

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

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
Filed March 12, 2012

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO MOTION OF THE INDEPENDENT ENERGY PRODUCERS
ASSOCIATION TO ACCELERATE TRACK 4**

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
Filed March 22, 2012

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE MOTION OF THE INDEPENDENT ENERGY PRODUCERS
ASSOCIATION TO ACCELERATE TRACK 4**

Pursuant to Rule 11.1(e) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby responds to the *Motion of the Independent Energy Producers Association (“IEP”) to Accelerate Track 4*, dated June 12, 2013 (“IEP’s Motion”). CESA urges the Commission to grant IEP’s Motion. CESA is mindful of the challenges that Southern California Edison (“SCE”) faces in accelerating the detailed modeling efforts that are presently underway, but must strongly agree with IEP that: “Under the changed circumstances, the Commission should (1) accelerate the schedule for Track 4, and (2) modify the scope of Track 4 to include identification of the precise resource needs resulting from the SONGS retirement. The final Track 4 decision should

¹ The California Energy Storage Alliance consists of A123 Systems, AES Energy Storage, Alton Energy, American Vanadium, AU Optronics, Beacon Power, Bright Energy Storage, BrightSource Energy, CALMAC, Chevron Energy Solutions, Christenson Electric Inc., Clean Energy Systems Inc., CODA Energy, Deeya Energy, Demand Energy, DN Tanks, East Penn Manufacturing Co., Energy Cache, EnerVault, FAFCO Thermal Storage Systems, Flextronics, Foresight Renewable Systems, Greensmith Energy Management Systems, Growing Energy Labs, Gridtential Energy, Halotechnics, Hecate Energy LLC, Hydrogenics, Ice Energy, Innovation Core SEI, Invenergy, KYOCERA Solar, LG Chem, LightSail Energy, NextEra Energy Resources, Panasonic, Parker Hannifin, PDE Total Energy Solutions, 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>.

order an expedited competitive procurement of the resources needed to meet the identified needs.” (IEP Motion, pp. 1-2).

Fortunately, the Commission has the opportunity to closely coordinate the extra effort required of all stakeholders by “connecting the dots” with its Energy Storage Rulemaking.² CESA therefore also strongly agrees with IEP that: “These competitive solicitations should be open to all bidders who are capable of providing the desired ‘product,’ regardless of vintage or technology, including thermal resources, renewable resources, and unconventional resources like energy efficiency, demand response, or storage. A vigorous competition to provide the defined product will help ensure that the desired resource meets the “least-cost/best-fit” criteria.” (IEP Motion, pp. 2-3).

Respectfully submitted,



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² Energy Storage Rulemaking (R.10-12-007). See *Assigned Commissioners Ruling Proposing Storage Procurement Targets and Noticing All-Party Meeting*, issued June 10, 2013,