

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to consider policy and implementation refinements to the Energy Storage Procurement Framework and Design Program (D.13-10-040, D.14-10-045) and related Action Plan of the California Energy Storage Roadmap.

FILED  
PUBLIC UTILITIES COMMISSION  
MARCH 26, 2015  
SAN FRANCISCO, CALIFORNIA  
RULEMAKING 15-03-011

**ORDER INSTITUTING RULEMAKING**

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## ORDER INSTITUTING RULEMAKING

### Summary

The California Public Utilities Commission (CPUC or Commission) opens this Order Instituting Rulemaking in response to the enactment and ongoing implementation of legislation Assembly Bill 2514-(Skinner, Stats. 2010 – ch. 469) and to continue to *refine* policies and program details as required or recommended by Decision (D.) 13-10-040 and D.14.10-045, which established the Energy Storage Procurement Framework and Program and approved the utilities' applications in implementing the program. This rulemaking considers recommendations included in the California Energy Storage Roadmap, an interagency guidance document which was jointly developed by the California Independent System Operator, the California Energy Commission and the CPUC.

The Commission utilizes this rulemaking as a procedural forum to effectuate policy and program details that shall apply to *future* solicitations beyond the present 2014-2016 procurement period.

### 1. Guiding Principles

In this rulemaking, consistent with Assembly Bill (AB) 2514 and current Commission energy storage policy, we will continue to adhere to the following guiding principles:

1. The optimization of the grid, including peak reduction, contribution to reliability needs, or deferment of transmission and distribution upgrade investments;
2. The integration of renewable energy; and

3. The reduction of greenhouse gas emissions to 80 percent below 1900 levels by 2050, per California goals.<sup>1</sup>

## **2. Background**

On December 16, 2010, the Commission opened Rulemaking (R.) 10-12-007 to implement the provision of AB 2514 (Skinner, Stats. 2010, ch. 469).<sup>2</sup> AB 2514 directed the Commission to determine appropriate targets, if any, for each load serving entity as defined by Pub. Util. Code § 380(j) to procure viable and cost-effective energy storage systems and sets dates for any targets deemed appropriate to achieve.<sup>3</sup> In response to legislation, the Commission took immediate action to advance energy storage through a robust stakeholder process and three subsequent energy storage decisions in 2012, 2013, and 2014. As described in Sections 2.1, 2.2, and 2.3 below, these three decisions established the groundbreaking foundation for the current Commission Energy Storage Procurement Framework and Design Program.

### **2.1. D.12-08-016: Framework for Analyzing Energy Storage Needs**

The first decision, among other things, D.12-08-016 (“Decision Adopting Framework for Analyzing Energy Storage Needs” issued August 2, 2012), adopted a framework and a plan for developing policies and guidelines pertaining to energy storage. It adopted an energy storage “end use” framework, which identified 20 types of storage depending on its application

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<sup>1</sup> Decision (D.) 14-10-045 at 9-10.

<sup>2</sup> R.10-12-007 “Order Instituting Rulemaking Pursuant to AB 2514 to Consider the Adoption of Procurement Targets for Viable and Cost-Effective Energy Storage Systems” filed December 16, 2010; AB 2514 was approved on September 29, 2010 and was entered into California Public Utilities Code, Chapter 7.7, Sections 2835-2839.

<sup>3</sup> R.10-12-007 at 1.

and use in the various market segments or grid domains (e.g., Customer, Transmission/Distribution, Generation, California Independent System Operator (ISO)/Market).

**2.2. D.13-10-040: (Energy Storage Procurement Framework and Design Program)**

The second decision, D.13-10-040 (“Decision Adopting Energy Storage Procurement Framework and Design Program” issued on October 2013), directed San Diego Gas & Electric Company (SDG&E), Pacific, Gas and Electric Company (PG&E), and Southern California Edison Company (SCE) - together, the Investor-Owned Utilities (IOUs) - to procure at least 1,325 megawatts (MW) of energy storage in four biennial solicitations through 2020. (Non-IOU Load serving entities have targets based on 1% peak load by 2020.) D.13-10-040 also directed IOUs to file separate procurement applications containing a solicitation proposal for their first energy storage procurement period by March 1, 2014.

