

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

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**OPENING COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON THE PROPOSED DECISION ON IMPLEMENTATION OF NEW
PORTFOLIO CONTENT CATEGORIES FOR THE RENEWABLES
PORTFOLIO STANDARD PROGRAM**

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October 27, 2011

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I. INTRODUCTION AND SUMMARY

In accordance with Rule 14 of the California Public Utilities Commission’s Rules of Practice and Procedure, the California Energy Storage Alliance (“CESA”)¹ respectfully submits to the California Public Utilities Commission (“Commission”) the following comments on the Proposed Decision on Implementation of New Portfolio Content Categories for the Renewables Portfolio Standard Program (“Proposed Decision”).

II. ISSUES RELATED TO THE RPS ELIGIBILITY OF ENERGY STORAGE RESOURCES ARE PROPERLY CONSIDERED BY THE CALIFORNIA ENERGY COMMISSION.

CESA strongly supports the view of the Commission expressed at page 20 of the Proposed Decision² that the California Energy Commission (“CEC”) is the appropriate agency to consider renewables portfolio standard (“RPS”) eligibility of energy storage resources as follows:

¹ The California Energy Storage Alliance consists of A123 Systems, Altairnano, Applied Intellectual Capital, Beacon Power Corporation, Chevron Energy Solutions, Debenham Energy, Deeya Energy, East Penn Manufacturing Co., Inc., Enersys, Enervault, Fluidic Energy, General Compression, Greensmith Energy Management Systems, HDR, Inc., Ice Energy, International Battery, Inc., Lightsail Energy, Inc., MEMC/SunEdison, Powergetics, Primus Power, Prudent Energy, Redflow, ReStore Energy Systems, Saft America, Inc., SA, Samsung SDI, Seo, Silent Power, Sumitomo Electric, Suntech, Sunverge, SustainX, and Xtreme Power. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. <http://www.storagealliance.org>.

² At footnote number 39.

“Duke Energy and SolarReserve argue that scheduling from off-site storage of renewable generation should also [be deemed “scheduled from an eligible resource without substituting electricity from another source”]. The Commission is currently examining issues related to energy storage in R.10-12-007. Until the Commission has set a more general framework for storage, it is premature to speculate on how storage will fit into the portfolio content regime set by SB 2 (1X). To the extent that there are basic issues of the RPS eligibility of storage resources, those issues are properly considered by the CEC.” (p. 20, fn. 39).

III. CONCLUSION.

CESA thanks the Commission for its consideration of these comments and urge that the Commission act expeditiously to consider and implement the recommendations discussed herein.

Respectfully submitted,



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Counsel for the
CALIFORNIA STORAGE ALLIANCE

Date: October 27, 2011

VERIFICATION

I, Donald C. Liddell, am counsel for the California Energy Storage Alliance and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of Opening Comments of the California Energy Storage Alliance on the Proposed Decision on Implementation of New Portfolio Content Categories for the Renewables Portfolio Standard Program, filed in R.11-05-005, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on October 27, 2011, at San Diego, California.



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DOUGLASS & LIDDELL

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