

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



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Order Instituting Rulemaking Regarding  
Policies, Procedures and Rules for the  
California Solar Initiative, the Self-Generation  
Incentive Program and Other Distributed  
Generation Issues.

Rulemaking 12-11-005

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE TO  
JOINT PETITION FOR MODIFICATION OF DECISION 15-06-002 CONCERNING  
SELF-GENERATION INCENTIVE PROGRAM REQUIREMENTS**

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May 8, 2025

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Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), the California Energy Storage Alliance (“CESA”) hereby responds to the *Joint Petition for Modification of Decision 15-06-002 Concerning Self-Generation Incentive Program Requirements* (“the Petition”), filed by the Southern California Tribal Chairmen's Association (“SCTCA”) and Local Government Sustainable Energy Coalition (“LGSEC”) on April 8, 2025.

**I. INTRODUCTION**

CESA is a 501(c)(6) membership-based advocacy group committed to advancing the role of energy storage across scales, technologies, and business models. CESA represents developers, installers, and owner-operators of behind-the-meter (“BTM”) energy storage systems, many of whom participate in the Self-Generation Incentive Program (“SGIP”). CESA and its members recognize the importance of SGIP’s Equity and Equity Resiliency Budgets in making BTM storage accessible to local governments, tribes, and other members of disadvantaged communities.

## **II. CESA SUPPORTS THE PETITION AND URGES ITS SPEEDY ADOPTION.**

The Petition proposes to provide relief to certain SGIP projects from the timelines set forth in Decision (“D.”) 15-06-002. Specifically, the Petition requests that non-residential projects utilizing the Equity and Equity Resiliency Budgets be granted up to four additional, six-month extensions beyond the three presently authorized. The Petition cites supply chain challenges, financial market and funding uncertainties, interconnection issues, new import tariffs and related uncertainties, and developer bankruptcies.<sup>1</sup> These challenges are very real, and they are outside the control of project developers or customers. Without relief from the current timeline requirements, many Tribes and local governments in need of resiliency solutions and/or serving disadvantaged communities will face significant financial losses of the resources already invested in these projects.<sup>2</sup>

CESA strongly supports the Petition. The proposal offered therein is reasonable and considered. It correctly responds to worsening challenges in the BTM storage market and offers a targeted, zero-cost solution.<sup>3</sup> Moreover, it ensures that projects continue to make demonstrable progress during the extensions, requiring that customers provide “verified information that demonstrates the project is generally being pursued in good faith.”<sup>4</sup> Therefore, CESA encourages the Commission to act quickly to grant the Petition.

## **III. CONCLUSION**

CESA appreciates the opportunity to respond to the Petition and respectfully requests that the Commission move to approve it expeditiously.

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<sup>1</sup> Petition, p. 2-3 and 8-9

<sup>2</sup> Petition, p. 9

<sup>3</sup> Petition, p. 2

<sup>4</sup> Petition, p. 10

Respectfully submitted on May 8, 2025

/s/ Scott Murtishaw

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