D.13-10-040 provided a basis for cost/benefit analysis in several use cases, illustrating how storage may provide services to the utility grid in transmission, distribution, and customer applications. Because the energy storage market is new and untested, the decision allowed some flexibility among grid domains, subject to certain requirements.

The decision also allowed each IOU to utilize their proprietary evaluation protocols for assessing and selecting winning bids, but required the IOUs to develop a consistent evaluation protocol (CEP) for reporting/benchmarking and facilitating a consistent comparison across utilities, bids, and use-cases. Finally, the decision directed a comprehensive evaluation of the Energy Storage Framework and Design Program by no later than 2016, and once every three years thereafter.

In compliance, the three IOUs filed plans for the initial solicitation issued December 2014. The plans included a CEP to provide a common benchmark for evaluating programs selected by the IOUs in their solicitation.

D.13-10-040 encouraged adjustments to the energy storage program based on various market and program developments. In D.13-10-040, the Commission agreed with parties that being overly prescriptive in a nascent market may have unintended consequences. Consequently, the Commission found it reasonable to adopt a broad framework initially and add additional details later, if necessary, as more experience is gained and lessons can be applied.<sup>4</sup>

Accordingly, D.13-10-040 directed the following:

After the first procurement period in December 2014, Energy Division will assess best practices and challenges within the procurement process and recommend, if needed, adjustments to the procurement process in the context of an appropriate proceeding (rulemaking or otherwise) available during that time period. It is premature to anticipate what the precise nature of these changes will be. However, we believe that the timing of the solicitations [December 2014] will allow sufficient time for review.<sup>5</sup>

### **2.3. D.14-10-045 (2014-2016 Energy Storage Compliance Decision)**

The third decision, D.14-10-045 (“Decision Approving SDG&E Company, PG&E, and SCE Company’s Storage Procurement Framework and Program Applications for the 2014 Biennial Procurement Period,” issued October 22, 2014), approved IOU energy storage plans (for the 2014 biennial period only) with minor modifications and closed the rulemaking proceeding. More

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<sup>4</sup> D.13-10-040 at 25.

<sup>5</sup> D.13-10-040 at 27.

specifically, this compliance decision approved proposed energy storage procurement targets of SDG&E (16 MW); SCE (16.3 MW); and modified the storage proposal of PG&E to 80.5 MW.

Further, this compliance decision approved “eligible” technologies including vehicle-to-grid (V2G) electric vehicle technologies, eligible storage component of biogas, eligible storage component of solar thermal (Concentrating Solar Power-Thermal Energy Storage (CSP-TES)), eligible storage component of hybrid thermal generation (Hybrid-TES), but excluding Vehicle-grid integration (V1G) (managed charging) and biogas (without eligible storage component).

As to cost recovery, the compliance decision authorized the Power Charge Indifference Adjustment (PCIA) mechanism to allow recovery of above-market costs associated with departing load for market/“bundled” energy storage projects but denied a request for an extension of the PCIA mechanism for market/“bundled” energy storage contracts beyond 10 years. It directed the IOUs to submit for Commission review and approval a “Joint IOU Protocol” proposal for a PCIA methodology to determine potential above market stranded cost of bundled service storage (procured in the 2014-2016 solicitation).

The compliance decision deferred the resolution of the “dual usage” cost recovery proposal for combined generation/distribution energy storage but directed IOUs to file “dual use” cost recovery methodologies for combined generation/distribution storage projects if and when they propose such projects to the Commission for approval.

The compliance decision approved the proposed IOU CEP, with some modifications, for reporting and benchmarking purposes, and proprietary evaluation protocols for bid selection, and directed that these protocols be used in December 2014 solicitation requirements and bid materials.

