

February 18, 2020

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
EDTariffUnit@cpuc.ca.gov

Re: Response of the California Energy Storage Alliance to Advice Letter 4191-G-A/5714-E of Pacific Gas and Electric Company (U 39-M), Advice Letter 4127-E-A of Southern California Edison Company (U 338-E), Advice Letter 5555-G-A of Southern California Gas Company (U 904-G), and Advice Letter 106-E-A of Center for Sustainable Energy

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance (“CESA”)¹ hereby submits this protest to the above-referenced Advice Letter 4191-G-A/5714-E of Pacific Gas and Electric Company (“PG&E”), Advice Letter 4127-E-A of Southern California Edison Company (“SCE”), Advice Letter 5555-G-A of Southern California Gas Company (“SoCalGas”), and Advice Letter 106-E-A of Center for Sustainable Energy (“CSE”), *Supplemental: Proposed Revisions to the Self-Generation Incentive Program Handbook to Implement Program Revisions Adopted in D.20-01-021 Specific to Equity Resiliency Budget Residential Customers* (“Joint Supplemental Advice Letter”), submitted on January 28, 2020.

¹ 174 Power Global, 8minutenergy Solar Energy, Able Grid Energy Solutions, Aggreko, Alligent Scientific, AltaGas Services, Amber Kinetics, Ameresco, Aparrent, Avangrid Renewables, Axiom Exergy, Better Energies, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Clean Energy Associates, ConEd Battery Development, Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, E.ON Climate & Renewables, Eagle Crest Energy, East Penn Manufacturing, EDF Renewable Energy, Enel X, Energport Inc., Energy Vault, Engie, esVolta, Fluence, Form Energy, General Electric, Greensmith Energy, Gridwiz, Hecate Energy, Highview Power, Honda, Hydrostor, Jensen Hughes, Lendlease Energy Development, LG Chem Power, Li-Ion Tamer, Lockheed Martin AES, LS Energy Solutions, LS Power Development, Magnum CAES, Malta, Munich Re, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Nuvve, Ormat, Pattern Development, Pintail Power, Plus Power, PolyJoule, Primus Power Corporation, PxiSE, Quidnet Energy, Range Energy Storage, Recurrent Energy, Reimagine Power, RES Americas Inc., SNC-Lavalin, Soltage, Southwest Generation Company, Stem, STOREME Inc., Sumitomo Electric, Sunrun, Swell Energy, Tenaska, Tesla, Trane, True North Venture Partners, UL, VRB Energy, WattTime, and Wellhead Electric. 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>).

I. RESPONSE.

Following the adoption of Decision (D.) 19-09-027 that modified the Equity Budget and established a new Equity Resiliency Budget, the Commission issued D.20-01-021 that made further efforts to modify Self-Generation Incentive Program (SGIP) rules (e.g., customer eligibility, system sizing, developer cap) to support customers in need of resiliency solutions ahead of the 2020 (and beyond) wildfire seasons, in addition to allocating funds authorized under Senate Bill (SB) 700 across the various budget categories. Pursuant to Ordering Paragraph (OP) 3 and 18 of D.20-01-021, the SGIP Program Administrators (PAs) are submitting this supplemental advice letter to make the appropriate program revisions to support timely opening of the Equity Resiliency Budget for residential customer applications by March 1, 2020.

In reviewing the Joint PA Advice Letter, CESA finds many of the implementation details as reflected in the SGIP Handbook are compliant with D.20-01-021. Specifically, the Joint Supplemental Advice Letter clarifies that critical load panel and wiring upgrades are eligible project costs for SGIP incentives² and expands eligibility of customers to include those who have experienced two or more discrete public safety power shut-off (PSPS) events and customers who rely on electric pump water wells for water supplies if they reside in Tier 2 or Tier 3 High-Fire Threat District (HFTD) zones.³

In this response, CESA supports the timely approval of the Joint Supplemental Advice Letter to ensure timely implementation and launch of the Equity Resiliency Budget for residential customers by March 1, 2020 and for all eligible customers by April 1, 2020. At the same time, the PAs should seek to develop an accessible but secure list to support customer identification and validation by developers. OP 23, for example, directed the utilities to post information about the master list of all circuits impacted by two or more PSPS events and to have a method by which to verify a customer was subjected to two or more discrete PSPS events. Without this information, the benefit of an earlier launch of the Equity Resiliency Budget category for residential customers will be lost or reduced since customer eligibility uncertainties will make it difficult for developers to acquire customers and deploy projects to support their resiliency needs.

II. CONCLUSION.

CESA appreciates the opportunity to submit this response to the Joint PA Advice Letter and supports timely implementation and launch of the Equity Resiliency Budget for small residential customers by February 18, 2020 and for all eligible customers by April 1, 2020. CESA looks forward to reviewing the Joint Tier Non-Residential Equity Resiliency advice letter expected on February 18, 2020, the Joint Tier 1 Funding Allocation advice letter expected on April 15, 2020, and all other D.20-01-021 changes in Joint Tier 2 advice letter expected on April 15, 2020

² Joint Supplemental Advice Letter Attachment A at 31.

³ *Ibid* at 37.

Respectfully submitted,



Alex J. Morris
Executive Director
California Energy Storage Alliance

cc: Erik Jacobson, PG&E (PGETariffs@pge.com)
Gary A. Stern, SCE (AdviceTariffManager@sce.com)
Laura Genao c/o Karyn Gansecki, SCE (Karyn.Gansecki@sce.com)
Ray Ortiz, SoCalGas (rortiz@socalgas.com)
Sephra A. Ninow, CSE (sephra.ninow@energycenter.org)
Service list R.12-11-005