

August 11, 2020

CPUC Energy Division Tariff Unit
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Re: Comments of the California Energy Storage Alliance to Draft Resolution E-5100: Pacific Gas and Electric Company’s Request for Approval of System Reliability Contracts Pursuant to Decision 19-11-016

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”) hereby submits these comments to the above-referenced Draft Resolution E-5100 issued on July 22, 2020, approving Advice Letter 5826-E of Pacific Gas and Electric Company (“PG&E”), which sought to approve System Reliability Contracts pursuant to Decision (“D.”) 19-11-016.

I. INTRODUCTION & COMMENTS.

On May 18, 2020, PG&E submitted an advice letter to obtain approval of seven contracts resulting from Phase 1 of its 2020 System Reliability Request for Offers (“RFO”). Collectively, PG&E procured 423 MW of energy storage projects with July 18, 2021 commercial online dates and October 1, 2021 initial delivery dates. All projects will develop four-hour standalone lithium-ion battery storage. Subsequently, Draft Resolution E-5100 detailed how the seven contracts submitted for approval are compliant with the orders and requirements of D.19-11-016.

CESA agrees with the determinations made in the Draft Resolution and supports timely and expeditious approval of the seven energy storage contracts. As noted in the Draft Resolution, some of the uncertainties around a more permanent cost recovery and allocation mechanisms will be addressed separately in Rulemaking (“R.”) 20-05-003 and exact Resource Adequacy (“RA”) capacity value will be determined through the net qualifying capacity (“NQC”) list. Due to the financing, procurement, and development timelines of these projects to come online prior to the August 1, 2021 deadline, CESA urges approval of the contracts by the August 27, 2020 voting meeting without delay.

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II. CONCLUSION.

CESA appreciates the opportunity to submit these comments to Draft Resolution E-5100 and looks forward to collaborating with the Commission and PG&E in the applicable proceedings.

Respectfully submitted,



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Executive Director
California Energy Storage Alliance

cc: Michele Kito, Energy Division (Michele.Kito@cpuc.ca.gov)
Nick Dahlberg, Energy Division, (Nick.Dahlberg@cpuc.ca.gov)
Service lists R.16-02-007, R.20-05-003, and R.19-11-009