

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

Application of Pacific Gas and Electric Company (U 39-E) for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014.	Application 11-03-001 (Filed March 1, 2011)
Application of San Diego Gas & Electric Company (U902M) for Approval of Demand Response Programs and Budgets for Years 2012-2014.	Application 11-03-002 (Filed March 1, 2011)
Application of Southern California Edison Company (U338E) for Approval of Demand Response Programs, Activities and Budgets for 2012-2014.	Application 11-03-003 (Filed March 1, 2011)

**RESPONSE OF ICE ENERGY, INC. TO  
APPLICATIONS OF THE CALIFORNIA INVESTOR-OWNED UTILITIES  
FOR APPROVAL OF DEMAND RESPONSE PROGRAMS,  
PILOTS AND BUDGETS FOR 2012-2014**

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In accordance with Rule 2.6 of the California Public Utilities Commission’s (“Commission’s”) Rules of Practice and Procedure and the *Administrative Law Judge’s Ruling Consolidating Proceedings and Setting a Prehearing Conference*, issued by Administrative Law Judge Kelly A. Hymes, on March 30, 2011, (“ALJ’s Ruling”) Ice Energy, Inc. (“Ice Energy”) respectfully submits this response to the Applications of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (collectively, the “Utilities” or the “IOUs”) for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014 (“Applications”).

## I. INTRODUCTION.

Ice Energy's response to the Applications solely comments on Permanent Load Shifting ("PLS"), a proven form of energy storage. Ice Energy submits this response, recognizing that a Prehearing Conference has been scheduled by the Ruling, and that the substance of this response will be the subject of Ice Energy's detailed intervener testimony to be submitted at the appropriate time.

The Commission has repeatedly, and wisely, worked to expand deployment of PLS technology since the heat storm of 2006.<sup>1</sup> PLS resources provide numerous benefits for California, as has been well documented by Ice Energy and many other parties – as well as the Commission itself – over the past several years. These include peak demand management, cost-effective resource procurement, taking advantage of all cost-effective demand-side measures, renewable energy integration, CO<sub>2</sub> and ambient emissions reductions, and energy storage deployment in general.

However, the IOUs' Applications fall substantially short of the Commission's goals to expand and diversify PLS program offerings, and of the appropriate and cost-effective contribution that PLS can and should make to the California grid. For the reasons explained below, the Commission should therefore direct the Utilities to submit revised Applications that make several essential changes to the PLS proposals, including offering more valuable incentives (\$ per kW), larger total budget allocations (millions of \$), and various related activities (such as greater outreach regarding PLS availability).

The Commission should also direct the Utilities to expand and diversify the potential benefit of PLS to ratepayers by issuing technology neutral, but application-specific Requests for Offers ("RFOs") that call for deployment of PLS technology on the customer and the utility sides of the meter.

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<sup>1</sup> See, D.06-11-049 *Order Adopting Changes to 2007 Utility Demand Response Programs*, issued November 30, 2006: "We are interested in pursuing permanent load shifting opportunities in time for the summer of 2007. These types of programs may reduce energy use during critical periods and in some cases conserve energy overall. While we defer the issue of how this or other permanent load shifting technologies should count toward demand response goals, we do recognize that new installations of permanent load shifting technologies will accomplish our goal of reducing peak demand for summer 2007 and so wish to encourage the IOUs to pursue permanent load shifting by allowing the use of TA/TI funds toward offsetting the initial costs of installation." (p. 46).

**II. THE COMMISSION SHOULD DIRECT THE UTILITIES TO SUBMIT REVISED APPLICATIONS THAT INCREASE THE SCOPE AND FUNDING REQUESTED FOR PERMANENT LOAD SHIFTING PROPOSALS.**

For several years the Commission has consistently worked to promote PLS in California to recognize and capture its value to the electric grid<sup>2</sup>, but the PLS program budgets fall substantially short of making this important goal a reality.

