

**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 12-11-005
(Filed November 8, 2012)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE PROPOSED DECISION REGARDING SELF-GENERATION INCENTIVE
PROGRAM REVISIONS PURSUANT TO SENATE BILL 700 AND OTHER PROGRAM
CHANGES**

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”) hereby submits these comments to the *Proposed Decision Regarding Self-Generation Incentive Program Revisions Pursuant to Senate Bill 700 and Other Program Changes* (“PD”), issued by Commissioner Clifford Rechtschaffen in Rulemaking (“R.”) 12-11-005 on December 11, 2019. Pursuant to the *Email Ruling Granting Extension of Time to Comment on Commissioner Rechtschaffen’s Proposed Decision Re Self-Generation Incentive Program Revisions Pursuant to SB 700 and Other Program Changes* (“Email Ruling”), issued by Administrative Law Judge (“ALJ”) Cathleen A. Fogel, CESA is timely submitting these comments on January 3, 2020.

I. INTRODUCTION.

CESA commends the Commission for all of its efforts to date in directing the Self-Generation Incentive Program (“SGIP”) in smart ways to align SGIP-funded projects with the program’s goals for market transformation, greenhouse gas (“GHG”) emission reductions, and grid service benefits while recognizing the potential for the program to be prioritized in a way to address important equity and disadvantaged community (“DAC”) goals as well as emerging issues around customer resiliency in response to wildfire and Public Safety Power Shut-off (“PSPS”) events. Once again, CESA supports the Commission’s decision as outlined in the PD to direct the full collection of funds authorized under Senate Bill (“SB”) 700 to support energy storage and

other generation technology deployments to further these objectives, especially in light of the urgency for resiliency solutions ahead of upcoming wildfire season(s). Similarly, CESA is supportive of the 85% allocation of SB 700 authorized funds to energy storage budget categories within SGIP, recognizing the potential for storage to provide resiliency benefits, support renewables integration, deliver GHG benefits with the recently adopted and soon-to-be implemented rules from Decision (“D.”) 19-08-001, and transform the storage market. Furthermore, CESA is supportive of the funding allocation of the SB 700 funds across the different budget categories, agreeing with the Commission’s decision to dedicate a majority of the authorized funds to the Equity Resiliency Budget that support eligible residential and non-residential customers in greatest need of onsite storage and resiliency, while transforming market in this segment.

While supportive of these larger decisions, CESA recommends several modifications to the PD to better ensure that SGIP funds are directed to most effectively and efficiently address customer resiliency needs ahead of the 2020 and 2021 wildfire seasons while supporting continued storage deployments generally to achieve the program’s multi-pronged statutory objectives. Though many of the proposed modifications included in the PD are well-intentioned and generally effective, CESA believes certain refinements are needed to improve program outcomes and ensure a meaningful amount of deployment, which requires a recognition of some of the practical realities of deploying resilient systems. Specifically, CESA recommends the following to overcome the major barriers to project deployment:

- Funds should be allocated to allow for flexibility for incentives to align better with market demand.
- The General Large-Scale Storage Budget incentive rate is too low if unchanged and should be adjusted upward by \$0.10/Wh for each step to support market deployments in the commercial sector.
- A ratchet-up mechanism should be implemented for General Large-Scale and Small Residential Storage Budget categories to avoid stalled budget categories.
- Cycling requirements for energy storage systems claiming the resiliency adder or Equity Resiliency incentive funds should be reduced to 52 cycles per year to support resiliency objectives given that new GHG rules and performance incentives are in place.

- Eligibility for the resiliency adder and the Equity Resiliency Budget should be modified to not only allow PSPS-affected customers but also consider customers at risk of PSPS events.
- Schools should also be added as eligible non-residential customers for the resiliency adder and the Equity Resiliency Budget and the revenue limit for markets should be removed.
- System sizing rules should be revisited to support the deployment of proper resiliency projects.
- The developer cap should be lifted after a certain period of time in a given step budget category to support utilization of these funds.
- This decision should affirm the Equity Resiliency Budget launch date as being no later than April 1, 2020, which is open to interpretation in D.19-09-027.

