

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

Order Instituting Rulemaking to Oversee  
the Resource Adequacy Program, Consider Program  
Refinements, and Establish Annual Local and  
Flexible Procurement Obligations for the 2016 and  
2017 Compliance Years.

Rulemaking 14-10-010  
(Filed October 16, 2014)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
TO MOTION OF INDEPENDENT ENERGY PRODUCERS ASSOCIATION  
TO AMEND THE PHASE 2 SCOPING MEMO AND RULING**

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**CALIFORNIA ENERGY STORAGE ALLIANCE**

February 16, 2016

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The California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits this response to *Motion of Independent Energy Producers Association to Amend the Phase 2 Scoping Memo and Ruling* filed on January 29, 2016 (“IEP Motion”).

**I. INTRODUCTION.**

CESA supports the IEP Motion and asks that it be expeditiously granted by the Commission because multi-year Resource Adequacy (“RA”) procurement should be very favorable for the expanded deployment of preferred resources and energy storage.<sup>2</sup> As the IEP

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<sup>1</sup> 1 Energy Systems Inc., Advanced Microgrid Solutions, AES Energy Storage, Aquion Energy, Brookfield, CODA Energy, Consolidated Edison Development, Inc., Cumulus Energy Storage, Customized Energy Solutions, Demand Energy, Dynapower Company, LLC, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, ELSYS Inc., eMotorWerks, Energy Storage Systems, Inc., Enersys, Enphase Energy, EV Grid, GE Energy Storage, Geli, Gordon & Rees LLP, Green Charge Networks, Greensmith Energy, Gridtential Energy, Inc., Hitachi Chemical Co., Ice Energy, Imergy Power Systems, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Invenergy LLC, JuiceBox Energy, K&L Gates, LG Chem Power, Inc., LightSail Energy, Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Mitsubishi Corporation (Americas), Mobile Solar, NEC Energy Solutions, Inc., NextEra Energy Resources, NRG Solar LLC, OutBack Power Technologies, Panasonic, Parker Hannifin Corporation, Powertree Services Inc., Primus Power Corporation, Princeton Power Systems, Recurrent Energy, Renewable Energy Systems Americas Inc., S&C Electric Company, Saft America Inc., Sharp Electronics Corporation, Skylar Capital Management, SolarCity, Sony Corporation of America, Sovereign Energy, Stem, SunEdison, SunPower, Toshiba International Corporation, Trimark Associates, Inc., Trina Energy Storage, Tri-Technic, Wellhead Electric. The views expressed in this Response are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

<sup>2</sup> *Comments of the California Energy Storage Alliance on Preliminary Scoping Memo*, filed February 20, 2014, in R.14-02-001, p. 6).

Motion explains, the Commission very recently closed R.14-02-001,<sup>3</sup> noting, among other things, that:

“The RA proceeding has the permanent flexible capacity issue scoped, and that effort needs to be finalized before a two- or three-year RA requirement can be determined. This effort will not be completed by the scheduled end of the JRP. As most parties recommended in this proceeding, once the permanent flexible capacity determination is in place, the Commission can return to the issue of multi-year RA with this information in mind.” (p. 5).

**II. MULTI-YEAR RESOURCE ADEQUACY PROCUREMENT SHOULD BE ADDRESSED BY THE COMMISSION IN THIS PROCEEDING.**

CESA also spoke very recently and specifically to the subject of the IEP Motion in terms of the order of priority in which issues should be taken up by the Commission in its Prehearing Conference Statement<sup>4</sup> filed in this proceeding:

“CESA thus recommends the multi-year decision be addressed first in this proceeding in so far as it remains relevant, with the expectation R.14-02-001 will assess whether that proceeding’s policy goals were met after any decision in this proceeding. Alternatively, multi-year RA discussions can be considered directly on a parallel track in R.14-02-001, so long as the chosen procedural path speeds progress on achievement of critical path capacity product and contracting reforms.

**III. CONCLUSION.**

For the reasons stated in this response, CESA respectfully requests that the Commission modify the Scope of this proceeding to include consideration of multi-year RA procurement.

Respectfully submitted,



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<sup>3</sup> *Decision Closing the Order Instituting Rulemaking*, D.16-01-033, issued January 28, 2016.

<sup>4</sup> *Prehearing Conference Statement of the California Energy Storage Alliance*, filed December 2, 2015, pp. 4-5.