

DOUGLASS & LIDDELL

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April 29, 2013

Edward Randolph, Director
Energy Division, Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
edtariffunit@cpuc.ca.gov

Re: Comments of the California Energy Storage Alliance on Draft Resolution E-4586 – Permanent Load Shifting Program

Dear Mr. Randolph:

CESA appreciates the opportunity to provide these comments on Draft Resolution E-4586 (“Resolution”) issued by the California Public Utilities Commission’s (“Commission’s”) Energy Division in accordance with Decision (D.) 12-04-045 (“PLS Decision”), in which the Commission approved a Permanent Load Shifting (“PLS”) program budget for 2012-2014, and directed the three investor-owned utilities (“Utilities”)¹ to propose a statewide PLS program based on a standard offer with common design and rules. CESA particularly appreciates standardization of incentive levels on a statewide basis.

CESA applauds the removal of 110% TES efficiency requirement by requiring TES systems to meet existing building codes. By removing this penalty the Commission recognizes that a separate production (chiller efficiency) energy penalty illogically dismisses the round trip efficiency of TES. Title 24 requirements are established by the California Energy Commission and define mandatory building energy requirements. These regulations are enforced by City Building and Safety Permit authorities guiding standard energy efficiency standards for our State. CESA and its members follow these established manufacturing and design guideline principles and agree that PLS energy efficiency guidelines would be unnecessary additions to existing state regulated requirements.

¹ Pacific Gas and Electric Company (PG&E), Southern California Electric Company (SCE), and San Diego Gas & Electric Company (SDG&E).

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CESA requests that the Resolution be adopted by the Commission.

Respectfully,



Donald C. Liddell
DOUGLASS & LIDDELL

DCL/md

cc: Michael Peevey, President
Mike Florio, Commissioner
Catherine Sandoval, Commissioner
Mark Ferron, Commissioner
Carla Peterman, Commissioner
Edward Randolph, Director – Energy Division
Karen Clopton, Chief ALJ
Frank Lindh, General Counsel
Ehren Seybert, Energy Division
Bruce Kaneshiro, Energy Division
Akbar Jazayeri, SCE
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Service Lists: A.11-03-001, A.11-03-002 and A.11-03-003