

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

Application of Southern California Edison  
Company (U338E) for Approval of the Results  
of Its 2013 Local Capacity Requirements  
Request for Offers for the Western Los  
Angeles Basin

Application 14-11-012  
(November 21, 2014)

**RESPONSE OF CALIFORNIA ENERGY STORAGE ALLIANCE  
TO APPLICATIONS FOR REHEARING OF D.15-11-041**

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January 8, 2016

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

Application of Southern California Edison  
Company (U338E) for Approval of The  
Results of Its 2013 Local Capacity  
Requirements Request for Offers for the  
Western Los Angeles Basin

Application 14-11-012  
(Filed October 30, 2014)

**RESPONSE OF CALIFORNIA ENERGY STORAGE ALLIANCE  
TO APPLICATIONS FOR REHEARING OF D.15-11-041**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)<sup>1</sup> hereby submits this response to the *Applications for Rehearing of D.15-11-041 filed by the Los Cerritos Wetlands Trust, the Sierra Club, EnerNOC, Inc., and Powers Engineering* (“Applications”).

**I. INTRODUCTION.**

CESA urges the Commission to act on and dispose of the Applications as expeditiously as possible to avert the very real possibility that pendency of the Applications may unreasonably delay or interfere with fulfillment of the contracts approved by the Commission in D.15-11-041.

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<sup>1</sup> 1 Energy Systems Inc., Advanced Microgrid Solutions, AES Energy Storage, Aquion Energy, Brookfield, Clean Energy Systems, CODA Energy, 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., 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. The views expressed in this Response are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. <http://storagealliance.org>.

Delays in reviewing the Applications has the potential to irreparably jeopardize more than 260 MW of energy storage contracts that was a landmark solicitation that demonstrated the value of energy storage versus conventional generation resources and signaled the potential of energy storage as a flexible, cost effective resource.

CESA takes no position on the merits of any of the issues articulated in the Applications at this time, arguing instead that the issues are very straight forward and familiar to the Commission and thus can be appropriately addressed and disposed of fairly and quickly consistent with the Commission's rules and precedents and provide due process for the parties.

**II. THE COMMISSION SHOULD ACT ON AND DISPOSE OF THE APPLICATIONS AS EXPEDITIOUSLY AS REASONABLY POSSIBLE.**

Although the issues specific to each Application differ, in this response CESA addresses all four of the Applications in exactly the same manner in urging the Commission to act on and dispose of the Applications as expeditiously as possible. In brief, the Los Cerritos Wetlands Land Trust asked the Commission to review whether all of the energy procured by Southern California Edison ("SCE") was actually needed. They group expressed the opinion that the environmental review for the energy generation from the contracts will not occur until later environmental review processes should be changed.

The Sierra Club asked the Commission to find that the Stanton Reliability Center contract was less cost-effective than energy storage bids in SCE's request for offers ("RFO"). The Sierra Club argued that SCE should have met its resource needs through a subsequent solicitation for preferred resources and energy storage, and that the location did not justify departing from the loading order because other resources could provide the same locational benefits.

EnerNOC urged the Commission to find that SCE had imposed stricter limits on demand response resources after bids were submitted. EnerNOC also argued that SCE had not procured the required minimum amount of preferred resources.

Powers Engineering urged the Commission to find that SCE failed to address circumstances that had changed had eliminated the need for SCE's gas-fired generation contracts. Powers Engineering argued that the Commission had unreasonably relied on the opinion of the California Independent System Operator ("CAISO") that procurement was needed, and that the CAISO has used inconsistent assumptions and shown a bias toward new construction.

### **III. CONCLUSION.**

CESA thanks the Commission for its consideration of this response and the recommendations set forth herein.

Respectfully submitted,



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