BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues.

RULEMAKING 08-03-008
(Filed March 13, 2008)

Comments of the California Center for Sustainable Energy and the California Energy Storage Alliance regarding the Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells

California Center for Sustainable Energy
California Energy Storage Alliance

February 1, 2010

Andrew McAllister
Director of Programs
California Center for Sustainable Energy
8690 Balboa Ave., Suite 100
San Diego, CA 92123
Tel: (858) 244-7282
Fax: (858) 244-1178
andrew.mcallister@energycenter.org

Donald C. Liddell
DOUGLAS & LIDDELL
2928 2nd Avenue
San Diego, CA 92103
Tel: (619) 993-9096
Fax: (619) 296-4662
liddell@energyattorney.com
Counsel for the CALIFORNIA ENERGY STORAGE ALLIANCE
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues.

RULEMAKING 08-03-008
(Filed March 13, 2008)

Comments of the California Center for Sustainable Energy and the California Energy Storage Alliance regarding the Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells

I. INTRODUCTION

The California Center for Sustainable Energy (CCSE) and the California Energy Storage Alliance (CESA)1 (together, the “Joint Petitioners”) welcome the opportunity to offer these Comments regarding the Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells (Proposed Decision). The Joint Petitioners are pleased to see that the California Public Utilities Commission (Commission) has found that “[t]he multiple daily discharge requirement in [Decision (D.)] 08-11-044, while appropriate for enabling the smoothing of energy output from an intermittent resource such as a wind facility, may be excessive and unnecessary for achieving peak load reductions when [Advanced Energy Storage (AES)] is

1 The California Energy Alliance is an advocacy group made up of renewable energy developers and system integrators and energy storage system manufacturers presently comprised, of A123 Systems, Altair Nanotechnologies, Beacon Power Corporation, Chevron Energy Solutions, Debenham Energy LLC, Deeya Energy, Energy Alchemy LLC, Enersys, Fluidic Energy Inc., Ice Energy Inc., Powergetics, Prudent Energy, PVT Solar, Suntech America, Inc., SustainX, Xtreme Power Solutions, and ZBB Energy Corporation. The views attributed to CESA in these Comments are those of CESA, and they do not necessarily represent the views of each CESA member company on every specific point.
coupled with fuel cells.”

We support the Commission’s decision to grant the relief requested in our August 7, 2009, Amended Petition for Modification and modify D.08-11-044, with a minor adjustment, to revise the technical parameters for AES systems coupled with fuel cells. CESA has authorized the undersigned to sign these Comments on its behalf, and the Joint Petitioners provide the following comments in response to the Proposed Decision:

• The Joint Petitioners support the minor adjustment to require that AES systems coupled with fuel cells must meet the site-specific requirements for peak demand reduction and be capable of discharging fully at least once per day in order to be eligible for the $2/Watt incentive from the Self-Generation Incentive Program (SGIP).

• The Joint Petitioners support the additional requirement that AES systems coupled with fuel cells must install metering equipment capable of measuring and recording interval data on generation output and charging and discharging in order to be eligible for the $2/Watt incentive from the SGIP.

II. THE JOINT PETITIONERS SUPPORT THE MINOR ADJUSTMENT TO REQUIRE THAT AES SYSTEMS COUPLED WITH FUEL CELLS MUST MEET THE SITE-SPECIFIC REQUIREMENTS FOR PEAK DEMAND REDUCTION AND BE CAPABLE OF DISCHARGING FULLY AT LEAST ONCE PER DAY IN ORDER TO BE ELIGIBLE FOR THE $2/WATT INCENTIVE FROM THE SGIP.

The Joint Petitioners support the minor adjustment to D.08-11-044 to require that AES systems coupled with fuel cells must meet the site-specific requirements for peak demand reduction and be capable of discharging fully at least once per day in order to be eligible for the $2/Watt incentive from the SGIP. We find this adjustment reasonable and agree with the Commission that “[t]his requirement will ensure that storage systems are capable of discharging the energy that is produced during off peak hours during times of peak demand.”


