

August 12, 2020

CPUC Energy Division Tariff Unit
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Re: Comments of the California Energy Storage Alliance to Draft Resolution E-5101: Approves Southern California Edison’s plan submitted in Advice Letter 4218-E to procure 770 MW of resources to satisfy requirements of D.19-11-016, and as modified by Supplemental Advice Letter 4218-E-A

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-5101 issued on July 23, 2020, approving Advice Letter 4218-E and Advice Letter 4218-E-A of Southern California Edison Company (“SCE”), which sought to approve System Reliability Contracts pursuant to Decision (“D.”) 19-11-016.

I. INTRODUCTION & COMMENTS.

On May 22, 2020, SCE submitted an advice letter to obtain approval of seven contracts resulting from the Fast Track of its 2019 System Reliability Request for Offers (“RFO”). In total, SCE procured 770 MW of energy storage projects with August 1, 2021 commercial online dates, counting 644 MW toward its System Resource Adequacy (“RA”) requirements. Subsequently, SCE submitted a supplemental advice letter that converted three solar contracts from RA Put Option to tolling agreements. Finally, Draft Resolution E-5101 was issued that detailed how the seven contracts submitted for approval are compliant with the orders and requirements of D.19-11-016 and accepted the modifications made in the supplemental advice letter.

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. CESA also supports the Commission’s determination to revisit the contracting issue for future procurements at a later time. Importantly, 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-5101 and looks forward to collaborating with the Commission and SCE 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)
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Service lists R.16-02-007 and R.20-05-003