

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

02-14-11  
04:59 PM

Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's own Motion to Actively Guide Policy in California's Development of a Smart Grid System.

R.08-12-009  
Filed December 18, 2008

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON  
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS  
ON PROPOSED INTERIM METRICS TO MEASURE PROGRESS  
IN IMPLEMENTING A SMART GRID**

Donald C. Liddell  
DOUGLASS & LIDDELL  
2928 2<sup>nd</sup> Avenue  
San Diego, California 92103  
Telephone: (619) 993-9096  
Facsimile: (619) 296-4662  
Email: [liddell@energyattorney.com](mailto:liddell@energyattorney.com)

Counsel for the  
**CALIFORNIA ENERGY STORAGE ALLIANCE**

February 14, 2011

**BEFORE THE PUBLIC UTILITIES COMMISSION**  
**OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's own Motion to Actively Guide Policy in California's Development of a Smart Grid System.

R.08-12-009  
Filed December 18, 2008

**REPLY COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON  
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS  
ON PROPOSED INTERIM METRICS TO MEASURE PROGRESS  
IN IMPLEMENTING A SMART GRID**

Pursuant to *Administrative Law Judge's Ruling Seeking Comment on Proposed Metrics to Measure progress by Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company in Implementing a Smart Grid*, issued December 29, 2010 ("ALJ's Ruling"), the California Energy Storage Alliance ("CESA") hereby respectfully submits these reply comments.

In its Comments filed on January 24, 2011, related to energy storage metrics San Diego Gas & Electric Company ("SDG&E") advocates that the Commission should "*Continue discussion once policy is established in the Energy Storage rulemaking*" (SDG&E Comments, p. 2). CESA strongly disagrees with SDG&E's view because, if it were to be accepted by the Commission, it would result in an unintended policy consequence of the first order. Since the entire purpose of the Energy Storage Rulemaking is to accelerate deployment of energy storage technology, it should not be open to suggestion as a possible reason to suspend or defer Commission action to advance energy storage in this, or any other, Commission proceeding.<sup>1</sup>

On the other hand, in its Comments filed on January 14, 2011, the Division of Ratepayer Advocates ("DRA") agrees with the proposed energy storage metric. The DRA goes on to say: "However, the Commission recently issued an OIR related to energy storage. *This metric should be subject to revision depending on the outcome of the storage OIR.* [Emphasis added]. (p. 10).

---

<sup>1</sup> See, Comments of the California Energy Storage Alliance to Order Instituting Rulemaking Pursuant to Assembly Bill 2514 to Consider the Adoption of Procurement Targets for Viable and Cost-Effective Energy Storage Systems, January 21, 2010 (pp. 1-2).

As previously noted by CESA,<sup>2</sup> any approach other than the one suggested by the DRA would be unwarranted and very disruptive of potentially numerous Commission proceedings. The Draft Report should include the metric related energy storage that was included in the ALJ's Ruling for the reasons stated by the DRA and because it is the correct policy. The Commission should expeditiously approve the energy storage metric being developed in this proceeding.

Respectfully submitted,



Donald C. Liddell  
DOUGLASS & LIDDELL

Counsel for the  
**CALIFORNIA ENERGY STORAGE ALLIANCE**

Date: February 14, 2011

---

<sup>2</sup> For example, the question of where the dividing line is between storage and generation was raised at the Prehearing Conference held on November 16, 2010, in Pacific Gas and Electric's pumped storage Application (A.10-08-011).

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of this *Reply Comments of the California Energy Storage Alliance on Administrative Law Judge's Ruling Seeking Comments on Proposed Interim Metric to Measure Progress in Implementing a Smart Grid* on all parties of record in proceeding *R.08-12-009* by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on February 14, 2011, at Woodland Hills, California.



