

March 31, 2021

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
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Re: Resolution E-5139. San Diego Gas & Electric Company's Request for Approval of Tranche 2 and 3 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-5139 (“Draft Resolution”) issued on March 10, 2020, approving Advice Letter 3666-E of San Diego Gas and Electric Company (“SDG&E”), submitted on December 30, 2020.

I. INTRODUCTION & SUMMARY.

Pursuant to Decision (“D.”) 19-11-016, SDG&E launched their 2020 System Reliability Request for Offers (“RFO”) on December 13, 2019, seeking to procure approximately 140 MW of System RA capacity that can meet commercial online dates (“CODs”) by August 1, 2022 and August 1, 2023. SDG&E subsequently submitted Advice Letter 3666-E on December 30, 2020 seeking Commission approval of five contracts for 140 MW of incremental storage nameplate and Resource Adequacy (“RA”) capacity as in-front-of-the-meter (“IFOM”) standalone or hybrid projects.

Upon review of Advice Letter 3666-E and parties’ protests and responses, Draft Resolution E-5139 was issued approving each of the five contracts submitted by SDG&E. CESA is supportive of the findings and conclusions made in this regard. Despite the questions about bid evaluation methodologies for different contract types and multiple-use application (“MUA”) considerations,¹ CESA agrees with the Commission that these matters do not represent significant issues that make the contracts out of compliance with D.19-11-016 and that refinements to the procurement parameters, processes, and methods can be better addressed through policymaking activities in the Integrated Resources Planning (“IRP”) proceeding. In R.20-05-003, for example, a procurement track is actively contemplating key issues around procurement processes, orders, parameters, and contract approval processes, where such refinements and improvements as it relates to SDG&E’s

¹ Draft Resolution E-5139 at 9-10.

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recent contract procurements can be more thoroughly and carefully addressed. In addition, CESA believes it is reasonable to approve these contracts needed for system reliability at this time to ensure that these projects can come online on time given the tight lead time until their contracted commercial online dates. As a result, without delay, CESA supports the Commission's vote for approval of Draft Resolution E-5139 at the upcoming April 15, 2021 Commission voting meeting.

II. CONCLUSION.

CESA appreciates the opportunity to submit these comments to Draft Resolution E-5139 and looks forward to collaborating with the Commission and SDG&E.

Respectfully submitted,



Jin Noh
Policy Director
California Energy Storage Alliance

cc: Jaime Rose Gannon, Energy Division (JaimeRose.Gannon@cpuc.ca.gov)
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Service lists R.16-02-007 and R.20-05-003