

**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)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE JOINT PETITION FOR MODIFICATION OF DECISIONS 11-09-015 AND 16-
06-055 BY SOUTHERN CALIFORNIA GAS COMPANY (U 904 G), PACIFIC GAS AND
ELECTRIC COMPANY (U-39-E), SOUTHERN CALIFORNIA EDISON COMPANY (U
338-E), AND CENTER FOR SUSTAINABLE ENERGY CONCERNING SELF-
GENERATION INCENTIVE APPLICATION REQUIREMENTS**

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October 16, 2019

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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”) hereby submits this response to the *Joint Petition for Modification of Decisions 11-09-015 and 16-06-055 by Southern California Gas Company (U 904 G), Pacific Gas and Electric Company (U-39-E), Southern California Edison Company (U 338-E), and Center for Sustainable Energy Concerning Self-Generation Incentive Program Application Requirements* (“PFM”), submitted by the Joint Program Administrators (“PAs”) on September 17, 2019.

I. INTRODUCTION & RESPONSE.

In their PFM, to streamline the application process for the Self-Generation Incentive Program (“SGIP”), the PAs recommend removing the application fee for residential projects and removing the requirement to submit a hard copy of the Energy Efficiency Audit (“EEA”). Each of the proposed measures are sensible, justified, and support greater efficiency in the SGIP application process. CESA agrees with the PAs that these measures could not have been predicted

at the times these application processes were adopted, leading to the need for this PFM to make improvements to support efficient and streamlined energy storage project deployments. CESA commends the PAs for proposing these common-sense changes and supports the proposed modifications in full.

II. CONCLUSION.

CESA appreciates the opportunity to submit this response to the PFM and looks forward to working with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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Vice President, Policy & Operations
CALIFORNIA ENERGY STORAGE ALLIANCE

Date: October 16, 2019