II. FUNDS SHOULD BE ALLOCATED TO ALLOW FOR FLEXIBILITY FOR INCENTIVES TO ALIGN BETTER WITH MARKET DEMAND.

Accounting for unused accumulated funds, market demand, and various SGIP priorities, the allocation of funds across all other storage budget categories seem generally reasonable. However, with discrete funding allocations, CESA believes that there are some risks that the funding allocations will not reflect market demand and lead to funds being stranded and unused. CESA commends the Commission for seeking to shore up specific market segments and agrees that some market certainty should be provided to these areas since there are other barriers that could be holding up funds despite there being market demand (*e.g.*, incentive rates, regulatory uncertainty), as identified, for example, for the Equity Budget categories. However, to balance the need to align better with market demand and preserve market growth across different market segments, CESA recommends the use of “floors” or minimum allocations of funds to different budget categories, as opposed to the full allocation across the categories, as proposed in the PD. In doing so, the PD could be modified to allocate a moderate portion of SB 700 funds into a “General Budget” that is accessible to all SGIP participants and project types to give the program flexibility to reflect market demand and growth trends. In particular, with a small re-allocation of the proposed Equity Resiliency Budget funds to a General Budget (*e.g.*, from 63% to 50%), the program will still have significant funds reserved as a floor for the Equity Resiliency Budget, create some additional flexibility to meet market demand, and continue to incentivize resiliency

solutions through the \$0.15/Wh adder for non-Equity customers and \$1.00/Wh incentive rate for Equity customers. CESA proposes that such general funds only be made available upon the exhaustion of allocated funds for any given budget category, thus better ensuring that this general pool of funds will support the greatest number of projects (*i.e.*, considering such budget category will have lower incentive rates relative to other budget categories).

III. THE GENERAL LARGE-SCALE STORAGE BUDGET INCENTIVE RATE IS TOO LOW IF UNCHANGED AND SHOULD BE ADJUSTED UPWARD BY \$0.10/WH FOR EACH STEP TO SUPPORT MARKET DEPLOYMENTS.

CESA welcomes many of the modifications made in this PD to implement SB 700 and support the State’s growing resiliency needs, but one of the major shortcomings of the PD is the lack of modifications made to the General Large-Scale Storage Budget. Most importantly, CESA finds the PD maintaining the current incentive rate as the chief barrier to participation in this budget category. CESA agrees with the PD that the impact of rate changes, new GHG requirements, and the Federal investment tax credit (“ITC”) step-down for longer lead-time projects are contributing factors to the “chilling effect” for general non-residential storage projects¹ but the fundamental reason for the lack of activity in this market segment is the fact that the economics do not work for these projects when accounting for the realizable customer savings plus the current Step 2 and 3 incentive rates of \$0.40/Wh and \$0.35/Wh. Furthermore, with the change in time-of-use (“TOU”) rates to the late afternoon and early evening periods of the day, the economics of solar have become less attractive; however, since storage access to the ITC is tied to solar, storage deployments have been impacted as a result as well.

To address some of these barriers, the PD proposes to eliminate the ITC adjustment for equipment purchased after December 31, 2021.² However, this change will ensure that this budget category is stalled until 2022 since nothing is otherwise being done in the PD to support increased participation. As a result of the lack of change to the base incentive rate for non-residential projects, CESA predicts that very few non-Equity resiliency projects will be deployed for non-residential customers. The \$0.15/Wh resiliency adder may be sufficient to cover the incremental costs of adding resiliency to a project, but it does not support the core economics of a non-residential

¹ PD at 28.

² *Ibid.*

project to provide customer bill savings. In talking with customers about the resilience incentive, members report that the added value of resilience is insufficient to bridge the current gap. There are other factors that lead to the need for different incentive rates from small residential projects, where non-residential projects generally face incrementally higher interconnection and permitting costs, particularly if seeking to add resiliency to these projects. In addition, with the new GHG rules, member companies have confirmed that these requirements could reduce customer savings by as much as 10%. Taking these factors into account, an adjustment to the base incentive rate for the General Large-Scale Storage Budget category is justified. As such, CESA recommends that the General Large-Scale Storage Budget incentive rate be increased by \$0.10/Wh across all the current steps. Otherwise, CESA believes that there will be minimal participation in these budget categories in the near term.