---

Michelle Dangott

## SERVICE LIST – R.08-12-009

aaron.burstein@gmail.com  
ab2@cpuc.ca.gov  
abb@eslawfirm.com  
achuang@epri.com  
ag2@cpuc.ca.gov  
agc@cpuc.ca.gov  
ahl@cpuc.ca.gov  
aivancovich@caiso.com  
ali.ipakchi@oati.com  
am1@cpuc.ca.gov  
andrew\_meiman@newcomb.cc  
ann.johnson@verizon.com  
ATrial@SempraUtilities.com  
barbalex@ctel.net  
bcragg@goodinmacbride.com  
bdille@jmpsecurities.com  
bfinkelstein@turn.org  
BKallo@rwbaird.com  
blake@consumercal.org  
BLee@energy.state.ca.us  
bmcc@mccarthy.com  
bob.rowe@northwestern.com  
bobsmithtl@gmail.com  
brbarkovich@earthlink.net  
brian.theaker@dynegey.com  
bsb@eslawfirm.com  
bschuman@pacific-crest.com  
C4MU@pge.com  
carlgustin@groundedpower.com  
caryn.lai@bingham.com  
case.admin@sce.com  
cassandra.sweet@dowjones.com  
cbk@eslawfirm.com  
cbreakstone@control4.com  
cbrooks@tendrillinc.com  
cem@newsdata.com  
CentralFiles@SempraUtilities.com  
chris@emeter.com  
cjh5@pge.com  
ckuennen@ci.glendale.us  
CManson@SempraUtilities.com  
cmkehrin@ems-ca.com  
coney@epic.org  
cpucdockets@keyesandfox.com  
crjohnson@lge.com  
crv@cpuc.ca.gov  
ctoca@utility-savings.com  
dan.mooy@ventyx.com  
danielle@cert.org  
dave@ppallc.com  
david.discher@att.com  
david.rubin@troutmansanders.com  
davidmorse9@gmail.com  
dblackburn@caiso.com  
dbp@cpuc.ca.gov  
dbrenner@qualcomm.com  
dennis@ddecuir.com  
df1@cpuc.ca.gov  
dgrandy@caonsitegen.com  
dhuard@manatt.com  
diana@aspectlabs.com  
Diane.Fellman@nrgenergy.com  
djsulliv@qualcomm.com  
dkm@ischool.berkeley.edu  
dkolk@compenergy.com  
dmarcus2@sbcglobal.net  
DNG6@pge.com  
DNiehaus@SempraUtilities.com  
Douglas.Garrett@cox.com  
douglass@energyattorney.com  
dpb5@pge.com  
dschneider@lumesource.com  
dwtcpucdockets@dwt.com  
dzlotlow@caiso.com  
ed.may@itron.com  
ed@megawatts.com  
EGrizard@deweysquare.com  
ek@a-klaw.com  
enriqueg@greenlining.org  
ep@aspectlabs.com  
epetrill@epri.com  
e-recipient@caiso.com  
eric.wright@bves.com  
esther.northrup@cox.com  
faramarz@ieee.org  
farrokh.albuyeh@oati.net  
filings@a-klaw.com  
fsmith@sfwater.org  
fxg@cpuc.ca.gov  
gayatri@jbsenergy.com  
GHealy@SempraUtilities.com  
glw@eslawfirm.com  
gmorris@emf.net  
gstaples@mendotagroup.net  
gtd@cpuc.ca.gov  
harold@seakayinc.org  
HRasool@SempraUtilities.com  
hsanders@caiso.com  
info@tobiaslo.com  
j\_peterson@ourhomespaces.com  
jandersen@tiaonline.org  
janet.combs@sce.com  
jarmstrong@goodinmacbride.com  
jas@cpdb.com  
jcorralejo@lbcgla.org  
Jcox@fce.com  
jdr@cpuc.ca.gov  
jeffrcam@cisco.com  
jellis@resero.com  
jennsanf@cisco.com  
jerry@enernex.com  
jfine@edf.org  
jgoodin@caiso.com  
jhalpert@dlapiper.com  
jhawley@technet.org  
jLin@strategen.com  
jlynch@law.berkeley.edu  
jmccarthy@ctia.org  
jmcfarland@treasurer.ca.gov  
jmh@cpuc.ca.gov  
jody\_london\_consulting@earthlink.net  
joe.weiss@realtimeacs.com  
john.quealy@canaccordadams.com  
john\_gutierrez@cable.comcast.com  
jon.fortune@energycenter.org  
joshdavidson@dwt.com  
joyw@mid.org  
jparks@smud.org  
jscancarelli@crowell.com  
jskromer@qmail.com  
juan.otero@trilliantinc.com  
judith@tothept.com  
julespol@futureofprivacy.org  
julien.dumoulin-smith@ubs.com  
jurban@law.berkeley.edu  
jurban@law.berkeley.edu  
jw2@cpuc.ca.gov  
jwiedman@keyesandfox.com  
kar@cpuc.ca.gov  
kco@kingstoncole.com  
kellie.smith@sen.ca.gov  
kerry.hattevik@nrgenergy.com  
KFoley@SempraUtilities.com  
kfox@keyesandfox.com  
kgrenfell@nrdc.org  
kladko@aspectlabs.com  
kmills@cfbf.com  
kmkiener@cox.net  
kris.vyas@sce.com  
lau@cpuc.ca.gov  
lbs@cpuc.ca.gov  
lburdick@higgslaw.com  
leilani.johnson@ladwp.com  
lencanty@blackeconomiccouncil.org  
Lesla@calcable.org  
lewis3000us@gmail.com

