

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

Application of Pacific Gas and Electric Company (U39E) for Approval of Demand Response Programs, Pilots and Budgets for Program Years 2018-2022.

Application 17-01-012  
(Filed January 17, 2017)

Application of Southern California Edison Company (U338E) for Approval of its 2018–2022 Demand Response Programs.

Application 17-01-018  
(Filed January 17, 2017)

Application of San Diego Gas & Electric Company (U902E) Requesting Approval and Funding for 2018-2022 Demand Response Portfolio in compliance with Decision 16-09-056.

Application 17-01-019  
(Filed January 17, 2017)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
ON ADMINISTRATIVE LAW JUDGE’S RULING CONSOLIDATING  
PROCEEDINGS AND SETTING A PREHEARING CONFERENCE**

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February 27, 2017

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The California Energy Storage Alliance (“CESA”)<sup>1</sup> respectfully submits this Response to the Applications of Pacific Gas and Electric Company (PG&E), Southern California Edison

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<sup>1</sup> 8minutenergy Renewables, Adara Power, Advanced Microgrid Solutions, AES Energy Storage, AltaGas Services, Amber Kinetics, Bright Energy Storage Technologies, BrightSource Energy, Brookfield, Consolidated Edison Development, Inc., Customized Energy Solutions, Demand Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, ElectrIQ Power, ELSYS Inc., eMotorWerks, Inc., Energport, Energy Storage Systems Inc., Enphase Energy, GE Energy Storage, Geli, Green Charge Networks, Greensmith Energy, Gridscape Solutions, Gridtential Energy, Inc., Hitachi Chemical Co., IE Softworks, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Johnson Controls, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NICE America Research, NRG Energy, Inc., OutBack Power Technologies, Parker Hannifin Corporation, Qnovo, Recurrent Energy, RES Americas Inc., Sharp Electronics Corporation, SolarCity, Southwest Generation, Sovereign Energy, Stem, Sunrun, Swell Energy, UniEnergy Technologies, Wellhead Electric, and Younicos. 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>) .

Company (SCE) and San Diego Gas & Electric Company (SDG&E), collectively the Investor Owned Utilities (IOUs) for Approval of Demand Response Programs, Pilots and Budgets for 2018-2022. This Response is filed and served pursuant to the Commission’s Rules of Practice and Procedure and the *Administrative Law Judge’s Ruling Consolidating Proceedings and Setting Prehearing Conference*, issued by Administrative Law Judge Kelly A. Hymes and Administrative Law Judge Nilgun Atamturk, on February 16, 2017 (“Ruling”).

**I. COMMENTS.**

CESA generally supports the consolidation of the 2018-2022 Demand Response (“DR”) Program Applications of Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and San Diego Gas and Electric Company (“SDG&E”), collectively referred to as the investor-owned utilities (“IOUs”). In these very brief Response, CESA recommends that the Commission include the following issues as within the scope of this proceeding:

- Whether the net export constraint is necessary for DR programs administered by the IOUs.
- Whether baselines for frequently-dispatched resources are necessary in certain cases, and if so, which baselines are appropriate.
- Whether the current Rule 24 and Rule 32 tariffs should be revised to allow for reasonable and appropriate multiple DR market and program participation rules and barriers.
- Streamlined interconnection process for non-exporting and net-zero exporting supply-side DR resources.

As the Commission considers how to improve the existing models of DR programs for 2018-2022, CESA believes all of these issues should be included in the scope of this proceeding and require resolution by the Commission.

**II. CONCLUSION.**

CESA appreciates the opportunity to submit this Response on the Ruling and trusts that they will serve to help guide next steps in this proceeding.

Respectfully submitted,



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