

From: Tom Melling  
Sent: 7/3/2013 4:01:17 PM

AAmirali@starwood.com (AAmirali@starwood.com); aadeyeye@earthjustice.org (aadeyeye@earthjustice.org); adam.green@solarreserve.com (adam.green@solarreserve.com); abb@eslawfirm.com (abb@eslawfirm.com); acsmith@stoel.com (acsmith@stoel.com); abrown@xtremepower.com (abrown@xtremepower.com); afreifeld@viridityenergy.com (afreifeld@viridityenergy.com); agassner@enbala.com (agassner@enbala.com); abining@energy.state.ca.us (abining@energy.state.ca.us); ag2@cpuc.ca.gov (ag2@cpuc.ca.gov); andrea.morrison@directenergy.com (andrea.morrison@directenergy.com); andykatz@sonic.net (andykatz@sonic.net); atrowbridge@daycartermurphy.com (atrowbridge@daycartermurphy.com); amber@iepa.com (amber@iepa.com); ao1@cpuc.ca.gov (ao1@cpuc.ca.gov); aschwartz@solarcity.com (aschwartz@solarcity.com); Reid, Alice L (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=ALR4); ames\_doug@yahoo.com (ames\_doug@yahoo.com); ATrial@SempraUtilities.com (ATrial@SempraUtilities.com); aviramontes@lbl.gov (aviramontes@lbl.gov); AKaplan@BrownRudnick.com (AKaplan@BrownRudnick.com); art@ucan.org (art@ucan.org); anfanzon@semprautilities.com (anfanzon@semprautilities.com); al4@cpuc.ca.gov (al4@cpuc.ca.gov); andra.pligavko@gmail.com (andra.pligavko@gmail.com); aw3@cpuc.ca.gov (aw3@cpuc.ca.gov); Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); clamasbabbini@comverge.com (clamasbabbini@comverge.com); CentralFiles@SempraUtilities.com (CentralFiles@SempraUtilities.com); cem@newsdata.com (cem@newsdata.com); case.admin@sce.com (case.admin@sce.com); bcragg@goodinmacbride.com (bcragg@goodinmacbride.com); cathy.karlstad@sce.com (cathy.karlstad@sce.com); blaising@braunlegal.com (blaising@braunlegal.com); barmackm@calpine.com (barmackm@calpine.com); californiadockets@pacificorp.com (californiadockets@pacificorp.com); cpacc@calpine.com (cpacc@calpine.com); chris@emeter.com (chris@emeter.com); brian.theaker@nrgenergy.com (brian.theaker@nrgenergy.com); cpuc@primuspower.com (cpuc@primuspower.com); clu@cpuc.ca.gov (clu@cpuc.ca.gov); crv@cpuc.ca.gov (crv@cpuc.ca.gov); cpuc@libertyutilities.com (cpuc@libertyutilities.com); Patwa, Daidipya (/O=PG&E/OU=Corporate/cn=Recipients/cn=D2PA); ayk@cpuc.ca.gov (ayk@cpuc.ca.gov); berlin@susieberlinlaw.com (berlin@susieberlinlaw.com); Capp@GridStorageConsulting.com (Capp@GridStorageConsulting.com); BAdams@EnerVault.com (BAdams@EnerVault.com); Smith, Christopher (/O=PG&E/OU=Corporate/cn=Recipients/cn=C5SE); cecilia.aguillon@kyocera.com (cecilia.aguillon@kyocera.com); cpuc-r1012007@olivineinc.com (cpuc-r1012007@olivineinc.com); dadams@viridityenergy.com (dadams@viridityenergy.com); CSummers@SempraUtilities.com (CSummers@SempraUtilities.com); Berlinski@BeaconPower.com (Berlinski@BeaconPower.com); CalConsumersAlliance@gmail.com (CalConsumersAlliance@gmail.com); csullivan@zbbenergy.com

