

March 30, 2012

E-mail: docket@energy.state.ca.us
RPS33@energy.ca.gov

Robert B. Weisenmiller, Chairman

Original copy to
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-RPS-01
1516 Ninth Street
Sacramento, CA 95814-5512

**Re: Input of the California Energy Storage Alliance on the 33 Percent
Renewables Portfolio Standard Pre-Rulemaking Draft Regulations
for Publicly Owned Electric Utilities.
Docket No.: 11-RPS-01**

Dear Chairman Weisenmiller:

The California Energy Storage Alliance (“CESA”) appreciates this opportunity to provide input on the Energy Commission’s **33 Percent Renewables Portfolio Standard Pre-Rulemaking Draft Regulations for Publicly Owned Electric Utilities**. CESA applauds, and continues to applaud, the Energy Commission for continuing to highlight the essential role energy storage must play in transforming the future of California’s infrastructure and energy policy.¹ CESA specifically commends the Energy Commission for proactively including energy storage in the following provision in Section 3206(a)(2) of the Pre-Rulemaking Draft Regulations for Publicly Owned Electric Utilities:

“Delay of timely compliance (A) The governing board of a POU may adopt rules permitting a POU to make a finding that reasonable cause exists to delay the timely compliance with RPS procurement. . . .2. Permitting, interconnection, or other circumstances have delayed procured eligible renewable energy resource projects, or there is an insufficient supply of eligible renewable energy resources available to the POU. The POU must also find that: . . . The POU sought to develop either its own eligible renewable energy resources, transmission to interconnect to eligible

¹ *Comments of the California Energy Storage Alliance on 2011 Integrated Energy Policy Report (“IEPR”) Committee Scoping Memo*, December 17, 2010; *Comments of the California Energy Storage Alliance on Draft Committee Revised Scoping Order*, March 11, 2011; *Comments of the California Energy Storage Alliance on Lead Commissioner Draft 2011 Integrated Energy Policy Report*, December 26, 2011.

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renewable energy resources, ***or energy storage used to integrate eligible renewable energy resources.***" (pp. 16-17).

CESA looks forward to continuing to work with the Energy Commission and stakeholders in this important proceeding.

Respectfully,



Janice Lin
Cofounder and Executive Director, California Energy Storage Alliance

cc: Suzanne Korosec, CEC, Assistant Director for Policy Development,
via e-mail: skorosec@energy.state.ca.us