

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

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  
(Filed November 8, 2012)

**PREHEARING CONFERENCE STATEMENT OF THE  
CALIFORNIA ENERGY STORAGE ALLIANCE**

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March 11, 2013

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Pursuant to Administrative Law Judge Katherine Kwan MacDonald's *Ruling Setting Prehearing Conference*, issued on March 6, 2013, the California Energy Storage Alliance ("CESA")<sup>1</sup> hereby submits this Prehearing Conference Statement.

**I. INTRODUCTION.**

This Prehearing Conference Statement does not respond directly to the specific issues identified in the list of priorities identified by the staff of the Commission's Energy Division regarding program modifications to the California Solar Initiative ("CSI"). Instead, CESA brings to the Commission's attention the importance of establishing comparable priority and specific focus on issues related energy storage that should be addressed in both the CSI program and the Self Generation Incentive Program ("SGIP") that are not included in the *Ruling Setting*

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<sup>1</sup> The California Energy Storage Alliance consists of A123 Systems, Alton Energy, AU Optronics, Beacon Power, CALMAC, Chevron Energy Solutions, Christenson Electric Inc., Clean Energy Systems Inc., CODA Energy, Deeya Energy, DN Tanks, Energy Cache, EnerVault, FAFCO Thermal Storage Systems, Flextronics, Foresight Renewable Systems, Greensmith Energy Management Systems, Growing Energy Labs, Gridtential Energy, Halotechnics, Hecate Energy LLC, Ice Energy, Innovation Core SEI, LG Chem, LightSail Energy, NextEra Energy Resources, Panasonic, Powertree, Primus Power, RedFlow Technologies, RES Americas, Saft America, Samsung SDI, Sharp Labs of America, Silent Power, SolarCity, Stem, Sovereign Energy Storage LLC, Sumitomo Corporation of America, TAS Energy, UniEnergy Technologies, 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://storagealliance.org>

*Prehearing Conference Statement.*<sup>2</sup> CESA also identifies certain additional energy storage-related issue areas in the broad context of distributed generation (“DG”) for the Commission’s consideration in this proceeding that are not presently covered anywhere.<sup>3</sup> CESA notes that the Commission has stated in its Order Instituting Rulemaking in this proceeding that:

“We will continue to assess whether changes are needed to SGIP to comply with SB 412, and, as needed, any policy, legal, or administrative issues that arise *in the broad context of DG or within* the ongoing SGIP [Emphasis added].” (p. 7).

The issue areas identified below should all be included within the scope of this proceeding because they each individually address very important Commission policies for the reasons explained in the referenced active Commission proceedings, and should be afforded priority equal to those identified in the *Ruling Setting Prehearing Conference*.

**II. THE COMMISSION SHOULD ADDRESS ISSUES RELATED TO ENERGY STORAGE IN THE CALIFORNIA SOLAR INITIATIVE PROGRAM, IN THE SELF-GENERATION INCENTIVE PROGRAM, AND IN THE BROAD CONTEXT OF DISTRIBUTED GENERATION AT THE SAME TIME AND WITH EQUAL PRIORITY.**

CESA plans to identify and prioritize issue areas related to energy storage at the prehearing conference, but highlights the following topics for discussion and consideration by the Commission:

- Issues discussed, but not resolved, in D.11-09-015 and Resolution E-4519, including determination of eligibility of thermal energy storage systems in the SGIP.
- Issues related to energy storage identified as relating to DG in the Energy Storage Rulemaking (R.10-12-007).

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<sup>2</sup> For example, “Coordination of CSI Program Application Process with Utility Interconnection Application.”

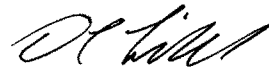
<sup>3</sup> In its *Energy Storage Phase 2 Interim Staff Report*, issued January 4, 2013, in the Commission’s Energy Storage Rulemaking (R.10-12-007), the Energy Division Staff has explicitly recommended that energy storage-related issues should be addressed in this proceeding.

- Issues related to interconnection of energy storage in R.11-09-011, including requirement of supplemental interconnection review under Rule 21 for energy storage systems as small as 5 kW.
- Issues related to deliverability of DG and energy storage for purposes of determining net qualifying capacity in the Resource Adequacy program discussed in R.11-10-023.

### **III. CONCLUSION.**

CESA thanks the Commission for the opportunity to submit this Prehearing Conference Statement, and looks forward to working with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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