(csullivan@zbbenergy.com); borion@lawyersforcleanenergy.com  
(borion@lawyersforcleanenergy.com); bgross@caiso.com (bgross@caiso.com);  
jeanne.sole@sfgov.org (jeanne.sole@sfgov.org); eric@ethree.com  
(eric@ethree.com); david@nemtzw.com (david@nemtzw.com); filings@a-  
klaw.com (filings@a-klaw.com); Cotroneo, Eileen  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=EFM2); e-recipient@caiso.com (e-  
recipient@caiso.com); jarmstrong@goodinmacbride.com  
(jarmstrong@goodinmacbride.com); gmorris@emf.net (gmorris@emf.net);  
DWTCPUCDOCKETS@dwt.com (DWTCPUCDOCKETS@dwt.com);  
douglass@energyattorney.com (douglass@energyattorney.com);  
GloriaB@anzaelectric.org (GloriaB@anzaelectric.org);  
igoodman@commerceenergy.com (igoodman@commerceenergy.com);  
dkk@eslawfirm.com (dkk@eslawfirm.com); dorth@krcd.org (dorth@krcd.org);  
gbass@noblesolutions.com (gbass@noblesolutions.com); JanMcFar@sonic.net  
(JanMcFar@sonic.net); eddyconsulting@gmail.com (eddyconsulting@gmail.com);  
dgrandy@caonsitegen.com (dgrandy@caonsitegen.com);  
Erin.Grizard@BloomEnergy.com (Erin.Grizard@BloomEnergy.com);  
Diane.Fellman@nrgenergy.com (Diane.Fellman@nrgenergy.com); ek@a-klaw.com  
(ek@a-klaw.com); ehadley@reupower.com (ehadley@reupower.com);  
HRasool@SempraUtilities.com (HRasool@SempraUtilities.com);  
ddavie@wellhead.com (ddavie@wellhead.com); dbp@cpuc.ca.gov  
(dbp@cpuc.ca.gov); david@ceert.org (david@ceert.org); dansvec@hdo.net  
(dansvec@hdo.net); jack@casaraquel.com (jack@casaraquel.com);  
jbaird@earthjustice.org (jbaird@earthjustice.org); info@3PhasesRenewables.com  
(info@3PhasesRenewables.com); dbehles@ggu.edu (dbehles@ggu.edu);  
dhilla@consumercal.org (dhilla@consumercal.org); dchia@solarcity.com  
(dchia@solarcity.com); jderosa@ces-ltd.com (jderosa@ces-ltd.com);  
dsc@cpuc.ca.gov (dsc@cpuc.ca.gov); jfortune@sunverge.com  
(jfortune@sunverge.com); francis.taylor@enersys.com (francis.taylor@enersys.com);  
jbryan@codaenergy.com (jbryan@codaenergy.com);  
felicia.bellows@torresolenergy.com (felicia.bellows@torresolenergy.com);  
f.schubert@renewableanalytics.com (f.schubert@renewableanalytics.com);  
ddivine@eaglecrestenergy.com (ddivine@eaglecrestenergy.com);  
dan.patry@recurrentenergy.com (dan.patry@recurrentenergy.com);  
greencowboysdf@gmail.com (greencowboysdf@gmail.com);  
Doug.Hackley@Calenergy.com (Doug.Hackley@Calenergy.com);  
janderson@viridityenergy.com (janderson@viridityenergy.com); irene@igc.org  
(irene@igc.org); ericg@votesolar.org (ericg@votesolar.org); Jim.Hicks@state.or.us  
(Jim.Hicks@state.or.us); ehsieh@a123systems.com (ehsieh@a123systems.com);  
gotschall@ti-sd.com (gotschall@ti-sd.com); JJudson-mcqueeney@ces-ltd.com  
(JJudson-mcqueeney@ces-ltd.com); dhawkins3@mac.com (dhawkins3@mac.com);  
Hal@AltonEnergy.com (Hal@AltonEnergy.com);  
dschlosberg@brightsourceenergy.com (dschlosberg@brightsourceenergy.com);  
dmoglen@foe.org (dmoglen@foe.org); dkates@sonic.net (dkates@sonic.net);  
jkopyciok@energy-solution.com (jkopyciok@energy-solution.com);