“The utilities’ 2012-2014 Applications shall contain proposals to *expand* the use of permanent load shifting that are informed by the December 2010 study, and should include discussion of the most effective ways to encourage an *increase* in cost effective permanent load shifting, for example through dynamic rates, future RFPs, or standard offer contracts. [Emphasis added]” (p. 17).

The Commission has stated that “we consider the permanent load shifting activities discussed in this section to be *programs, not pilots*. [Emphasis added]”.<sup>3</sup> Yet, the budgets proposed in the IOUs’ Applications are roughly the same size as the current PLS program budgets. It is appropriate at this time to greatly increase the size of these programs so as to advance the Commission’s goals for PLS.

By way of comparison, investment in small thermal systems by publicly owned utilities in California is an *order of magnitude greater* when considering PLS reduction goals as a percent of utility system peak.<sup>4</sup>

**III. THE COMMISSION SHOULD DIRECT THE UTILITIES TO SUBMIT REVISED APPLICATIONS THAT INCREASE THE (PER KILOWATT) INCENTIVE LEVELS FOR PERMANENT LOAD SHIFTING RESOURCES.**

Ice Energy recommends that the Utilities do not at this time set a specific limit for the incentive funding budget (and certainly not at the inadequate levels proposed in their Applications). The incentive levels should be set at a level that is advantageous (or at least not disadvantageous) to ratepayers in the long-term and not needlessly, prematurely constrained. In

<sup>2</sup> See, *ALJ’s Ruling Providing Guidance for 2012-2014 DR Applications*, issued August 27, 2008.

<sup>3</sup> *Op cit*, footnote 13: “In various filings and discussions, the utilities refer to their permanent load shifting programs as pilots. Pilot programs are generally designed to test technologies or answer questions about the uses and applications of those technologies. In the case of the permanent load shifting activities, however, it is not clear what aspects of the technologies are being tested or what questions are being explored. For this reason, we consider the permanent load shifting activities discussed in this section to be programs, not pilots.” (p. 149).

<sup>4</sup> For example, Burbank Water and Power has committed to and is currently engaged in deploying small-scale distributed thermal storage that represents 3% of its peak demand; Imperial Irrigation District, 1%; Azusa Light and Water, 2%; and Glendale Water and Power, ½%.

fact, unless the PLS incentive levels and budget allocations are sufficiently robust it will not be possible to attract adequate investments in cost-effective PLS, nor to maintain a PLS industry for – and in – California.

It is being proposed to divide the PLS program into two categories: mature PLS resources and emerging PLS technologies. Ice Energy appreciates the logic of that approach, as well as its limitations, and recommends that such a bifurcation be closely examined and considered in the course of this proceeding. We do note at this time that if such a distinction is made then it must be clear how to determine which category a given technology or application would participate in.

Ice Energy also encourages the Commission to direct the utilities to encourage incentives that are appropriate for smaller, distributed thermal energy storage technologies with an aggressive incentive level and an adequate total budget allocation. Such investment will not only achieve greater deployment of PLS technology, but also provide additional performance and other field data that will be critical to many California policy objectives, including the nascent implementation of AB 2514.<sup>5</sup> PLS technologies are easily installed, can be distributed throughout California and can be aggregated and controlled to improve the system load factor and help integrate greater penetration of renewables. Although the full benefits of such systems have not been quantified, such a deployment is worthwhile for the learning benefit alone.

A greatly expanded PLS program will be an enormously useful and timely experience with energy storage in the California power grid and marketplace, and with energy end users. As the PLS Study notes, “To encourage these technologies, a ‘market transformation’ program could be developed, geared toward creating manufacturing scale in the industry, as well as local capability for PLS implementation; this includes design, construction, and maintenance, which will lead to lower costs and higher performance over time.”<sup>6</sup>

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<sup>5</sup> In addition to the IOU’s PLS programs in the CPUC DR proceeding, there have been policy initiatives by the CEC and CPUC to study energy storage and enhancements to demand response that involve PLS. The CEC’s “Energy Storage and Automated Demand Response Technologies to Support Renewable Energy Integration” initiative aims to establish a technology baseline for its 2011 Integrated Energy Policy Report (2011 IEPR) and develop policies to accelerate the deployment of energy storage and automated demand response technologies. The CEC is also leading the development of a 2020 Energy Storage Strategic Vision that will feed into the 2011 IEPR. The CPUC is required to initiate a storage focused rulemaking pursuant to AB2514. That proceeding will, by 2013, determine whether cost effective and technologically feasible energy storage procurement targets should be established for 2015 and 2020. PLS technologies are covered under both the CEC and CPUC initiatives. PLS Study, Section 2.1.2

<sup>6</sup> PLS Study, page 108.

