

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

Application of Pacific Gas and Electric
Company for Approval of its 2020
Energy Storage Procurement Plan.
(U39E.)

Application 20-03-002
(Filed March 2, 2020)

And Related Matters.

Application 20-03-003
Application 20-03-004

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON THE
PROPOSED DECISION ADOPTING REMAINING DIRECTION REGARDING
ASSEMBLY BILL 2514 ENERGY STORAGE PROCUREMENT TARGETS AND
APPROVING TWO ENERGY STORAGE PROGRAMS PURSUANT TO ASSEMBLY
BILL 2868**

Jin Noh
Policy Director

Sergio Dueñas
Policy Manager

CALIFORNIA ENERGY STORAGE ALLIANCE
2150 Allston Way, Suite 400
Berkeley, California 94704
Telephone: (510) 665-7811
Email: cesa_regulatory@storagealliance.org

April 7, 2022

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

Application of Pacific Gas and Electric Company for Approval of its 2020 Energy Storage Procurement Plan. (U39E.)	Application 20-03-002 (Filed March 2, 2020)
And Related Matters.	Application 20-03-003 Application 20-03-004

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON THE
PROPOSED DECISION ADOPTING REMAINING DIRECTION REGARDING
ASSEMBLY BILL 2514 ENERGY STORAGE PROCUREMENT TARGETS AND
APPROVING TWO ENERGY STORAGE PROGRAMS PURSUANT TO ASSEMBLY
BILL 2868**

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 *Proposed Decision Adopting Remaining Direction Regarding Assembly Bill 2514 Energy Storage Procurement Targets and Approving Two Energy Storage Programs Pursuant to Assembly Bill 2868* (“PD”), issued by Administrative Law Judge (“ALJ”) Brian Stevens on March 18, 2022.

I. INTRODUCTION & SUMMARY.

The PD would approve each of the investor-owned utilities’ (“IOUs”) 2020 Energy Storage Procurement Plans pursuant to Assembly Bill (“AB”) 2514, commonly known as the Energy Storage Procurement Mandate, which specified that the IOUs would not conduct storage-specific solicitations but rather meet any residual targets through ongoing procurements to meet Integrated Resource Planning (“IRP”) or Emergency Reliability procurement obligations. In addition, pursuant to AB 2868, the PD would approve two proposed programs from Southern California

Edison Company (“SCE”): (1) the New Home Energy Storage Pilot (“NHESP”); and (2) Smart Heat Pump Water Heater (“HPWH”) Program.

CESA supports the findings and determinations made in the PD regarding AB 2514 procurement, as well as the proposed approval of the two SCE programs pursuant to AB 2868. CESA commends the IOUs for largely meeting and/or exceeding their overall and domain-specific energy storage procurement targets, with the issuance of this PD closing a key chapter in the early market transformation of the energy storage market in California. We are pleased to see energy storage become a mainstream part of the electric grid toolkit, where energy storage is regularly procured to meet incremental capacity needs and identified through IRP modeling as being needed to advance our decarbonization goals. CESA is confident that, given the significant mid-term reliability (“MTR”) procurement needs, Pacific Gas and Electric Company (“PG&E”) and San Diego Gas and Electric Company (“SDG&E”) will meet their residual targets. The focus is appropriately set on execution and bringing these energy storage projects to commercial operations by 2024 for those that could count both toward AB 2514 and IRP obligations. If not met through these all-source solicitations, the PD appropriately approves the IOUs’ plans to conduct an additional storage-specific solicitation as needed to meet their residual targets.

Furthermore, CESA also supports the Commission’s approval of SCE’s NHESP Program and Smart HPWH Program, which are consistent with AB 2868 and not duplicative of other programs available today. These two programs will also provide new insights into how distributed energy storage can support our various grid-support needs, decarbonization goals, and equity objectives of the state.

All in all, CESA is supportive of the PD.

VII. CONCLUSION.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Noh', written in a cursive style.

Jin Noh
Policy Director
CALIFORNIA ENERGY STORAGE ALLIANCE

Date: April 7, 2022