

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

Southern California Edison Company Storage
Amendments to the Wholesale Distribution
Access Tariff.

Docket No. ER19-2505-000

ANSWER OF THE CALIFORNIA ENERGY STORAGE ALLIANCE

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October 25, 2019

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Pursuant to Rule 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or Commission”), the California Energy Storage Alliance (“CESA”) respectfully submits this Answer in support of the Motion for Leave to Intervene Out of Time and Protest of the Public Utilities Commission of the State of California (“CPUC Motion”) in response to the amendments to the Wholesale Distribution Access Tariff (“WDAT”) by Southern California Edison Company (“SCE”) on July 31, 2019 and August 28, 2019. CESA recommends that the Commission grant the CPUC Motion considering the CPUC represents the unique interests of California’s retail electric ratepayers and because they raise valid concerns with SCE’s proposed amendments, in line with many of the issues and concerns raised by CESA in our comments on August 21, 2019 and September 18, 2019.

I. ANSWER.

Like CESA and other Protestors, the CPUC raised a number of issues and concerns including the importance of acknowledging key differences between storage charging load and end-use load and how that related to cost responsibility for distribution upgrades. For example, the CPUC comments that “[w]hile storage charging load and end-use customer load are comparable to some degree, storage loads should be recognized as a “negative generation” for later resale and

warrants key differences in load-side study of storage and in cost responsibility for distribution upgrades.”¹ Importantly, the CPUC agrees with CESA and other Protestors on the lack of sufficient process, record building, and meaningful stakeholder engagement to support such significant changes to the interconnection and cost responsibility of energy storage devices, especially given the precedential nature of the proposed amendments to other regions if the Commission accepts SCE’s filing in full or in part.²

Considering the CPUC’s Motion and the comments/protests submitted by a number of other stakeholders in the above-captioned docket, CESA recommends that the Commission initiate a technical conference to further consider cost responsibility policies and, if deemed appropriate, develop the distribution rates for energy storage for energy storage devices interconnecting under the WDAT. A technical conference would provide the collaborative stakeholder process that CESA, CPUC, and other parties seek in collecting the facts and information necessary to determine if SCE’s amendments to assess demand charges and/or higher-of costs for energy storage devices seeking wholesale distribution service is consistent with Order No. 841 and follows cost-causation principles. While the Commission previously directed SCE to submit a proposal for Firm Distribution Charging Service, SCE’s filing goes beyond the scope of the Commission’s Order and thus necessitates a technical conference to establish distribution cost responsibilities of energy storage devices under WDAT and vet the methodologies for quantifying the costs and benefits of storage in establishing rates (if deemed appropriate).

CESA recognizes that a technical conference could expand the scope of these policy issues to a broader scope beyond just California’s market. At the same time, CESA observes that many

¹ CPUC Motion at 5.

² *Ibid* at 6.

other states and regions are also starting to face similar questions about distribution cost responsibilities as the storage market matures and as Order No. 841 supports the opening of wholesale market participation pathways for many distribution-connected storage resources. To support reasonable and smart forward-looking policies for energy storage projects to come to market, CESA believes a technical conference would be an effective and streamlined pathway to set a common set of policy principles for the Commission to use to address similar proposals from other distribution utilities.

II. CONCLUSION

CESA appreciates the opportunity to submit this Answer and recommends that the Commission reject SCE's instant filing and initiate a technical conference to address these issues with deeper record building.

Respectfully submitted,



Alex J. Morris
Vice President, Policy & Operations
CALIFORNIA ENERGY STORAGE ALLIANCE

October 25, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of *Answer of the California Energy Storage Alliance* on the official service list in the proceeding ER19-2505-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Executed on October 25, 2019 at Berkeley, California

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