

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

Order Instituting Rulemaking To Enhance the Role of
Demand Response in Meeting the State's Resource
Planning Needs and Operational Requirements

R.13-09-011
Filed September 19, 2013

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
ON ORDER INSTITUTING RULEMAKING TO ENHANCE THE ROLE OF
DEMAND RESPONSE IN MEETING THE STATE'S RESOURCE
PLANNING NEEDS AND OPERATIONAL REQUIREMENTS**

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October 21, 2013

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Pursuant Rule 14 of the California Public Utilities Commission’s (“Commission’s”) Rules of Practice and Procedure, and the *Order Instituting Rulemaking to Enhance the Role of Demand Response in Meeting the State’s Resource Planning Needs and Operational Requirements*, filed on September 19, 2013 (“OIR”) the California Energy Storage Alliance (“CESA”)¹ hereby submits these comments on the OIR.

CESA strongly supports the Commission’s stated intention to determine whether and how to bifurcate current utility-administered, ratepayer-funded Demand Response (“DR”)

¹ The California Energy Storage Alliance consists of 1 Energy Systems, 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, Eagle Crest Energy, East Penn Manufacturing Co., Ecoult, Energy Cache, EnerVault, FAFCO Thermal Storage Systems, FIAMM Group, FIAMM Energy Storage Solutions, Flextronics, Foresight Renewable Systems, GE Energy Storage, Green Charge Networks, Greensmith Energy Management Systems, Growing Energy Labs, Gridtential Energy, Halotechnics, Hecate Energy LLC, Hydrogenics, Ice Energy, Innovation Core SEI, Invenergy, K&L Gates LLP, KYOCERA Solar, LightSail Energy, LG Chem Ltd., NextEra Energy Resources, OCI Company Ltd., Panasonic, Paramount Energy West, Parker Hannifin, PDE Total Energy Solutions, Powertree Services, Primus Power, RedFlow Technologies, RES Americas, S&C Electric Co., 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>

programs into demand-side and supply-side resources, for the purpose of prioritizing DR as a utility-procured resource competitively bid into the California Independent System Operator's ("CAISO's") wholesale electricity market. Like the Commission, CESA recognizes that the Commission's review and analysis of DR programs described in the OIR will not be complete in time for the 2015 budget cycle. CESA thus, supports the Commission's proposal to move forward with developing a proposed decision that provides for 2015 funding for the current DR programs.

CESA appreciates this opportunity to respond to the OIR, and looks forward to working with the Commission and other stakeholders throughout the entire proceeding.

Respectfully submitted,



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