

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

8-18-16
04:59 PM

Application of Pacific Gas and Electric Company (U39E) for Authorization to Procure Energy Storage Systems During the 2016-2017 Biennial Procurement Period Pursuant to Decision 13-10-040.

And Related Matters.

Application 16-03-001
(Filed March 1, 2016)

Application 16-03-002
Application 16-03-003

**OPENING COMMENTS OF THE
OFFICE OF RATEPAYER ADVOCATES**

ROSANNE O'HARA
CHRISTOPHER MYERS
Analysts

Office of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Phone: (415) 703-2386
Email: RO4@cpuc.ca.gov

LISA-MARIE CLARK
Attorney

Office of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Phone: (415) 703-2069
Facsimile: (415) 703-2262
Email: lisa-marie.clark@cpuc.ca.gov

August 18, 2016

SUBJECT INDEX

	<u>Pages</u>
I. INTRODUCTION	1
II. BACKGROUND.....	1
III. DISCUSSION.....	2
A. THE PROPOSED DECISION SHOULD REFLECT CONCLUSION OF LAW 6.....	2
IV. CONCLUSION	3

TABLE OF AUTHORITIES

CPUC Decisions

D.13-10-040..... 1

I. INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), the Office of Ratepayer Advocates hereby submits these opening comments on the *Proposed Decision Approving Storage Procurement Framework For The 2016 Biennial Procurement Period*, issued on July 29, 2016, in the consolidated applications of Pacific Gas and Electric Company (PG&E), Application (A.) 16-03-001,¹ Southern California Edison Company (SCE), A.16-03-002,² and San Diego Gas & Electric Company (SDG&E), A.16-03-003.³

ORA recommends adding an Ordering Paragraph to the Proposed Decision to reflect Conclusions of Law (CoL) 6, to direct Investor-Owned Utilities' (IOU) to confer and validate Self Generation Incentive Program (SGIP)-funded energy storage systems receiving incentives with Community Choice Aggregators (CCAs) and Energy Service Providers (ESPs).

II. BACKGROUND

Pursuant to Decision (D.) 13-10-040, the IOUs filed their 2016 energy storage procurement applications on March 1, 2016. PG&E proposes to procure 115.3 megawatts (MW).⁴ SCE states that it already exceeded its 2016 procurement targets⁵ but will hold a 2016 Energy Storage Request for Offers (RFO) to solicit up to 20 MW of resource adequacy-eligible energy storage projects and will explore additional use cases.⁶ SDG&E also met its 2016 target, but proposes to solicit up to 140 MW in its 2016

¹ *Application of Pacific Gas and Electric Company for Approval of Agreements Resulting from Its 2014-2015 Energy Storage Solicitation and Related Cost Recovery* (PG&E Application).

² *Application of Southern California Edison Company (U 338E) for Approval of Contracts Resulting From its 2014 Energy Storage Request for Offers* (SCE Application).

³ *Application of San Diego Gas & Electric Company (U 902M) for Approval of its Energy Storage Procurement Framework and Program As Required by Decision 13-10-040* (SDG&E Application).

⁴ PG&E Application, p. 8.

⁵ SCE Application, p. 4.

⁶ Exhibit (Exh.) SCE-01, p. 5.

Preferred Resources Local Capacity Requirement (LCR) RFO and plans to issue a Request for Proposals (RFP) for up to 4 MW of Distribution Reliability/Power Quality energy storage resources.⁷ On June 3, 2016, the Assigned Commissioner and Administrative Law Judge (ALJ) issued a Scoping Memo, consolidating the three IOUs' procurement plan applications and identified issues to be determined in this proceeding.⁸

III. DISCUSSION

A. The Proposed Decision should reflect Conclusion of Law 6.

ORA supports the Proposed Decision's findings and conclusions regarding SGIP-funded storage deployment, and recommends including a new Ordering Paragraph to reflect CoL 6.² As noted by the Proposed Decision, "customer-specific SGIP information is held confidential, accessible only by the SGIP Program Administrators."¹⁰ As such, ORA agrees that SGIP-funded energy storage deployment information may not be readily available to CCAs and ESPs and thus, necessitating IOUs to provide notice to CCAs and ESPs. Without such notice, CCAs and ESPs may not be in a position to accurately report their storage procurement¹¹ or may not procure storage as needed.

In CoL 6, the Proposed Decision adopts ORA's recommendation that the Commission require IOUs, CCAs and ESPs to confer and validate the amount of SGIP-funded energy storage systems.¹² However, the Proposed Decision lacks a corresponding Ordering Paragraph directing the IOUs to provide such notice to the CCAs

⁷ SDG&E Application, p. 8.

⁸ Scoping Memo, pp. 4-5.

² "PG&E, SCE, and SDG&E should provide CCAs and ESPs notice when SGIP customers begin to receive inventive payments in their respective territories." Proposed Decision, CoL 6.

¹⁰ Proposed Decision, p. 12.

¹¹ CCAs and ESPs are required to file Tier 2 Advice Letters every two years on January 1. This is prior to when the IOUs file their biennial procurement plans in March.

¹² ORA Opening Brief, p. 2.

and ESPs. To further the intent of the Commission, the Commission should provide clear direction to the parties by adding the following Ordering Paragraph in the final decision:

X. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must provide CCAs and ESPs with the breakout of Self-Generation Incentive Program-funded installations on an annual basis, in the same format as designated pursuant to Ordering Paragraph 6.

IV. CONCLUSION

The Proposed Decision should be amended to include a new Ordering Paragraph reflecting Conclusion of Law 6.

Respectfully submitted,

/s/ LISA-MARIE CLARK

Lisa-Marie Clark

Attorney for the Office of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-2069
Email: lisa-marie.clark@cpuc.ca.gov

August 18, 2016