



May 19, 2016

Via U.S. Mail and Electronic Mail

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**Re: California Independent System Operator Corporation Comments on
Draft Resolution E-4791**

Dear Energy Division:

The California Independent System Operator Corporation (CAISO) submits these comments on Draft Resolution E-4791 (Draft Resolution). The Draft Resolution orders Southern California Edison Company (SCE) to hold a competitive solicitation for storage contracts to address electrical reliability risks in the Los Angeles (“LA”) Basin due the moratorium on injections into the Aliso Canyon Natural Gas Storage Facility (“Aliso Canyon”). The CAISO fully supports the Draft Resolution and applauds the Commission’s efforts to ensure an expedited competitive solicitation for additional storage resources to address electric reliability risks due to the limited availability of gas supplies from Aliso Canyon.

I. Discussion

Storage resources can play an important role in addressing imminent electric reliability issues in the LA Basin. As the Draft Resolution points out, energy storage resources can provide needed reliability benefits because they can be fast-responding, firm, and dispatchable.¹ In addition, energy storage resources can be potentially constructed, interconnected and deployed in a relatively short time period.² Based on these attributes, the Draft Resolution properly directs SCE to conduct an energy storage competitive solicitation at its earliest opportunity.

¹ Draft Resolution, p. 4.

² Id.

The CAISO also supports the Draft Resolution’s finding that the energy storage resources must “interconnect in a location that will help alleviate electric reliability concerns.”³ Based on the location of the Aliso Canyon facility, storage resources in the LA Basin are preferred, though resources elsewhere in southern California should also be encouraged because resources outside of the LA Basin can also be effective in mitigating the effects of potential gas curtailments on the Southern California Gas Company pipeline system. As a result, the CAISO supports procurement efforts for new storage resources in southern California.

II. Conclusion

Based on the foregoing, the CAISO supports the Draft Resolution.

Respectfully submitted,

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³ Id.