

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

Order Instituting Rulemaking Pursuant to  
Assembly Bill 2514 to Consider the Adoption  
of Procurement Targets for Viable and  
Cost-Effective Energy Storage Systems.

Rulemaking R.10-12-007  
(Filed December 16, 2010)

**FURTHER COMMENTS OF MEGAWATT STORAGE FARMS, INC. ON THE  
JUNE 28, 2011 WORKSHOP AND RELATED QUESTIONS**

September 16, 2011

Tendered by:  
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In our recent filing on Rulemaking R.10-12-007, dated August 29, 2011, MegaWatt urged the CPUC to move quickly on the AB2514 portfolio standard decision (Item 10, page 11).

We noted that at the CAISO August Board meeting, CAISO expressed concern that the long lead time on new facilities for 2020 renewables integration required deployment choices to be made now (Pages 2 and 10, including footnotes 2, 9 and 10).

We indicated in our filing that if the CPUC did not move quickly to establish a supportive portfolio standard for storage under AB 2514, gigawatts of gas turbines would end up being deployed for the 2020 renewables integration, undermining CA's GHG efforts (Item 10, page 11.)

We saw today that an article in Power Engineering stating that GE had already captured 2 GW of fossil plant deployments to help meet CA renewable integration needs, with planned shipments of 24 LMS1000 fossil generators in CA in 2011 and 2012. (Link: <http://www.power-eng.com/articles/2011/09/ge-2010-gas-turbine-order-books-hit-1bn-introduces-50-mw-turbine.html>, accessed 2011-09-16)

This update to our filing is to clarify that, in light of this new GE information, we probably understated the need for decisive, timely action on AB 2514 by the CPUC, if CA's GHG goals are not to be undermined by deployment of fossil plants for renewable integration.

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Dated September 16, 2011

Respectfully submitted,

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