June 25, 2019

Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA  94102
edtariffunit@cpuc.ca.gov

Re:   Comments of the California Energy Storage Alliance to Resolution E-4997:
Rejection of San Diego Gas and Electric Advice Letter 3309-E related to its Request to Procure a Distributed Energy Resource Solution, pursuant to Decision (D.) 18-02-004

Dear Mr. Petlin and Mr. Wellington:

The California Energy Storage Alliance (“CESA”)
submits these comments to Draft Resolution E-4997, issued on June 5, 2019, rejecting Advice Letter 3309-E of San Diego Gas and Electric Company (“SDG&E”) related to its request to procure a distributed energy resource (“DER”) solution, pursuant to Decision (“D.”) 18-02-004.

I. INTRODUCTION & COMMENTS.

CESA appreciates the Commission’s efforts to better insure a transparent and competitive request for offers ("RFOs") within the Integrated Distributed Energy Resources ("IDER") proceeding. Draft Resolution E-4977 appropriately rejects SDG&E’s Advice Letter ("AL") 3309-E, which stems from the Commission requiring SDG&E to provide justification for coupling distribution capacity service with back-tie requirement on a case-by-case basis and for allowing a reevaluation of the candidate deferral project in the 2019 Distribution Investment Deferral Framework ("DIDF") process. CESA appreciates the incorporation of many of our recommended modifications in the Draft Resolution and sees no factual, legal, or technical errors in the Draft Resolution.

II. CONCLUSION.

CESA appreciates the opportunity to submit these comments to Draft Resolution E-4997 and supports the Commission’s efforts to better ensure a fair, transparent, and competitive DIDF RFO process. We look forward to participating in the next DIDF cycle.

Respectfully submitted,

Alex J. Morris
Vice President, Policy & Operations
California Energy Storage Alliance

c: Gabriel Petlin, Supervisor, Energy Division (gabe.petlin@cpuc.ca.gov)
Fred Wellington, Senior Regulatory Analyst (frederick.wellington@cpuc.ca.gov)
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