

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION**

Tariff Amendments to Implement Demand
Response Enhancements.

Docket No. ER20-2443-000

**MOTION TO INTERVENE AND COMMENTS OF THE CALIFORNIA ENERGY
STORAGE ALLIANCE**

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August 5, 2020

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Pursuant to Rule 211 of the Federal Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, the California Energy Storage Alliance (“CESA”) respectfully moves to intervene and provides comments in response to the tariff amendment filing of the California Independent System Operator (“CAISO”) submitted on July 16, 2020 in Docket No. ER20-2443. CESA offers our comments here in support of the proposed revisions to: (1) allow electric vehicle (“EV”) charging stations to have a separate load curtailment measure when providing demand response with onsite load; and (2) create a demand response (“DR”) participation model that facilitates “load shifting” capabilities and accounts for when behind-the-meter (“BTM”) energy storage charges and discharges at optimal times. These proposed revisions are just and reasonable and support the wholesale market participation of electric vehicle supply equipment (“EVSE”) and BTM storage with enhancements to proxy demand resource (“PDR”) model and requirements.

I. BACKGROUND.

Founded in 2009, CESA is a non-profit membership-based advocacy group committed to advancing the role of energy storage in the electric power sector through policy, education, outreach, and research. CESA’s mission is to make energy storage a mainstream energy

resource which accelerates the adoption of renewable energy and promotes a more efficient, reliable, affordable, and secure electric power system. As a technology-neutral group that supports all business models for deployment of energy storage resources, CESA membership includes technology manufacturers, project developers, systems integrators, consulting firms, and other clean-tech industry leaders.

II. COMMUNICATIONS AND CORRESPONDENCE.

Address all communications and correspondence concerning this proceeding to:

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III. MOTION TO INTERVENE IN THIS PROCEEDING.

CESA's current membership consists of 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Aggreko, Amber Kinetics, Ameresco, Antora Energy, Aparrent, Aquifer Based Hydroelectric Systems LLC, Arevon Energy Management by Capital Dynamics, Avangrid Renewables, B2U Storage Solutions, Better Energies, Borrego Solar Systems Inc., Boston Energy Trading & Marketing, Bright Energy Storage Technologies, Broad Reach Power, Buchalter, Carrier, Clean Energy Associates, ConEd Battery Development, Connect California, Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy, East Penn Manufacturing, EDF Renewable Energy, Emera, Enel X, Energy Dome, Energport Inc., Energy Storage Response Group, Energy Vault, Engie, ESS Inc., esVolta, Fluence, ForeFront Power, LLC, Form Energy,

General Electric, Gridwiz, Hecate Energy, Highview Power, Honda, Hydrostor, Jensen Hughes, Lendlease Energy Development, LG Chem Power, Li-Ion Tamer, Lockheed Martin AES, LS Power Development, Malta, NantEnergy, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Nostromo, NRStor, Nuvve, Ormat/Viridity, Plus Power, PolyJoule, PXiSE, Quidnet Energy, Range Energy Storage, RAW Energy, Recurrent Energy, Reimagine Power, RWE, Southwest Generation Company, Stem, Stoel Rives, Strata Solar Development, Elsys, Sumitomo Electric, Sunrun, Swell Energy, Tenaska, Tenaska Power Services Company, Trane, TRC, UL, VRB Energy, Wartsila, WattTime, Wellhead Electric and Zitara Technologies. 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. 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.

CESA's intervention in this proceeding is in the public interest, and CESA's interests will not be adequately reflected by any other party, particularly given CESA's role in energy storage and participatory access to the CAISO and California electric marketplace. California-focused energy storage interests also have existing, planned, and expected future deployments of energy storage that may be affected by rule changes, requiring CESA to communicate in this proceeding on their behalf. CESA therefore respectfully requests that this motion to intervene be granted.

IV. COMMENTS.

CESA has been an active participant in the CAISO's Energy Storage and Distributed Energy Resources ("ESDER") Initiative where various refinements to market participation pathways and wholesale market designs are developed for energy storage resources as well as

other types of distributed energy resources (“DERs”), including EVSEs as a DR resource.

First, regarding the CAISO’s proposed revisions to allow PDRs to separate their EVSE performance from the onsite host load, CESA supports the proposal as better reflecting the EVSE resource characteristics as a PDR and being consistent with the requirements in place with the meter generator output (“MGO”) methodology in place for BTM stationary energy storage loads. As such, CESA requests that the Commission approve these proposed revisions.

Second, regarding the CAISO’s proposed revisions to create a new load-shift methodology for PDRs with BTM energy storage, CESA supports the proposal as enabling BTM energy storage to address oversupply conditions on the CAISO grid by creating a reasonable and innovative set of bidding, scheduling, and performance evaluation rules through the new PDR-LSR model. Similar to the first proposal, CESA requests that the Commission approve these proposed revisions.

V. CONCLUSION.

CESA appreciates the Commission’s considerations of these comments and looks forward to further collaborating with the CAISO and the Commission regarding market participation and access by DERs.

Respectfully submitted,



Alex J. Morris
Executive Director
CALIFORNIA ENERGY STORAGE ALLIANCE

August 5, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of *Motion to Intervene and Comments of the California Energy Storage Alliance* on the official service list in the proceeding ER20-2443-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Executed on August 5, 2020 in Berkeley, California.

A handwritten signature in blue ink, appearing to read "Alex Morris".

Alex Morris