

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

Application of Southern California Edison  
Company (U 338-E) for Approval of its 2018  
Energy Storage Procurement & Investment  
Plan.

---

Application 18-03-002  
(Filed March 1, 2018)

**PROTEST OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-  
E) FOR APPROVAL OF ITS 2018 ENERGY STORAGE PROCUREMENT AND  
INVESTMENT PLAN**

Alex J. Morris  
Sr. Director, Policy & Regulatory Affairs

Jin Noh  
Policy Manager

**CALIFORNIA ENERGY STORAGE ALLIANCE**  
2150 Allston Way, Suite 210  
Berkeley, California 94704  
Telephone: (310) 617-3441  
Email: [amorris@storagealliance.org](mailto:amorris@storagealliance.org)

April 6, 2018

**TABLE OF CONTENTS**

I. INTRODUCTION. ....2

II. AB 2514 ENERGY STORAGE PROCUREMENT SHOULD CONSIDER  
HYBRID AND ALTERNATIVE ENERGY STORAGE TECHNOLOGIES.....4

III. SCE SHOULD NOT DEFAULT TO UTILITY-OWNERSHIP FOR AB 2868  
INVESTMENTS AND SHOULD CONDUCT COMPETITIVE  
SOLICITATIONS FOR THIRD-PARTY-OWNED PROJECTS TO COMPETE  
WITH UTILITY-OWNED PROJECTS TO DELIVER INTENDED  
RESILIENCY SERVICES. ....5

IV. SCE SHOULD BETTER DEFINE THE LOCAL RENEWABLE  
INTEGRATION NEED AND CONSIDER A WIDER RANGE OF SOURCING  
MECHANISMS TO PROCURE SOLUTIONS. ....10

V. SCE SHOULD CONSIDER EXPANDING THE SCOPE OF ITS PROPOSED  
ENERGY STORAGE FOR MULTI-FAMILY AFFORDABLE HOUSING  
INCENTIVE PROGRAM. ....12

VI. CONCLUSION.....14

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

Application of Southern California Edison  
Company (U 338-E) for Approval of its 2018  
Energy Storage Procurement & Investment  
Plan.

Application 18-03-002  
(Filed March 1, 2018)

**PROTEST OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-  
E) FOR APPROVAL OF ITS 2018 ENERGY STORAGE PROCUREMENT AND  
INVESTMENT PLAN**

In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits this protest to the *Application of Southern California Edison Company (U 338-E) for Approval of its 2018 Energy Storage Procurement and Investment Plan* (“Application”), filed by Southern California Edison Company (“SCE”) on March 1, 2018.

---

<sup>1</sup> 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Axiom Exergy, Brenmiller Energy, Bright Energy Storage Technologies, BrightSource Energy, Brookfield Renewables, Centrica Business Solutions, 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, Energy Storage Systems Inc., EnerNOC, ENGIE Energy Storage, E.ON Climate & Renewables North America, Fluence Energy, GAF, Geli, Greensmith Energy, Gridscape Solutions, IE Softworks, Ingersoll Rand, 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, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy, Inc., Ormat Technologies, Parker Hannifin Corporation, Pintail Power, Qnovo, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Semptra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, STOREME, Inc., Sunrun, Swell Energy, True North Venture Partners, 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>).

## **I. INTRODUCTION.**

CESA continues to support the procurement of energy storage resources to not only meet the targets set forth under the Assembly Bill (“AB”) 2514 framework but also to support continued learning on incorporating energy storage capabilities and values in modeling and evaluation, developing procurement best practices for energy storage resources, and gaining operational experience with energy storage resources to provide grid services. SCE has made significant progress in this regard, including with the expedited procurement of energy storage resources to address grid reliability issues stemming from the limited operations of the Aliso Canyon gas storage facility, which demonstrated the option value of energy storage and the ability for energy storage to be procured to meet an emergency grid reliability situation in short order. SCE has also been very active with major energy storage procurement in its 2013 Local Capacity Requirements (“LCR”) Request for Offers (“RFO”), 2014 Energy Storage RFO, 2016 Second Preferred Resources Pilot (“PRP”) RFO, and 2016 Energy Storage and Distribution Deferral (“ES&DD”) RFO. CESA commends SCE for pushing to learn about the procurement and operation of energy storage resources to meet local capacity needs as well as to address more localized distribution needs.

