Decision (D.)] 08-11-044, while appropriate for enabling the smoothing of energy output from an intermittent resource such as a wind facility, may be excessive and unnecessary for achieving peak load reductions when [Advanced Energy Storage (AES)] is

---

<sup>1</sup> The California Energy Alliance is an advocacy group made up of renewable energy developers and system integrators and energy storage system manufacturers presently comprised, of A123 Systems, Altair Nanotechnologies, Beacon Power Corporation, Chevron Energy Solutions, Debenham Energy LLC, Deeya Energy, Energy Alchemy LLC, Enersys, Fluidic Energy Inc., Ice Energy Inc., Powergetics, Prudent Energy, PVT Solar, Suntech America, Inc., SustainX, Xtreme Power Solutions, and ZBB Energy Corporation. The views attributed to CESA in these Comments are those of CESA, and they do not necessarily represent the views of each CESA member company on every specific point.

coupled with fuel cells.”<sup>2</sup> We support the Commission’s decision to grant the relief requested in our August 7, 2009, Amended Petition for Modification and modify D.08-11-044, with a minor adjustment, to revise the technical parameters for AES systems coupled with fuel cells. CESA has authorized the undersigned to sign these Comments on its behalf, and the Joint Petitioners provide the following comments in response to the Proposed Decision:

- The Joint Petitioners support the minor adjustment to require that AES systems coupled with fuel cells must meet the site-specific requirements for peak demand reduction and be capable of discharging fully at least once per day in order to be eligible for the \$2/Watt incentive from the Self-Generation Incentive Program (SGIP).
- The Joint Petitioners support the additional requirement that AES systems coupled with fuel cells must install metering equipment capable of measuring and recording interval data on generation output and charging and discharging in order to be eligible for the \$2/Watt incentive from the SGIP.

**II. THE JOINT PETITIONERS SUPPORT THE MINOR ADJUSTMENT TO REQUIRE THAT AES SYSTEMS COUPLED WITH FUEL CELLS MUST MEET THE SITE-SPECIFIC REQUIREMENTS FOR PEAK DEMAND REDUCTION AND BE CAPABLE OF DISCHARGING FULLY AT LEAST ONCE PER DAY IN ORDER TO BE ELIGIBLE FOR THE \$2/WATT INCENTIVE FROM THE SGIP.**

The Joint Petitioners support the minor adjustment to D.08-11-044 to require that AES systems coupled with fuel cells must meet the site-specific requirements for peak demand reduction and be capable of discharging fully at least once per day in order to be eligible for the \$2/Watt incentive from the SGIP. We find this adjustment reasonable and agree with the Commission that “[t]his requirement will ensure that storage systems are capable of discharging the energy that is produced during off peak hours during times of peak demand.”<sup>3</sup>

---

<sup>2</sup> *Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells* (Proposed Decision), January 11, 2010, page 7.

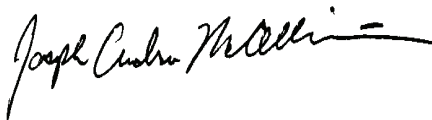
<sup>3</sup> Proposed Decision at page 6.

**III. THE JOINT PETITIONERS SUPPORT THE ADDITIONAL REQUIREMENT THAT AES SYSTEMS COUPLED WITH FUEL CELLS MUST INSTALL METERING EQUIPMENT CAPABLE OF MEASURING AND RECORDING INTERVAL DATA ON GENERATION OUTPUT AND CHARGING AND DISCHARGING IN ORDER TO BE ELIGIBLE FOR THE \$2/WATT INCENTIVE FROM THE SGIP.**

The Joint Petitioners support the additional requirement that AES systems coupled with fuel cells must install metering equipment capable of measuring and recording interval data on generation output and charging and discharging in order to be eligible for the \$2/Watt incentive from the SGIP. We agree with the Commission that this requirement will facilitate the transmission of comprehensive information regarding AES system performance to the SGIP Program Administrators on an ongoing basis and will assist the Commission to better evaluate if these projects are facilitating peak load reductions.<sup>4</sup>

**IV. CONCLUSION**

The Joint Petitioners thank the Commission for its consideration of their Amended Petition for Modification of D.08-11-044 and for granting the relief requested therein. We very much appreciate the opportunity to provide these Comments in response to the Proposed Decision.



