

April 21, 2021

CPUC Energy Division Tariff Unit
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**Re: Comments of the California Energy Storage Alliance to Resolution E-5142:
Southern California Edison Company’s Request for Review and Approval
of System Reliability Standard Track Contracts Pursuant to Decision 19-
11-016**

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”) hereby submits these comments to the above-referenced Draft Resolution E-5142 (“Draft Resolution”) issued on April 1, 2020, approving Advice Letter 4373-E of Southern California Edison Company (“SCE”), submitted on December 18, 2020.

I. INTRODUCTION & SUMMARY.

Pursuant to Decision (“D.”) 19-11-016, SCE launched their 2019 System Reliability Request for Offers (“RFO”) and subsequently submitted Advice Letter 4373-E on December 18, 2020, seeking Commission approval of five energy storage contracts as part of the Standard Review Track of its 2020 System Reliability RFO. In sum, SCE contracted with 590 MW in incremental storage and Resource Adequacy (“RA”) capacity, comprised of in-front-of-the-meter (“IFOM”) energy storage projects and behind-the-meter (“BTM”) energy storage projects operating as demand response (“DR”) resources. In response to the Advice Letter, CESA expressed support for expeditious approval of the contracts as compliant with D.19-11-016, in line with precedents set with Resolutions E-5100 and E-5101, and otherwise reasonable.

Upon review of Advice Letter 4373-E and parties’ protests and responses, Draft Resolution E-5142 was issued that approved each of the five contracts submitted by SCE. CESA is supportive of the findings and conclusions made in this regard. Pointing to SCE’s responses and the Independent Evaluator (“IE”) assessment, the Commission found the determinations and outcomes from the bid evaluation process (*e.g.*, as it relates to treatment of debt equivalence costs) and incrementality assessment to be reasonable.¹ CESA agrees and recommends approval of these contracts needed for system reliability. As a result, without delay, CESA supports the

¹ Draft Resolution E-5142 at 9-10.

April 21, 2021
Page 2 of 2

Commission's vote for approval of Draft Resolution E-5142 at the upcoming May 6, 2021 Commission voting meeting.

II. CONCLUSION.

CESA appreciates the opportunity to submit these comments to Draft Resolution E-5142 and looks forward to collaborating with the Commission and SCE.

Respectfully submitted,



Jin Noh
Policy Director
California Energy Storage Alliance

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Service lists R.16-02-007 and R.20-05-003