

September 6, 2018

Mike Gravely
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Mike.Gravely@energy.ca.gov

Trelynd Bowles
Governor's Office of Planning & Research
1400 Tenth Street
Sacramento, CA 95814
trelynd.bowles@opr.ca.gov

Re: CESA Remarks on AB 546 Implementation Workshop and related Energy Storage Permitting Guidebook planning and preparation efforts.

Dear Mr. Gravely and Mr. Bowles,

The California Energy Storage Alliance (“CESA”) strongly supports efforts to hone, improve, and develop best practices for permitting behind-the meter energy storage. CESA appreciates the contributions of both the California Energy Commission’s (“CEC”) and the Governor’s Office of Planning and Research (“OPR”) execute on the smart objectives of AB 546 (Chiu, 2017), as well as the contributions of stakeholders at the August 21, 2018 workshop. The permitting standards, best-practices, and handbook efforts targeted by AB 546 will provide cost- and time-savings to both energy storage developers and to permitting authorities and areas having jurisdiction (“AHJs”), benefitting Californians. As the sponsor for AB 546, CESA sees the collective input and work-plans by CEC and OPR as very helpful in meeting the goals of the legislation.

CESA recommends three points to support and inform this joint agency effort.

Online Interim Guidance

Consistent with the discussion at the August 21 workshop, CESA recommends the CEC and OPR develop and share interim guidance documents in a publicly-accessible online location where practicable. Even with incomplete information, these documents can shape and signal or direct some elements of permitting which should be helpful to both industry and AHJs. The CEC’s proposed timeline for its solicitation would produce a completed storage permitting guidebook in approximately two years, but many energy storage systems will be deployed in California in that time. Other provisions of AB 546, such as posting forms online, may occur sooner than this timeframe, so the sharing and posting of interim information is appropriate.

Stakeholder Engagement and Education

CESA supports efforts to further and on an ongoing basis allow for stakeholder engagement and input into the storage permitting guidebook effort. CESA recommends that any selected third-party contractor include regular check-ins with industry, trade groups, and other relevant community organizations to seek feedback throughout the guidebook development process. The third-party contractor should also be responsible for outreach to and education of applicable AHJs once the guidebook is completed.

Updates Across Time

CESA recommends the guidebook developers anticipate the need or desire for updates across time, as has been done with solar permitting guidebooks. This seems like a prudent expectation for this fast-growing industry sector, and CESA supports scoping in future update where practicable. It may also help to establish some certainty regarding an update, e.g. two years after completion of the first version. A collaborative stakeholder input structure should inform any updates.

CESA greatly appreciates consideration of these remarks.

Sincerely,

Alex J. Morris
Vice President, Policy and Operations
California Energy Storage Alliance
(CESA)
amorris@storagealliance.org

Sarah Busch
Manager, AB 546 Implementation
California Energy Storage Alliance
(CESA)
sbusch@storagealliance.org