Andrew McAllister  
Director of Programs  
California Center for Sustainable Energy  
8690 Balboa Ave., Suite 100  
San Diego, CA 92123  
Tel: (858) 244-7282  
Fax: (858) 244-1178  
[andrew.mcallister@energycenter.org](mailto:andrew.mcallister@energycenter.org)

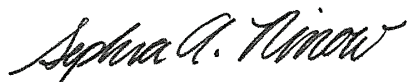
---

<sup>4</sup> Proposed Decision at page 6.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of these *Comments of the California Center for Sustainable Energy and the California Energy Storage Alliance regarding the Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells* on all known parties of record in proceeding R.08-03-008 by delivering a copy via email to the current service list or by delivering a copy via U.S. First Class mail to those members of the current service list with no or undeliverable email addresses.

Executed on February 1, 2010, in San Diego, CA.



Sephra Ninow  
Policy Analyst  
California Center for Sustainable Energy  
8690 Balboa Ave., Suite 100  
San Diego, CA 92123  
Tel: (858) 244-1177  
Fax: (858) 244-1178  
[sephra.ninow@energycenter.org](mailto:sephra.ninow@energycenter.org)

**Service List** (as of 2/01/10)

Michael.Brown@utcpower.com  
steven.huhman@morganstanley.com  
dhaines@environmentalpower.com  
sa@zeropex.com  
ghilberg@tas.com  
peter.thompson@solar.abengoa.com  
lglover@solidsolar.com  
spatrick@sempra.com  
EGuise@NationalEnergySolutionsLLC.com  
jrathke@capstoneturbine.com  
lrosen@eesolar.com  
annette.gilliam@sce.com  
mike.montoya@sce.com  
fmazanec@biofuelsenergyllc.com  
scott@debenhamenergy.com  
liddell@energyattorney.com  
andrew.mcallister@energycenter.org  
kirk@NoElectricBill.com  
tam.hunt@gmail.com  
tam.hunt@gmail.com  
dalbers@americandairyparks.com  
eric@harpiris.com  
nes@a-klaw.com  
pepper@sunfundcorp.com  
susanne@emersonenvironmental.com  
julia@jasenergies.com  
cec@cpuc.ca.gov  
srt@cpuc.ca.gov  
matt@sustainablespace.com  
marcel@turn.org  
megan@nonprofithousing.org  
michael.hindus@pillsburylaw.com  
abrowning@votesolar.org  
Eriks@ecoplexus.com  
jarmstrong@goodinmacbride.com  
jkarp@winston.com  
mday@goodinmacbride.com  
rjl9@pge.com  
ssmyers@att.net  
bill@brobecksolarenergy.com  
info@calseia.org  
hank@wasteheatsol.com  
rknight@bki.com  
emackie@gridalternatives.org  
jharris@volkerlaw.com  
kfox@keyesandfox.com  
gmorris@emf.net  
kdzienkowski@pvt solar.com  
john@proctoreng.com  
sebesq@comcast.net  
julie.blunden@sunpowercorp.com  
michaelkyes@sbcglobal.net  
elee@davisenergy.com  
mkober@pyramidsolar.com