SCE has indicated that it has just a 6.5 MW deficit in meeting its 2018 cumulative energy storage target, which will be met by an energy storage solicitation of at least 20 MW in the Los Angeles Basin in the coming months pursuant to Senate Bill (“SB”) 801 and a recently-launched solicitation for energy storage and other preferred resources for 76 to 86 MW in the Moorpark and Goleta areas.<sup>2</sup> SCE thus proposed that it would meet its AB 2514 procurement targets through those solicitations. CESA plans to support SCE as it moves forward with these plans.

---

<sup>2</sup> *Testimony of Southern California Edison Company in Support of Its 2018 Energy Storage Procurement and Investment Plan*, pp. 5-6, 24-26.

The basis for CESA’s protest to this Application is regarding SCE’s proposed AB 2868 energy storage programs and investments. D.17-04-029 determined that energy storage programs and investments pursuant to AB 2868 should be included and implemented in the existing biennial energy storage application and plans process. Specifically, AB 2868 authorized each of the investor-owned utilities (“IOUs”) to propose up to 166.66 MW of programs and investments for distributed energy storage<sup>3</sup> – incremental to what is required under AB 2514 – with a focus on disadvantaged communities and public-sector customers and in compliance with several key statutory goals.<sup>4</sup> Pursuant to AB 2868, SCE filed its Application that proposed several preliminary ideas around utility-owned energy storage at its substations to support renewables integration, which SCE calls its Local Energy Storage & Management Systems (“LESMS”) Investments. Additionally, SCE also proposes a \$9.8-million Energy Storage for Multi-Family Affordable Housing Incentive Program.<sup>5</sup>

First, CESA appreciates SCE’s preliminary proposal that seeks to use energy storage resources to support renewables integration. Still, though CESA is generally supportive of the proposal’s concepts, we find that the proposed investments fall short of all the statutory objectives laid out in AB 2868. Particularly, in this protest, CESA believes that SCE did not adequately consider how it could minimize overall costs through solicitation of third-party-owned projects and failed to consider a pathway for non-utility enterprises to reasonably compete to address the identified renewable integration need. Instead, SCE’s proposed investments default to utility-

---

<sup>3</sup> AB 2868 defines distributed energy storage systems as an energy storage system with a useful life of at least 10 years that is connected to the distribution system or on the customer side of the meter and that has an “energy storage management system”.

<sup>4</sup> According to AB 2868 Section 2838, programs and investments must achieve ratepayer benefits, reduce GHG emissions, meet air quality standards, reduce dependence on petroleum, minimize overall costs, prioritize public-sector and low-income customers, and do not unreasonably impair non-utility enterprises.

<sup>5</sup> *Ibid*, pp. 28-30, 44-45.

owned investments, and SCE does not indicate that it intends to conduct an active solicitation for third-party-owned energy storage solutions. CESA emphasizes that it is supportive of competition and all business and ownership models, including utility-owned projects, so long as utility-owned projects do not harm competition in the overall energy storage market and third-party-owned projects are also solicited in a competitive and transparent procurement process to determine the most cost-competitive solution to address the identified grid need.

Second, CESA is generally supportive of the proposed Energy Storage for Multi-Family Affordable Housing Incentive Program, which is structured similar to the Self-Generation Incentive Program (“SGIP”) but targeted to multi-family housing units who are also participating in the Solar on Multifamily Affordable Housing (“SOMAH”) Program. CESA looks forward to reviewing SCE’s advice letter that will include program design and implementation details, but recommends here that SCE may wish to consider expanding the scope, target, and budget of this program to meet the intended objectives of this program.

In sum, CESA’s main concerns are around default utility ownership of the proposed LESMS Investments pursuant to AB 2868. Instead, CESA recommends that SCE consider a wider range of solutions that could address the identified renewable integration needs. So, though CESA is generally supportive of the proposed concepts in SCE’s Application, we find that the proposed investments fall short of the statutory objectives laid out in AB 2868.

