



Stakeholder Comments Interconnection Process Enhancements Draft Tariff Language

Submitted by	Company	Date Submitted
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The California Energy Storage Alliance (CESA)¹ appreciates the opportunity to comment on draft tariff language for the CAISO’s Interconnection Process Enhancements initiative relating to topics 4 and 5 and compliance with Federal Energy Regulatory Commission (FERC) Order No. 792.

CESA supports the CAISO’s Order 792 compliance language relating to energy storage. Including “storage for later injection” in the CAISO’s definition of a Generating Facility will significantly streamline interconnection processes for storage resources, and remove the tariff uncertainty as to whether both the discharging and charging of storage resources are considered a wholesale market resource versus a retail end-use “load.”

CESA commends the CAISO for its continued work clarifying and reforming its tariff to enable energy storage resources to participate in wholesale markets on a level playing field with traditional unidirectional generation resources.

¹ 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>)