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

Order Instituting Rulemaking to consider policy and implementation refinements to the Energy Storage Procurement Framework and Design Program (D.13-10-040, D.14-10-045) and related Action Plan of the California Energy Storage Roadmap.

Rulemaking 15-03-011
(Filed March 26, 2015)

**COMMENTS OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ON THE NEED FOR A NEW GENERAL ORDER**

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Dated: October 24, 2016

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

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Pursuant to the schedule set forth in the September 30, 2016 *Administrative Law Judge's Ruling Requesting Comment on Whether a New General Order is Needed to Establish a Preliminary Commission Inspection Checklist for Energy Storage Facilities* ("September 30, 2016 ALJ Ruling"), Pacific Gas and Electric Company ("PG&E") hereby provides its comments on whether a new general order is needed.

At this time, PG&E does not see a need for a new general order, or for amendments to existing general orders, to implement the storage facility inspection protocol set forth in Attachment A to the September 30, 2016 ALJ Ruling. In its reply comments, PG&E will respond to any points or arguments made in other parties' comments regarding such a need.

One PG&E comment relating to the protocol is that all grid-connected storage facilities used to help maintain utility service reliability should be subject to the same treatment by the California Public Utilities Commission ("Commission"). To the extent that the inspection protocol, whose applicability by its terms is limited to "storage devices at utility-owned sites," is intended to suggest that not all storage facilities used to help maintain utility service reliability will be subject to the same Commission treatment, the protocol should be modified. The