IV. A RATCHET-UP MECHANISM SHOULD BE IMPLEMENTED FOR GENERAL LARGE-SCALE AND SMALL RESIDENTIAL STORAGE BUDGET CATEGORIES TO AVOID STALLED BUDGET CATEGORIES.

SGIP has improved over the years to become relatively more responsive to market demand and conditions, leading to a step-down incentive rate structure that assumes will occur in lock-step with declines in capital and balance of system costs of energy storage projects. However, at times, the prescribed step-down structure may not be well aligned with the market transformation of energy storage technologies and specific energy storage market segments, as is being experienced in the Large-Scale Storage Budget category where incentive rates have stepped down precipitously with respect to the actual energy storage system and project costs. To mitigate these stalling effects, CESA recommends that the Commission consider a ratchet-up mechanism that responds to market participation in a given budget category below a certain threshold, which would ensure that incentive rates are not prematurely or too dramatically dropped out of line with market conditions. Instead, such a mechanism could help “right-size” the incentive rate to ensure continued energy storage deployments on a steady trajectory.

Specifically, CESA recommends that the Commission adapt the Renewable Market Adjusting Tariff (“ReMAT”) as a model for SGIP’s ratchet-up mechanism. ReMAT was structured with bimonthly program periods where prices increased by set \$/MWh levels if subscription for a defined period is less than 20% of the available allocation for that product type. This serves to help drive deployment if offered prices are not sufficient. In a similar way, the Commission could

establish an incentive rate step-up (e.g., \$0.02/Wh, \$0.05/Wh) if, after a certain amount of time (e.g., 6 months), a certain percentage of available funding in a step (e.g., 20%) is not claimed. With sufficient time before the incentive rate increase but not too long where the market completely stalls, the program can avoid gaming concerns.

Our recommendation comes from our concern with the lack of incentive rate change in the General Large-Scale Storage Budget as well as the additional \$0.05/Wh drops to Step 6 and Step 7 incentive rate for the General Small Residential Storage Budget category, which could prove to be precipitous, especially as small residential storage projects are not eligible for the resiliency adder.³ To mitigate these risks, CESA recommends that a ratchet-up mechanism be implemented as proposed above in order to ensure continued and steady market participation. For the General Large-Scale Storage Budget, CESA recommends the immediate \$0.10/Wh incentive rate increase for all current steps given the over two years that the Steps 2 and 3 have witnessed little or no participation, but thereafter, a similar ratchet-up mechanism could be instituted.

In particular, CESA notes that SGIP is an effective program in discovering energy storage deployment elasticities where some responsiveness of deployments to different incentive rates support changes to ensure steady market transformation. With a ratchet-up mechanism in place, CESA believes the Commission can avoid situations where budget categories stall for long periods of time until Commission or PA action is taken.

V. CYCLING REQUIREMENTS FOR ENERGY STORAGE SYSTEMS CLAIMING THE RESILIENCY ADDER OR EQUITY RESILIENCY INCENTIVE FUNDS SHOULD BE REDUCED TO 52 CYCLES PER YEAR TO SUPPORT RESILIENCY OBJECTIVES GIVEN THE NEW GHG RULES AND PERFORMANCE INCENTIVES ARE IN PLACE.

In D.19-09-027, the Commission affirmed that resilience projects are still subject to the same requirements as non-resilience projects in terms of GHG reduction and cycling requirements to ensure that backup is not the primary purpose of the installation. In doing so, the Commission did not alter the 104 cycle-equivalent requirement for commercial systems. However, CESA recommends that the cycling requirement be lowered to 52 cycles for “resilient systems” – *i.e.*, projects that claim the resiliency adder or Equity Resiliency Budget funds – in order to support rapid deployment of customer resiliency solutions and avoid unintended outcomes that deliver no

³ PD at 29-30.

ratepayer benefits. Otherwise, if unchanged for resilient systems, developers are faced with a tension to meet the minimum cycling requirements while at the same time delivering on the resiliency needs of the customers by developing longer duration projects and by ensuring sufficient state of charge for PSPS and other outage events. Additional cycling for the sake of meeting minimum operational requirements that are not tied to GHG/grid benefits or related to customer resiliency needs needlessly reduces the lifetime of battery storage assets that is not tied to value to the customer, grid, or state policy objectives.