Given changing market conditions in a nascent storage market and the aggressive timelines to implement the decisions, the Commission allowed some flexibility to consider adjustments to help resolve contentious issues in future solicitations and biennial periods:

As to subsequent solicitations beyond the 2014 Biennial Procurement Period, the Commission may consider other venues such as workshops or Order Instituting Rulemaking [OIR] to help resolve contentious issues including, but not limited to: 1) storage definition and eligibility rules; 2) PCIA to recover above-market stranded and Dual Usage cost recovery methodologies; and 3) extension of PCIA treatment to the life of the contract beyond 10 years.<sup>6</sup>

#### **2.4. California Energy Storage Roadmap**

Following the issuance of the three energy storage decisions, in December 2014, the ISO, the CPUC and the California Energy Commission, in cooperation with 400 interested parties, including utilities, energy storage developers, generators, environmental groups and other industry stakeholders published “Advancing and Maximizing the Value of Energy Storage Technology-A California Roadmap” (Storage Roadmap).

The [Storage] [R]oadmap focuses on actions that address three categories of challenges expressed by stakeholders:

- Expanding revenue opportunities;
- Reducing costs of integrating and connecting to the grid;  
and
- Streamlining and spelling out policies and processes to increase certainty.

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<sup>6</sup> D.14-10-045 at 4.

It analyzes the current state to identify needed actions, sets priorities for the next steps and defines the responsibilities of each organization to address the issues. The document highlights actions and will act as a platform to inform future regulatory proceedings, initiatives, and policies; however, it does not lay out a plan to perform them. Work on many of those actions is underway or planned.<sup>7</sup>

With the passage of AB 2514 and the resulting CPUC decisions to adopt energy storage targets and implement the first utility plans for the 2014-2016 biennial procurement period, a strong foundation has been laid to introduce more storage resources into the power grid. Although much progress has been made in the emerging storage market, some “unanswered questions” propelled the CPUC, Energy Commission, and ISO to partner to develop the Storage Roadmap or interagency energy storage “action plan.” To meet the aforementioned challenges, each agency is accountable for specific or shared deliverables in specific areas (e.g., planning, market participation, rate treatment, procurement); each deliverable is designated a “high,” “medium,” or “low” priority.

Many Commission proceedings and initiatives are directly related to energy storage procurement and/or interconnection while others establish policies or incentives for installation of energy storage.<sup>8</sup> In this rulemaking, in addition to storage procurement and design program issues, we address a more limited set of three action items from the Storage Roadmap that relate to

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<sup>7</sup> Storage Roadmap at 1.

<sup>8</sup> For example, *see* R.11-09-011 (Rule 21 Interconnection Rules and Regulations) and R.14-07-002 (Net Energy Metering).

planning, market participation, or procurement areas, as detailed in the following preliminary scope of this proceeding.<sup>9</sup>

### **3. Preliminary Scope of This Proceeding**

As set forth in Rule 7.1(d),<sup>10</sup> we include a preliminary scoping memo in this rulemaking. As discussed in the sections below, this preliminary scoping memo is composed of the proposed issues, preliminary determination of category, preliminary determination of need for hearing, and proposed schedule.

As the three IOUs conduct bid solicitations and award bids to satisfy requirements in fulfillment of energy storage targets, both the aforementioned decisions and Storage Roadmap raise a number of policy and implementation questions that were either short-term only (i.e., addressed only through the 2014-2016 solicitation), not clear, or unaddressed. These “open” questions and other “emerging” issues form the foundation of the scoping issues listed below.

#### **Issue 1: Address Outstanding Implementation Issues pertaining to D.13-10-040 (“Decision Adopting Energy Storage Procurement Framework and Design Program”)**

1(a) Develop a Measurement and Evaluation (M&E) plan for 2016 (Energy Division)

- D.13-10-040 requires Energy Division to conduct a comprehensive evaluation of the Storage Framework by no later than 2016 and every 3 years thereafter that demonstrates the following:
  - Whether the energy storage procured pursuant to this proposal meets the stated purposes of optimizing the

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<sup>9</sup> For a more complete set of action items related to the Storage Roadmap, please see “Next Steps” Appendix at 16-20. Multiple procedural venues (e.g., CPUC, ISO, California Energy Commission) are targeted to help resolve outstanding energy storage challenges.

