

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

Order Instituting Rulemaking to Continue
Implementation and Administration, and
Consider Further Development, of California
Renewables Portfolio Standard Program.

Rulemaking 18-07-003
(Filed July 12, 2018)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS
ON STAFF PROPOSAL ON EFFECTIVE LOAD CARRYING CAPABILITY, TIME OF
DELIVERY FACTORS, AND PROJECT VIABILITY**

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits these comments to the *Administrative Law Judge’s Ruling Requesting Comments on Staff Proposal on Effective Load Carrying Capability, Time of Delivery Factors, and Project Viability* (“Ruling”), issued by Commissioner Clifford Rechtschaffen and Administrative Law Judge (“ALJ”) Nilgun Atamturk on September 12, 2018.

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>).

I. INTRODUCTION.

CESA appreciates the Commission staff's efforts to develop a Staff Proposal in this proceeding to consider timely and much-needed reforms to the Effective Load Carrying Capability ("ELCC"), time-of-delivery ("TOD") factors, and project viability in the least-cost, best-fit ("LCBF") methodology for procurement and bid evaluation in the Renewables Portfolio Standard ("RPS") Program, especially as we have seen separate procurement of RPS versus energy storage through different procurement mechanisms.² In separate comments filed in R.15-02-020,³ CESA highlighted factors that create barriers and challenges for the procurement of renewable resources paired with energy storage – some of which may be addressed through refinement of the modifications and ideas proposed in the Staff Proposal.

While directionally supportive of the Staff Proposal, CESA offers recommendations for potential improvements in our responses to the questions posed in the Ruling. Specifically, our recommendations for improving the Staff Proposal are the following:

- The new proposed ELCC technology categories and sub-classes will encourage greater consideration of paired energy storage in RPS procurement by more fairly valuing the capacity value of paired resources while keeping the process computationally manageable.
- Further analysis is needed on shorter-duration paired energy storage systems that could materially improve the ELCC value.

² *Comments of the California Energy Storage Alliance to the Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program*, filed on August 13, 2018, pp. 3-4.

<http://www.storagealliance.org/sites/default/files/Filings/2018-08-13%20CESA%27s%20Comments%20on%20RPS%20OIR%20-%20FINAL.pdf>

³ *Comments of the California Energy Storage Alliance on the Assigned Commissioner and Assigned Administrative Law Judge's Ruling Identifying Issues and Schedule of Review for 2018 Renewables Portfolio Standard Procurement Plans*, filed on August 17, 2018.

<http://www.storagealliance.org/sites/default/files/Filings/2018-08-17%20CESA%27s%20Comments%20on%202018%20RPS%20Procurement%20Plans%20Ruling%20-%20FINAL.pdf>

- An additive ELCC calculation may be appropriate for ELCC sub-classes with paired four-hour duration energy storage given that standalone four-hour duration energy storage would otherwise qualify for full Resource Adequacy (“RA”) capacity value.
- CESA supports the use of the more granular Project Viability Calculator (“PVC”) 2.0, with certain modifications, over the current project viability criteria.
- Clear ties to valuation and power purchase agreement (“PPA”) prices are needed through TOD factors as opposed to just relying on forward energy and capacity price curves to inform developers.

II. RESPONSES TO QUESTIONS ON EFFECTIVE LOAD CARRYING CAPABILITY FOR RPS PROCUREMENT.

Question 1: Provide comments on Staff’s proposal and explain why you do or do not agree with the proposal.

CESA generally supports the various modifications proposed in the Staff Proposal on the RPS ELCC methodology. Specifically, CESA appreciates that the Commission staff will differentiate ELCC values for RPS procurement by resource classes and resource class sub-types.⁴ Previously, pairing RPS resources with energy storage would *not* have generated a ‘boost’ in the ELCC value, presumably because combined resources would be assigned the average ELCC value for the standalone RPS resource. For example, despite materially different generation profiles of solar or wind resources when paired with energy storage, hybrid solar-plus-storage or wind-plus-storage resources would have ELCC values calculated equivalently to that of standalone solar or standalone wind resources. The Staff Proposal thus better recognizes the different reliability contribution of solar-plus-storage and wind-plus-storage resources and represents an improvement upon current RPS procurement methodologies.

