

**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 MOTION OF THE CALIFORNIA WIND ENERGY ASSOCIATION,
THE LARGE SCALE SOLAR ASSOCIATION, AND THE SOLAR ENERGY
INDUSTRIES ASSOCIATION TO EXPAND THE SCOPE OF TRACK 4**

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June 27, 2013

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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 California Wind Energy Association, the Large Scale Solar Association and the Solar Energy Industries Association to Expand the Scope of Track 4*, dated June 14, 2013 (“Motion to Expand Track 4”). CESA urges the Commission to grant the Motion to Expand the Scope of Track 4. CESA is mindful of the challenges that Southern California Edison (“SCE”) faces in expanding the detailed modeling efforts that are presently underway, but must agree with the parties to the Motion to Expand Track 4 that the extra effort applied at

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>.

this time will smooth the way for the next stage of the necessary work that lies ahead over the next few months. CESA certainly agrees with the parties to the Motion to Expand the Scope of Track 4 that the Commission should “further expand and modify the scope for Track 4 to include consideration of the impact on the state’s greenhouse-gas-reduction goals of the loss of a facility which has served some 20 percent of Southern California Edison’s electricity load without emitting greenhouse gases or other emissions.” (p. 2).

Strong and focused emphasis on the benefits of preferred resources and energy storage, which is a central topic presently being considered by the Commission in the Energy Storage Rulemaking,² should enable the Commission to also achieve the goal of filling the need for flexible resources that will assure efficiency and reliability of the grid.

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,