

**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 PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) PETITION FOR
MODIFICATION OF DECISION 19-08-001**

Alex J. Morris
Executive Director

Jin Noh
Senior Policy Manager

CALIFORNIA ENERGY STORAGE ALLIANCE
2150 Allston Way, Suite 400
Berkeley, California 94704
Telephone: (510) 665-7811
Email: cesa_regulatory@storagealliance.org

March 26, 2020

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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 *Pacific Gas and Electric Company's (U 39 E) Petition for Modification of Decision 19-08-001* (“Petition”), submitted by Pacific Gas and Electric Company (“PG&E”) on March 11, 2020. Pursuant to the *Email Ruling Shortening Response Period on Petition for Modification of Decision 19-08-001* (“Ruling”), issued by Administrative Law Judge (“ALJ”) Cathleen A. Fogel on March 13, 2020, CESA timely submits this response on March 26, 2020.

I. RESPONSE.

CESA strongly supports PG&E’s Petition to ensure that Medical Baseline (“MB”) customers have access to Self-Generation Incentive Program (“SGIP”) funds, despite not having access to an SGIP-approved time-of-use (“TOU”) rate, as required by Decision (“D.”) 19-08-001. The logic for exempting California Alternate Rates for Energy (“CARE”) customers can be extended to MB customers as well, as explained by PG&E in its Petition.¹ These changes are reasonable and necessary to support MB customer deployments of energy storage, especially ahead

¹ PG&E’s PFM at 3.

of the upcoming 2020 wildfire season. Furthermore, PG&E's proposed modifications to the decision ensure that MB customers in other service territories have similar exemptions apply. As such, CESA recommends that the Commission grant PG&E's requested relief in its Petition.

II. CONCLUSION.

CESA appreciates the opportunity to submit this response to the Petition and recommends that the Commission expeditiously grant PG&E's Petition to ensure timely access to SGIP incentives for MB customers.

Respectfully submitted,



Alex J. Morris
Executive Director
CALIFORNIA ENERGY STORAGE ALLIANCE

Date: March 26, 2020