⁴ Ruling, Attachment A, p. 4.

Ideally, the ELCC value of RPS-paired-storage resources would be calculated for the specific paired configuration in terms of coupling, solar-to-storage sizing ratio, and dispatchability, but CESA understands that modeling an entire portfolio of RPS resources may be challenging. Thus, differentiating ELCC calculations based on resource performance classes may strike the right balance of more accurately modeling the reliability contributions of resources while keeping any technical modeling manageable. However, by taking this ‘class approach’, the Commission should conduct additional analysis to determine what the appropriate paired-storage resource class sub-types should be. CESA details our thoughts on this matter in our responses to Question 3 for ELCC topics.

Question 2: *The IRP Staff Proposal on Production Cost Modeling (September 2017) and D.18-02-018 direct Energy Division staff to conduct a marginal ELCC study through a production cost modeling process when reviewing Load Serving Entity (LSE) IRP portfolios as part of the Preferred System Plan. It is proposed herein that the IOUs perform an updated marginal ELCC study in 2018 for use in future RPS procurement. If the ELCC for RPS procurement proposal is adopted, should the marginal ELCC study used for IRP Preferred System Plan also be used in RPS procurement? If so, in what capacity should the IRP study be used in relation to RPS procurement? Should the ELCC study performed by IRP staff be used as the primary marginal ELCC study in the future? Provide a justification for your response?*

CESA has no comment at this time.

Question 3: *Staff proposes analyzing RPS resources paired with storage, specifically 4-hour duration batteries. Should the ELCC study analyze different battery durations or multiple variations? If so, what duration(s) and/or variations should be studied instead? Explain reasoning for the proposed alternative(s).*

As noted in our response to Question 1, CESA supports the creation of new RPS resource sub-classes that encourage greater consideration of RPS-paired storage projects. Generally, from a developer’s perspective, energy storage project design will involve an assessment of whether the incremental potential revenues generated by the energy storage pairing, such as from the increase

in the ELCC value that may be later reflected in the RA or PPA price, will sufficiently offset the costs of adding greater energy storage capacity and duration. With that in mind, CESA recommends a few modifications to the Staff Proposal and advocates for the need to conduct further analysis to identify the appropriate energy storage pairing variations.

First, CESA recommends that the Staff Proposal be modified to take an additive approach to the RPS resource combined with the dispatchable four-hour energy storage resource, which, as the Commission is aware, should already qualify for full RA value for their MW capacity (*e.g.*, a 10 MW, 4-hour system qualifies for 10 MW of RA). In the Revised Moorpark Procurement Plan, Southern California Edison Company (“SCE”) proposed to take this additive approach:⁵

“In the first instance, where the battery is fully dispatchable, the proper NQC is the sum of the ELCC for the renewable resource and the Pmax of the battery under a four-hour discharge. Similar to the assessment where both resources are dispatchable, the interconnection would need to be sized to ensure full deliverability of the battery and the renewable resource at Pmax. This is to ensure that in periods where the renewable resource is scheduling in accordance with RA requirements at its forecast and the forecast is for full output, the interconnection must be sized to allow the incremental capacity from the battery to be delivered at the same time. For EFC, the value should be based upon the flexible capability of the battery.”

CESA supported SCE’s proposed RA counting methodology for hybrid resources in comments in response to the Revised Moorpark Procurement Plan.⁶ With this additive approach, however, CESA believes that there may be less usefulness in *assuming a four-hour* duration energy storage system for the sub-class of solar-paired-storage and wind-paired-storage resources, though further analysis is needed to assess the best and most appropriate approach to measure the reliability contribution of these configurations.

