



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

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

**OPENING COMMENTS OF THE
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
ON THE PROPOSED DECISION REGARDING SOUTHERN CALIFORNIA EDISON
COMPANY 2018 LOCAL CAPACITY REQUIREMENTS REQUEST FOR PROPOSALS
FOR MOORPARK SUB-AREA PURSUANT TO DECISION 13-02-015**

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Dated: December 5, 2019

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The Center for Energy Efficiency and Renewable Technologies respectfully submits these Opening Comments on the Proposed Decision Regarding Southern California Edison Company 2018 Local Capacity Requirements Request for Proposals for Moorpark Sub-Area Pursuant to Decision 13-02-015 (Proposed Decision), mailed in this proceeding, Application (A.) 19-04-016, on November 15, 2019. These Comments are timely filed and served pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure and the instructions accompanying the Revised Proposed Decision.

**I.
THE PROPOSED DECISION SHOULD BE ADOPTED BY THE COMMISSION**

CEERT applauds the Commission and Administrative Law Judge (ALJ) Kline for issuing this Proposed Decision which approves Southern California Edison's (SCE's) 2018 Local Capacity Requirements (LCR) Request for Proposals (RFP) and approves SCE's Strata Saticoy contract for 100 MW of in-front-of-meter energy storage.¹ Throughout this proceeding, CEERT has advocated for the expeditious approval of SCE's Application because it meets the criteria set forth in the Scoping Memo and the requirements set forth in Decision (D.) 13-02-015.²

¹ Proposed Decision, at p. 1.

² See, CEERT Opening Brief, at pp. 3-4.

CEERT repeatedly stressed that failure to quickly approve this Application would lead to at least two (2) negative consequences. First, this would lead to the extension of 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 the Application.³ Second, this would also lead to the State Water Resources Control Board having to extend the current permission to use once-through cooling (OTC) from the Pacific Ocean which would lead to mitigation fees that would add to ratepayer costs.⁴

As such, CEERT is pleased that the Commission and ALJ Kline acted quickly by issuing the Proposed Decision within seven (7) months since the filing of the Application. CEERT agrees with the Proposed Decision that “the Strata Saticoy contract will enhance the safe and reliable operation of SCE’s electrical service because it helps meet the local capacity need in the Santa Clara Sub-area.”⁵ CEERT also agrees with the Proposed Decision’s finding that the “price, terms and conditions of the Strata Saticoy contract reasonable.”⁶

II. THE PROPOSED DECISION CORRECTLY REJECTS THE PUBLIC ADVOCATES OFFICE’S ARGUMENTS REGARDING CONTINGENT APPROVAL AND PROCUREMENT REQUIREMENTS

While the parties “unanimously support approval fo the Strata Saticoy contract[,]” the Public Advocates Office made several recommendations to the Commission.⁷ First, the Public Advocates Office recommended that the Commission make approval of the Strata Saticoy contract contingent upon approval of the Aliso Canyon Energy Storage 2 Request for Offer (ACES 2 RFO). Second, the Public Advocates Office argued that the Commission should “find

³ See, Proposed Decision, at p. 13 and CEERT Opening Brief, at p. 3.

⁴ See, CEERT Opening Brief, at p. 3.

⁵ Proposed Decision, at p. 13.

⁶ *Id.*

⁷ *Id.*

that no further procurement is required pursuant to D.13-02-015 in the event the Commission approves both the Strata Saticoy contract and the ACES 2 RFO contracts.”⁸

The Proposed Decision correctly rejects both of these recommendations. As to the Public Advocates Office’s contingency argument, CEERT agrees with the Proposed Decision that the “Strata Saticoy contract adds value to SCE’s customers as a cost-effective resource which contributes to local reliability needs in the Santa Clara sub-area independent of the ACES 2 RFO contracts.”⁹ As to the “no further procurement requirement,” CEERT agrees with the Proposed Decision’s determination not “to foreclose SCE’s ability to procure additional resources in the event contracted resources fail to perform or the CAISO determines additional LCR need remains.”¹⁰

III. CONCLUSION

CEERT respectfully requests that the Commission approve the Proposed Decision.

December 5, 2019

Respectfully submitted,

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⁸ Proposed Decision, at p. 18.

⁹ *Id.*

¹⁰ *Id.*, at p. 19.