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P A S A D E N A
Water&Power

December 22, 2020

Sent via Email (rachel.macdonald@energy.ca.gov) and U.S. Mail.

California Energy Commission (CEC)
RE: AB 2514 & AB 2227
Energy Assessments Division
1516 Ninth Street
Sacramento, CA 95814-5512

Submission Type: efile

Subject: City of Pasadena's AB 2514/AB 2227 Compliance Report Regarding Energy Storage System Procurement

Dear Ms. MacDonald,

This letter serves as Pasadena Water & Power's ("PWP") Compliance Report regarding energy storage procurement target/policies adopted by the Pasadena City Council. This report is due by January 1, 2021, per the CEC AB 2514 rulemaking and highlighted via the AB 2514 California Energy Commission ("CEC") website (<https://www.energy.ca.gov/data-reports/reports/energy-storage-targets-publicly-owned-utilities>). The Public Utilities Code requires that each Publicly Owned Utility ("POU") submit reports to the CEC demonstrating that it has complied with the energy storage targets previously adopted.

AB 2514 requires that POUs, by December 31, 2014 and December 31, 2017, evaluate the potential to procure viable and cost-effective energy storage systems, and that their governing bodies (the Pasadena City Council, in the case of PWP) set and meet appropriate voluntary procurement targets (if any) for energy storage systems to be procured by December 31, 2016 and December 31, 2020. The law further directs POUs to follow up with triennial re-evaluations of energy storage options. PWP has met its voluntary target of 0 megawatts ("MW") as set in the 2017 Energy Storage Evaluation completed by PWP staff and there is no update to the target at this time. Additionally,

each POU is also required to submit reports to the CEC demonstrating that it has complied with the energy storage targets previously adopted. As mentioned earlier, the deadline for the first compliance report was January 1, 2017. The second report must be submitted by January 1, 2021.

On September 12, 2017, PWP, with the concurrence of the City Council, found that the available energy storage technologies were still not cost effective, nor did any fulfill an existing or anticipated unmet energy need. On September 18, 2020, PWP submitted a letter highlighting that the 2017 target of 0 MW will remain for the immediate future and there are no changes to the targets at this time. As such, staff continues to recommend a 0 MW procurement target for energy storage with the caveat that if specific criteria identified by PWP are met in the future (including opportunities for funding), PWP may consider a small energy storage pilot project (in addition to the pilot project discussed below).

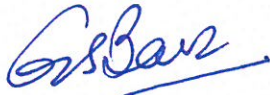
On December 14, 2020, the City of Pasadena City Council approved the installation of a 28 Kilowatt/hour energy storage pilot project, in partnership with the California Institute of Technology ("Caltech"). As part of this pilot project, PWP will be installing commercially available battery storage and communication systems on existing power poles, adjacent to the Caltech campus. The goal of the pilot project is to explore alternative methods to improve voltage quality and line loss in and around the Caltech campus. Using batteries to improve voltage capabilities allows PWP to explore other potential uses for this type of battery technology, including cost savings from avoiding high-cost energy purchases during peak hours, integration of intermittent renewable energy sources, and help optimize distribution grid operations. Caltech will provide modeling for battery replacement and recommendations for best-case use. In order to assist with funding, PWP was able to secure a grant from the American Public Power Association, which will help to offset a portion of PWP's costs of this pilot project. The installation is expected to be completed before the end of 2021. In the future, PWP may consider additional energy storage pilot projects, based on the availability of funding opportunities.

PWP staff continues to actively explore new energy storage opportunities, both independently and through its membership in the Southern California Public Power Authority ("SCPPA"). On an annual basis, SCPPA issues a Request for Proposals for clean energy projects. An increasing number of storage technology vendors are submitting proposals for consideration and PWP, as well as other SCPPA member utilities, continue to evaluate these in greater detail during SCPPA working group meetings.

As required by AB 2514 and AB 2227, PWP continues to monitor and review new energy storage technology to see if establishing a procurement target in the future would be appropriate. Additionally, PWP plans to investigate energy storage systems in more detail in the Power Integrated Resource Plan in calendar year 2022 or 2023.

Should you have any questions, please contact Oren Weiner at 626-744-7901.

Respectfully Submitted,



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