

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

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U902E) for Approval of its Electric  
Vehicle-Grid Integration Pilot Program.

A.14-04-014  
(Filed April 11, 2014)

And Related Matter.

R.13-11-007

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
ON MARIN CLEAN ENERGY MOTION TO CONSOLIDATE PROCEEDINGS**

Donald C. Liddell  
DOUGLASS & LIDDELL  
2928 2<sup>nd</sup> Avenue  
San Diego, California 92103  
Telephone: (619) 993-9096  
Facsimile: (619) 296-4662  
Email: [liddell@energyattorney.com](mailto:liddell@energyattorney.com)

Attorney for the  
**CALIFORNIA ENERGY STORAGE ALLIANCE**

March 25, 2015

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In accordance with the California Public Utilities Commission’s (“Commission’s”) Rules of Practice and Procedure, the California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits

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<sup>1</sup> The California Energy Storage Alliance consists of 1 Energy Systems Inc., Advanced Microgrid Solutions, AES Energy Storage, Alton Energy, American Vanadium, Amperex Technology Limited, Aquion Energy, ARES North America, Beacon Power, LLC, Bosch Energy Storage Solutions Company LLC, Bright Energy Storage Technologies, Brookfield, CALMAC, Chargepoint, Clean Energy Systems, Coda Energy, Consolidated Edison Development, Inc., Cumulus Energy Storage, Customized Energy Solutions, Demand Energy, DN Tanks, Duke Energy, Eagle Crest Energy Company, EaglePicher Technologies, LLC, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, Enersys, EnerVault Corporation, EV Grid, FAFCO Thermal Storage Systems, FIAMM Energy Storage Solutions, Flextronics, Foresight Renewable Solutions, GE Energy Storage, Green Charge Networks, Greensmith Energy, Gridscape Solutions, Gridtential Energy, Inc., Halotechnics, Hitachi Chemical Co., Hydrogenics, Ice Energy, Imergy Power Systems, ImMODO Energy Services Corporation, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Invenergy LLC, K&L Gates, KYOCERA Solar, Inc., LG Chem, LightSail Energy, LS Power Development, LLC, Mitsubishi International Corporation, NEC Energy Solutions, Inc., NextEra Energy Resources, NRG Solar LLC, OCI, OutBack Power Technologies, Panasonic, Parker Hannifin Corporation, PDE Total Energy Solutions, Powertree Services Inc., Primus Power Corporation, Recurrent Energy, Renewable Energy Systems Americas Inc., Rosendin Electric, S&C Electric Company, Saft America Inc., Samsung, SEEO, Sharp Electronics Corporation, SolarCity, Sony Corporation of America, Sovereign Energy, STEM, Stoel Rives LLP, SunEdison, SunPower, TAS Energy, Toshiba International Corporation, Trimark Associates, Inc., Tri-Technic, UniEnergy Technologies, LLC, and Wellhead Electric. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. <http://storagealliance.org>.

this response on the *Marin Clean Energy Motion to Consolidate Proceedings*, filed March 2, 2015 (“Motion”).

The Commission should grant the Motion as it relates to consolidating PG&E’s Application, but should deny the Motion as it relates to SCE’s Pilot Program (Phase 1 of their Application).

CESA believes the PG&E and SDG&E application (the latter of which was already consolidated) share many characteristics. The most important of attribute they share is that both proposals would fundamentally alter the traditional role of the utility in the competitive market for energy services. There are numerous programmatic issues that need to be prioritized as part of a new phase in the AFV rulemaking prior to proceeding with review of the PG&E and SDG&E applications. Those issues include but are not limited to:

1. Policies and programmatic messaging to signal to the market that California intends to preserve a competitive market for EV charging
2. Marketing education and outreach
3. EVSE site selection
4. Net benefits to ratepayers
5. Preservation of customer and service provider options for vehicle grid integration and enhanced grid benefits.
6. Coordination with the Distribution Resources Plan proceeding and the Integrated Demand Side Management proceeding.

SCE’s pilot program does not propose a similar shift in the role of the utility. Therefore, the pilot program presents a far narrower set of issues that would need to be addressed during the course of the proceeding, and we therefore believe there is a much higher probability of

achieving stakeholder consensus around the SCE's pilot program without first being informed by the programmatic level questions that the AFV rulemaking intends to address. We therefore request that a decision on consolidating the pilot program in the SCE Application, at a minimum, be deferred to allow time for substantive stakeholder discussions to take place.

CESA urges the Commission to accept CESA's recommendations for the reasons stated herein, and thus grant the Motion as it applies to PG&E's Application and reject the Motion as it relates to SCE's pilot program.

Respectfully submitted,



Donald C. Liddell  
DOUGLASS & LIDDELL

Attorney for the  
**CALIFORNIA ENERGY STORAGE ALLIANCE**

Date: March 25, 2015