farshid.arman@siemens.com (farshid.arman@siemens.com); eim@cpuc.ca.gov (eim@cpuc.ca.gov); dyana@clean-coalition.org (dyana@clean-coalition.org); fxg@cpuc.ca.gov (fxg@cpuc.ca.gov); Ekelly@MarinEnergy.com (Ekelly@MarinEnergy.com); GBenson@perkinscoie.com (GBenson@perkinscoie.com); je-erica@gr.sie.co.jp (je-erica@gr.sie.co.jp); Haertle, Steve (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=SRH1); RegRelCPUCCases (/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases); ssmyers@att.net (ssmyers@att.net); lmh@eslawfirm.com (lmh@eslawfirm.com); sdhilton@stoel.com (sdhilton@stoel.com); joyw@mid.org (joyw@mid.org); nes@a-klaw.com (nes@a-klaw.com); tam@communityrenewables.biz (tam@communityrenewables.biz); sephra.ninow@energycenter.org (sephra.ninow@energycenter.org); mtierney-lloyd@enernoc.com (mtierney-lloyd@enernoc.com); liddell@energyattorney.com (liddell@energyattorney.com); mrw@mrwassoc.com (mrw@mrwassoc.com); tdarton@pilotpowergroup.com (tdarton@pilotpowergroup.com); Gonzales, Matthew (/O=PG&E/OU=Corporate/cn=Recipients/cn=MRGg); rick\_noger@praxair.com (rick\_noger@praxair.com); Pagedar, Sujata (/O=PG&E/OU=Corporate/cn=Recipients/cn=sxpg); Huffman, Mark (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=MRH2); mdjoseph@adamsbroadwell.com (mdjoseph@adamsbroadwell.com); jsanders@caiso.com (jsanders@caiso.com); lwisland@ucsusa.org (lwisland@ucsusa.org); rl@eslawfirm.com (rl@eslawfirm.com); sue.mara@RTOadvisors.com (sue.mara@RTOadvisors.com); matthew@turn.org (matthew@turn.org); tomb@crossborderenergy.com (tomb@crossborderenergy.com); klatt@energyattorney.com (klatt@energyattorney.com); kowalewskia@calpine.com (kowalewskia@calpine.com); nrader@calwea.org (nrader@calwea.org); steven@iepa.com (steven@iepa.com); spauker@wsgr.com (spauker@wsgr.com); juliettea7@aol.com (juliettea7@aol.com); ttutt@smud.org (ttutt@smud.org); kdw@woodruff-expert-services.com (kdw@woodruff-expert-services.com); Monica.Schwebs@bingham.com (Monica.Schwebs@bingham.com); rkmoore@gswater.com (rkmoore@gswater.com); lwhouse@innercite.com (lwhouse@innercite.com); marcie.milner@shell.com (marcie.milner@shell.com); mary.wiencke@pacificorp.com (mary.wiencke@pacificorp.com); VidhyaPrabhakaran@dwt.com (VidhyaPrabhakaran@dwt.com); srt@cpuc.ca.gov (srt@cpuc.ca.gov); tcr@cpuc.ca.gov (tcr@cpuc.ca.gov); michelle.d.grant@dynegey.com (michelle.d.grant@dynegey.com); nsuetake@turn.org (nsuetake@turn.org); khojasteh.davoodi@navy.mil (khojasteh.davoodi@navy.mil); steven.huhman@morganstanley.com (steven.huhman@morganstanley.com); psd@cpuc.ca.gov (psd@cpuc.ca.gov); kwh@cpuc.ca.gov (kwh@cpuc.ca.gov); rl4@cpuc.ca.gov (rl4@cpuc.ca.gov); larry.r.allen@navy.mil (larry.r.allen@navy.mil); jleslie@mckennalong.com (jleslie@mckennalong.com); JMauldin@adamsbroadwell.com (JMauldin@adamsbroadwell.com); matt.vespa@SierraClub.org (matt.vespa@SierraClub.org); TLindl@kfwlaw.com (TLindl@kfwlaw.com); TMcRae@svlg.org (TMcRae@svlg.org);