3 Proposed Decision at page 6.
III. THE JOINT PETITIONERS SUPPORT THE ADDITIONAL REQUIREMENT THAT AES SYSTEMS COUPLED WITH FUEL CELLS MUST INSTALL METERING EQUIPMENT CAPABLE OF MEASURING AND RECORDING INTERVAL DATA ON GENERATION OUTPUT AND CHARGING AND DISCHARGING IN ORDER TO BE ELIGIBLE FOR THE $2/WATT INCENTIVE FROM THE SGIP.

The Joint Petitioners support the additional requirement that AES systems coupled with fuel cells must install metering equipment capable of measuring and recording interval data on generation output and charging and discharging in order to be eligible for the $2/Watt incentive from the SGIP. We agree with the Commission that this requirement will facilitate the transmission of comprehensive information regarding AES system performance to the SGIP Program Administrators on an ongoing basis and will assist the Commission to better evaluate if these projects are facilitating peak load reductions.4

IV. CONCLUSION

The Joint Petitioners thank the Commission for its consideration of their Amended Petition for Modification of D.08-11-044 and for granting the relief requested therein. We very much appreciate the opportunity to provide these Comments in response to the Proposed Decision.

Andrew McAllister
Director of Programs
California Center for Sustainable Energy
8690 Balboa Ave., Suite 100
San Diego, CA  92123
Tel: (858) 244-7282
Fax: (858) 244-1178
andrew.mcallister@energycenter.org

4 Proposed Decision at page 6.
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of these Comments of the California Center for Sustainable Energy and the California Energy Storage Alliance regarding the Proposed Decision Modifying Decision 08-11-044 revising the Technical Parameters for Advanced Energy Storage Systems Coupled with Fuel Cells on all known parties of record in proceeding R.08-03-008 by delivering a copy via email to the current service list or by delivering a copy via U.S. First Class mail to those members of the current service list with no or undeliverable email addresses.

Executed on February 1, 2010, in San Diego, CA.

Sephra Ninow
Policy Analyst
California Center for Sustainable Energy
8690 Balboa Ave., Suite 100
San Diego, CA 92123
Tel: (858) 244-1177
Fax: (858) 244-1178
sephra.ninow@energycenter.org
### Service List (as of 2/01/10)