pstoner@lgc.org  
jgg@eslawfirm.com  
lmh@eslawfirm.com  
hodgesjl@surewest.net  
atrowbridge@daycartermurphy.com  
jmaskrey@sopogy.com  
chuck.hornbrook@itron.com  
elvine@lbl.gov  
jlin@strategen.com  
jpittsjr@pcgconsultants.com  
psaxton@energy.state.ca.us  
dan@energysmarthomes.net  
nick.chaset@tesseract solar.com  
NJSa@pge.com  
r.raushenbush@comcast.net  
RKC0@pge.com  
robert.tierney@utcpower.com  
ensmith@mwe.com  
mdorn@mwe.com  
myuffee@mwe.com  
rsiada@guardian.com  
jimross@r-c-s-inc.com  
bchao@simmonsco-intl.com  
jrrohrbach@rienergy.com  
kirby.bosley@jpmorgan.com  
Paul.Tramonte@jpmorgan.com  
phammond@simmonsco-intl.com  
bbarkett@summitblue.com  
kcooney@summitblue.com  
bbaker@summitblue.com  
tim\_merrigan@nrel.gov  
LPaskett@FirstSolar.com  
WPark@FIRSTSOLAR.COM  
terry.mohn@baesystems.com  
robert.pettinato@ladwp.com  
HYao@SempraUtilities.com  
david.eaglefan@gmail.com  
asteele@hanmor.com  
npedersen@hanmor.com  
jpalmer@solarcity.com  
rrkriete@earthlink.net  
social.forum@yahoo.com  
susan.munves@smgov.net  
rick.ruiz@zenviro.net  
tbardacke@globalgreen.org  
rzhang@cityofpasadena.net  
eklinkner@cityofpasadena.net  
sendo@ci.pasadena.ca.us  
thamilton@icfi.com  
bjeider@ci.burbank.ca.us  
MtenEyck@ci.rancho-cucamonga.ca.us  
akbar.jazayeri@sce.com  
case.admin@sce.com  
walter.gordon@sce.com  
rishii@aesc-inc.com

dbruder@onsitenergy.com  
 rsperberg@onsitenergy.com  
 allenseligson@yahoo.com  
 mowrysswr@cox.net  
 fortlieb@sandiego.gov  
 ctai@edgetechsolar.com  
 benjamin.airth@energycenter.org  
 CentralFiles@semprautilities.com  
 dakinports@semprautilities.com  
 doug.white@energycenter.org  
 irene.stillings@energycenter.org  
 jennifer.porter@energycenter.org  
 jon.bonk-vasko@energycenter.org  
 jyamagata@semprautilities.com  
 katrina.perez@energycenter.org  
 katrina.phruksukarn@energycenter.org  
 ryan.amador@energycenter.org  
 sephra.ninow@energycenter.org  
 terry.clapham@energycenter.org  
 cmanson@semprautilities.com  
 elee@sandiego.gov  
 tblair@sandiego.gov  
 bob.ramirez@itron.com  
 hesusman@stoel.com  
 jmgarber@iid.com  
 ctoca@utility-savings.com  
 ebroudeur@steadfastcompanies.com  
 sbarata@opiniondynamics.com  
 wlscoth@earthlink.net  
 Inelson@westernrenewables.com  
 ssciortino@anaheim.net  
 warehouse@mohrpower.com  
 janet.gagnon@solarworld-usa.com  
 rsantos@guardian.com  
 m.stout@cleantechamerica.com  
 ek@a-klaw.com  
 Olivia.puerta@mountainview.gov  
 bkarney@comcast.net  
 matthew.kilkenny@skywatchenergy.com  
 linda.forsberg@mountainview.gov  
 michael.mcdonald@ieee.org  
 jrichman@bloomenergy.com  
 jeanne.sole@sfgov.org  
 fsmith@sfgwater.org  
 andre.devilbiss@recurrentenergy.com  
 jim.howell@recurrentenergy.com  
 mike@ethree.com  
 nlong@nrdc.org  
 cbeebe@enovity.com  
 CJSv@pge.com  
 CABe@pge.com  
 efm2@pge.com  
 G1GK@pge.com  
 j2t7@pge-corp.com  
 jwwd@pge.com  
 filings@a-klaw.com

