

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

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
(NOT CONSOLIDATED)	
In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005
And Related Matters.	Application 15-07-007 Application 15-07-008

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE JOINT AMENDED SCOPING MEMO AND RULING OF ASSIGNED
COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**

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In accordance with 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 *Joint Amended Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge* (“Amended Scoping Memo”), issued by President Michael Picker and Administrative Law Judge Robert M. Mason III on January 24, 2018, and the *E-Mail Ruling Extending Time for Comments on Scoping Memo and Ruling* (“E-Mail Ruling”), issued by Administrative Law Judge Robert M. Mason III on February 6, 2018.

I. INTRODUCTION.

CESA is generally supportive of the Amended Scoping Memo, as it continues to advance the Distributed Resource Plan (“DRP”) proceeding toward addressing further refinements to the Locational Net Benefits Analysis (“LNBA”) and Integration Capacity Analysis (“ICA”) methodologies, consideration of additional use cases for the two methodologies, and coordination of outputs and outcomes of this proceeding with other critical proceedings, such as the Net Energy Metering (“NEM”), Integrated Distributed Energy Resources (“IDER”), and Integrated Resource Planning (“IRP”) proceedings. CESA agrees that these issues are important to address in this

¹ 8minutenergy Renewables, Able Grid Energy Solutions, Adara Power, Advanced Microgrid Solutions, AES, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Brenmiller Energy, Bright Energy Storage Technologies, Brookfield, Consolidated Edison Development, Inc., Customized Energy Solutions, Demand Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectriQ Power, eMotorWerks, Inc., Energport, ENGIE Energy Storage, Fluence Energy, GAF, Geli, Greensmith Energy, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NICE America Research, NRG Energy, Inc., Ormat Technologies, Parker Hannifin Corporation, Qnovo, Range Energy Storage, Recurrent Energy, RES Americas Inc., Semptra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, STOREME, Inc., Sunrun, Swell Energy, Viridity Energy, Wellhead Electric, and Younicos. 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>).

proceeding. In these comments, CESA instead focuses on its response to the E-Mail Ruling. Specifically, CESA believes that it is critical for the Commission to consider DRP policy issues around enabling and accelerating the installation of electric vehicle (“EV”) charging stations pursuant to the state’s EV adoption and climate goals.

II. THE INTEGRATION CAPACITY ANALYSIS VALUES SHOULD SUPPORT OPTIMAL SITING OF ELECTRIC VEHICLE CHARGERS.

There are a number of proceedings, investments, and programs underway that aim to build out California’s EV charging infrastructure to support the state’s EV goals and to help decarbonize the transportation sector. Given the scale of EV charging infrastructure deployment over the next decade, CESA believes it is important for the LNBA and ICA methodologies to be refined and utilized to support optimal siting of EV chargers where feasible. Ideally, it will be prudent for the Commission to consider to the degree possible how it can identify locations where there is available hosting capacity or where it could increase hosting capacity on overloaded circuits with smart EV charging. CESA previously commented on how the ICA methodology could be refined and improved with the consideration of charging resources such as energy storage systems to understand where they can be sited and optimally charged to increase hosting capacity on a given circuit to enable greater siting of other distributed generation resources.² Similarly, EV chargers should not be limited to only locations where there is spare hosting capacity, but ones where it can alleviate distribution grid stresses.

² *Comments of the California Energy Storage Alliance on the Assigned Commissioner’s Ruling Proposing Scope and Schedule for Continued Long Term Refinement Discussion Pertaining to the Integration Capacity Analysis and Locational Net Benefits Analysis in Track One of the Distributed Resources Plan Proceedings*, filed on May 3, 2017, pp. 2-4.

The discussion on smart EV charging would naturally fit into the DRP long-term refinements policy discussions, where the ICA Working Group is actively discussing methods for reflecting the effect of potential load-modifying resources, which appears to be included in the scope in 2019.³ While these discussions would ideally begin earlier, CESA understands that the initial ICA is just being deployed for different use cases. However, when the ICA Working Group begins discussion on this topic, CESA recommends that the Commission ensure that the hosting capacity effect of and ICA planning use case for EV chargers be included with other load-modifying resources. Additionally, the ICA Working Group should also address how to utilize the ICA methodology to guide optimal siting of EV charging investments when paired with rooftop solar and energy storage to mitigate the impacts on certain circuits. Naturally, this would involve coordination with the relevant EV and transportation electrification proceedings because the impact of EV chargers on hosting capacity would be achieved through EV rate designs that guide its charging behavior.

³ *Integration Capacity Analysis Working Group: Final ICA WG Long Term Refinements Report*, filed on January 8, 2018, p. 25.

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments on the Proposed Decision and looks forward to working with the Commission, the IOUs and other parties going forward in this proceeding to ensure a sustainable and robust DIDF going forward.

Respectfully submitted,



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