<sup>10</sup> All references to rules are to the Commission’s Rules of Practice and Procedure.

grid, integrating renewables, and/or reducing greenhouse gas emissions;

- Progress toward market transformation;
  - Learning from collection, analysis, and reporting of energy storage operational data; and
  - Learning from collection, analysis, and reporting of the cost-effectiveness of the energy storage systems procured, with attention to data confidentiality;
  - Best practices for the safe operation of energy storage technologies.<sup>11</sup>
- In this rulemaking, a plan shall be established for the 2016 evaluation plan, including determining which studies (e.g., cost-effectiveness, impact) or other factors shall be included in the evaluation.

1(b) Assess best practices and challenges within the procurement process in the context of a future proceeding and recommend, if needed, adjustments to the process.

- D.13-10-040 directed IOUs to file procurement applications in biennial energy storage procurement periods 2016, 2018 and 2020 with any proposed modifications based on data and experiences from previous procurement periods.<sup>12</sup> Energy Division staff is continuously interacting with Independent Evaluators regarding the desired achievement of RFO “best practices.”
- In this rulemaking, we will strive for continuous improvement in energy storage program details and make appropriate recommendations consistent with overall program objectives.

1(c) Consider revising allocation/flexibility of targets within grid-domains.

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<sup>11</sup> Pub. Util. Code § 2836 (b).

<sup>12</sup> D.13-10-040, Ordering Paragraph 4 at 77.

- D.13-10-040 provided the IOUs some flexibility in shifting MWs between targets. Specifically, the IOUs are allowed to shift up to 80% of MWs between the Transmission and Distribution (T&D) grid domains, but no shifting is allowed between the Customer and the T&D domains.<sup>13</sup>
- This rulemaking will consider whether the IOUs should be granted the additional flexibility of shifting MWs into and out of the Customer grid domain.

1(d) Examine utility safety standards and certifications that must be met by devices, whether utility owned or third party owned and operated.

- Best practices for permitting and interconnection of safety of energy storage systems at residential and commercial locations were addressed in D.14-05-033.<sup>14</sup> This decision directed the Safety and Enforcement Division (SED) and ED to “work with the Office of the State Fire Marshall and the Governor’s Office of Planning and Research to develop a set of best practices that seek to improve the permitting for local authorities and should work to improve the coordination of standards and rules addressing safety at the state level. The resulting best practices should be posted on the Commission’s website.”<sup>15</sup>
- While this decision recognizes that safety requirements for local interconnections are the responsibility of local Authorities Having Jurisdiction, there remains a need for the Commission to address safety of larger storage systems that are connected to the distribution grid and which may be located at utility substations or co-located with power generation facilities.

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<sup>13</sup> D.13-10-040 at 39.

<sup>14</sup> D.14.05-033 “Decision Regarding Net Metering, Interconnection Eligibility for Storage Devices Paired with Net Energy Metering Generation Devices.”

<sup>15</sup> D.14-05-033, COL 23 at 38.

**Issue 2: Address policy issues raised in D.14-10-045 (“Decision Approving SDG&E Company, PG&E Company, and SCE Company’s Storage Procurement Framework and Program Applications for the 2014 Procurement Period”)**