**II. AB 2514 ENERGY STORAGE PROCUREMENT SHOULD CONSIDER HYBRID AND ALTERNATIVE ENERGY STORAGE TECHNOLOGIES.**

With the SB 801 solicitation and Moorpark/Goleta Request for Proposals (“RFP”) likely meeting the remaining AB 2514 energy storage procurement target for SCE in its 2018 biennial cycle, no details are provided on the eligibility criteria, solicitation process, or *pro forma* contract. CESA looks forward to reviewing these forthcoming details in a separate advice letter that SCE

plans to file in the coming months. CESA only adds that SCE should consider the eligibility of hybrid energy storage and alternative energy storage technologies in this upcoming solicitation, as well as in future 2020 solicitations. Solicitations by SCE have generally been concentrated in standalone lithium-ion battery storage resources or solar-paired lithium-ion battery storage resources, but CESA also recommends that eligibility to compete, as represented through the consideration of their different capabilities and/or through differentiated *pro forma* contracts, for hybrid energy storage (*e.g.*, wind-plus-storage, gas-paired-storage) and alternative energy storage technologies (*e.g.*, thermal storage, compressed air energy storage) be accommodated.

**III. SCE SHOULD NOT DEFAULT TO UTILITY-OWNERSHIP FOR AB 2868 INVESTMENTS AND SHOULD CONDUCT COMPETITIVE SOLICITATIONS FOR THIRD-PARTY-OWNED PROJECTS TO COMPETE WITH UTILITY-OWNED PROJECTS TO DELIVER INTENDED RESILIENCY SERVICES.**

SCE proposes approximately 40 MW of utility-owned energy storage investments located at its substations, with a focus on providing system renewable integration support by participating in the energy and ancillary services market at the California Independent System Operator (“CAISO”), in addition to exploring the utilization of these energy storage assets for other purposes – *e.g.*, increasing hosting capacity, increasing operational flexibility during localized system congestion, and providing emergency resiliency.<sup>6</sup> To select the LESMS Investment sites, SCE discussed how it used load-factor research to identify substations based on low monthly and yearly load factors as well as high forecasted renewable generation, with prioritization of locations with high levels of disadvantaged community (“DAC”) and California Alternate Rates for Energy (“CARE”) customers. In analyzing space around the substations, SCE was able to calculate the

---

<sup>6</sup> *Testimony of Southern California Edison Company in Support of Its 2018 Energy Storage Procurement and Investment Plan*, p. 30.

energy storage potential to potentially identify how it could potentially increase the energy capacity of its LESMS Investments over time as conditions change.<sup>7</sup> The proposed LESMS candidate projects appear to achieve many of the statutory objectives of AB 2868, such as maximizing ratepayer benefit by pursuing multiple purposes for the same energy storage asset, reducing dependence on petroleum by pursuing emergency backup and resiliency at the substation, and prioritizing public-sector and low-income customers by prioritizing locations with high levels of DAC and CARE customers.

However, CESA observes that SCE's Application could fail to meet two of its statutory objectives: to minimize overall costs and to not unreasonably impair non-utility enterprises. SCE justifies the solicitation for utility-owned energy storage assets because SCE, as the operator of the energy storage asset, can prioritize reliability over market concerns and operate the systems to their physical limitations.<sup>8</sup> Furthermore, by conducting a competitive solicitation for design-build-transfer ("DBT") of turnkey energy storage systems, SCE states that it is minimizing costs to customers, and by making substation land owned by SCE available to third parties that would otherwise not be available to third parties, SCE contends that it is not impairing but creating a new opportunity for third parties to deploy energy storage systems.<sup>9</sup>

First, CESA disputes SCE's claim that simply holding a competitive solicitation solely for utility-owned energy storage projects achieves the statutory objective to minimize overall costs for ratepayers because it is impossible for the Commission to determine whether the most cost-effective resource was selected *if only* utility-owned projects are solicited. While a competitive solicitation for DBT offers will produce the most cost-effective *utility-owned* energy storage

---

<sup>7</sup> *Ibid*, pp. 30-32.

<sup>8</sup> *Ibid*, p. 35.

<sup>9</sup> *Ibid*, pp. 29, 35-36.



project, the Commission will be restricting its cost-effectiveness assessment to one type of contracting mechanism, without being able to determine whether other ownership models and contracting mechanisms can achieve the same renewable integration objectives and meet the same statutory goals at a lower cost to the ratepayer.

