

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

Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the
California Solar Initiative, the
Self-Generation Incentive Program and
Other Distributed Generation Issues.

Rulemaking 12-11-005
(Filed November 8, 2012)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE PROPOSED DECISION GRANTING PETITIONS FOR MODIFICATION OF
DECISIONS 16-06-055 AND 16-12-055**

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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 on the *Proposed Decision Granting Petitions for Modification of Decisions 16-06-055 and 16-12-055* (“PD”), issued by Commissioner Clifford Rechtschaffen on January 16, 2019.

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Clean Energy Associates, 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 X North America, Energport, ENGIE, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, GAF, General Electric Company, Greensmith Energy, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), 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, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy, Inc., Parker Hannifin Corporation, Pintail Power, Primus Power, Quidnet Energy, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), SNC-Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., True North Venture Partners, Viridity Energy, VRB Energy, WattTime, 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 goals of the Self-Generation Incentive Program (“SGIP”) to provide grid support, foster market transformation, and reduce greenhouse gas (“GHG”) emissions. Furthermore, with the 20% California supplier adder in place, the program also provides additional benefit to and from SGIP-funded projects that economically benefit California by having the majority of manufacturing value-add from within California. This is a logical and appropriate incentive for SGIP. CESA believes it is not only important to drive job creation for the development of SGIP projects in California but also, where appropriate, to foster job creation related to manufacturing of components and equipment that go into SGIP projects.

II. COMMENT ON PROPOSED DECISION.

CESA appreciates the Commission’s continued support and desire to improve upon SGIP. We note that Southern California Gas Company, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and the Center for Sustainable Energy® (CSE) (Collectively Program Administrators or Pas), submitted a Joint Petition for Modification (PFM-California Manufacturer Adder) of Decision (D.) 16-06-055 to modify the method for determining the eligibility for a SGIP project to receive the additional incentive for projects manufactured in California.

The proposal defines eligibility for the California Manufacturer Adder for cases where 50% or more of the project’s capital equipment value is supplied by one or more California manufacturers. This differs from current eligibility rules by which the 50% composition must come from a single California manufacturer. In addition, the proposal allows for individual battery cells that were manufactured elsewhere but combined in California to form pods or modules, to qualify for the California Manufacturer Adder.

CESA supports the proposed decision of modifying the 50% threshold to include the aggregation of California manufacturer's rather than having it being met by a sole manufacturer as this advances the goal of increasing in- state manufacturing to serve the green economy. In addition, we support of the notion of expanding what constitutes being made in California in this case. We believe that if a cell was developed out of state but put together within California it should be considered to be eligible for the California Manufacturer Adder in SGIP.

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments to the PD and looks forward to working with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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