

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

Application of Southern California Edison
Company (U 338-E) for Approval of the
Results of Its 2018 Local Capacity
Requirements Request for Proposals.

Application 19-04-016
(Filed April 22, 2019)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE PROPOSED DECISION REGARDING SOUTHERN CALIFORNIA EDISON
COMPANY 2018 LOCAL CAPACITY REQUIREMENTS REQUEST FOR PROPOSALS
FOR MOORPARK SUB-AREA PURSUANT TO DECISION 13-02-015**

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December 5, 2019

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”) hereby submits these comments on *Proposed Decision Regarding Southern California Edison Company 2018 Local Capacity Requirements Request for Proposals for Moorpark Sub-Area Pursuant to Decision 13-02-015* (“PD”), issued by Administrative Law Judge (“ALJ”) Zita Kline on November 15, 2019.

I. INTRODUCTION.

In its Application, SCE submitted 100 MW of in-front-of-the-meter (“IFOM”) energy storage contracts for approval to meet the local capacity requirement (“LCR”) need in the Moorpark sub-area, which, after accounting for the Decision (“D.”) 13-02-015 and the cancellation of the Puente gas-fired generation plant, had a remaining 278 MW need, including a 102-164 MW LCR deficiency in the Santa Clara sub-area. According to SCE, the remainder of the LCR need will be addressed through contracts that was submitted for approval through an Advice Letter filing on May 23, 2019 related to SCE’s Aliso Canyon Energy Storage (“ACES”) 2 Request for Offers (“RFO”), which was soliciting projects in the same locations.

CESA supports the PD in approving the 100 MW of in-front-of-the-meter (“IFOM”) energy storage contract proposed for approval in Application (“A.”) 19-04-016, which will support Southern California Edison Company (“SCE”) in meeting its local capacity requirement (“LCR”) need in the Moorpark sub-area, as authorized through Decision (“D.”) 13-02-015. CESA commends the Commission and SCE for procuring energy storage resources that will support the state’s clean energy and environmental goals by supporting the retirement of the Ormond Beach once-through-cooling (“OTC”) facilities and replacing the since-cancelled Puente gas-fired generation plant. In our comments herein, we express our support for the PD.

II. APPROVAL OF THE STRATA SATICOY ENERGY STORAGE CONTRACT IS REASONABLE IN LIGHT OF THE EVIDENCE.

For all the reasons highlighted in the PD, CESA agrees that approval of the Strata Saticoy energy storage contract is reasonable. In particular, CESA supports the Commission’s determination that separate solicitation of energy storage contracts procured pursuant to Resolution E-4937 and submitted for approval via a separate Advice Letter process does not render the Strata Saticoy contract as out of conformance with D.13-02-015.¹ Even when separately considered, the merits of the Strata Saticoy contract was clearly demonstrated.² As noted throughout this Application review process, the Commission found it reasonable in Resolution E-4937 for SCE to target locations that would “yield simultaneous benefits to electric reliability as well as reducing natural gas demand” as part of the Aliso Canyon Energy Storage (“ACES”) 2 Request for Offers (“RFO”) contracts solicitation authorized under SB 801.³ In addition to the Commission’s separate

¹ PD at 11.

² *Ibid* at 18.

³ *Resolution E-4937. Authorizing Southern California Edison’s plan to conduct a solicitation for energy storage to comply with SB 801 (Stern)*, issued on August 10, 2018, Findings 4 and 12 and Order 4. <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M221/K689/221689899.PDF>

authorizations, SCE also demonstrated how it worked closely with the California Independent System Operator (“CAISO”) to study and confirm that the Strata Saticoy contract and the ACES 2 RFO contracts together would address the LCR need. In light of the evidence, approval of the Strata Saticoy contract is reasonable.

Finally, CESA agrees with the PD to *not* limit SCE’s ability to procure additional resources in the Moorpark sub-area if additional needs are identified,⁴ including not just for four-hour energy storage systems but also longer-duration storage resources that could compete and also viably address the needs.

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments to the PD and commends the Commission and SCE in advancing the state’s goals through this decision.

Respectfully submitted,



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Date: December 5, 2019

⁴ PD at 19.