

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Southern California Edison
Company (U338E) for Approval of the
Results of its 2018 Local Capacity
Requirements Request for Proposals.

Application 19-04-016
(Filed April 22, 2019)

**OPENING BRIEF OF THE
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES**

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For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES

October 7, 2019

SUMMARY OF RECOMMENDATIONS

Pursuant to Rule 13.11 of the Commission's Rules of Practice and Procedure, the Center for Energy Efficiency and Renewable Technologies (CEERT) recommends and requests that the Commission's decision in Application (A.) 19-04-016 do all of the following:

1. The Commission should expeditiously approve this Application.

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CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES**

The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits this Opening Brief in Application (A.) 19-04-016 (Application). By this Application, Southern California Edison (SCE) seeks approval of its 2018 Local Capacity Requirements (LCR) Request for Proposals (RFP). CEERT's Opening Brief is timely filed and served pursuant to the Commission's Rules of Practice and Procedure (Rule 13.11) and the Administrative Law Judge's (ALJ's) directions regarding Opening Briefs made in the Ruling, issued in this proceeding on September 12, 2019.

**I.
BACKGROUND AND INTRODUCTION**

On April 22, 2019, SCE submitted its Application for Approval of its 2018 LCR RFP pursuant to Decision (D.) 13-02-015 which authorized SCE to procure 215 to 290 MW of electrical capacity in the Moorpark sub-area to meet long-term LCRs by 2021.¹ According to Ex. SCE-01, through its 2018 LCR RFP, and consistent with D.13-02-015, SCE selected and though this Application seeks approval of the Strata Saticoy, LLC (Strata Saticoy) 100 MW/400 MWh in-front-of-the meter (IFOM) battery energy storage project which has a delivery period expected to begin on December 1, 2020.²

¹ D.13-02-015, Ordering Paragraph 2, at p. 131.

² Ex. SCE-01, at pp. 1-2.

On July 10, 2019, Assigned Commissioner Randolph issued a Scoping Memo and Ruling which addressed the following issues as within the scope of this proceeding:

1. Whether the results of SCE's 2018 LCR RFP for the Moorpark sub-area enhance the safe and reliable operation of SCE's electrical service.
2. Whether SCE's 2018 LCR RFP complies with the procurement authority granted by the Commission in D.13-02-015.
3. Whether the results of SCE's 2018 LCR RFP are a reasonable means of meeting the LCR need in the Moorpark sub-area (which includes the Santa Clara and the Goleta sub-areas).

This includes consideration of the reasonableness of at least the following:

- a. Whether the price, terms and conditions of the selected contract is reasonable;
- b. Whether the process used to develop the eligibility requirements is reasonable;
- c. Whether SCE's proposed rate treatment, cost recovery, and cost allocation of the selected contract is just and reasonable; and
- d. Whether SCE adequately considered the impact of the selected contract on disadvantaged communities.³

On August 5, 2019, CEERT submitted Opening Prepared Testimony in this proceeding.

This Opening Prepared Testimony was subsequently admitted into evidence as Exhibit (Ex.) CEERT-01 by an ALJ Ruling, issued in this proceeding on October 3, 2019. As demonstrated in Ex. CEERT-01, CEERT fully supported adoption of this Application and recommended that the Commission approve it as soon as possible.⁴ In this Opening Brief, CEERT continues to

³ Scoping Memo, at pp. 4-5.

⁴ Ex. CEERT-01, at p. 2.

advocate for the expeditious adoption of this Application and notes that none of the parties who submitted testimony in this proceeding oppose the adoption of this Application.⁵

II.
**THE COMMISSION SHOULD EXPEDITIOUSLY APPROVE THIS APPLICATION
BECAUSE IT MEETS THE CRITERIA SET FORTH IN THE SCOPING MEMO AND
THE REQUIREMENTS SET FORTH IN DECISION (D.) 13-02-015**

As stated in Ex. CEERT-01, SCE's Application meets the criteria set forth in the Scoping Memo issued in this proceeding and D.13-02-015.⁶ In this Opening Brief, CEERT once again urges the Commission to act quickly to approve this Application because failure to do so will extend the current backstop procurement of the Ormond Beach generating facility by the California Independent System Operator (CAISO) at prices above the revenue requirements for the resources contained in SCE's Application.⁷ In addition, if the Commission fails to approve this Application quickly, it will result in the need to have the State Water Resources Control Board (SWRCB) extend the current permission to use once-through cooling (OTC) from the Pacific Ocean and if that happens this will lead to mitigation fees that will add to ratepayer costs.⁸ For these reasons, CEERT recommends that the Commission approve this Application as soon as possible.

Furthermore, the record in this proceeding supports the expeditious approval of this Application and as stated above, no party objected to the approval of this Application. CEERT concurs with SCE that this Application should be approved and the Strata Saticoy contract "is needed to meet long-term local capacity requirements[.]"⁹ Furthermore, CEERT agrees with the Public Advocates Office at the Commission (Public Advocates Office) who stated that "SCE's

⁵ Ex. CEERT-01; Ex. CalAdv-1; Ex. SCE-01; Ex. SCE-03; and Ex. SCE-Errata.

⁶ Ex. CEERT-01, at pp. 2-3.

⁷ Ex. CEERT-01, at p. 3.

⁸ Ex. CEERT-01, at p. 3.

⁹ SCE Application, at p. 16.

proposed procurement of the Strata Saticoy contracts will enhance the safe and reliable operation of SCE's electrical service and complies with the procurement authority granted by the Commission in D.13-02-015."¹⁰ CEERT notes that the sole objection of the Public Advocates Office at this point is that the Commission should firmly state that no further procurement of resources is authorized.¹¹ However, this point is not material and has been made moot by the ongoing procurement track in the integrated resource plan (IRP) proceeding R.16-02-007.

III. CONCLUSION

Based on the record, law, and policy applicable to this Application, as detailed and supported here, it is CEERT's position that SCE has met its burden of demonstrating the reasonableness and propriety of approval of this Application. CEERT again requests that the Commission approve this Application as soon as possible.

Respectfully submitted,

October 7, 2019

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¹⁰ Ex. CalAdv-1, at p. 1-2.

¹¹ Ex. CalAdv-1, at pp. 1-9 to 1-10.