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Bcc:

Subject: RE: Storage R10-12-007: DNV KEMA's Storage Cost-Effectiveness Report Now Available / Request for Ruling

Your honor,

The Independent Energy Producers Association has received this request and a similar request for ruling from Energy Division this morning. Each request seeks an expedited ruling admitting a report on the cost-effectiveness of energy storage into the record in this proceeding, and for instructions on how the material in the reports may be used at the all-party meeting scheduled for next Tuesday morning.

IEP respectfully objects to Energy Division's requests on procedural grounds. IEP has just received the reports, one of which is designated as a draft report. Energy Division's request provides little or no opportunity for other parties to digest the reports and to determine whether or not the record would benefit from the information in the reports (particularly a report that is not yet in final form). If Energy Division had submitted its request in the form of a motion under Rule 11.1 of the Commission's Rules of Practice and Procedure, IEP and other parties would ordinarily have 15 days to respond to the motion, which would allow for a measured and informed response to Energy Division's request. It is procedurally improper and fundamentally unfair to ask parties to be positioned to react to these reports by Tuesday morning and to bypass the response procedure prescribed in Rule 11.1.

Respectfully submitted,

Brian T. Cragg

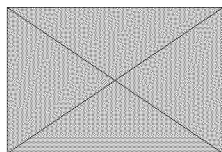
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Subject: Storage R10-12-007: DNV KEMA's Storage Cost-Effectiveness Report Now Available / Request for Ruling

ALJ Yip-Kikugawa:

Energy Division Staff is serving the Parties to R.10-12-007 (Energy Storage Rulemaking), via this email, the recently completed preliminary report from DNV KEMA describing the results of the CEC-funded storage cost-effectiveness study conducted by DNV KEMA's team for this proceeding. The report (titled "DRAFT - Energy Storage Cost-effectiveness Methodology and Preliminary Results") is attached, and can also be downloaded from DNV KEMA's website at the link below.

http://websafe.kemainc.com/CPUC/DNVKEMA-Energy%20Storage%20CostEffectiveness_Report_DRAFT3_June%2021-2013.pdf

We request an expedited ruling from you to enter this report into the record of this proceeding

(R.10-12-007). This is intended to ensure availability of a complete record for consideration of Commissioner Peterman's proposal described in the ACR released on 6/10/13. In the ruling, please include instructions to Parties on the process to comment (at the All-Party on 6/25/13 and in subsequent formal comments/replies) on the reports in connection with the questions related to storage cost-effectiveness posed in Commissioner Peterman's ACR.

Due to file size limitations, we will be re-serving a separate storage cost-effectiveness report from EPRI via a separate email and requesting a ruling on that as well. This report has already been distributed earlier this week.

As another reminder to the Parties, we note that the CPUC has not endorsed any particular storage cost-effectiveness methodology or modeling tool, nor has the CPUC passed upon the accuracy of the information in the cost-effectiveness report.

Parties can contact me for any report related questions.

Thanks,

Aloke Gupta

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