- Michael.Brown@utcpower.com
- steven.huhman@morganstanley.com
- dchaines@environmentalpower.com
- sa@zeropex.com
- ghilberg@tas.com
- peter.thompson@solar.abengoa.com
- lglover@solidssolar.com
- spatrick@sempra.com
- EGuise@NationalEnergySolutionsLLC.com
- jrathke@capstoneturbine.com
- lrosen@eesolar.com
- annette.gilliam@sce.com
- mike.montoya@sce.com
- fmazanec@biofuelsenergyllc.com
- scott@debenhamenergy.com
- liddell@energyattorney.com
- andrew.mcallister@energycenter.org
- kirk@NoElectricBill.com
- tam.hunt@gmail.com
- tam.hunt@gmail.com
- dalbers@americandairyparks.com
- eric@harpiris.com
- nes@a-klaw.com
- pepper@sunfundcorp.com
- susanne@emersonenvironmental.com
- julia@jasenergies.com
- cec@cpuc.ca.gov
- srt@cpuc.ca.gov
- matt@sustainablespaces.com
- marcel@tum.org
- meghan@nonprofithousing.org
- michael.hindus@pillsburylaw.com
- abrowning@votesolar.org
- Eriks@ecoplexus.com
- jarstrong@goodinacbride.com
- jkarp@winston.com
- mday@goodinmacbride.com
- rj9@pge.com
- ssmyers@att.net
- bill@brobecksolarenergy.com
- infocalseia.org
- hank@wasteheatson.com
- rknight@bki.com
- emackie@gridalternatives.org
- jharris@volkerlaw.com
- kfox@keysandfox.com
- gmorris@emf.net
- kdziekoński@pvtsolar.com
- john@proctoreng.com
- sebesq@comcast.net
- julie.blunden@sunpowercorp.com
- michael.kyes@sbcglobal.net
- elee@davisenergy.com
- mkober@pyramidsolar.com
- pstoner@lgc.org
- jg@eslawfirm.com
- lmh@eslawfirm.com
- hodgesjl@surewest.net
- atrowbridge@daycartermurphy.com
- jmackrey@sopogy.com
- chuck.hornbrook@litron.com
- elvine@lbl.gov
- jlin@strategen.com
- jptitsr@pcgconsultants.com
- psaxton@energy.state.ca.us
- dan@energysmarthomes.net
- nick.chasel@tesserasolar.com
- NJSa@pge.com
- r.rauschenbush@comcast.net
- RKCO@pge.com
- robert.tierney@utcpower.com
- ensmith@mwe.com
- mdorn@mwe.com
- myuffee@mwe.com
- rsiada@guardian.com
- jimross@r-c-s-inc.com
- bcbl@simmonsco-intl.com
- jrohrbach@mienergy.com
- kirby.bosley@jpmorgan.com
- Paul.Tramante@jpmorgan.com
- phammond@simmonsco-intl.com
- bbkember@summitblue.com
- kcoonley@summitblue.com
- bbaker@summitblue.com
- tim_merrigan@nrel.gov
- LPaskett@Firstsolar.com
- WPark@FIRSTSOLAR.COM
- terry.mohn@baesystems.com
- robert.pettinato@ladwp.com
- HYao@SempraUtilities.com
- david.eaglefan@gmail.com
- asteele@hanmor.com
- npedersen@hanmor.com
- jpalmer@solarcity.com
- rrrkriege@earthlink.net
- socal форум@ yahoo.com
- susan.munves@smgov.net
- rick.ruiz@zenviron.net
- tbardacke@globalgreen.org
- rzhang@cityofpasadena.net
- eklinkner@cityofpasadena.net
- seno@ci.pasadena.ca.us
- thamilton@icfi.com
- bjeider@ci.burbank.ca.us
- MtenEyck@ci.rancho-cucamonga.ca.us
- akbar.jazayeri@sce.com
- case.admin@sce.com
- walter.gordon@sce.com
- rishii@aesc-inc.com
GARY HINNERS
RRI ENERGY, INC.
PO BOX 148
HOUSTON, TX  77001-0148

ROBERT HANNA
RRI ENERGY, INC.
1000 MAIN ST SUITE 1100
HOUSTON, TX  77002

HOWARD GREEN
DIR. UTILITY PROGAMS- WEST
SUN EDISON
1130 CALLE CORDILLERA
SAN CLEMENTE, CA  92673

ANTHONY BROWN
CHEVRON ENERGY SOLUTIONS
COMPANY
345 CALIFORNIA STREET
SAN FRANCISCO, CA  94104

SEAN HAZLETT
MORGAN STANLEY
555 CALIFORNIA ST., SUITE 2200
SAN FRANCISCO, CA  94104

JAYSON WIMBLEY
MGR. OF ENERGY AND
ENVIRONMENTAL SVCS.
DEPT. OF COMMUNITY SERVICES & DEVELP.
700 NORTH 10TH ST., ROOM 258
SACRAMENTO, CA  95814-0338

TOM ECKHART
CAL-UCONS
10612 NE 46TH STREET
KIRKLAND, WA  98033

MATT SUMMERS
ITRON INC.
601 OFFICERS ROW
VANCOUVER, WA  98661

PATRICK LILLY
ITRON, INC.
601 OFFICERS ROW
VANCOUVER, WA  98661

MELISSA JONES
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-39
SACRAMENTO, CA  95814