Notably, resilient energy storage systems will likely be larger in kWh capacity because customers will seek longer backup services, which is also reflected in the PD's proposed changes to the duration-based incentive rate step downs for all storage projects. Given that the cycling requirement is based on the full equivalent kWh capacity of the installation, storage systems intended to support customer resiliency will be faced with significant cycling requirements due to the added kWh capacity, thereby potentially driving such systems to cycle more times even though they may not be tied to GHG or grid-service value. To illustrate in a very simplified example, a commercial customer may typically install a 30-kW, 2-hour energy storage system as the most economical solution to deliver customer bill savings, which translates to 6,240 kWh annual cycling requirement (104 full cycles), or more likely 173 operational cycles (assuming this system cycles between 80% to 20% state of charge).⁴ For the same customer that seeks to not only deliver on their customer bill savings but also on their resiliency needs, the customer may seek a system with higher energy duration (say, a 30-kW, 6-hour system) where the additional duration would support longer outage needs. In this case, the annual cycling requirement would increase to 18,720 kWh (104 full cycles) and 520 operational cycles (assuming this system cycles between 80% to 20% state of charge). Even as the additional energy duration is not always needed to deliver on customer bill savings, the dramatic increase in operational cycles could lead to unnecessary and wasteful cycling that could harm the customer's economics.

CESA understands that the 104 annual cycles requirement was established for commercial storage projects to ensure that they are not primarily installed for backup power; however, the 52 annual cycles requirement will provide sufficient guardrails similar to what has been established

⁴ Battery storage systems typically do not cycle from 100% to 0% state of charge due to degradation factors, so the actual operational cycles to meet the annual cycling requirement would be 6,240 kWh divided by 36 kWh per cycle. Note that not all storage systems cycle in this way, as some systems may not have such "deep" cycles to address the specific use case.

and determined to be sufficient for residential systems. The Commission have not raised why commercial systems should be subject to higher cycling requirements. Furthermore, by subjecting all energy storage systems to the new GHG emission reduction requirements, which include GHG reduction targets and various penalty structures (e.g., reduced performance-based incentive [“PBI”] payments, post-PBI period reporting), sufficient incentive is in place to ensure that resilient systems are cycled for GHG and grid benefit and not just sitting idle.

VI. ELIGIBILITY FOR THE RESILIENCY ADDER AND THE EQUITY RESILIENCY BUDGET SHOULD BE MODIFIED TO NOT ONLY ALLOW PSPS-AFFECTED CUSTOMERS BUT ALSO CONSIDER CUSTOMERS AT RISK OF PSPS EVENTS.

The PD proposes to modify eligibility for the resiliency adder and the Equity Resiliency Budget to include residential and non-residential customers “whose electricity was shut off during two or more discrete PSPS events prior to the date of application for SGIP incentives”.⁵ CESA is supportive of the added eligibility criteria for the resiliency adder and the Equity Resiliency Budget, especially considering that PSPS events have often impacted customers that are partially outside of Tier 2 or 3 HFTD zones given the de-energization of any one circuit.⁶ However, CESA has concerns that this eligibility criteria creates a situation where customers must first suffer through two or more PSPS events before being able to deploy customer resiliency solutions rather than being able to adopt resilient storage technologies to mitigate PSPS events. In many of the PSPS events experienced in October 2019, CESA observed that many customers were also notified of a potential shut-off, but the actual de-energization event was never triggered, leading to situations where such customers face such PSPS-related outage risks but were fortunate to not be impacted by one. Rather than determining eligibility by being impacted by an actual PSPS event, CESA instead recommends that this expanded eligibility criteria include all customers who have been notified of potential and imminent PSPS events – something that the IOUs presumably track as part of their PSPS notification protocols. Any customer in a locality that is deemed as being at-risk of a PSPS event should be eligible, subject to the other aforementioned requirements, and to that end, the IOUs should be directed to develop and issue maps that identify these localities in the

⁵ PD at 18 and 37-38.

