

January 29, 2013

E-mail to docket@energy.state.ca.us

Original copy to

Lead Commissioner: Andrew McAllister
California Energy Commission
Dockets Office, MS-4
Re: Docket 13-IEP-1
1516 Ninth Street
Sacramento, California 95814-5512

**Re: Comments of the California Energy Storage Alliance on Draft 2013
Integrated Energy Policy Report Scoping Order**

Dear Commissioner McAllister:

CESA has applauded the Energy Commission for highlighting the essential role energy storage must play in transforming the future of California's infrastructure and energy policy over the past several years and continues to do so today. CESA's view, shared by the Governor and an ever increasing chorus of stakeholders is that energy storage must have an even more central focus, to impart a greater sense of urgency to accelerate the critical role of energy storage in the 2013 IEPR. CESA has two specific recommendations to assist in bring the discussion from general support into sharper focus.

I. THE COMMISSION SHOULD PROCTIVELY ADVANCE ENERGY STORAGE IN RPS IMPLEMENTATION.

CESA was pleased to provide input on the Energy Commission's 33 Percent Renewables Portfolio Standard Pre-Rulemaking Draft Regulations for Publicly Owned Electric Utilities (Docket No. 11-RPS-01). CESA commended the Energy Commission for proactively including energy storage in its Pre-Rulemaking Draft Regulations for Publicly Owned Electric Utilities (Section 3206(a)(2)) by , for example ,requiring justification of any delay in implementation by trying to develop either (i) its own eligible renewable energy resources, (ii) transmission to interconnect to eligible renewable energy resources, or (iii) *energy storage used to integrate eligible renewable energy resources.*" There are many other specific ways that the Energy Commission can provide a positive impetus to promoting a key role for the entire range of large and distributed applications of grid-connected energy storage in renewable integration. CESA plans to bring additional specific recommendations forward as the Energy Commission progresses with its work on both the RPS regulations and in the 20013 IEPR.

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A123 Systems ● AIC/East Penn ● AltairNano ● Beacon Power ● Chevron Energy Solutions
Deeya Energy ● EnerSys ● EnerVault ● Debenham Energy ● Fluidic Energy ● General Compression
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PVT Solar ● ReStore Energy Systems ● SAFT ● Samsung SDI ● Seo ● Suntech ● SunVerge ● SustainX
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II. THE ENERGY COMMISSION SHOULD PROACTIVELY ADVANCE ENERGY STORAGE BY ACCELERATION OF IMPLEMENTATION AB 2514 BY PUBLICLY OWNED UTILITIES.

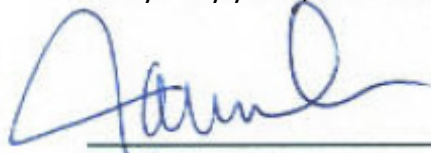
On December 16, 2010 (before AB 2514 became effective on January 1, 2011), the California Public Utilities Commission (“CPUC”) opened the rulemaking proceeding it was required to open by March 1, 2012. In opening the rulemaking over a year before it had to the CPUC said:

“We also open this proceeding on our own motion to initiate policy for California utilities to consider the procurement of viable and cost-effective energy storage systems. Although the Legislature has given the Commission until March 1, 2012 to open this proceeding, we see the enactment of AB 2514 as an important opportunity for this Commission to continue its rational implementation of advanced sustainable energy technologies and the integration of intermittent resources in our electricity grid.” (p. 1).

The Energy Commission is well aware of the critical role it is required to fulfill in implementation of AB 2514, and it must act now if it is to exercise needed leadership in marshaling the efforts of California’s local publicly owned utilities. Local publicly owned electric utilities serving end use customers must, on or before March 1, 2012, initiate a process to determine appropriate targets, if any, to procure viable and cost-effective energy storage systems to be achieved by December 31, 2016, and December 31, 2021. The Energy Commission must, in reviewing the plans and reports submitted by public electric utilities, consider the integration of technologically viable and cost effective energy storage technologies with other programs, including demand side management, and other means that will result in the most efficient use of electricity generation and load management resources.

CESA looks forward to continuing to work with the Energy Commission and stakeholders in this important proceeding and thanks the Energy Commission for its consideration of these comments.

Very truly yours,



Janice Lin, Executive Director

cc: Suzane.Korosec@energy.ca.gov