⁵ *Moorpark Sub-Area Local Capacity Requirements Procurement Plan of Southern California Edison Company Submitted to Energy Division Pursuant to D.13-02-015*, submitted on July 31, 2018, pp. 42-43.

⁶ *Comments of the California Energy Storage Alliance on the Southern California Edison Company’s Revised Moorpark Procurement Plan*, filed on September 7, 2018, p. 4.

Second, CESA recommends that the Staff Proposal be modified to include several different sub-classes of RPS-paired storage systems with shorter durations. In many cases, CESA expects there may be ‘outsized’ value generated from adding a small amount of duration (*e.g.*, 30 minute or 1 hour) from a paired energy storage system that will materially firm generation profiles capabilities and avoided ancillary service or other renewables integration costs. While a 30-minute or 1-hour duration energy storage system would qualify for little standalone RA value relative to its capacity rating when measured based on four hours of sustained output, the pairing of such shorter-duration energy storage systems to RPS resources may lead to an outsized boost in the ELCC value of the combined resource because the firming helps the resource perform during critical load-carrying periods, which can be very brief (*e.g.*, 15 minutes).

Finally, the Commission should also be aware of the wide variations of RPS-paired storage resources that are sized in different ways but can be operated flexibly to provide both high-power and high-energy applications. For example, a 10-MW, two-hour energy storage system using the same inverter capacity as a 10-MW solar resource may also be able to de-rate its capacity to 5 MW for four hours. In doing so, developers may find it more cost-effective to pair shorter-duration energy storage to RPS resources, which still leaves the option for resource operators to provide load shifting applications by de-rating the power and extending the energy duration. This means that the way an energy storage resource firms the generation output of a renewable resource may vary from operator to operator.

Overall, initial steps are needed to authorize and value RPS-paired storage resources. Over time, enhancements and additional variations may be needed, but providing some basic valuation pathways is necessary and appropriate at this time. To further perfect any initial valuation approaches at a later time, CESA recommends that the Commission study different duration

lengths of paired energy storage systems. CESA also wishes to explore whether and how to model sub-hourly energy storage pairings, given that the SERVVM and other models used by the Commission are hourly interval models. At minimum, one-hour energy storage durations should be modeled, but there may be even shorter-duration energy storage additions that provide significant ELCC value ‘boosts’ that should not be overlooked in RPS procurement.

Question 4: Staff proposes that the IOUs use the resource portfolio from the IRP Reference System Plan as the base portfolio to be modeled for the updated marginal ELCC study for RPS procurement. Is the base portfolio from the IRP Reference System Plan a reasonable assumption of installed capacities? If not, what portfolio should be used? Provide a justification for your response.

CESA has no comment at this time.

Question 5: Staff proposes that the IOUs use 2022 as the study year in the updated marginal ELCC study because marginal ELCC values should be calculated for multiple years in the future to account for expected changes in the electric system that may occur over the term of new RPS contracts. Would a different study year be more appropriate (e.g. 2026 or 2030) for the updated ELCC study? Provide a justification for your response.

CESA has no comments at this time.

Question 6: At the January 18, 2018 workshop, parties discussed the potential differences between a monthly vs. annual ELCC on RPS bid ranking results. The Commission requests that the IOUs investigate the sensitivity of RPS bids’ NMVs to changes in the ELCC study through utilizing two ranking systems: one using only annual marginal ELCC values and one using monthly marginal ELCC values, and provide the results in comments. The IOUs may use representative bid data obtained through a prior solicitation. In their response, the IOUs should include work papers showing their calculations.

CESA has no comments at this time.

III. **RESPONSES TO QUESTIONS ON PROJECT VIABILITY.**

Question 1: Please comment on the Staff proposal and explain why you do or do not agree with the proposal.