2(a) Clarify rules on storage technology eligibility and definitions

- D.14-10-045 clarified eligible technologies to be included in the 2014 Storage Solicitation. These clarifications were limited to the 2014 procurement cycle and applied only to the eligible storage component of biogas, eligible storage component of solar thermal (CSP-TES), eligible storage component of hybrid thermal generation (Hybrid-TES), and excluded V1G electric vehicles, and biogas (without the eligible storage component).
- D.14-10-045 deferred a broader discussion of storage eligibility to a future quasi-legislative proceeding.<sup>16</sup> This rulemaking will serve as the venue to explore which technologies will be eligible to participate in future solicitations.
  - 2(b) Clarify issues related to PCIA to recover above-market stranded and Dual Usage cost recovery methodologies.
- D.14-10-045 approved use of the PCIA to recover above-market costs associated with departing load for energy storage projects, subject to Commission approval, for the 2014 solicitation.
- The decision deferred the issue of PCIA allowance for future solicitations to a future proceeding.<sup>17</sup>
  - 2(c) Consider PCIA treatment to the life of the contract beyond ten years.
- D.14-10-045 denied a proposed exemption to the 10-year rule for PCIA stranded cost recovery.<sup>18</sup>

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<sup>16</sup> D.14-10-045 at 60.

<sup>17</sup> D.14-10-045 at 47.

- D.14-10-045 stated that the Commission may consider issues involving PCIA treatment for subsequent solicitations or the extension of PCIA treatment to the life of the contract terms beyond 10 years.<sup>19</sup> D.14-10-045 also stated that in subsequent solicitations, when we have more knowledge about the market (and if we have a Commission approved Joint IOU PCIA Protocol), we may choose to revisit the issue.<sup>20</sup>

**Issue 3: Address Action Plan Items raised in the California Energy Storage Roadmap (“Storage Roadmap”)**

**3(a) Examine and clarify opportunities for storage to defer/displace transmission and distribution upgrades. (“Planning”-“High Priority”)**<sup>21</sup> - Refine existing and add new wholesale and retail market participation to meet grid needs.

- In grid planning, the IOUs must understand the operational characteristics of any storage interconnecting to the grid. This includes identifying and examining any opportunities for storage to defer or displace infrastructure upgrades.
- One of the action items for the CPUC identified in the Storage Roadmap is to examine and clarify opportunities for storage to defer or displace T&D upgrades.

**3(b) Define and develop models and rules (e.g., cost recovery, cost allocation, operations) for multiple-use applications [that cross different jurisdictions] (“Market Participation”-“Medium Priority”)**<sup>22</sup> - Determine storage configurations and multiple use

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<sup>18</sup> D.14-10-045 at 88-89. “For the first solicitation, if IOUs seek authorization for a long-term contract for storage based services for bundled customers, IOUs can submit an Application or Tier 3 Advice letter (as appropriate to the applicable proceeding) for pre-approval of long-term contracts according to D.04-12-048, at OP 14.”

<sup>19</sup> D.14-10-045 at 47.

<sup>20</sup> D.14-10-045 at 89.

<sup>21</sup> Energy Storage Roadmap, “Next Steps,” at 17.

<sup>22</sup> Energy Storage Roadmap, “Next Steps,” at 17.

applications to enable prioritization and development of requirements.

- The Storage Roadmap defines multiple use applications as those that provide multiple services to different entities or jurisdictions.<sup>23</sup>
  - One example is storage serving as a distribution reliability asset during some times but also serving the wholesale market during other times.
  - Another example is customer-side storage (behind-the-meter) interconnected that normally operates as a retail device but could potentially offer services to ISO wholesale markets.

**3(c) Consider refinements to [CEP] and valuation methodologies used by IOUs to support CPUC decisions on storage procurement and make models publicly available.**

**(“Procurement”-“High Priority”)**<sup>24</sup> - Assess existing methodologies for valuing energy storage and develop a common methodology.

- D.13-10-040 directed the utilities to develop a Consistent Evaluation Protocol (CEP) to be used in the biennial storage solicitations. Although D.14-10-045 encouraged ED to establish a common CEP for benchmarking and reporting purposes, it gave the IOUs wide latitude to use proprietary protocols for actual project selection, while ensuring that the protocols “draw on” the range of costs and benefits identified in the OIR/studies.<sup>25</sup>
- Both D.14-10-045 and the Storage Roadmap noted that a review of the utilities’ CEP and valuation methodologies may be needed. According to D.14-10-045, the best venue

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<sup>23</sup> Energy Storage Roadmap at 14.

