

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

Application of Pacific Gas and Electric Company (U 39-E) for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014.	Application 11-03-001 (Filed March 1, 2011)
Application of San Diego Gas & Electric Company (U902M) for Approval of Demand Response Programs and Budgets for Years 2012-2014.	Application 11-03-002 (Filed March 1, 2011)
Application of Southern California Edison Company (U338E) for Approval of Demand Response Programs, Activities and Budgets for 2012-2014.	Application 11-03-003 (Filed March 1, 2011)

**OPENING COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE TO
PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE HYMES ADOPTING
DEMAND RESPONSE ACTIVITIES AND BUDGETS FOR 2012 THROUGH 2014**

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

Counsel for the
CALIFORNIA ENERGY STORAGE ALLIANCE

November 17, 2011

TABLE OF CONTENTS

I. INTRODUCTION.1

II. THE COMMISSION SHOULD ADOPT THE PROPOSED DECISION WITHOUT
MODIFICATION IS INsofar AS IT RELATES TO PERMANENT LOAD
SHIFTING.2

III. CONCLUSION.....2

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

Application of Pacific Gas and Electric Company (U 39-E) for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014.	Application 11-03-001 (Filed March 1, 2011)
Application of San Diego Gas & Electric Company (U902M) for Approval of Demand Response Programs and Budgets for Years 2012-2014.	Application 11-03-002 (Filed March 1, 2011)
Application of Southern California Edison Company (U338E) for Approval of Demand Response Programs, Activities and Budgets for 2012-2014.	Application 11-03-003 (Filed March 1, 2011)

**OPENING COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE TO
PROPOSED DECISION OF ADMINISTRATIVE LAW JUDGE HYMES ADOPTING
DEMAND RESPONSE ACTIVITIES AND BUDGETS FOR 2012 THROUGH 2014**

The California Energy Storage Alliance (“CESA”) hereby submits these opening comments on the *Proposed Decision of Administrative Law Judge Hymes Adopting Demand Response Activities and Budgets for 2012 through 2014*, filed on October 28, 2011 (“Proposed Decision”).

I. INTRODUCTION.

CESA strongly supports and urges the Commission to adopt the Proposed Decision as written insofar as it relates to Permanent load shifting (“PLS”). CESA expresses no opinion on the remainder of the Proposed Decision at this time.

II. THE COMMISSION SHOULD ADOPT THE PROPOSED DECISION WITHOUT MODIFICATION IS INsofar AS IT RELATES TO PERMANENT LOAD SHIFTING.

CESA urges the Commission to adopt each and every part of the Proposed Decision that is related to PLS as written, including, without limitation, Sections 7.7.4.1 through 7.7.4.3 of the body of the text, Findings of Fact Numbers 44 and 45, and Ordering Paragraph Numbers 46 through 50,

III. CONCLUSION.

CESA thanks the Commission for this opportunity to comment, and looks forward to continuing to work with the Commission and the parties to this proceeding

Respectfully submitted,



Donald C. Liddell
DOUGLASS & LIDDELL
Email: liddell@energyattorney.com

Counsel for the
CALIFORNIA ENERGY STORAGE ALLIANCE

November 17, 2011