

December 5, 2019

CPUC Energy Division Tariff Unit
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Re: Response of the California Energy Storage Alliance to Advice Letter 5688-E of Pacific Gas and Electric Company and Advice Letter 4108-E of Southern California Edison Company

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”)¹ hereby submits this response to the above-referenced Advice Letter 5688-E of Pacific Gas and Electric Company (“PG&E”), *Request for Approval to Issue Competitive Solicitations for Distributed Energy Resource (DER) Procurement for Electric Distribution Deferral Opportunities*, and Advice Letter 4037-E of Southern California Edison Company (“SCE”), *Southern California Edison Company’s Request for Approval to Launch the 2020 Distribution Investment Deferral Framework Solicitation*, both submitted on November 15, 2019.

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, Aggreko, Alligant Scientific, LLC, AltaGas Services, Amber Kinetics, Ameresco, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Better Energies, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Clean Energy Associates, ConEd Battery Development, Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, EDF Renewable Energy, eMotorWerks, Inc., Enel X North America, Energport, Energy Vault, Engie Storage, E.ON Climate & Renewables North America, esVolta, Fluence, Form Energy, General Electric Company, Greensmith Energy, Gridwiz Inc., Hecate Grid LLC, Highview Power, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Energy Solutions, LS Power Development, LLC, Magnum CAES, Malta Inc, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., Nuvve, Pattern Energy, Pintail Power, Plus Power, Primus Power, PolyJoule, Quidnet Energy, PXiSE Energy, Range Energy Storage Systems, Recurrent Energy, RES Americas, SNC-Lavalin, Soltage, Southwest Generation, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., Tesla, True North Venture Partners, Viridity Energy, VRB Energy, WattTime, and Wellhead Electric. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

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I. BACKGROUND & INTRODUCTION.

In the Distribution Resources Plan (“DRP”) proceeding (R.14-08-013), each of the investor-owned utilities (“IOUs”) worked with the Distribution Planning Advisory Group (“DPAG”) to provide advisory input into their Grid Needs Assessment (“GNA”) and Distribution Deferral Opportunity Report (“DDOR”) as part of the Distribution Investment Deferral Framework (“DIDF”). As a member of the DPAG, CESA appreciated the opportunity to collaborate with PG&E, SCE, and other stakeholders to provide insights into the capabilities of distributed energy resources (“DERs”) and to identify a shortlist of ‘best-fit’ opportunities for DERs to potentially cost-effectively defer a planned investment.

In reviewing the Advice Letters and the attached Independent Professional Engineer (“IPE”) Reports, CESA supports the proposed Tier 1 projects from PG&E and SCE to be included as part of their respective 2020 DIDF Request for Offers (“RFO”). CESA recommends that the Commission expeditiously approve the Advice Letters so that the RFOs can launch in a timely manner in January 2020 and bidders can have sufficient time to respond to these competitive solicitations, which will better ensure the potential for viable distributed energy resource (“DER”) solutions in cost-effectively deferring the planned investments.

CESA also notes that there were many helpful observations and recommendations from the IPE Reports to improve the DIDF and DPAG processes as well as the GNA and DDOR filings. In a separate commenting opportunity in R.14-08-013, CESA will provide our response and recommendations.

II. DISCUSSION.

A. PG&E’s proposed projects for its 2020 DIDF RFO are high-potential deferral candidates.

CESA agrees with PG&E’s submission of the four proposed projects in the 2020 DIDF RFO: Alpaugh New Feeder, Calfax Bank 2, Santa Nella Bank and New Feeder, and FMC 1102. These projects have sufficient deferral value, manageable duration of need, and well-defined windows of need. In particular, CESA supports PG&E’s inclusion of the FMC 1102 project, especially with the de-coupling of the distribution capacity need from the 24-hour back-tie reliability need, which will encourage DER solutions. Even for learning purposes, PG&E will benefit from taking this project to the market to see if innovative DER solutions could address this deferral need. CESA appreciates PG&E’s consideration of our informal feedback and comments throughout the DPAG process.

B. SCE's proposed projects for its 2020 DIDF RFO are high-potential deferral candidates.

CESA agrees with SCE's submission of the six proposed projects in the 2020 DIDF RFO: Eisenhower, Saugus-Newhall, Pechanga, Alessandro, Saugus-Elizabeth Lake-MWD, and Saugus-Colossus-Lockheed. These projects have sufficient deferral value, manageable duration of need, and well-defined windows of need, with some variation in the number of circuits with needs. In particular, CESA appreciates SCE's inclusion of the Saugus-Newhall project as a good opportunity to test DER-provided deferral of sub-transmission reliability investments. Additionally, CESA supports SCE's inclusion of the Saugus-Elizabeth Lake-MWD and Saugus-Colossus-Lockheed projects, which were previously ranked in Tier 2. Despite the need occurring in 2023, the two projects could be met with a single project that addresses both needs and presents the possibility of value stacking with other procurements, given the timing and duration of the need. CESA appreciates SCE's consideration of our informal feedback and comments throughout the DPAG process.

III. CONCLUSION.

CESA appreciates the opportunity to submit this response to PG&E's and SCE's Advice Letter and commends PG&E and SCE for its productive and collaborative approach throughout the DIDF process.

Respectfully submitted,



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California Energy Storage Alliance

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Service list R.14-08-013 and R.14-10-003