

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



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Application of Pacific Gas and Electric Company (U 39-E) for Authorization to Procure Energy Storage Systems During the 2016-2017 Biennial Procurement Period Pursuant to Decision 13-10-040.	Application 16-03-001 (Filed March 1, 2016)
Application of Southern California Edison Company (U 338-E) for Approval of Its 2016 Energy Storage Procurement Plan.	Application 16-03-002 (Filed March 1, 2016)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Energy Storage Procurement Framework and Program As Required by Decision 13-10-040.	Application 16-03-003 (Filed March 1, 2016)

**COMMENTS OF COMMUNITY CHOICE AGGREGATION PARTIES  
ON THE PROPOSED DECISION APPROVING STORAGE PROCUREMENT  
FRAMEWORK FOR THE 2016 BIENNIAL PROCUREMENT PERIOD**

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August 18, 2016

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Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), Marin Clean Energy (“MCE”), Sonoma Clean Power (“SCP”), and the City of Lancaster (“Lancaster”) hereby jointly file comments as the Community Choice Aggregation (“CCA”) Parties on the *Proposed Decision Approving Storage Procurement Framework for the 2016 Biennial Procurement Period* (“PD”). The comments of the CCA Parties focus on the proposed counting methodology for Self-Generation Incentive Program (“SGIP”) funded storage projects.

**I. THE PROPOSED SGIP-FUNDED PROJECTS ACCOUNTING METHOD DOES NOT ADEQUATELY CONSIDER POTENTIAL CHANGES IN CCA SERVICE AREAS**

The CCA Parties appreciate the Commission’s effort to specify the accounting and verification for SGIP-funded projects.<sup>1</sup> However, the proposed method would not adequately assist CCAs in accurately accounting for SGIP-funded projects in their service areas. If a CCA expands its service area, or if a new CCA forms after the applications and Advice Letter have already been filed, such CCA would not be able to track SGIP-funded energy installations in its service area.

Because the biennial procurement application cycles and Advice Letters do not have the flexibility to reflect the change of the equipment host’s generation service provider, CCAs’ ability to meet their energy storage procurement requirements would be impacted. Under present reporting requirements, there may be a significant lag time between the project coming online and being eligible to count toward CCA storage targets. The delay would put CCA programs at a disadvantage in knowing the present status of their compliance with the targets and unnecessarily complicate procurement efforts.

The CCA Parties provide clarifications on its joint accounting proposal with the Alliance for Retail Energy Markets (“AREM”), and the Direct Access Customer Coalition (“DACC”). The CCA Parties urge the Commission to update the format of the existing SGIP Weekly Projects report to reflect vital information that can assist the CCAs in accounting for SGIP-funded projects.

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<sup>1</sup> PD at page 12. The Commission directs “the utilities to provide a breakout of SGIP-funded energy storage installations by bundled, CCA, and Direct Access customers as part of future biennial procurement contract approval applications. In instances where a utility does not submit an application for approval of its storage contracts (for example, when energy storage contracts are being procured through a Local Capacity Requirement RFO), the utility should file a Tier 1 Advice Letter containing the breakout of SGIP-funded installations, served on parties to the current energy storage rulemaking (R.15-03-011), or any successor to the rulemaking.”

## **II. THE COMMISSION SHOULD DIRECT THE ENERGY DIVISION TO UPDATE THE EXISTING SGIP DATABASE TO REFLECT THE APPROPRIATE LSES**

The CCA Parties respectfully request the Commission to direct the Energy Division and the SGIP Program Administrators to modify the existing SGIP Weekly Projects report as described below. The modifications should provide crucial information to help all LSEs accurately account for SGIP-funded projects in their service areas that are online after D.16-01-032.<sup>2</sup>

The Commission's website currently publishes an SGIP Weekly Projects report, which contains information on each SGIP project's equipment type, rated capacity, location, electric utility, and interconnection date.<sup>3</sup> To help all LSEs account for SGIP-funded projects procured by their customers, the SGIP Program Administrators should update the electric utility column to precisely indicate the equipment host's generation service provider. Alternatively, a column can be added to indicate whether the customer is served by an IOU, a CCA, or an Energy Service Provider ("ESP"). Separately, a column should be added to indicate when the project is online, so the LSEs know when to count the credit toward their procurement targets.

This approach provides CCAs and ESPs the ability to regularly track whether there are newly online SGIP-funded projects in their service areas and allows existing CCAs to adjust their storage procurement plans accordingly. If the Commission finds the frequency of weekly updates too onerous, monthly updates can still assist CCAs in accounting for SGIP-funded projects. As long as this report is updated regularly, new CCAs will also be able to identify online SGIP-funded storage projects without having to rely on the biennial application cycles.

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<sup>2</sup> *Id.*

<sup>3</sup> SGIP Weekly Projects Report, August 2, 2016. <http://www.cpuc.ca.gov/sgip/>

### III. CONCLUSION

The CCA Parties thank the Commission, Commissioner Peterman, and Administrative Law Judge Cooke for their attention to these comments on the PD.

Respectfully Submitted,

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## Appendix A

### The CCA Parties' Proposed Changes to Ordering Paragraphs of the Proposed Decision

#### Conclusions of Law

5. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must provide a breakout of Self-Generation Incentive Program-funded energy storage installations by bundled, Community Choice Aggregators, and Direct Access customers ~~as part of future biennial procurement contract approval applications. If a utility does not submit a storage specific application for approval of its storage contracts, the utility must file a Tier 1 Advice Letter containing the breakout of Self-Generation Incentive Program funded installations, and serve it on parties to the energy storage rulemaking (Rulemaking15-03-011), or its successor~~ in the SGIP Weekly Projects report.