<sup>24</sup> Energy Storage Roadmap, “Next Steps,” at 18.

<sup>25</sup> D.14-10-045 at 69.

to accomplish any needed changes to the CEP is via the 2016 evaluation and/or rulemaking.<sup>26</sup>

**Issue 4: Address Emerging Policy and Implementation Issues Not Covered in D.13-10-040 and D.14-10-045 or the Storage Roadmap**

4(a) Provide guidelines, as appropriate or necessary, to distinguish station power from wholesale charging energy taken in by distribution connected storage assets participating in the wholesale markets.

- On November 2014 , the CAISO issued a draft report<sup>27</sup> which clarified the rate treatment of charging energy taken in at one time by a storage asset that is intended to be returned to the system/grid at some point later in time (except for the energy lost in the round trip process due to inefficiencies). Essentially, such energy would be treated as a wholesale product and assessed at locational marginal price (LMP) but free of transmission access charges (TAC) and distribution charges.
- However, wholesale assets also consume energy as end use load (that is not returned to the system), such as energy used to power onsite lights and cooling units; the rate treatment of such energy is handled under station power tariff, which include TAC and distribution charges. While the identification of station power has been straightforward for conventional generating assets, it may not be so in the case of wholesale storage assets.

4(b) Explore use of non-utility storage assets by third parties to provide permitted services to multiple customers.

- Currently, there is clear demarcation line at the customer meter with customer-side grid-connected assets operating under one set of rules and other grid-connected assets on the other side of the meter operating under a different set of rules. In the case of storage, there may be applications

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<sup>26</sup> D.14-10-045 at 70.

<sup>27</sup> ISO, "Energy Storage Interconnection" (Draft Final Report), November 18, 2014, at 27.

where it may be natural or more efficient to have a non-utility storage asset provide services to multiple customers but located on the utility side of meters for these customers.

- One example is a storage asset supporting an EV charging station utilized by multiple customers in a residential multi-tenant building.
- Another example is a storage asset connected to a community owned solar plant (for virtual net energy metering (VNM)).
- In this rulemaking, we seek to explore such “shared” storage use cases and consider whether it is appropriate to create a new category of grid-connected assets with new rules applicable to their operation that may blur the traditional distinction between customer and utility-side assets.

#### **4. Preliminary Schedule**

The preliminary schedule for this proceeding shall be as follows:

Thirty days after the issuance of this decision OIR, parties shall file comments that will identify the facts and issues of laws that they believe to be relevant to this proceeding’s scope as guided by the directions and comments in this OIR. The Comments should also: identify the party and interest of the party in this proceeding (*see* Rule 1.4(b)); raise any objections to or recommendations regarding this order’s determinations as to categorization of the proceeding as quasi-legislative, the need for hearing, issues to be considered, or scheduling (*see* Rule 6.2); and, identify any other procedural or substantive issues parties believe to be relevant.

Based on the parties’ comments in response to the OIR, the assigned Commissioner or the Administrative Law Judge may develop a ruling, specifying the particular topics on which additional information and input from the parties will be solicited.

Following the issuance of this Ruling, we anticipate holding a prehearing conference (PHC) to address scoping and scheduling issues. Shortly thereafter, the assigned Commissioner will issue a scoping memo setting forth the scope of the proceeding and establishing a procedural schedule.

Subsequent to the issuance of such a scoping memo, we expect that additional workshops, staff and/or utility proposals and filed comments will be required to establish a full record.

For example, as part of the rulemaking, SED's Risk Assessment Section should submit a report on Safety Risks for Grid Connected Storage co-located at Substations and Generation Sites with recommendations for what SED should take into account during substation and generation facility inspections. Parties may include comments on Storage Safety in this regard. Further, SED and ED staff should conduct a joint workshop to refine final recommendations for inspection protocols to be included in SED's safety inspections.