sean.beatty@nrgenergy.com (sean.beatty@nrgenergy.com);  
Rachel@largescalesolar.org (Rachel@largescalesolar.org); klr@a-klaw.com (klr@a-klaw.com); kar@cpuc.ca.gov (kar@cpuc.ca.gov); mvc@cpuc.ca.gov (mvc@cpuc.ca.gov); jls@cpuc.ca.gov (jls@cpuc.ca.gov); TRH@cpuc.ca.gov (TRH@cpuc.ca.gov); Rita.Liotta@navy.mil (Rita.Liotta@navy.mil); Fukui, Lucy (/O=PG&E/OU=Corporate/cn=Recipients/cn=LGK2); nellie.tong@dnvkema.com (nellie.tong@dnvkema.com); mary.hemmingsen@brookfieldpower.com (mary.hemmingsen@brookfieldpower.com); shears@ceert.org (shears@ceert.org); pcarson@energycentral.com (pcarson@energycentral.com); rvillarreal@earthjustice.org (rvillarreal@earthjustice.org); john.cummins@navy.mil (john.cummins@navy.mil); sreineccius@gmail.com (sreineccius@gmail.com); KSEngineers@aol.com (KSEngineers@aol.com); Rachel@ConsciousVenturesGroup.com (Rachel@ConsciousVenturesGroup.com); mehta.associates@ymail.com (mehta.associates@ymail.com); knakatani@calhrc.org (knakatani@calhrc.org); MeganMMyers@yahoo.com (MeganMMyers@yahoo.com); Steph@Clean-Coalition.org (Steph@Clean-Coalition.org); nate.sandvig@enxco.com (nate.sandvig@enxco.com); mdetsky@dietzedavis.com (mdetsky@dietzedavis.com); n.davidson@renewableanalytics.com (n.davidson@renewableanalytics.com); roger@cbeal.org (roger@cbeal.org); toguin@lightsail.com (toguin@lightsail.com); tandrews@calmac.com (tandrews@calmac.com); praveen.kathpal@aes.com (praveen.kathpal@aes.com); Richard.S.Flood@jci.com (Richard.S.Flood@jci.com); mike\_windpower@yahoo.com (mike\_windpower@yahoo.com); shaun.logue@brookfieldrenewable.com (shaun.logue@brookfieldrenewable.com); MbeLively@aol.com (MbeLively@aol.com); usappk@gmail.com (usappk@gmail.com); karlk@dietzedavis.com (karlk@dietzedavis.com); paul.stith@greenonramp.com (paul.stith@greenonramp.com); jserfass@californiahydrogen.org (jserfass@californiahydrogen.org); jspilman@gridflexenergy.com (jspilman@gridflexenergy.com); SLowe@EagleCrestEnergy.com (SLowe@EagleCrestEnergy.com); Nancy.Allred@sce.com (Nancy.Allred@sce.com); skincaid@makerscapital.com (skincaid@makerscapital.com); SZuretti@seia.org (SZuretti@seia.org); NODonovan@LREnergy.com (NODonovan@LREnergy.com); rfo@sovereignenergy.net (rfo@sovereignenergy.net); lflowers111@gmail.com (lflowers111@gmail.com); rokeefe@xtremepower.com (rokeefe@xtremepower.com); sdavis@kngrid.com (sdavis@kngrid.com); maya@cbeal.org (maya@cbeal.org); michael.stelts@panasonic.com (michael.stelts@panasonic.com); kevin.snyder@hdrinc.com (kevin.snyder@hdrinc.com); sahm@clean-coalition.org (sahm@clean-coalition.org); margaret.miller@brookfieldrenewable.com (margaret.miller@brookfieldrenewable.com); pklauer@caiso.com (pklauer@caiso.com); proceedings@psrec.coop (proceedings@psrec.coop); martinc@mid.org (martinc@mid.org); SDeb@EnergyOnLine.com (SDeb@EnergyOnLine.com); sean.kagiyama@nedosv.org (sean.kagiyama@nedosv.org); jLin@strategen.com (jLin@strategen.com); toconnor@edf.org (toconnor@edf.org); proceedings@megawattsf.com