Second, by limiting the proposed investment to one type of ownership model and contracting mechanism, CESA argues that non-utility enterprises are in fact unduly impaired, as third-party-owned distribution-connected projects or behind-the-meter (“BTM”) customer-sited projects could achieve the same objectives and statutory goals as a utility-owned DBT project. For example, a third-party-owned distribution-connected energy storage project located on adjacent available land but not on utility-owned property could potentially deliver the intended renewable integration support while still providing other grid-service applications such as Resource Adequacy (“RA”) capacity to maximize ratepayer benefit. Alternatively, a suite of BTM energy storage systems could be strategically sited to deliver the intended energy, ancillary services, and emergency resiliency. Potentially, the most cost-effective solution to the ratepayer could be a combination of utility-owned, third-party-owned distribution-connected, and customer-sited energy storage projects. But without a competitive solicitation for other ownership and contracting mechanisms, it is impossible to tell.

The key issue is that SCE does not clearly justify why these proposed investments must be located on substation land owned by SCE and/or why SCE must be the operator of the energy storage asset to prioritize reliability over market revenue. CESA does not believe that it is necessary to site an energy storage asset on SCE-owned substation land to deliver localized renewable integration services, as projects located nearby or further downstream of the substation could potentially address low load factor and forecasted ‘duck curve’ issues. In fact, the Second

PRP RFO points to how SCE is considering how distribution issues arising from localized load growth can be addressed through a portfolio of third-party contracts for energy storage.<sup>10</sup>

Furthermore, CESA disagrees with SCE that it must be the operator of the energy storage asset to prioritize reliability over market revenue. As SCE is aware, local capacity is considered a reliability service by the Commission,<sup>11</sup> and yet, SCE has already contracted for a number of third-party-owned energy storage resources to deliver both local capacity (reliability service) and customer bill savings (non-reliability service) in its 2013 LCR RFO. In addition, SCE is also in the process of considering how localized energy storage assets (and other distributed energy resources) can be procured and operated to defer distribution capital investments in the Integrated Distributed Energy Resources (“IDER”) Pilot RFOs. Though the distribution deferral use case is in the process of being tested, the fact that the IDER RFOs are currently underway indicates that the Commission and SCE believe that these reliability benefits can be provided with third-party-owned resources. Given clear contractual requirements, signals, or incentives, such as must-offer obligations and availability penalties as done for RA resources, third-party-owned energy storage projects can successfully deliver on the reliability need over maximizing market revenues.

CESA also disputes SCE’s argument in favor of utility-owned energy storage projects by citing how SCE will be able to operate the system to its physical (rather than contractual) limitations. In many cases, the contractual warranty limitations are in place to ensure a minimum 10- or 15-year useful life of the energy storage asset, which is important if the Commission seeks to minimize overall costs and maximize ratepayer benefits over time and if SCE seeks to comply

---

<sup>10</sup> CESA understands that those contracts currently face regulatory uncertainty based on a recent proposed decision and have yet to be approved by the Commission. But CESA’s point still stands that SCE found it possible to address local load-growth issues by contracting for third-party-owned projects.

<sup>11</sup> *Decision on Multiple-Use Application Issues*, D.18-01-003, issued on January 17, 2018, p. 10.

with AB 2868, which defines eligible energy storage systems for these authorized programs and investments as having a useful life of at least 10 years. CESA does not see the ability to push an asset to its physical limitation as justifying utility ownership of projects or as being in the best interest of ratepayers. If, for example, SCE were to consistently push an energy storage asset to its physical limitation, the asset may wear down unreasonably quickly. Additionally, via contracts, third-party-owned contracts could be designed to operate to meet physical requirements just like a utility-owned project. Thus, location on SCE-owned substation land and having a utility asset operator to ‘ensure’ reliability should *not* serve as the basis for defaulting to utility-owned energy storage projects as part of these proposed investments.

