BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA


OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE DRAFT WORKSHOP REPORTS FOR ENERGY STORAGE

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OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE DRAFT WORKSHOP REPORTS FOR ENERGY STORAGE

I. INTRODUCTION

Pursuant to Administrative Law Judge Halligan’s e-mail ruling dated Friday, September 18, 2015 requesting comments on the combined Draft Workshop Reports on Energy Storage Track 1 (“Workshop Report”), Southern California Edison Company (“SCE”) submits the following comments on the Workshop Report prepared by the California Public Utilities Commission (“Commission”) Energy Division (“ED”) and Safety and Enforcement Division (“SED”). SCE’s comments are limited to a few key topics that were raised at the two Track 1 workshops, namely: (1) SCE’s efforts to support the safe construction and operation of energy storage devices; (2) the intended purpose of, and modifications to, the Consistent Evaluation Protocol (“CEP”); and (3) confidentiality of energy storage solicitation information.
II.

SCE ACTIVELY SUPPORTS SAFE CONSTRUCTION AND OPERATION OF ENERGY STORAGE DEVICES

The Workshop Report states, “SED said that the Commission hasn’t been prescriptive about rules for storage [Requests for Offers (“RFOs”)] and that either the IOUs will have to be more prescriptive or the Commission will have to be more prescriptive about the safety component of RFO bids for energy storage.”\(^1\) SCE offers the following comments to clarify its practices and position regarding the safety matters raised by parties and SED. First, all of SCE’s power procurement agreements (“PPAs”), including its contracts for energy storage, now include provisions that require the developers of energy storage resources to take specific actions to ensure safe construction and operation of the facilities. Second, SCE recognizes that the ultimate responsibility for the safety of any given storage device lies with the owner and operator the device, who has the full responsibility to ensure its safe and reliable operation. Finally, to support the safe construction and operation of storage devices by all parties, SCE is actively involved in industry efforts to develop and refine safety standards for energy storage devices.

A. SCE’s RFO Process and PPAs Support Safe Construction and Operation of Energy Storage Devices

SCE is keenly aware of its necessary role to promote safety through its procurement of energy storage resources. As discussed below, the ultimate responsibility for safe operation of a storage facility falls to the owner/operator of that facility. However, SCE’s PPAs do contain numerous provisions requiring the storage operator to follow best practices for safety.

Specifically, SCE includes language in all contracts that require all sellers to develop a written safety plan that provides for safe construction and operation of the energy storage facility.\(^2\) An independent engineer must review the safety plan and provide a report to SCE

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\(^1\) Workshop Report at 29-30.

\(^2\) See, e.g., Section 5.01(g) of SCE’s Energy Storage RFO pro formas, available in the “Program Documents” section at scees.accionpower.com.
certifying that the Seller has a written plan for the safe construction and operation of the Project in accordance with Prudent Electrical Practices\(^3\) prior to commencement of any construction activities.\(^4\) Sellers are further required to maintain permits, licenses, certifications and approvals while the contract is in effect,\(^5\) and to operate the facility in accordance with Prudent Electrical Practices, Applicable Laws, Permit Requirements and applicable California utility Industry Standards.\(^6\) Sellers are also required to maintain records and logbooks demonstrating that the project has been operated and maintained in accordance with these provisions. Failure to adhere to these provisions would be a default under the agreement, and could result in termination of the contract.

B. **Safety Is Ultimately the Responsibility of the Owner/Operator of the Storage Device**

   When an Investor Owned Utility ("IOU") procures energy storage – or any generation resource – from a third-party, it is ultimately the third-party that owns and operates the resource. As discussed above, SCE includes provisions in its contracts to require third-party sellers to engage in safe practices and comply with all applicable standards. IOUs are not in a position to inspect third-parties’ generation facilities, nor is it appropriate for an IOU to make a positive or negative determination on whether a third-party facility is in compliance with various standards and government regulations. Instead, SCE builds language into its contracts as described above to require the third-parties to implement appropriate safety plans.

\(^3\) “Prudent Electrical Practices” are defined to include, among other things, compliance with all relevant laws, regulations, safety standards, permitting requirements, and licensing requirements. “Prudent Electrical Practices” include ensuring that sufficient operating personnel are available at all times and are adequately experienced and trained and licensed as necessary to operate the facilities properly and efficiently, and are capable of responding to reasonably foreseeable emergency conditions. They also include ensuring equipment is not operated in a reckless manner, in violation of manufacturer’s guidelines or in a manner unsafe to workers or the general public. See SCE’s Energy Storage RFO *pro formas*, Appendix A, definition of Prudent Electrical Practices.

\(^4\) See SCE’s Energy Storage RFO *pro formas*, Section 5.01(g).

\(^5\) Each of these defined terms can be found in SCE’s Energy Storage RFO *pro formas*, Appendix A.

\(^6\) SCE’s Energy Storage RFO *pro formas*, Section 8.01(a).
C. **SCE Is Actively Supporting and Participating in Efforts to Develop and Refine Safety Standards for Energy Storage**

SCE has been engaged for several years with numerous organizations involved with identifying new Codes, Standards, and Regulations (“CSR”) that are required for the safe and reliable deployment of energy storage systems. In recent years, SCE has been working closely with the Electric Power Research Institute (“EPRI”) and the government national labs. Below is a summary of the three major energy storage safety initiatives in which SCE is currently engaged.