## **5. Proceeding Category and Need for Hearing**

Rule 7.1(d) of the Commission's Rules specifies that an OIR will preliminarily determine the category of the proceeding and the need for hearing. We determine that this proceeding is quasi-legislative as defined in Rule 1.3(d). While it appears that the issues may be resolved through comments and workshops without the need for evidentiary hearings, a final determination on the need for hearings will be made in the assigned Commissioner's scoping memo.

## **6. Becoming a Party; Joining and Using the Service List**

PG&E Company, SDG&E Company and SCE Company shall be respondents in this proceeding. All LSEs, as defined in Pub. Util. Code § 380(j),

are placed on notice that they may be subject to the decisions issued in this rulemaking, and this OIR shall be served upon them. Respondents shall be placed on the service list automatically as parties, but other LSEs as well as other interested parties and those interested in monitoring the proceeding shall follow the instructions below.

To ensure you receive all documents, send your request within 30 days after the OIR is published. The Commission's Process Office will publish the official service list at the Commission's website ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)) and will update the list as necessary.

#### **6.1. During the First 30 days**

Within 30 days of the publication of this OIR, any person may ask to be added to the official service list. Send your request to the Process Office. You may use e-mail ([Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov)) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102).

Include the following information:

- Docket Number of this Rulemaking;
- Name (and party represented, if applicable);
- Postal Address;
- Telephone Number;
- Email Address; and
- Desired Status (Party, State Service, or Information Only).<sup>28</sup>

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<sup>28</sup> If you want to file comments or otherwise actively participate, choose "Party" status. If you do not want to actively participate but want to follow events and filings as they occur, choose "State Service" status if you are an employee of the State of California; otherwise, choose "Information Only" status.

If the OIR names you as respondent, you are already a party, but if you wish a different representative, you must still ask to be added to the official service list.

### **6.2. After the First 30 Days**

If you want to become a party after the first 30 days, you may do so by making an oral motion (Rule 1.4(a)(3)), or by filing a motion (Rule 1.4(a)(4)). If you file a motion, you must also comply with Rule 1.4(b). These rules are in the Commission's Rules of Practice and Procedure, which you can read at the Commission's website.

If you want to be added to the official service list as a non-party (that is, as State Service or Information Only), follow the instructions above.

### **6.3. Updating Information**

Once you are on the official service list, you must ensure that the information you have provided is up-to-date. To change your postal address, telephone number, e-mail address, or the name of your representative, send the change to the Process Office by letter or e-mail, and send a copy to everyone on the official service list.

If you have questions about the Commission's filing and service procedures, contact the Docket Office.

## **7. Service List**

The OIR shall be served on all respondents, all other LSEs listed on the Commission's official records, the CAISO, and the service lists for the following proceedings:

Application (A.) 14-02-006 et al. (Storage Procurement Plans);

R.10-12-007 (Storage);

R.13-09-011 (Demand Response);

R.13-12-010 (Procurement);

R.09-10-032 (Resource Adequacy);

R.14-02-001 (Joint Reliability Plan);

R.08-12-009 (Smart Grid);

R.14-08-013 (Distribution Resources Plans);

R.11-09-011 (Rule 21 Interconnection Rules and Regulations);

R.11-05-005 (Renewable Portfolio Standards);

R.14-07-002 (Net Energy Metering);

R.13-11-007 (Alternative-Fueled Vehicles);

Service of the OIR does not confer party status in this proceeding upon any person or entity other than respondents, and does not result in that person or entity being placed on the official service list for this proceeding.

## **8. Subscription Service**

Persons may monitor the proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission's website. There is no need to be on the official service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission's website at <http://subscribecpuc.cpuc.ca.gov>.

## **9. Filing and Service of Comments and Other Documents**

Filing and service of comments and other documents in this proceeding are governed by the rules contained in Article 1 of the Commission's Rules of Practice and Procedure. (See particularly Rules 1.5 through 1.10 and 1.13.)

## **10. Public Advisor**

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission's procedures should contact the Commission's

Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or e-mail [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov); or in Los Angeles at (213) 576-7055 or (866) 849-8391, or e-mail [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov). The TYY number is (866) 836-7825.

