

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Investigate
and Design Clean Energy Financing Options
for Electricity and Natural Gas Customers.

Rulemaking 20-08-022
(Filed August 27, 2020)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON THE
ORDER INSTITUTING RULEMAKING**

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October 5, 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 these comments on the *Order Instituting Rulemaking* (“OIR”), issued by the Joint Commissioners on September 4, 2020.

I. INTRODUCTION.

CESA supports the Commission’s issuance of this OIR to develop a cohesive and comprehensive strategy for helping customers finance energy improvements, not only in a siloed technology-specific approach but also in efficiently integrating multiple distributed energy resources (“DERs”). Given the importance and various barriers in ensuring equitable access to DERs for low-income and disadvantaged community customers, CESA supports the OIR’s particular focus in this area. CESA thus looks forward to being an active participant in this proceeding.

II. BACKGROUND & INTEREST IN PROCEEDING.

CESA is a 501c(6) membership-based advocacy group committed to advancing the role of energy storage in the electric power sector through policy development, education, outreach, and research. With over 95 companies represented in the energy storage ecosystem, CESA has a direct

interest in the proceeding in shaping the policies, procedures, and rules for energy storage projects that could be impacted by clean energy financing options adopted herein and seeks to explore the potential financing mechanisms that support the deployment of energy storage with other clean energy investments. CESA also has been an active participant in related rulemakings, such as the Self-Generation Incentive Program (“SGIP”) (R.12-11-005, R.20-05-012).

III. PRELIMINARY SCOPING MEMO.

At this stage, CESA has no comments or recommendations on the target and scope as outlined in the Preliminary Scoping Memo. CESA generally supports the open-ended nature of this proceeding at this time since it will be first important to explore the various barriers to customer adoption and deployment of energy efficiency, renewable energy, storage, and zero-emission vehicles prior to proposing and developing financing mechanisms.

IV. CATEGORIZATION, HEARINGS, AND SCHEDULE.

CESA supports the proposed schedule and categorization of this proceeding.

V. NOTICES.

Services of all notices and communications in this proceeding should be directed to the following CESA representative:

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VI. CONCLUSION.

CESA appreciates the opportunity to these comments on the OIR and looks forward to working with the Commission and other stakeholders in this proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Alex J. Morris".

Alex J. Morris
Executive Director
CALIFORNIA ENERGY STORAGE ALLIANCE

Date: October 5, 2020