⁶ See, for example, Appendix B of *PG&E Public Safety Power Shutoff (PSPS) Report to the CPUC October 9-12, 2019 De-Energization Event*.

next 2-3 months. In this way, all at-risk customers will have the means to deploy resiliency solutions, while prioritizing the most vulnerable via the Equity-related criteria in the Equity Resiliency Budget. The maps will also reduce the administrative burden of having to validate whether a customer has experienced at least two PSPS outages.

VII. SCHOOLS SHOULD ALSO BE ADDED AS ELIGIBLE NON-RESIDENTIAL CUSTOMERS FOR THE RESILIENCY ADDER AND THE EQUITY RESILIENCY BUDGET AND THE REVENUE LIMIT FOR MARKETS SHOULD BE REMOVED.

In addition to “PSPS-affected customers”, the PD expanded the definition of eligible customers to include markets, households relying on electric-pump water wells, independent living centers, and food banks to ensure various goods and services during PSPS events. CESA is supportive of this expanded definition but requests that schools also be adopted as eligible for the resiliency adder and the Equity Resiliency Budget as well. As CESA understands D.19-09-027, schools are only eligible if they are designated by the investor-owned utility (“IOU”) as “Public Answering Points”.⁷ Even though D.19-05-042 deemed schools to be a critical facility subject to PSPS notification protocols,⁸ D.19-09-027 adopted a narrower list of eligible non-residential customers “to target *limited equity budget incentive funds* to the most vulnerable customers and to those that provide critical services or infrastructure” [emphasis added].⁹ However, CESA requests that the Commission revisit the exclusion of schools given the significant funds (*i.e.*, over \$600 million) being added to the Equity Resiliency Budget, where the rationale for narrowing the eligibility list from the critical facilities as defined by D.19-09-027 may be less applicable. Furthermore, making schools eligible for the resiliency adder and the Equity Resiliency Budget would support working parents and increase student safety. In many ways, by keeping schools online during an outage, a “gathering center” located in dispersed locations could be maintained for students and teachers, not to mention the added benefit of preserving teaching time.¹⁰

⁷ D.19-09-027 at 25-26.

⁸ D.19-05-042 at 76 and A5.

⁹ D.19-09-027 at 26.

¹⁰ Cano, Ricardo. “Will Fires, Outages Land California Students in ‘Disaster Relief’ Summer School?” KQED News. 2019 December 7. <https://www.kqed.org/news/11790206/will-fires-outages-land-california-students-in-disaster-relief-summer-school>

Finally, CESA is supportive of the addition of markets to the list of eligible non-residential customers but requests a modification to their eligibility criteria that removes the revenue limit from determining their qualifications. For customers that may rely on national chains for their food, pharmacy, and other essential goods and services, CESA believes it is reasonable to allow larger entities, even those above the \$15-million revenue limit, to qualify for the resiliency adder and the Equity Resiliency Budget. Without access to these incentives to support energy storage investments, these larger entities are likely to deploy conventional generators.

VIII. SYSTEM SIZING RULES SHOULD BE REVISITED TO SUPPORT THE DEPLOYMENT OF PROPER RESILIENCY PROJECTS.

CESA supports the duration-related modifications to the incentive rate step-down structure, which better supports long-duration capabilities for resiliency needs, but the Commission should also revisit system sizing rules in the SGIP Handbook to support the deployment of proper resiliency projects.¹¹ Under current SGIP rules, the largest storage system that a customer can deploy is capped at their maximum demand over the prior 12 months and limit the maximum rated capacity of the storage inverter to the peak load of the customer site.¹² CESA is concerned that this size limit is not reasonable for resiliency projects, where a key consideration for sizing is not only the maximum power the host customer draws, but also how much energy customers anticipate using over the course of an outage. Furthermore, resilient systems that seek to provide backup power to the entire site may need to size the inverter larger than peak load for several reasons. First, the installation needs to include a buffer for potential future load growth at the customer site. Second, according to our members, inverter products are sized in discrete kW blocks that are unlikely to add up exactly to the customer's peak load.¹³ Instead, CESA recommends that the inverter size limitation be removed in SGIP for resilient systems, though the actual incentive claim would be limited to the customer's peak load.

