



June 25, 2019

Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
edtariffunit@cpuc.ca.gov

**Re: Comments of the California Energy Storage Alliance to Resolution E-4997:
Rejection of San Diego Gas and Electric Advice Letter 3309-E related to its Request
to Procure a Distributed Energy Resource Solution, pursuant to Decision (D.) 18-02-
004**

Dear Mr. Petlin and Mr. Wellington:

The California Energy Storage Alliance (“CESA”)¹ submits these comments to Draft Resolution E-4997, issued on June 5, 2019, rejecting Advice Letter 3309-E of San Diego Gas and Electric Company (“SDG&E”) related to its request to procure a distributed energy resource (“DER”) solution, pursuant to Decision (“D.”) 18-02-004.

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, Aggreko, Alligant Scientific, LLC, AltaGas Services, Amber Kinetics, Ameresco, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Better Energies, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Clean Energy Associates, ConEd Battery Development, Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, EDF Renewable Energy, eMotorWerks, Inc., Enel X North America, Energport, Energy Vault, Engie Storage, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, General Electric Company, Greensmith Energy, Gridwiz Inc., Hecate Grid LLC, Highview Power, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Energy Solutions, LS Power Development, LLC, Magnum CAES, Malta Inc, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., Nuvve, Pattern Energy, Pintail Power, Plus Power, Primus Power, PolyJoule, Quidnet Energy, PXiSE Energy, Range Energy Storage Systems, Recurrent Energy, RES Americas, SNC-Lavalin, Soltage, Southwest Generation, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., Tesla, True North Venture Partners, Viridity Energy, VRB Energy, WattTime, and Wellhead Electric. The views expressed in this comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies.

I. INTRODUCTION & COMMENTS.

CESA appreciates the Commission's efforts to better insure a transparent and competitive request for offers ("RFOs") within the Integrated Distributed Energy Resources ("IDER") proceeding. Draft Resolution E-4977 appropriately rejects SDG&E's Advice Letter ("AL") 3309-E, which stems from the Commission requiring SDG&E to provide justification for coupling distribution capacity service with back-tie requirement on a case-by-case basis and for allowing a reevaluation of the candidate deferral project in the 2019 Distribution Investment Deferral Framework ("DIDF") process. CESA appreciates the incorporation of many of our recommended modifications in the Draft Resolution and sees no factual, legal, or technical errors in the Draft Resolution.

II. CONCLUSION.

CESA appreciates the opportunity to submit these comments to Draft Resolution E-4997 and supports the Commission's efforts to better ensure a fair, transparent, and competitive DIDF RFO process. We look forward to participating in the next DIDF cycle.

Respectfully submitted,



Alex J. Morris
Vice President, Policy & Operations
California Energy Storage Alliance

cc: Gabriel Petlin, Supervisor, Energy Division (gabe.petlin@cpuc.ca.gov)
Fred Wellington, Senior Regulatory Analyst (frederick.wellington@cpuc.ca.gov)
Service list R.14-08-013