

December 23, 2019

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
EDTariffUnit@cpuc.ca.gov

Re: Response of the California Energy Storage Alliance to Advice Letter 5707-E of Pacific Gas and Electric Company

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”)¹ hereby submits this response to the above-referenced Advice Letter 5707-E of Pacific Gas and Electric Company (“PG&E”), *Approval of Contracts Resulting from Competitive Solicitation for the 2019 Distribution Investment Deferral Framework Requests for Offers* (“Advice Letter”), submitted on December 3, 2019.

¹ 174 Power Global, 8minutenergy Solar Energy, Able Grid Energy Solutions, Advanced Microgrid Solutions, Aggreko, Alligent Scientific, AltaGas Services, Amber Kinetics, Ameresco, Aparrent, 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, E.ON Climate & Renewables, Eagle Crest Energy, East Penn Manufacturing, EDF Renewable Energy, Enel X, Energport Inc., Energy Vault, Engie, esVolta, Fluence, Form Energy, General Electric, Greensmith Energy, Gridwiz, Hecate Energy, Highview Power, Honda, Hydrostor, Jensen Hughes, Lendlease Energy Development, LG Chem Power, Li-Ion Tamer, Lockheed Martin AES, LS Energy Solutions, LS Power Development, Magnum CAES, Malta, Munich Re, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Nuvve, Ormat, Pattern Development, Pintail Power, Plus Power, PolyJoule, Primus Power Corporation, PxiSE, Quidnet Energy, Range Energy Storage, Recurrent Energy, Reimagine Power, RES Americas Inc., Shifted Energy, SNC-Lavalin, Soltage, Southwest Generation Company, Stem, STOREME Inc., Sumitomo Electric, Sunrun, Swell Energy, Tenaska, Tesla, Trane, True North Venture Partners, UL, VRB Energy, WattTime, and Wellhead Electric. 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. RESPONSE.

In the Distribution Resources Plan (“DRP”) proceeding (R.14-08-013), each of the investor-owned utilities (“IOUs”) worked with the Distribution Planning Advisory Group (“DPAG”) to provide advisory input into their Grid Needs Assessment (“GNA”) and Distribution Deferral Opportunity Report (“DDOR”) as part of the Distribution Investment Deferral Framework (“DIDF”). As a member of the DPAG, CESA appreciated the opportunity to collaborate with PG&E and other stakeholders to provide insights into the capabilities of distributed energy resources (“DERs”) and to identify a shortlist of ‘best-fit’ opportunities for DERs to potentially cost-effectively defer a planned investment. PG&E proceeded to launch its 2019 DIDF Request for Offers (“RFO”) on February 21, 2019.

In reviewing the Advice Letter, CESA supports the expeditious approval of PG&E’s Advice Letter. CESA understands the challenges of procuring for DERs to defer distribution investments as forecasts and needs change. Despite these challenges, CESA commends PG&E for working closely with RFO participants, the Commission staff, and independent evaluator (“IE”) in seeking ways to have DERs address the revised needs. The lessons learned from the IE report are also particularly helpful, and we look forward to discussing them in future DIDF cycles to identify ways in which the DIDF process can be continuously improved.

II. CONCLUSION.

CESA appreciates the opportunity to submit this response to PG&E’s Advice Letter and looks forward to collaborating with the Commission and PG&E in the next DIDF cycle.

Respectfully submitted,



Alex J. Morris
Executive Director
California Energy Storage Alliance

cc: Erik Jacobson, PG&E (PGETariffs@pge.com)
Service list R.14-10-003