(proceedings@megawatts.com); rspolek@besciences.com  
(rspolek@besciences.com); TJS@cyp-res.com (TJS@cyp-res.com);  
steve.eckert@BrookfieldPower.com (steve.eckert@BrookfieldPower.com);  
NThakar@PerkinsCoie.com (NThakar@PerkinsCoie.com);  
msloustcher@codaelectric.com (msloustcher@codaelectric.com);  
rmm@cpuc.ca.gov (rmm@cpuc.ca.gov); jmk@cpuc.ca.gov (jmk@cpuc.ca.gov);  
sswaroop@marinenergy.com (sswaroop@marinenergy.com);  
kim.johnson@RiverbankPower.com (kim.johnson@RiverbankPower.com);  
merideth.sterkel@cpuc.ca.gov (merideth.sterkel@cpuc.ca.gov);  
pdarcy@sna.sanyo.com (pdarcy@sna.sanyo.com); JWaen@MarinEnergy.com  
(JWaen@MarinEnergy.com); katherine.krause@DirectEnergy.com  
(katherine.krause@DirectEnergy.com); LManz@tresamigasllc.com  
(LManz@tresamigasllc.com); Tom Melling (TomM@1energysystems.com);  
wrostov@earthjustice.org (wrostov@earthjustice.org); wtr@cpuc.ca.gov  
(wtr@cpuc.ca.gov); word@altonenergy.com (word@altonenergy.com);  
whitney@clean-coalition.org (whitney@clean-coalition.org); virinder.singh@edf-  
re.com (virinder.singh@edf-re.com); willem.fadrhonc@stem.com  
(willem.fadrhonc@stem.com); waltnerlaw@gmail.com (waltnerlaw@gmail.com);  
yaron@voltmetrix.com (yaron@voltmetrix.com); wtorre@ucsd.edu  
(wtorre@ucsd.edu); yu@beaconpower.com (yu@beaconpower.com);  
whholmes@stoel.com (whholmes@stoel.com); Greenacre, Wade  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=WAG9); WJKeese@aol.com  
(WJKeese@aol.com); wmp@cpuc.ca.gov (wmp@cpuc.ca.gov); zz1@cpuc.ca.gov  
(zz1@cpuc.ca.gov)

Cc:

Bcc:

Subject: R.10-12-007 1Energy System, Inc.'s Comments

To All Parties: R.10-12-007:

Attached please find the Comments of 1Energy Systems, Inc. to the June 10, 2013 Assigned Commissioner's Ruling Proposing Storage Procurement Targets and Mechanisms, which have been filed with the CPUC Docket Office and are being served today, July 3, 2013, to all parties to this proceeding.

*Summary:* The lack of non-proprietary standards for energy storage is an impediment that is not yet addressed in the ACR. The Commission can help remove this barrier to market transformation by (1) identifying and highlighting the barrier; and (2) incenting utilities to encourage and use, and the energy storage industry to adopt, non-proprietary standards for constructing and integrating energy storage assets. We provide a real life example of a utility that is encouraging the use of non-proprietary standards in its procurement of energy storage.

Tom Melling

Vice President, Operations  
1Energy Systems, Inc.  
tomm@1EnergySystems.com  
206-930-7099

Using the power of software, 1Energy helps utilities deploy, manage, and dispatch energy storage and other distributed resources to integrate renewable energy and provide cleaner, cheaper, and more reliable electricity.