kxn8@pge.com  
 mxw8@pge.com  
 SGraham@navigantconsulting.com  
 spauker@wsgr.com  
 sww9@pge.com  
 croaman@ccsf.edu  
 JohnG@ecoplexus.com  
 steven@moss.net  
 gilligan06@gmail.com  
 stacey.reineccius@powergetics.com  
 bcragg@goodinmacbride.com  
 bdille@jmpsecurities.com  
 matt@criterionmgt.com  
 sdhilton@stoel.com  
 cem@newsdata.com  
 C2M1@pge.com  
 gopal@recolteenergy.com  
 bawilkins@sbcglobal.net  
 sara@solaralliance.org  
 ronnie@energyrecommerce.com  
 cp@kacosolar.com  
 AXY4@pge.com  
 hhh4@pge.com  
 mgh9@pge.com  
 regrelcuccases@pge.com  
 grant.kolling@cityofpaloalto.org  
 colin@tiogaenergy.com  
 jordan@tiogaenergy.com  
 paul@tiogaenergy.com  
 ben@solarcity.com  
 ecarlson@solarcity.com  
 rguild@solarcity.com  
 Shoeless838@comcast.net  
 JMCLA@comcast.net  
 seawayland@comcast.net  
 sbeserra@sbcglobal.net  
 jbarnes@summitblue.com  
 tzentai@summitblue.com  
 kbest@realenergy.com  
 jlarkin@us.kema.com  
 nellie.tong@us.kema.com  
 karin.corfee@kema.com  
 JerryL@abag.ca.gov  
 jody\_london\_consulting@earthlink.net  
 sgreschner@gridalternatives.org  
 zfranklin@gridalternatives.org  
 kmerrill@energy-solution.com  
 mcampbell@opiniondynamics.com  
 mrw@mrwassoc.com  
 cpucdockets@keyesandfox.com  
 gteigen@rcmdigesters.com  
 taram@greenlining.org  
 gjs8@att.net  
 gjs8@att.net  
 tomb@crossborderenergy.com  
 heidi@sunlightandpower.com

jason.jones@tiltsolar.com  
katie@sunlightandpower.com  
lauren@sunlightandpower.com  
rhwisner@lbl.gov  
tdfeder@lbl.gov  
justin@sunwatersolar.com  
clamasbabbini@comverge.com  
jna@speakeasy.org  
joelene.monestier@spgsolar.com  
jtengco@akeena.com  
emahlon@ecoact.org  
mary.tucker@sanjoseca.gov  
dmcfely@solartech.org  
stanimoto@sna.sanyo.com  
njfolly@tid.org  
fwmonier@tid.org  
preston@sonomaenergymgt.com  
brbarkovich@earthlink.net  
dgrandy@caonsitegen.com  
will@solarroofs.com  
lmerry@vervesolar.com  
rmccann@umich.edu  
martinhomerc@gmail.com  
george.simons@itron.com  
smita.gupta@itron.com  
dennis@ddecuir.com  
kenneth.swain@navigantconsulting.com  
lwhouse@innercite.com  
amber@iepa.com  
dcarroll@downeybrand.com  
dseperas@calpine.com  
dchong@energy.state.ca.us  
EGrizard@deweysquare.com  
jmcFarland@treasurer.ca.gov  
jamckinsey@stoel.com  
kellie.smith@sen.ca.gov  
laurene\_park@sbcglobal.net  
bernardo@braunlegal.com  
blaising@braunlegal.com  
Paige.Brokaw@asm.ca.gov  
abb@eslawfirm.com  
glw@eslawfirm.com  
ttutt@smud.org  
artrivera@comcast.net  
mdavis@barnumcelillo.com  
chuck@csolt.net  
karen@klindh.com  
jbarnet@smud.org  
rhuang@smud.org  
sfrantz@smud.org  
whughes@smud.org  
sas@a-klaw.com  
mpa@a-klaw.com  
erickpetersen@pvpowered.com  
jholmes@emi1.com  
michael@awish.net

