

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

Order Instituting Rulemaking to Examine  
Electric Utility De-Energization of Power  
Lines in Dangerous Conditions.

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Rulemaking 18-12-005  
(Filed December 13, 2018)

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE TO  
ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS ON  
PROPOSED ADDITIONAL AND MODIFIED DE-ENERGIZATION GUIDELINES**

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February 26, 2020

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”) hereby submits these reply comments on the Administrative Law Judge’s Ruling Requesting Comments on Proposed Additional and Modified De-Energization Guidelines, issued by Administrative Law Judge (“ALJ”) Brian R. Stevens on January 30, 2020. CESA was granted party status in Rulemaking (“R.”) 18-12-005 on February 19, 2019 at the prehearing conference<sup>1</sup> by virtue of filing comments on *Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions* (“OIR”) on February 8, 2019.<sup>2</sup>

**I. INTRODUCTION.**

As noted in our opening comments and echoed by a number of parties, CESA generally supports the Commission’s examination of the Phase 1 de-energization guidelines adopted in Decision (“D.”) 19-05-042 in this proceeding. In the spirit of collaboration, similar to how parties expressed local governments and community choice aggregators (“CCAs”) should be allies in

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<sup>1</sup> See *Reporter’s Transcript* at p. 17.

<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M268/K444/268444747.PDF>

<sup>2</sup> *Comments of the California Energy Storage Alliance to the Order Instituting Rulemaking*, filed on February 8, 2019. <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M265/K165/265165647.PDF>

siting community resource centers (“CRCs”), CESA supports a pathway to allow private and non-utility entities to have facilities designated as CRCs upon meeting a set of criteria developed as part of this proceeding. In addition, similar criteria could be developed as part of the Transportation Resiliency Task Force in order to designate key electric vehicle (“EV”) charging stations and corridors as critical facilities.

## **II. CRITERIA SHOULD BE DEVELOPED TO SUPPORT THE SITING OF PRIVATE COMMUNITY RESOURCE CENTERS.**

CESA supports the recommendation from Tesla to develop criteria and process to support the designation of CRCs for private and other non-utility entities,<sup>3</sup> which would expand the accessibility and scope of CRCs that are accessible to customers in need during Public Safety Power Shutoff (“PSPS”) events. Given that the proposed guideline revisions seek to ensure that impacted customers do not need to drive more than 30 minutes to a CRC,<sup>4</sup> the Commission seems intent to ensure a comprehensive level of accessibility and availability of CRCs that can provide critical customer services during PSPS events (*e.g.*, shelter, water, backup electricity). Rather than relying solely on utility designations of CRCs, a bottom-up process to allow private entities to qualify and register as a CRC during PSPS events would support the Commission’s intent to establish a vast network of CRCs.

In doing so, as Tesla mentioned,<sup>5</sup> the Commission will also be able to leverage synergies with other programs, such as the Self-Generation Incentive Program (“SGIP”), in incentivizing the deployment of clean resiliency solutions in energy storage. Considering the eligibility of customers to access Equity Resiliency Budget incentives is dependent on, among other things, being

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<sup>3</sup> Tesla comments at 4.

<sup>4</sup> Ruling Attachment 1 at 4-5.

<sup>5</sup> Tesla comments at 3.

designated as a CRC to provide support during PSPS events, the Commission should create a more bottom-up process where communities and private entities can more efficiently be designated as CRCs that also serve to support the deployment of energy storage resiliency solutions.

**III. CRITERIA SHOULD BE DEVELOPED TO SUPPORT THE SITING OF RESILIENT TRANSPORTATION AT KEY LOCATIONS AND CORRIDORS.**

CESA also supports the recommendation of Tesla to develop criteria and processes to have certain EV chargers and infrastructure to be deemed critical facilities that align with eligibility criteria in other programs (*e.g.*, SGIP).<sup>6</sup> The Transportation Resiliency Task Force could be responsible for developing this criteria and process that would then inform industry and local/utility collaborators to site EV charging infrastructure backed with storage and other resiliency solutions, thereby increasing transportation resiliency and leveraging SGIP incentive funds as much as possible. Aligning eligibility criteria between the revised guidelines herein and SGIP would help guide storage resiliency investments in smart ways that also support key transportation needs.

**IV. CONCLUSION.**

CESA appreciates the opportunity to submit these reply comments on the Ruling and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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<sup>6</sup> Tesla comments at 6-7.