david@nemtzw.com  
lisa\_weinzimer@platts.com  
ljimene@smud.org  
lkelly@energy.state.ca.us  
lmh@eslawfirm.com  
lmitchell@hanmor.com  
lms@cpuc.ca.gov  
lnavarro@edf.org  
ltt@cpuc.ca.gov  
mandywallace@gmail.com  
marcel@turn.org  
margarita.gutierrez@sfgov.org  
mark.s.martinez@sce.com  
Mark.Schaeffer@granitekey.com  
mark.sigal@canaccordadams.com  
martinhomerc@gmail.com  
martinhomerc@gmail.com  
mary.tucker@sanjoseca.gov  
marybrow@cisco.com  
mbp@cpuc.ca.gov  
mc3@cpuc.ca.gov  
mcarboy@signalhill.com  
mcoop@homegridforum.org  
mday@goodinmacbride.com  
mdjoseph@adamsbroadwell.com  
mgo@goodinmacbride.com  
michael.backstrom@sce.com  
michael.jung@silverspringnet.com  
michael.sachse@opower.com  
michael\_w@copper-gate.com  
michaelboyd@sbcglobal.net  
michelle.choo@att.com  
mike.ahmadi@Granitekey.com  
mike@ucan.org  
mjd@cpuc.ca.gov  
mkurtovich@chevron.com  
mokeefe@efficiencycouncil.org  
monica.merino@comed.com  
mpa@a-klaw.com  
mpieniazek@drenergyconsulting.com  
mrw@mrwassoc.com  
mshames@ucan.org  
mterrell@google.com  
mtierney-lloyd@enernoc.com

jay.birnbaum@currentgroup.com  
mzx@cpuc.ca.gov  
nellie.tong@us.kema.com  
nes@a-klaw.com  
nml@cpdb.com  
norman.furuta@navy.mil  
npedersen@hanmor.com  
nquan@gswater.com  
nsuetake@turn.org  
pcasciato@sbcglobal.net  
peter.pearson@bves.com  
philm@scdenergy.com  
pickering@energyhub.net  
pkulkarn@energy.state.ca.us  
prp1@pge.com  
puja@opower.com  
r.raushenbush@comcast.net  
ralf1241a@cs.com  
rboland@e-radioinc.com  
rcounihan@enernoc.com  
regrelpuccases@pge.com  
rgifford@wbklaw.com  
rhh@cpuc.ca.gov  
ro@calcable.org  
robertgnaizda@gmail.com  
RobertGnaizda@gmail.com  
rogerl47@aol.com  
rquattrini@energyconnectinc.com  
rschmidt@bartlewells.com  
rstuart@brightsourceenergy.com  
rudy.reyes@verizon.com  
ryn@rynhamiltonconsulting.com  
salleyoo@dwt.com  
samuelk@greenlining.org  
sas@a-klaw.com  
sberlin@mccarthyllaw.com  
scott.tomashefsky@ncpa.com  
scr@cpuc.ca.gov  
SDHilton@stoel.com  
SDPatrick@SempraUtilities.com  
sean.beatty@mirant.com  
seboyd@tid.org  
sephra.ninow@energycenter.org  
Service@spurr.org

liddell@energyattorney.com  
sharon.noell@pgn.com  
shears@ceert.org  
slins@ci.glendale.ca.us  
sls@a-klaw.com  
smaye@nappartners.com  
srovetti@sflower.org  
srt@cpuc.ca.gov  
ssmyers@worldnet.att.net  
stalbott@control4.com  
Stephanie.Holland@ATT.com  
stephaniec@greenlining.org  
stephen.j.callahan@us.ibm.com  
steven@lipmanconsulting.com  
steven@sfpower.org  
sthie@us.ibm.com  
sue.mara@rtoadvisors.com  
suzannetoller@dwt.com  
tam.hunt@gmail.com  
tburke@sflower.org  
TCahill@SempraUtilities.com  
TGlasse@Certichron.com  
tien@eff.org  
tjs@cpuc.ca.gov  
tmfry@nexant.com  
tomk@mid.org  
tpomales@arb.ca.gov  
traceydrabant@bves.com  
TRH@cpuc.ca.gov  
ttutt@smud.org  
uzma@crve.org  
Valerie.Richardson@us.kema.com  
vjb@cpuc.ca.gov  
vladimir.oksman@lantiq.com  
vwood@smud.org  
vzavatt@smud.org  
wamer@kirkwood.com  
wbooth@booth-law.com  
wchen@ecsgrid.com  
wmc@a-klaw.com  
wmp@cpuc.ca.gov  
wtr@cpuc.ca.gov  
xbaldwin@ci.burbank.ca.us  
zaf@cpuc.ca.gov