But without a meaningful incentive budget, the program will have insufficient ability to market the program to end users and not attain a critical mass that would lead to widespread adoption of PLS. Moreover, vendor and engineering education programs will not be adequate to empower industry with the necessary tools to design and build out a robust PLS market in California.

**IV. THE COMMISSION SHOULD PROVIDE THE GUIDANCE TO THE UTILITIES REGARDING PERMANENT LOAD SHIFTING, INCLUDING ITS COST-EFFECTIVENESS.**

In its Decision adopting D.09-08-027, the Commission unambiguously stated: “Further guidance on calculations of cost effectiveness for Permanent Load Shifting Activities *shall* be issued after the completion of the ongoing Permanent Load Shifting study . . . [Emphasis added]” (p. 39). Several parties, including SCE, PG&E, DRA, CESA and Ice Energy have expressly asked the Commission for guidance to clarify the measurement of cost-effectiveness for PLS. We repeat that recommendation and strongly and respectfully urge the Commission to, at the earliest opportunity, provide further guidance to the IOUs that is specifically focused on the measurement of cost-effectiveness for PLS.<sup>7</sup>

**V. THE COMMISSION SHOULD AUTHORIZE AND STRONGLY ENCOURAGE UTILITY OWNERSHIP OF COST-EFFECTIVE PERMANENT LOAD SHIFTING RESOURCES.**

The budgets and incentive levels proposed by the Utilities are insufficient to achieve economies of scale for emerging PLS Technologies identified in the PLS Study. The PLS Study notes that utility-ownership reduces costs through increased purchase volume and deployment efficiency. Ice Energy can readily verify this assumption based upon our utility-ownership deployment in California and elsewhere.

It is also acknowledged that focused customer targeting, marketing, and capture can be more efficient and cost-effective given a utility’s knowledge base of its own customers. In the future, utility ownership of PLS (and distributed energy storage) could also greatly reduce if not eliminate the capital investment hurdle and TOU rate change risks compared with customer-owned business models. While the utilities do not propose utility ownership programs at this

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<sup>7</sup> Ice Energy, for example, provided detailed recommendations for the Commission’s consideration on the topic of PLS cost-effectiveness; see Ice Energy Comments on PLS Study, March 7, 2011, pp. 5-12.

time, an expanded emerging technology program that includes a market transformation component would help achieve economies of scale. Such programs, a customer side of the meter program and a PLS owned by utilities on either the customer or the utility side of the meter could readily co-exist. The key to building any healthy market is diversity, not only in technologies/solutions but also in approach to market – including diversity in ownership model. A healthy PLS market in California will help to ensure greater system efficiency, reliability and lower rates for consumers.

**VI. CONCLUSION.**

Ice Energy thanks the Commission for the opportunity to provide this response to the Applications, and looks forward to continued active participation in this proceeding.

Respectfully submitted,



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April 4, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing *Response of Ice Energy, Inc. to Applications of the California Investor-Owned Utilities for Approval of Demand Response Programs, Pilots and Budgets for 2012-2014* on all parties of record in *A.11-03-001, A.11-03-002, A.11-03-003, R.06-04-010, R.07-01-041 and A.08-06-001* by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on April 4, 2011, at Woodland Hills, California.

  
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Michelle Dangott



**SERVICE LISTS A.11-03-001, A.11-03-002, A.11-03-003,  
R.06-04-010, R.07-01-041 and A.08-06-001**

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