CESA prefers the use of PVC 2.0, with some modifications, to assess project viability of RPS projects and bids because of the added granularity and transparency upon which project viability is scored. Rather than requiring all prospective RPS projects complete Phase 2 interconnection studies and Application Deemed Complete status, the PVC should allow the same criteria in addition to several other criteria to be used to support the evaluation of bids as opposed to using them to screen out bids altogether. While the investor-owned utilities (“IOUs”) have noted improved success rates and believe that the current project viability criteria are reasonable proxies,⁷ CESA believes the more granular criteria may also reasonably assess a developer’s experience and technology feasibility. In addition, CESA believes that the PVC better satisfies the three LCBF statutory requirements around project viability.

First, developer experience is not always sufficiently captured through the bid prerequisite of completing a Phase 2 interconnection study. While site control requirements and certain project viability requirements (*e.g.*, securing project financing or PPA) are built into the CAISO interconnection study process, the level of experience or ability of developers to bring projects online are conveyed to some degree through achieving a Phase 2 interconnection study. However, this bid prerequisite does not fully take into account developer experience (as the PVC does) that may correlate strongly with future project success, or account for the ability of developers to own, operate, and maintain their projects once contracted (as the PVC does). Furthermore, developer experience requires more than just the capabilities to navigate and move through the CAISO interconnection process, but also the ability to source materials, secure permitting, manage construction milestones, and staff teams for all elements of the development, operations, and

⁷ See IOU comments to *Assigned Commissioner and Assigned Administrative Law Judge’s Ruling Identifying Issues and Schedule of Review for 2016 Renewables Portfolio Standard Procurement Plans*, filed on May 17, 2016. <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M162/K005/162005148.PDF>

maintenance. Instead, the PVC is more reflective of developer experience and thus better aligns with the statutory requirements. By capturing the past experience of developers in not only developing *but also* operating, and maintaining “similar” projects, the Commission and the IOUs should be better assured of the project viability of submitted bids, as past experience is a reasonable indicator of future success.

Second, the bid prerequisite of completing a Phase 2 interconnection study may occasionally restrict good projects that should actually be considered. The PVC is more flexible in this regard in that it factors in an array of items, including level of site control, status of permitting, and progress in the CAISO interconnection process, as evaluation criteria. Naturally, due to the scoring system, bidders will be heavily incentivized to score highly, but no bidders will be automatically screened out for not completing all the development milestones, creating more flexibility for bidders to participate and reasonably move toward completion of these development milestones.

Third, the current bid prerequisites provide no indication of technology feasibility in accordance with statutory requirements. The CAISO interconnection process only assesses the grid impacts of interconnecting resources as well as the needed transmission upgrades. By contrast, the PVC includes a number of criteria and sub-factors that better scores the feasibility of different technologies and resources.

In sum, CESA supports the use of the PVC to meet the statutory requirements around the project viability criteria that also provides some flexibility for bidders in the project development cycle through the scoring system while providing sufficient incentives for developers to achieve the highest level of project viability as possible in order to improve the odds of winning PPA contracts in IOU RPS procurements.

Question 2: Staff proposes that the IOUs be directed to use PVC 2.0 in tandem with the two Commission required bid prerequisites. Parties should explain why they agree or disagree with staff's proposal. If parties disagree, what alternative framework(s) could satisfy the three LCBF statutory requirements: 1) a developer's experience, 2) the feasibility of the technology used to generate electricity, and 3) the risk that a facility will not be built or construction will be delayed? The proposal should be detailed and explain how it satisfies the statutory requirements.

CESA disagrees with the Staff Proposal to combine the use of PVC 2.0 in tandem with the two Commission required bid prerequisites. The use of PVC 2.0 should already capture whether a bidder has completed their Phase 2 interconnection study and whether Application Deemed Complete status is achieved, except bidders will be assessed against these two criteria as evaluation criteria rather than eligibility criteria as is done today. The combination of the PVC 2.0 and the two bid prerequisites would be duplicative and onerous and lead to the latter being the binding criteria upon which projects will be eligible for RPS procurement.

