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September 3, 2013

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

**Re: Comments of the California Energy Storage Alliance on
Advice No. 40 of the California 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 provides comments on the above-referenced *Proposed Modifications to the Self-Generation Incentive Program Handbook to Establish an Incentive Calculation Methodology for Eligible Thermal Energy Storage Technologies, in accordance with D.11-09-015*, submitted on August 14, 2013 (“Advice Letter”).

The California Center for Sustainable Energy (“CCSE”) has requested modifications to the Self-Generation Incentive Program (“SGIP”) Handbook to establish an incentive calculation

¹ The California Energy Storage Alliance consists of 1 Energy Systems, A123 Systems, AES Energy Storage, Alton Energy, American Vanadium, AU Optronics, Beacon Power, Bright Energy Storage, BrightSource Energy, CALMAC, Chevron Energy Solutions, Christenson Electric Inc., Clean Energy Systems Inc., CODA Energy, Deeya Energy, Demand Energy, DN Tanks, Eagle Crest Energy, East Penn Manufacturing Co., Energy Cache, EnerVault, FAFCO Thermal Storage Systems, FIAMM Group, FIAMM Energy Storage Solutions, Flextronics, Foresight Renewable Systems, GE Energy Storage, Green Charge Networks, Greensmith Energy Management Systems, Growing Energy Labs, Gridtential Energy, Halotechnics, Hecate Energy LLC, Hydrogenics, Ice Energy, Innovation Core SEI, Invenergy, K&L Gates LLP, KYOCERA Solar, LightSail Energy, NextEra Energy Resources, OCI Company Ltd., Panasonic, Paramount Energy West, Parker Hannifin, PDE Total Energy Solutions, Powertree Services, Primus Power, RedFlow Technologies, RES Americas, S&C Electric Co., Saft America, Samsung SDI, Sharp Labs of America, Silent Power, SolarCity, Stem, Sovereign Energy Storage LLC, Sumitomo Corporation of America, TAS Energy, UniEnergy Technologies, and Xtreme Power. 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>

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methodology for Thermal Energy Storage (“TES”) technologies determined to be “emerging” TES technologies in Application (A.) 11-03-001, et seq., and that would therefore be eligible for program incentives under the SGIP. D.11-09-015 authorizes the Program Administrators for the SGIP, to file an advice letter to submit for approval the incorporation of capacity equivalence and avoided peak kW estimates for TES into the SGIP Handbook.

The CPUC issued D.11-09-015 to implement SB 412 on September 8, 2011. In D.11-09-015, the CPUC directs the SGIP PAs to implement changes to the program identified in D.11-09-015, including filing an advice letter to propose revisions to the SGIP Handbook to implement D.11-09-015, improvements to incorporate capacity equivalence and avoided peak kW estimates for TES into the SGIP Handbook. The Advice Letter seeks to add a section to the SGIP Program Handbook to implement D.11-09-015 and to make other necessary updates and revisions. CESA supports the Advice letter as written and urges the Commission to expedite approval of this long overdue improvement to the SGIP that the PAs were directed to implement in September 2011.

Very truly yours,



Donald C. Liddell
DOUGLASS & LIDDELL

DCL/md

cc: Maria Salinas (EDTariffUnit@cpuc.ca.gov)
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