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March 9, 2015

VIA EMAIL: EDTariffUnit@cpuc.ca.gov

California Public Utilities Commission
Energy Division
Attention: ED Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102

Re: Center for Sustainable Energy Advice No. 56 - Proposed Modifications to the Self-Generation Incentive Program Handbook to Establish Metrics to Provide Incentives to "Emerging" Small Thermal Energy Storage ("TES") Systems, in accordance with D.08-11-044, D.11-09-015 and D.14-08-029.

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the California Energy Storage Alliance ("CESA") hereby provides these comments strongly supporting approval of Advice 56 of the California Center for Sustainable Energy ("Advice Letter").

D.08-11-044 defined "qualified advanced energy storage" as AES systems that can meet specified technical parameters. In D.11-09-015, the Commission granted interim SGIP eligibility to stand-alone AES technologies, redefined the technical parameters for AES, and stated that the SGIP Program Administrators ("PAs"), "after consultation with the Energy Division and stakeholders, may file a subsequent advice letter to incorporate capacity equivalence and avoided peak kWh for thermal storage into the SGIP Handbook."¹

On August 14, 2014, the Commission issued D.14-08-029, modifying D.12-04-045 to determine that small TES systems are eligible for SGIP incentives. Advice 56 asks the Energy Division to approve modifications to the Self-Generation Incentive Program ("SGIP") Handbook to incorporate capacity equivalence and avoided peak kWh for thermal storage into the SGIP Handbook by establishing metrics to provide incentives to "emerging" small TES systems.

¹ On October 9, 2013, Advice Letter 40 (supported by all of the PAs) was rejected without prejudice because developing a factual record regarding thermal energy storage ("TES") and determining its eligibility for ratepayer incentive programs must first be addressed.

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CESA strongly urges the Energy Division to promptly approve the Advice Letter and the proposed revisions to the SGIP Handbook, as written. CESA further requests that all of the PA's must be directed to promptly revise their respective versions of the SGIP Handbook to conform to the changes requested by the Advice Letter.

Very truly yours,



Donald C. Liddell
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COUNSEL FOR THE
CALIFORNIA ENERGY STORAGE ALLIANCE

DCL/md

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