

**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 (Filed August 14, 2014)
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 ADMINISTRATIVE LAW JUDGE’S RULING ON THE DISTRIBUTION
WORKING GROUP PROGRESS REPORT**

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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”) hereby submits these comments on the *Administrative Law Judge’s Ruling on the Distribution Working Group Progress Report* (“Ruling”), issued by Administrative Law Judge Robert M. Mason III on August 1, 2018.

I. INTRODUCTION.

CESA¹ appreciated the opportunity to participate in the Distribution Forecasting Working Group (“DFWG”) and appreciated the methods shared and discussed by the staff of the California Energy Commission (“CEC”) and the investor-owned utilities (“IOUs”) that provided helpful insights into how each conducts system-level forecasting and distribution-level disaggregation of system-level forecasts, respectively. The Distributed Energy Resource (“DER”) parties, including CESA, benefit from understanding the forecasting methodologies that are fed into distribution grid needs assessments.

CESA agrees that the IOU are implementing best practices given the available data but also believes that improvements could be made as methodologies are refined, tools are developed, and available data increases (or is pursued). Specifically, in regards to energy storage, there are many areas of further improvement in how energy storage resources are represented in terms of their operational profiles and how energy storage resource deployments are forecasted at the system level and when disaggregated down to the distribution system. CESA hopes to work

¹ 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, Brookfield Renewables, Carbon Solutions Group, Centrica Business Solutions, Consolidated Edison Development, Inc., Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectrIQ Power, eMotorWerks, Inc., Enel, Energport, ENGIE, E.ON Climate & Renewables North America, esVolta, Fluence Energy, GAF, General Electric Company, Greensmith Energy, 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., Parker Hannifin Corporation, Pintail Power, Primus Power, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Sempra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, True North Venture Partners, Viridity Energy, VRB 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>).

collaboratively with the Commission, CEC, and IOUs in refining these methodologies, tools, and data sources.

II. A REGULAR FORUM TO DISCUSS AND VET VARIOUS ASSUMPTIONS, FORECASTING, DISAGGREGATION, AND AGGREGATION METHODS WOULD BE HELPFUL FOR THE ANNUAL DISTRIBUTION INVESTMENT DEFERRAL FRAMEWORK.

In an effort to continue collaborative discussions, promote transparency, and identify and pursue areas of improvement, CESA agrees with the Ruling's order to have the IOUs provide an excel worksheet that shows the calculations for how they reach the disaggregated net load forecast from the system level and load forecast and to convene at least a one-day meeting to present their updates to their DER and load forecasts. These actions will be especially beneficial for the upcoming cycle of Grid Needs Assessment ("GNA") and Distribution Deferral Opportunity Report ("DDOR") filings within the Distribution Investment Deferral Framework ("DIDF"), but CESA also recommends that a regular, ongoing meeting or working group be established to address these matters. Similar to the Demand Analysis Working Group ("DAWG") at the CEC, these meetings will be strongly support evaluation and iteration of the IOUs' methods. Considering the DIDF is a framework that established annual GNA and DDOR filings to support the consideration of distribution deferral opportunities by DERs, a regular forum may also help stakeholders to provide industry insights to inform forecasts and 'spot check' assumptions, as well as to support potential incrementality determinations for DERs that are assessed in solicitations and ultimately procured. CESA also agrees with many of the questions raised by the Office of Ratepayer Advocates ("ORA") in the DFWG meetings, such as those around how net load forecasts are generated, which may benefit from a regular forum to discuss these matters.

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments on the Ruling and looks forward to working with the Commission, the IOUs and other parties going forward in this proceeding.

Respectfully submitted,



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