Finally, CESA points to previous Commission decisions that confirm that utilities must make a showing that holding a competitive solicitation for non-utility-owned generating resources is not feasible. In D.07-12-052, the Commission established an important principle regarding the electric utilities’ procurement of generating resources and expressed its preference for competitive approaches in a specific requirement:<sup>12</sup>

“We want to make it clear that we continue to believe in a “competitive market first” approach. As such we believe that all long-term procurement should occur via competitive procurements, rather than through preemptive actions by the IOU, except in truly extraordinary circumstances.” [emphasis in original]

“Because the Commission has a strong preference for competitive solicitation, in all cases, if an IOU proposes an UOG outside of a competitive RFO, ***the IOU must make a showing that holding a competitive RFO is infeasible.***” [emphasis added]

---

<sup>12</sup> *Opinion Adopting Pacific Gas and Electric Company’s, Southern California Edison Company’s, and San Diego Gas and Electric Company’s Long-Term Procurement Plans*, D.07-12-052, issued on December 21, 2007, pp. 209-211.

The Commission reaffirmed this policy in D.08-11-004.<sup>13</sup>

In sum, CESA reiterates its support for competition and transparency and believes that utility-owned energy storage and generating projects have a role in supporting the reliability and resiliency of California's electricity grid. However, to ensure the most cost-effective resource is procured, competition is promoted, and regulatory precedent/guidance is adhered to, SCE should conduct a competitive and transparent procurement process that includes third-party-owned projects to meet the identified local renewable integration need. Only after the competitive solicitation reveals that there is a lack of viable technical and commercial alternatives to utility-owned projects and that the utility-owned project is the most cost competitive (*i.e.*, in the best interest of ratepayers) should the Commission approve a utility-owned project.

**IV. SCE SHOULD BETTER DEFINE THE LOCAL RENEWABLE INTEGRATION NEED AND CONSIDER A WIDER RANGE OF SOURCING MECHANISMS TO PROCURE SOLUTIONS.**

A competitive solicitation for energy storage projects of all ownership types and different contracting mechanisms is needed to identify the solution that would confirm whether SCE has procured the energy storage resource that meets the local renewable integration objective while also minimizing overall costs. By specifically defining the need (*e.g.*, the timing and frequency of peak loading on the substation, hourly renewable growth forecast), third parties can understand how to configure their proposed solutions and submit offers for projects that deliver the target renewable integration services, which may be delivered by siting on non-SCE-owned land.

Additional information is also needed regarding the other purposes that SCE plans to pursue and explore. For example, if increasing hosting capacity is a potential secondary application

---

<sup>13</sup> *Decision Granting Motion to Dismiss of Western Power Trading Forum/The Alliance for Retail Energy Markets and the Independent Energy Producers Association*, D.08-11-004, filed on November 12, 2008, p. 24.

of the LESMS energy storage investment, then information is needed on the hour-by-hour thermal loading limits and steady-state voltage to allow third parties to propose cost-effective, multi-purpose energy storage assets that can deliver on the core application as well as potentially consider how it can add additional grid services. Similarly, to provide emergency resiliency, details on the minimum duration requirement during outages and black-start service requirements may be pieces of information that would support offers for innovative third-party solutions. This information is needed to provide third parties with a level playing field to propose effective energy storage solutions that meet the identified need. Without this information, SCE would be conducting a nominal competitive solicitation, leading to the utility falling back on utility-owned solutions without adequate consideration of third-party-owned energy storage projects.

Finally, procurement, valuation, and compensation for many of the local distribution grid services considered for the LESMS energy storage investments are being discussed in the Distributed Resources Plan (“DRP”) and IDER proceedings. In particular, alternative sourcing mechanisms such as programs and tariffs are starting to be discussed in the IDER proceeding, and CESA envisions that some of the additional services sought in these investments (*e.g.*, increasing hosting capacity, emergency resiliency) can be procured through specific programs and tariffs (*e.g.*, Volt/VAR optimization tariff) developed in the IDER proceeding,<sup>14</sup> making it not imperative that this competitive solicitation procure all distribution grid services in this specific competitive solicitation to maximize ratepayer value, and making it possible for third parties to deliver and be compensated for providing these additional distribution grid services as defined by these new

---

<sup>14</sup> See *Comments of the California Energy Storage Alliance on the Amended Scoping Memo of Assigned Commissioner and Joint Ruling with Administrative Law Judge*, filed on March 29, 2018. <http://www.storagealliance.org/sites/default/files/Filings/2018-03-29%20CESA%27s%20Comments%20on%20IDER%20Amended%20Scoping%20Memo%20-%20FINAL.pdf>

programs and tariffs. In other words, utility ownership of these energy storage projects is not needed to deliver these additional distribution grid services.

