

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

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
Filed March 12, 2012

**REPLY COMMENTS OF THE
CALIFORNIA ENERGY STORAGE ALLIANCE ON 2012 ENERGY DIVISION
STRAW PROPOSAL ON LTPP PLANNING STANDARDS**

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
Filed March 22, 2012

**REPLY COMMENTS OF THE
CALIFORNIA ENERGY STORAGE ALLIANCE ON 2012 ENERGY DIVISION
STRAW PROPOSAL ON STANDARDIZED LTPP PLANNING ASSUMPTIONS**

Pursuant to the *Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge*, dated May 17, 2012, the California Energy Storage Alliance (“CESA”)¹ hereby submits these reply comments on the Standardized Planning Assumptions dated May 10, 2012 (“Planning Assumptions”), consistent with the standard template provided to parties by the Energy Division on May 23, 2012.

I. THE PLANNING ASSUMPTION’S SILENCE ON ENERGY STORAGE IS SURPRISING AND VERY DISAPPOINTING AND THE COMMISSION SHOULD IMMEDIATELY CORRECT THE OMISSION.

In its comments filed thus far in this proceeding, and in its immediate predecessor proceeding (R.10-05-006),² CESA has repeatedly emphasized the importance of specifically

¹ The California Energy Storage Alliance consists of A123 Systems, Applied Intellectual Capital, Beacon Power Corporation, Chevron Energy Solutions, Deena Energy, East Penn Manufacturing Co., Inc., Energy’s, Enervate, Fluidic Energy, General Compression, Green smith Energy Management Systems, HDR, Inc., Ice Energy, International Battery, Inc., Light sail Energy, Inc., MMEC/Sun Edison, Powergetics, Primus Power, Prudent Energy, Restore Energy Systems, SA, Samsung SDI, Silent Power, Snitch, Sun verge, Sustain, and Extreme 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://www.storagealliance.org>.

² *Comments on Resource Planning Assumptions*, filed July 9, 2010; *Reply Comments on Resource Planning Assumptions*, filed July, 16, 2010; *Post-Workshop Comments on Renewable Integration Modeling Methodology*, filed September 21, 2010; *Reply Comments on Renewable Integration Modeling Methodology*, filed October 8, 2010; *Post-Workshop Comments in Response to ALJ’s Ruling Regarding Planning Assumptions and Modeling Issues*, filed January 14, 2011; *Comments on Preliminary Scoping Memorandum*, filed April 06, 2012.

addressing the key role of energy storage and explained why it is critical that its role should be expressly addressed in long-term procurement planning assumption. CESA is therefore disappointed to have to point out to the Commission that there is *no mention of energy storage anywhere in the Planning Assumptions*. This omission is not only a significant substantive concern, but it is also surprising considering the multiple formal and informal statements by the Commission and staff that energy storage would be robustly considered in this proceeding, including the recent *Energy Division Staff Framework Proposal*³ that stated: “CPUC Staff expects to coordinate with other on-going efforts in Resource Adequacy, Long-Term Procurement, and activities at the CAISO to ensure that energy storage is being considered in those efforts.”⁴

Other parties have mentioned this omission in their opening comments,⁵ but CESA wishes to go on record, once again, as strongly recommending that the increasingly significant role of energy storage should be explicitly addressed in this proceeding, specifically including the Planning Standards. CESA will not burden the record with a re-statement of its past comments, and CESA neither endorses nor refutes any specific statements made in the opening comments of other parties, but CESA notes its appreciation of the fact that it does not stand alone in bringing such an unexplained and unfortunate omission to the attention of the Commission.

CESA has, of course, also highlighted the importance of accounting for energy storage in all forms of planning subject to the Commission’s jurisdiction in the context of the Commission’s active proceeding focused on energy storage (“Storage OIR”).⁶ With the benefit

³ *Energy Division Staff Storage Framework Proposal*, published April 3, 2012.

⁴ *Id.*, cover letter, p 3.

⁵ See, Opening Comments filed by the California Environmental Justice Alliance, EnerNOC, Interstate Renewable Energy Council, Inc., and Sierra Club California.

⁶ See, CESA’s comments filed in R.10-12-007 (“Storage OIR”).

of the additional record made available by other reply comments filed by other parties, and any other pertinent sources of information, CESA plans to file testimony in this proceeding.

II. CONCLUSION

CESA looks forward to a continuing dialogue with the Commission, Commission staff and stakeholders in the Commission's numerous active proceedings that will benefit from the Commission's guidance regarding the accelerating prominence of the role of energy storage.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Liddell", is positioned above the printed name.

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