¹¹ CESA also raised this previously in *Comments of the California Energy Storage Alliance to the Proposed Decision Establishing a Self-Generation Incentive Program Equity Resiliency Budget, Modifying Existing Equity Budget Incentives, Approving Carry-Over of Accumulated Unspent Funds, and Approving \$10 Million to Support the San Joaquin Valley Disadvantaged Community Pilot Projects*, submitted on August 29, 2019 in R.12-11-005 at 14.

¹² SGIP Handbook Section 5.3.2.

¹³ For example, if a customer has a peak load of 130 kW and inverters are sized in 50 kW blocks, the host customer would need to choose between either a 100-kW installation, which would be too small to provide whole-site backup, or a 150-kW installation, which is currently prohibited.

IX. THE DEVELOPER CAP SHOULD BE LIFTED AFTER A CERTAIN PERIOD OF TIME IN A GIVEN STEP BUDGET CATEGORY TO SUPPORT UTILIZATION OF THESE FUNDS.

CESA supports the Commission’s decision in D.19-09-027 to not subject the Equity Budget or the Equity Resiliency Budget to the developer cap since the goal is to “eliminate barriers and rapidly increase participation.”¹⁴ The PD does not address the developer cap other than to readjust and extend the 20% developer cap to the added funds for the general budget categories and, in the case of the Small Residential Storage Budget, to the new Steps 6 and 7 as well.¹⁵ CESA supports maintaining the 20% developer cap but with a modification to allow the developer cap to be lifted after a certain period of time and under certain conditions in a given general storage budget step. Specifically, CESA recommends that a developer be “paused” from applying for more incentives in a given step (*e.g.*, 6 months) once they have hit their 20% cap for the applicable budget step. After a certain period of time, less than some percentage (*e.g.*, 10%) of the remaining funds in that step have been reserved, the developer should be released from its pause period to access the remaining funds in the step.

By instituting this pause period while making it possible to be released from this pause period under certain “stalled market” conditions, CESA believes that the program will be less likely to stall out if certain developers can build and install projects at the current incentive rate. Market transformation and diversity objectives would thus be balanced against the utilization of SGIP funds to support the program’s grid-service, resiliency, and GHG objectives by providing opportunities for new and diverse market entrants while “encouraging a competitive application process” as noted in the PD.¹⁶

X. THIS DECISION SHOULD AFFIRM THE EQUITY RESILIENCY BUDGET LAUNCH DATE AS BEING NO LATER THAN APRIL 1, 2020, WHICH IS OPEN TO INTERPRETATION IN D.19-09-027.

CESA agrees with the Commission’s intent to launch the Equity Resiliency Budget for all eligible customers by April 1, 2020. However, the PD highlights a potential area of ambiguity of D.19-09-027 in citing Ordering Paragraph (“OP”) 3 as requiring the program administrators

¹⁴ D.19-09-027 at 60.

¹⁵ PD at 29.

¹⁶ PD at 29.

(“PAs”) to make the Equity Resiliency Budget available no later than April 1, 2020.¹⁷ As CESA reads OP 3 of D.19-09-027, the Equity Resiliency Budget cannot be made available to commercial customers *until or no earlier than* April 1, 2020. At the same time, OP 2 of D.19-09-027 ordered that the changes in the decision are effective April 1, 2020, leaving it unclear as to whether the PAs are required to begin accepting applications for all eligible customers by April 1, 2020. Due to this ambiguity, CESA recommends that the Commission clarify the Equity Resiliency Budget launch date as April 1, 2020 in this PD and decision to clarify the Commission’s intent and directive. Due to customer acquisition and interconnection timelines, timely launch of the Equity Resiliency Budget for all eligible customers, including commercial customers, is important to ensuring deployment of resilient storage systems before the 2020 and 2021 wildfire seasons.

XI. CONCLUSION.

CESA appreciates the opportunity to submit these comments to the PD and looks forward to working with the Commission and stakeholders in this proceeding.

Respectfully submitted,



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Date: January 3, 2020

¹⁷ PD at 34.