brenda.latter@itron.com  
Kurt.Scheuermann@itron.com  
loe@cpuc.ca.gov  
arr@cpuc.ca.gov  
as2@cpuc.ca.gov  
aes@cpuc.ca.gov  
cjm@cpuc.ca.gov  
css@cpuc.ca.gov  
df1@cpuc.ca.gov  
dbp@cpuc.ca.gov  
dm1@cpuc.ca.gov  
dot@cpuc.ca.gov  
cln@cpuc.ca.gov  
joc@cpuc.ca.gov  
jf2@cpuc.ca.gov  
kar@cpuc.ca.gov  
lp1@cpuc.ca.gov  
meb@cpuc.ca.gov  
mvc@cpuc.ca.gov  
unc@cpuc.ca.gov  
mts@cpuc.ca.gov  
mc3@cpuc.ca.gov  
mdd@cpuc.ca.gov  
nmr@cpuc.ca.gov  
rl4@cpuc.ca.gov  
sco@cpuc.ca.gov  
skg@cpuc.ca.gov  
tcr@cpuc.ca.gov  
wmb@cpuc.ca.gov  
dtf@cpuc.ca.gov  
deden@energy.state.ca.us  
mdoughto@energy.state.ca.us  
pnarvand@energy.state.ca.us  
smiller@energy.state.ca.us  
dvidaver@energy.state.ca.us  
pbarthol@energy.state.ca.us  
rbaybayan@energy.state.ca.us

MICHAEL P. CALABRESE  
CITY OF SAN DIEGO  
OFFICE OF THE CITY ATTORNEY  
1200 THIRD AVENUE, SUITE 1100  
SAN DIEGO, CA 92101

STEPHEN A. S. MORRISON  
CITY & COUNTY OF SAN FRANCISCO  
CITY HALL, SUITE 234  
1 DR CARLTON B. GOODLET PLACE  
SAN FRANCISCO, CA 94102-4682

ENRIQUE GALLARDO  
ATTORNEY AT LAW  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
SAN FRANCISCO, CA 94111



R.08-03-008

GARY HINNERS  
RRI ENERGY, INC.  
PO BOX 148  
HOUSTON, TX 77001-0148

ROBERT HANNA  
RRI ENERGY, INC.  
1000 MAIN ST SUITE 1100  
HOUSTON, TX 77002

HOWARD GREEN  
DIR. UTILITY PROGRAMS- WEST  
SUN EDISON  
1130 CALLE CORDILLERA  
SAN CLEMENTE, CA 92673

ANTHONY BROWN  
CHEVRON ENERGY SOLUTIONS  
COMPANY  
345 CALIFORNIA STREET  
SAN FRANCISCO, CA 94104

SEAN HAZLETT  
MORGAN STANLEY  
555 CALIFORNIA ST., SUITE 2200  
SAN FRANCISCO, CA 94104

JAYSON WIMBLEY  
MGR. OF ENERGY AND  
ENVIRONMENTAL SVCS.  
DEPT. OF COMMUNITY SERVICES &  
DEVELOP.  
700 NORTH 10TH ST., ROOM 258  
SACRAMENTO, CA 95814-0338

TOM ECKHART  
CAL-UCONS  
10612 NE 46TH STREET  
KIRKLAND, WA 98033

MATT SUMMERS  
ITRON INC.  
601 OFFICERS ROW  
VANCOUVER, WA 98661

PATRICK LILLY  
ITRON, INC.  
601 OFFICERS ROW  
VANCOUVER, WA 98661

MELISSA JONES  
EXECUTIVE DIRECTOR  
CALIFORNIA ENERGY COMMISSION  
1516 9TH STREET, MS-39  
SACRAMENTO, CA 95814