### **11. Intervenor Compensation**

Any party that expects to claim intervenor compensation for its participation in this rulemaking shall file its notice of intent to claim intervenor compensation no later than 30 days after the first PHC, or as otherwise provided in Rule 17.1.

### **12. Ex Parte Communications**

Pursuant to Rule 8.2(a) *ex parte* communications in this rulemaking are allowed without restriction or reporting requirement.

### **13. Assignment of Rulemaking**

Carla J. Peterman is the assigned Commissioner. An Administrative Law Judge will be assigned to this proceeding at a later date.

**IT IS ORDERED** that:

1. This rulemaking to consider policy and implementation refinements to the Commission's Energy Storage Procurement Framework and Design Program and related Action Plan of the California Energy Storage Roadmap is initiated.

2. Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company are named as respondents and are parties to this proceeding pursuant to Rule 1.4(d) of the Commission's Rules of Practice and Procedure. All load serving entities (LSEs), as defined in Public Utilities Code Section 380(k), are placed on notice that they may be subject to the decisions issued in this rulemaking, and this Order Instituting Rulemaking shall be served upon them. Attachment A lists such entities as reflected in the

Commission's records. Any error or omission in Attachment A shall not excuse any LSE from compliance with decisions issued in this proceeding.

3. Respondents shall be placed on the service list automatically as parties, but other load serving entities as well as other interested parties and those interested in monitoring the proceeding must follow the directions set forth in Section 6 of this Order Instituting Rulemaking to become a party or be placed on the official service list as a non-party.

4. This proceeding is classified as quasi-legislative, as that term is defined in Rule 1.3(d) of the Commission's Rules of Practice and Procedure.

5. Parties shall file comments that will serve as the basis for the establishment of a detailed scope for this proceeding and shall identify any other relevant procedural issues within 30 days of the issuance of this Order Instituting Rulemaking (Order). Any person who objects to this Order's determinations regarding categorization of the proceeding as quasi-legislative, the need for hearing, issues to be considered or scheduling shall state such objections in their comments.

6. The Executive Director shall cause this Order Instituting Rulemaking to be served on the Respondents, all load serving entities listed in the Commission's official records (*see* Attachment A), the California Energy Commission, the California Independent System Operator, and the service lists for Application 14-02-006 et al. (Storage Procurement Plans); Rulemaking (R.) 10-12-007 (Storage); R.13-09-011 (Demand Response); R.13-12-010 (Procurement); R.09-10-032 (Resource Adequacy); R.14-02-001 (Joint Reliability Plan); R.08-12-009 (Smart Grid); R.14-08-013 (Distribution Resources Plans); R.11-09-011 (Rule 21 Interconnection Rules and Regulations); R.11-05-005

(Renewable Portfolio Standards); R.14-07-002 (Net Energy Metering) and R.13-11-007 (Alternative-Fueled Vehicles).

7. Parties serving documents in this proceeding shall comply with Section 9 of this Order Instituting Rulemaking regarding electronic service. Any documents served on the assigned Commissioner and Administrative Law Judge shall be both by e-mail and by delivery or mailing a paper format copy of the document.

8. A party that expects to request intervenor compensation for its participation in this rulemaking shall file its notice of intent to claim intervenor compensation in accordance with Rule 17.1 of the Commission's Rules of Practice and Procedure.

9. *Ex parte* communications in this rulemaking are governed by Rule 8.2(a) of the Commission's Rules of Practice and Procedure.

10. The assigned Commissioner or the Administrative Law Judge may make such revisions to the scheduling determinations made herein as may be necessary to facilitate the efficient management of this proceeding.

This order is effective today.

Dated March 26, 2015, at San Francisco, California.

MICHAEL PICKER  
President  
MICHEL PETER FLORIO  
CATHERINE J.K. SANDOVAL  
CARLA J. PETERMAN  
LIANE M. RANDOLPH  
Commissioners