- **EPRI’s Energy Storage Integration Council (“ESIC”):** SCE actively participates in ESIC, which is composed of 5 working groups: Applications, Performance, System Development, Grid Integration, and Analysis. SCE is currently leading the Performance Working Group, and works closely with all of the other working groups. The ESIC System Development group has a dedicated subgroup devoted to developing a common approach to safety. Due to the patchwork of codes and standards across the United States, many of the participating utilities, national labs (Pacific Northwest National Laboratory (“PNNL”) and Sandia), as well as the vendor community have identified safety as a critical task.

- **Sandia/PNNL Energy Storage Safety Working Group (“ESSWG”):** SCE has been following the activities in the Safety Validation and Risk Assessment Research and Development group as well as the Codes and Standards group. There is a tremendous amount of synergy between the Sandia/PNNL and EPRI’s ESIC. All of the ESSWG leads are also active participants in ESIC and have used several of the ESIC System Development documents as starting points.

- **American Recover and Reinvestment Act (“ARRA”) energy storage projects:** SCE has deployed several energy storage projects funded (in part) by the ARRA program. SCE provided firsthand experience in designing and deploying energy storage systems including residential systems, distribution connected, and at a
substation. The experience gained in the deployment of the ARRA projects were captured in the PNNL report entitled *Inventory of Safety-related Codes and Standards for Energy Storage Systems with some Experiences related to Approval and Acceptance.*

III.

THE CURRENT CEP WILL PROVIDE EFFECTIVE BENCHMARKING AND REPORTING OF INFORMATION

As provided in Decision (“D.”) 13-10-040, the CEP was designed “to provide a consistent comparison across utilities, bids and use-cases” and “for benchmarking and general reporting purposes.”\(^2\) This purpose was later confirmed in D.14-10-045.\(^8\) The reporting framework was designed to provide a means to compare storage offers across the three utilities, to provide a broader understanding of the cost and value of storage, and to identify any notable differences in shortlisted storage offers of the three IOUs. The current tool satisfies this framework: it provides sufficient information to compare bids across utilities and establish general benchmarks for storage.

The workshop report includes discussions of how GHG benefits are treated in the model. As noted by SCE and PG&E at the workshop, the CEP captures the first order GHG emissions reductions benefits as these are addressed in the price forecasts used in the model. This is appropriate and sufficient to meet the objectives of the CEP. Conducting WECC-wide models with and without each specific individual resource, as suggested by TURN, would be an administratively costly exercise that would yield dubious results due to the significant uncertainty around the future portfolio of both intermittent resources and energy storage resources. As PG&E noted at the workshop, we cannot know at this time how renewable or energy storage projects will be operating in 2030, and thus trying to report out on the second

\(^2\) D.13-10-040 at 75-76.
\(^8\) D. 14-10-045 at 64.
order GHG impacts at this early stage would lead to false precision. Thus, at this time, such an exercise would not yield useful information for benchmarking and reporting purposes.9 

Finally, at the workshop, some parties requested a public version of the tool. The tool uses actual bid data, which, as further discussed below, must remain confidential. However, non-market participants may access confidential data in a given proceeding by completing a non-disclosure agreement with the utility.

IV. CURRENT CONFIDENTIALITY RULES ARE APPROPRIATE

SCE maintains that certain energy storage bid and procurement information must remain confidential in order to maintain a competitive process that leads to competitive market outcomes. Additionally, as noted in the workshop report, both the IOUs and the Independent Evaluator recognized that sellers also require bid information to remain confidential. These positions are consistent with the approach taken by the Commission – that is, Commission has already established that the confidentiality rules related to storage procurement should be consistent with the confidentiality requirements set forth in D.06-06-066.10 The Confidentiality Matrix adopted in D.06-06-066 provides clear direction about what information is public, and what should be kept confidential (and for how long). Moreover, non-market participants can obtain RFO information if a non-disclosure agreement is signed. Thus, this information, while not available to market participants who could “game the system” or bid according to SCE’s valuation methodology, is already available to the non-market participants who are urging greater transparency of information. There is no need to consider modifications to this framework at this time.

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9 Workshop Report at 16.
V.

CONCLUSION

SCE appreciates the opportunity to participate in the Track 1 workshops and offer comments on the Workshop Report. SCE looks forward to working with the Commission and stakeholders on the topics contained in the Workshop Report.

Respectfully submitted,

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October 2, 2015
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA


Rulemaking 15-03-011

(Filed March 26, 2015)

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true copy of OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE DRAFT WORKSHOP REPORTS FOR ENERGY STORAGE on all parties identified on the attached service list(s) R.15-03-011. Service was effected by one or more means indicated below:

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ALJ Halligan
CPUC
505 Van Ness Avenue
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☒ Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties for those listed on the attached non-e-mail list.

Executed this October 2, 2015, at Rosemead, California.

/s/ Marcella Davis

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