

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

Order Instituting Rulemaking to Continue  
Implementation and Administration, and Consider  
Further Development of, California Renewables  
Portfolio Standard Program.

FILED  
PUBLIC UTILITIES COMMISSION  
MAY 8, 2015  
SAN FRANCISCO, CALIFORNIA  
RULEMAKING 15-02-020

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
ON RPS CALCULATOR POST-WORKSHOP COMMENTS**

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May 8, 2015

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Pursuant to the *Administrative Law Judge’s Ruling Seeking Post-Workshop Comments*, issued on April 13, 2015, the California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits these comments in reply to the RPS Calculator Post-Workshop Comments by CESA to be relevant to the purposes of the Order Instituting Rulemaking (“OIR”).

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<sup>1</sup> 1 Energy Systems Inc., Abengoa, Advanced Microgrid Solutions, AES Energy Storage, Aquion Energy, ARES North America, Brookfield, Chargepoint, Clean Energy Systems, CODA Energy, Consolidated Edison Development, Inc., Cumulus Energy Storage, Customized Energy Solutions, Demand Energy, Duke Energy, Dynapower Company, LLC, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, ELSYS Inc., Energy Storage Systems, Inc., Enersys, EnerVault Corporation, Enphase ENERGY, EV Grid, Flextronics, GE Energy Storage, Green Charge Networks, Greensmith Energy, Gridtential Energy, Inc., Hitachi Chemical Co., Ice Energy, IMERGY Power Systems, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Invenergy LLC, K&L Gates, LG Chem Power, Inc., LightSail Energy, Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Manatt, Phelps & Phillips, LLP, Mitsubishi Corporation (Americas), Mobile Solar, NEC Energy Solutions, Inc., NextEra Energy Resources, NRG Solar LLC, OutBack Power Technologies, Panasonic, Parker Hannifin Corporation, Powertree Services Inc., Primus Power Corporation, Princeton Power Systems, Recurrent Energy, Renewable Energy Systems Americas Inc., Rosendin Electric, S&C Electric Company, Saft America Inc., Sharp Electronics Corporation, Skylar Capital Management, SolarCity, Sony Corporation of America, Sovereign Energy, STEM, SunEdison, SunPower, Toshiba International Corporation, Trimark Associates, Inc., Tri-Technic, Wellhead Electric. See, <http://storagealliance.org>.

## I. INTRODUCTION

CESA supports the use of planning tools to inform transmission planning and other long-term efforts related to compliance and achievement of the Renewables Portfolio Standard (“RPS”). The RPS Calculator serves as one such important tool. Insofar as energy storage deployments can affect grid operations, they should be included in the RPS Calculator in order to achieve more rational RPS planning scenarios and the California Independent System Operator’s (“CAISO’s) Transmission Planning Process (“TPP”) inputs. It is widely recognized that the feasibility and reasonableness of future planning scenarios can be affected by energy storage.<sup>2</sup>

## II. THE RPS CALCULATOR SHOULD UTILIZE ALL RELEVANT INPUTS, INCLUDING PLANNED OR ANTICIPATED ENERGY STORAGE DEPLOYMENTS, TO CREATE MORE USEFUL RPS PLANNING SCENARIOS.

Any new version of the RPS Calculator, such as the anticipated Version 6.1, should include material known or anticipated energy storage deployments, such as those included in the Commission’s Long Term Procurement Plan (“LTPP”) decisions or going-forward energy storage assumptions. These assumptions should reflect the Commission’s D.13-10-040, which adopted energy storage procurement targets, as well as D.14-03-004, which authorized LTPP Track 1 procurement of local capacity in the Southern California Edison Company service territory.

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<sup>2</sup> See “Technical Notes in Response to Party Comments on RPS Calculator – Version 6.0”, CPUC Staff, February 9, 2015, p. 11. “To the extent that LTPP identifies and authorizes new generation capacity – preferred or non-preferred – those resources will be incorporated into the RPS Calculator.” Commission Staff also note that storage benefits can related to RPS planning scenarios through “more efficient use of renewable and other off-peak generation” and can lead to a “reduced need for transmission and distribution capacity upgrades”. See “Electric Energy Storage: An Assessment of Potential Barriers and Opportunities”, CPUC Policy and Planning Division, July 9, 2010, p. 7.

Incorporation and consideration of the role of planned or expected energy storage deployments can affect the feasibility of RPS Calculator outputs. As noted, these outputs inform critical, material, and influential industry Commission and CAISO planning processes. For instance, assumptions about energy storage system deployments may change expectations for RPS facility deployments based on the effects of energy storage on energy prices throughout the day. Given the intended role of the RPS Calculator, such information seems both relevant and useful. Energy storage expectations should clearly be included in the RPS Calculator.

CESA therefore agrees with the comments of the Large Scale Solar Alliance that better or more representation of energy storage resources will improve the RPS Calculator, and that “failure to include storage in the RPS Calculator resource stack will result in the development of arbitrary portfolios that will not optimize either renewables or the value of the storage resources already authorized by the Commission.”<sup>3</sup>

CESA disagrees with comments of Pacific Gas & Electric Company (“PG&E”) which suggest the “results of the Southern California Edison Company (“SCE”) Storage Solicitation should not be added to Version 6.1.”<sup>4</sup> PG&E claims that the inclusion of the SCE energy storage solicitation as a mitigation measure for over-generation may add additional complexity to the RPS Calculator. In this case, CESA believes that concerns over the accuracy of the RPS Calculator should trump concerns over complexity. CESA understands that over-generation is often a major element of transmission planning, and such information would certainly improve the RPS Calculator.

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<sup>3</sup> *Post-Workshop Comments of the Large Scale Solar Association*, filed, April 27, 2015, p. 11.

<sup>4</sup> *Pacific Gas and Electric Company’s Post-Workshop Comments on RPS Calculator*, file April 27, 2015, p. A-4.

**III. CONCLUSION.**

CESA thanks the Commission for the opportunity to submit these reply comments.

Respectfully submitted,



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**CALIFORNIA ENERGY STORAGE ALLIANCE**

May 8, 2015

**VERIFICATION**

I, Donald Liddell, am counsel for the California Energy Storage Alliance (“CESA”) and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of Reply Comments of the California Energy Storage Alliance on RPS Calculator Post-Workshop Comments, filed in R. 15-02-020, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on May 8, 2015, at San Diego, California.



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Donald Liddell