**V. SCE SHOULD CONSIDER EXPANDING THE SCOPE OF ITS PROPOSED ENERGY STORAGE FOR MULTI-FAMILY AFFORDABLE HOUSING INCENTIVE PROGRAM.**

CESA generally supports SCE's proposed Energy Storage for Multi-Family Affordable Housing Incentive Program, which will provide up to \$9.4 million in incentives and target multi-family affordable building owners in the SOMAH Program to install energy storage and leverage virtual net energy metering ("VNEM") and time-of-use ("TOU") rates. CESA believes that it is prudent to leverage the complementary nature of the proposed program with the SOMAH Program to maximize ratepayer benefit of this program. In addition, CESA supports SCE's proposed program design and structure that mimics that of SGIP in creating step budgets with incentive rates that automatically ratchets down from \$0.75/Wh by a pre-set amount, smartly reflecting market uptake. Finally, CESA supports the proposal to allocate more of the benefits to tenants (80%) to be consistent with other similar programs.

Importantly, because this proposed program is intended to complement the SOMAH Program, CESA believes that the scope of this program could be expanded. The SOMAH Program has an overall goal of installing at least 300 MW of solar on qualified properties by 2030, pursuant to AB 693, and has established an annual budget of \$100 million split across the three IOUs. In establishing the SOMAH Program, D.17-12-022 determined that it is reasonable to exempt participating tenants from the requirement applying to other customers using the Net Energy Metering ("NEM") successor tariff to take service under a TOU rate, finding that the grid impact

of this exemption would be minimal.<sup>15</sup> In the deliberations around AB 693 implementation, CESA observed that the IOUs sought to not apply this TOU rate exemption, and so the Energy Storage for Multi-family Affordable Housing Incentive Program presents an opportunity for SCE to support the transition of eligible multi-tenant buildings on the VNEM tariff to TOU rates for common areas.

Thus, given the intent of SCE to complement the SOMAH Program, CESA believes that the scope of the Energy Storage for Multi-Family Affordable Housing Incentive Program may be too small to act as a vehicle to support the ambitious goals of AB 693. While AB 693 sets an overall goal of 300 MW of solar on qualified multi-tenant facilities,<sup>16</sup> the Energy Storage for Multi-Family Affordable Housing Incentive Program only plans to make \$9.4 million in incentives available, which was determined based on a calculation of the proposed \$0.60/Wh to \$0.75/Wh incentive amounts and the allocation of 1 MW of energy storage projects across four steps. In other words, in total, the proposed program is structured to support just 4 MW of energy storage projects. By comparison to the overall 166.66 MW authorized under AB 2868 and the 300 MW goal by 2030 pursuant to AB 693, SCE's planned 4 MW of energy storage deployments under this program represent just 2.4% and 1.3%, respectively, of those authorizations and goals.

Within the context of these goals, CESA recommends that SCE consider an expanded program. The program's budget could be increased to support advancement to these goals and scale learnings and program administration costs. CESA looks forward to further programmatic and implementation details that SCE will provide in a subsequent advice letter filing.

---

<sup>15</sup> *Decision Adopting Implementation Framework for Assembly Bill 693 and Creating the Solar on Multifamily Affordable Housing Program*, D.17-12-022, issued on December 18, 2017, p. 20.

<sup>16</sup> *Ibid*, p. 56.

**VI. CONCLUSION.**

CESA appreciates the opportunity to submit this protest to the Application and looks forward to working with the Commission and SCE going forward in this proceeding.

Respectfully submitted,



Alex J. Morris  
Sr. Director, Policy & Regulatory Affairs  
**CALIFORNIA ENERGY STORAGE ALLIANCE**  
2150 Allston Way, Suite 210  
Berkeley, California 94704  
Telephone: (310) 617-3441  
Email: [amorris@storagealliance.org](mailto:amorris@storagealliance.org)

Date: April 6, 2018