Question 3: If PVC 2.0 is adopted by the Commission, are there components of PVC 2.0 that should be modified to ensure the project viability requirements are reasonably evaluated? For example, parties might recommend that PVC 2.0 could be modified to screen bids for environmental risks or a history of permitting problems such as delinquent fees or process delays. If so, provide a modified PVC 2.0 Excel spreadsheet, explain proposed revisions, and provide justification.

CESA supports the use of the PVC calculator but requests some closer consideration around the "similar or larger capacity" criteria for project development experience, ownership and O&M experience, and technical feasibility. CESA is concerned that the PVC may result in overly strict criteria if the definition of "similar or larger capacity" is narrowly defined. As the price for energy storage systems has decreased, there has been a trend toward relatively larger capacity energy storage systems to take advantage of greater grid-service and multiple-use opportunities. With a narrow 'band' by which "similar or larger capacity" is defined, developers may be unnecessarily 'docked' points in the evaluation for developer experience and technical feasibility.

It is unclear whether a developer, for example, who has previously developed, deployed, and operated a 10-MW energy storage system paired with solar, would be deducted points in the PVC for not having developed a 30-MW energy storage system paired with solar that was submitted into an RPS solicitation – *i.e.*, fit under the definition of having developed a project with “similar or larger capacity”. Further clarification will ensure a reasonable implementation of the PVC 2.0.⁸

At a high level, if the Commission moves forward with approving the use of the PVC, CESA recommends some follow-up work to refine the PVC to discuss the relative weighting of the PVC categories, whether certain categories are duplicative or unnecessary, and whether each of the PVC categories apply neutrally to different RPS technologies. Certain terms like “similar” and “commercialized” in the PVC may need to be better defined. While a specific and binding definition for some of these terms may be unnecessary given the qualitative nature of the PVC score sheet, some form of guidance around these terms may be needed to help bidders understand why they may have scored in certain ways during the RPS solicitation process.

IV. RESPONSES TO QUESTIONS ON TIME OF DELIVERY FACTORS.

Question 1: Please comment on the Staff proposal and explain why you do or do not agree with the proposal.

CESA disagrees with the Staff Proposal to use TOD factors on an information-only basis. TOD factors represent an important concept that should continue to inform RPS developments – *i.e.*, energy delivered is of higher value at certain times versus other times. Some representation of this concept is needed, so, for now, CESA believes that TOD factors should be maintained as a

⁸ CESA presumes that the “similar or larger capacity” definition may be applicable to certain technologies that have major differences in project development requirements based on the capacity of the resource. For example, wind technologies achieve greater capacity with taller wind turbines and longer blades, which have an impact across the project development process – *e.g.*, sourcing materials, securing permits, transporting larger wind turbine components, and/or specialized construction. However, for modular systems like energy storage, there should be broad ranges in defining “similar or larger capacity”.

necessary component of the LCBF methodology to encourage optimal procurement for the purposes of valuing bids and contract payments.

Clear ties to valuation and PPA prices are needed so that IOU forecasts for capacity and energy prices are realized through compensation to developers. Developers are less likely to respond to information-only TOD factors. For example, given the incremental capital costs in investing in paired energy storage solutions, developers may forgo these paired projects if PPA payments do not reflect TOD factors. Even if imperfect, CESA understands that TOD factors better align PPA contract payments with market prices and the hourly shapes used in valuation and appropriately inform any eventual \$/MWh offer price. CESA thus recommends that the Commission modify its Staff Proposal to eliminate the information-only option and require the use of TOD factors in bid valuation and contract payment.

At the same time, CESA supports the Staff Proposal in requiring the IOUs to submit public TOD factors to promote transparency, which will signal to developers what types of RPS solutions could be most competitive in solicitations. As noted before, transparency, while helpful, may be insufficient to drive the market to deliver RPS resources that provide the most optimal benefit to the grid if those signals are not later translated to compensation. CESA also supports the use of identical TOD factors and periods when using TOD factors for both bid valuation and contract payments to ensure that RPS generation at the most valuable times of the day are compensated.

