

April 1, 2021

CPUC Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

**Re: Comments of the California Energy Storage Alliance to Draft Resolution E-5140: Pacific Gas and Electric Company’s Request for Approval of Tranche 2 and Tranche 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-5140 (“Draft Resolution”) issued on March 11, 2020, approving Advice Letter 6033-E of Pacific Gas and Electric Company (“PG&E”), submitted on December 22, 2020.

**I. INTRODUCTION & SUMMARY.**

Pursuant to Decision (“D.”) 19-11-016, PG&E launched Phase 2 of their 2020 System Reliability Request for Offers (“RFO”) on July 10, 2020, seeking to procure approximately 350 MW of System RA capacity that can meet commercial online dates (“CODs”) by August 1, 2022 and August 1, 2023. PG&E subsequently submitted Advice Letter 6033-E on December 22, 2020 seeking Commission approval of six contracts for 387 MW of incremental storage nameplate and Resource Adequacy (“RA”) capacity for in-front-of-the-meter (“IFOM”) and behind-the-meter (“BTM”) energy storage operating as demand response (“DR”) resources. In response, CESA expressed support for expeditious approval of the contracts as compliant with D.19-11-016, in line with precedents set with Resolutions E-5100 and E-5101, and otherwise reasonable.

Upon review of Advice Letter 6033-E and parties’ protests and responses, Draft Resolution E-5140 was issued that approved each of the six contracts submitted by PG&E. CESA is supportive of the findings and conclusions made in this regard. With the Commission’s concerns about bid evaluation methodologies and results addressed through data requests,<sup>1</sup> CESA believes it is reasonable to approve these contracts needed for system reliability. As a result, without delay,

---

<sup>1</sup> Draft Resolution E-5140 at 11.

April 1, 2021  
Page 2 of 2

CESA supports the Commission's vote for approval of Draft Resolution E-5140 at the upcoming April 15, 2021 Commission voting meeting.

**II. CONCLUSION.**

CESA appreciates the opportunity to submit these comments to Draft Resolution E-5140 and looks forward to collaborating with the Commission and PG&E.

Respectfully submitted,



Jin Noh  
Policy Director  
**California Energy Storage Alliance**

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