

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

Pacific Gas and Electric Company's
Proposed Rate and Non-Rate Changes to the
Wholesale Distribution Tariff.

Docket No. ER20-2878-000, *et al.*

**MOTION TO RESPOND AND RESPONSE OF THE CALIFORNIA ENERGY
STORAGE ALLIANCE TO THE ANSWER OF PACIFIC GAS AND ELECTRIC
COMPANY**

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October 30, 2020

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Pursuant to the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("FERC" or Commission"), the California Energy Storage Alliance ("CESA") respectfully moves to respond and provides our response to *Pacific Gas and Electric Company's Answer to Motions to Reject, for Dismissal, and for Partial Summary Disposition and Request for Leave to Answer and Answer to Protests* ("Answer"), submitted by Pacific Gas and Electric Company ("PG&E") on October 21, 2020 in response to various parties' comments and protests to PG&E's Wholesale Distribution Tariff ("WDT") filing. Due to the disputed facts included in PG&E's Answer, CESA requests that the Commission grant our Motion herein and accept our Response.

I. RESPONSE.

A. PG&E's Answer fails to recognize that the current and proposed WDT do not make distinctions between wholesale load and generation service as it applies to energy storage.

In its Answer, PG&E explains that the changes proposed in its WDT filing are only focused on Wholesale Load Service, whereas the interconnection of energy storage and distributed energy

resources (“DERs”) are governed by provisions related to Wholesale Generation Service.¹ However, as many are aware, energy storage includes both a load (charging) and generation (discharging) component. Notwithstanding PG&E’s response that the filing only pertains to proposed modifications to Wholesale Load Service, PG&E’s current and proposed WDT does not explicitly clarify whether Wholesale Distribution Service includes the charging capacity of energy storage resources that may interconnect on PG&E’s WDT-jurisdictional distribution grid. Furthermore, from the PG&E’s grid perspective, whether the Wholesale Load Service increase is due to energy storage charging or due to increased wholesale customer load is indistinguishable under the current WDT requirements.

As a result, as expressed in our comments in response to PG&E’s WDT filing to the Commission, CESA’s concerns about the limitation of distribution service only to the primary voltage level still stand. Any new additions of load service or energy storage may not be possible in downtown San Francisco and Oakland areas beyond what is deemed legacy secondary services, which, as the California Public Utilities Commission (“CPUC”) and the City and County of San Francisco (“CCSF”) have pointed out,² would be a violation of the Commission’s recently issued Order No. 2222 to support DER market participation. Therefore, to reiterate our previous comments, PG&E’s proposed changes warrant further review and should not be adopted until these concerns and questions are discussed and addressed

¹ PG&E Answer at 5-6.

² CCSF Protest at 5 and CPUC Protest at 7-8.

II. CONCLUSION

CESA appreciates the considerations of this Response and looks forward to working with the Commission, PG&E, and other stakeholders on this matter.

Respectfully submitted,

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

Alex J. Morris
Executive Director
CALIFORNIA ENERGY STORAGE ALLIANCE

October 30, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of *Motion to Respond and Response of the California Energy Storage Alliance to the Answer of Pacific Gas and Electric Company* on the official service list in the proceeding ER20-2878-000, *et al.* in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Executed on October 30, 2020 at Berkeley, California

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