Question 2: In its August 9, 2016, reply comments to the Staff Paper on LCBF Reform, SCE proposed that new aggregate factors should be used instead of TOD factors. The new aggregate factors would not be a component of LCBF to avoid the future use of fixed TOD adjusted contract payments. However, because the new factors are not fixed, SCE can provide additional information to bidders about the value of generation for different blocks of hours over the course of the procurement horizon. With the additional information, bidders could develop more favorable bids that better align with SCE's forward price curves for energy and capacity benefits that drive its LCBF valuations.

Energy Division proposes that these new aggregate factors, if an IOU were to formally propose them, would be assessed as a part of the IOUs' annual RPS procurement plans. Explain why you support or oppose SCE's proposed use of information-only aggregate factors and the pros and cons of the proposal.

CESA supports the proposed use of information-only forward price curves for energy and capacity benefits to promote transparency and send an economic signal to developers, but this proposal alone is, as CESA understands it, insufficient if TOD factors are not also tied to bid valuation and PPA contract payments. Thus, the Commission may wish to consider the SCE proposal as one of the tools to signal to developers the most grid-beneficial times for RPS resources, but it should not be adopted in lieu of requirements to use TOD factors in the LCBF methodology.

Question 3: In its August 9, 2016, reply comments to the Staff Paper on LCBF Reform, SDG&E expressed concern about potential harm to ratepayers when a constructed project's generation profile does not match the one submitted in its bid. Aside from contract payments tied to fixed TOD factors and reduced payments for excess deliveries, are there other ways to ensure projects are built consistently with their bids? Explain your response.

CESA understands the concerns expressed by San Diego Gas and Electric Company ("SDG&E") about how RPS productions may generate and be operated in contrast to their PPA contract payments, which were calculated based on fixed TOD factors. Some of this concern may stem from the potential for dispatchable RPS-paired storage resources to negotiate higher PPA rates based on expectations of output informed by the TOD factors.⁹ CESA believes it is reasonable to seek solutions to this concern.

⁹ CESA notes that SDG&E's concerns likely do not apply to when considering RPS resources that are paired with short-duration energy storage, which may not be affected by TOD factors in their bid submission and evaluation. For example, a solar-plus-storage resource is likely to operate with a similar generation profile as a standalone solar resource, except, with the energy storage pairing, the solar-plus-storage resource will likely be able to ride through short-term fluctuations in generation (to avoid flexible

A goal here is to get higher value renewables through delivery at more useful times, where appropriate. Foregoing TOD factors may be counterproductive. Reasonably designed tiered PPA pricing structures or operational restrictions to operate in accordance with TOD periods may ensure that RPS-paired storage resources operate in line with expected and contracted production profiles. Other states have constructed PPA structures that work well for renewable energy paired with energy storage. For example, Arizona Public Service Company (“APS”) developed a heat map of their high-value capacity and energy needs for developers to use to construct bids that would then be used by APS to create a tiered pricing structure – *i.e.*, not a single-price PPA but a tiered-price PPA with “pricing ratios” between the lower-value periods and the higher-value periods.¹⁰

ramp allocation charges) and extend generation to a small degree when solar generation would normally begin to ramp down. Overall, there should be no major deviation from the contracted generation profile of such a solar-plus-storage pairing, thus obviating concerns on whether projects are being built consistently with their contract.

¹⁰ See *Arizona Public Service Company 2018 Peaking Capacity Request for Proposals*, prepared on April 26, 2018, p. 15. <https://www.aps.com/en/ourcompany/doingbusinesswithus/rfp/Pages/home.aspx>

V. **CONCLUSION.**

CESA appreciates the opportunity to submit these comments and responses to the questions posed in the Ruling and looks forward to working with the Commission and stakeholders in the RPS proceeding.

Respectfully submitted,



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