

COMMENTS ON DEMAND RESPONSE AND EFFICIENCY ROADMAP May 21, 2013

CESA commends the CAISO for taking the initiative to convene the Demand Response and Efficiency Roadmap Workshop held on May 13, 2013. Although energy storage was not expressly referred to in the written materials used at the Workshop, CESA wishes to go on record as noting that the subject of energy storage is implicit in any discussion of demand response. CESA therefore requests that energy storage should be explicitly included as an important topic for discussion as the CAISO moves forward with this important initiative.

In Comments filed on December 26, 2012, in Response to the Phase 2 Scoping Memo in the CPUC's Resource Adequacy proceeding (R.11-10-023) regarding counting demand response resources for purposes of meeting resource adequacy requirements, CESA made the following statement:

“CESA was pleased to note that the Commission considers energy storage to have NQC value at least equivalent to DR resources in D.12-06-0258: ‘. . . we point out that the existing QC counting methodology differentiates in general between three classes of resources in setting QC – dispatchable resources, non-dispatchable resources, and wind/solar resources. Storage is not called out specifically, but depending on whether it was dispatchable or non-dispatchable, storage would count towards RA obligations under the existing QC methodology.’ (p. 23). The Commission should now take the next step in Phase 2 and explicitly confirm that energy storage should have an NQC counting value in its own right.” (CESA Comments, p. 7).

CESA was very pleased with the initiative the CAISO recently took to include a web page on its web site for energy storage. It is noteworthy, and consistent with CESA's request in these comments, that the CAISO, at the same, time added energy storage as a subtopic on its web page devoted to “Load Participation and Demand Response”. CESA greatly appreciates the opportunity to submit these comments at this early stage and looks forward to participating actively in the CAISO's development of its Demand Response and Efficiency Roadmap going forward.