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| Filer: | Alicia Campos |
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Stora, Christine@Energy

From: Mike Ferry [Mike.Ferry@energycenter.org]
Sent: Friday, March 28, 2014 4:15 PM
To: 'Christine.Stora@energy.ca.gov'
Subject: Palen Solar Power Project

Ms. Stora,

My name is Mike Ferry and I am the Senior Manager for Advanced Energy Projects at the California Center for Sustainable Energy (CCSE).

I am writing with regard to the CEC Proposed Decision denying a permit for the Palen Solar Electric Generating System, and specifically Palen Solar Holdings, LLC's Overriding Considerations Supplemental Testimony from 2/10/14 and the discussion of Future Thermal Energy Storage (TES) at the PSEGS site.

Per Palen's Supplemental Testimony, the proposed energy storage upgrade could potentially add increased value by allowing "PSEGS to sustain output capacity through reduced solar conditions, curtail immediate electricity production in favor of delayed generation, and ensure maximum output capacity during hours of high demand."

In other words, energy storage would allow the generation of PSEGS to more adequately match load patterns and thereby address outstanding concerns regarding the reliable and economic integration of intermittent, non-dispatchable solar resources with the state's energy grid and subsequent energy/power demands as determined by the plant operator, utility off-taker and/or independent system operator.

However, as highlighted in Palen's written testimony, the addition of TES to PSEGS site would likely prohibit the project from moving forward due to constraints determined by CPUC permitting, environmental review, and financing of the project through the existing PPA structure.

If possible, I would like the opportunity to discuss a possible alternative to TES at PSEGS that could address the same concerns highlighted above but that, potentially, would not put the project at the same risk. Specifically, I would like to propose the integration of PSEGS generation with a Dispatchable Demand Resource consisting of an aggregated fleet of plug-in electric vehicles (PEVs), whereby the managed charging of vehicles would be matched with PSEGS generation in a manner that could fulfill many, though not all, of the value and benefits of TES.

The proposal would be a pilot project at a scale to be determined, with a cost borne by the PSEGS developer and operator. The pilot would be coordinated with the CAISO and the CEC and would fall directly under the framework of the current CPUC Proceeding (OIR 13-11-007) on Vehicle-Grid Integration (VGI).

I appreciate your time and consideration on this matter, and appreciate any feedback or direction that you can provide.

Sincerely,

Mike Ferry
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