

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

Application of San Diego Gas & Electric
Company (U 902 M) for approval of Its 2020
Energy Storage Procurement Framework and
Program.

Application 20-03-_____
(Filed March 2, 2020)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR
APPROVAL OF ITS 2020 ENERGY STORAGE PROCUREMENT FRAMEWORK
AND PROGRAM**

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March 2, 2020

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

Application of San Diego Gas & Electric Company (U 902 M) for Approval of Its 2020 Energy Storage Procurement Framework and Program.

Application 20-02-____
(Filed February 28, 2020)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) FOR
APPROVAL OF ITS 2020 ENERGY STORAGE PROCUREMENT FRAMEWORK
AND PROGRAM**

Pursuant to Article 2 of the Commission’s Rules,¹ Assembly Bill (“AB”) 2514,² and Commission Decision (“D.”) 13-10-040,³ San Diego Gas & Electric Company (“SDG&E”) submits this application seeking approval of its 2020 Energy Storage Procurement Framework and Program.

I. INTRODUCTION AND SUMMARY

Pursuant to AB 2514, D.13-10-040 established the Energy Storage Procurement Framework and Program.⁴ This application and supporting testimony report on SDG&E’s progress to date, and outlines its current plan to meet the storage targets initiated by AB 2514 as established in D.13-10-040 (the “Energy Storage Decision”), by procuring viable and cost-effective energy storage systems (“storage” or “energy storage”). The Energy Storage Decision

¹ Citations herein to a “Rule” or “Rules” are to the Commission’s Rules of Practice and Procedure.

² Stats 2010, ch. 469, *codified at* Cal. Pub. Util. Code (“P.U. Code”) §§ 2835-2839. AB 2514 directed the Commission to determine appropriate targets, if any, for each Load-Serving Entity (“LSE”) as defined by P.U. Code § 380(j) to procure viable and cost-effective energy storage systems and to set dates to achieve any such targets.

³ *Decision Adopting Energy Storage Procurement Framework and Design Program.*

⁴ To implement this program, D.13-10-040 adopted a total energy storage procurement target of 1,325 megawatts (“MW”), allocated to each of California’s three largest investor-owned utilities in four biennial solicitations through 2020. SDG&E’s share of this target is 165 MW.

sets a goal for SDG&E to procure 165 MW of energy storage by the end of 2020, to be installed no later than year-end, 2024.

This is SDG&E’s final application in the biennial process established by D.13-10-040. SDG&E’s three previous biennial applications were timely submitted and approved by the Commission as follows: Application (“A.”)14-02-006, *approved*, D.14-10-045; A.16-03-003, *approved*, D.16-09-007, and A.18-02-016. *approved*, D.18-10-036.⁵ SDG&E’s most recent prior biennial application (A.18-02-016) reported that SDG&E had completed contracting for energy storage sufficient to meet SDG&E’s AB 2514 target. As described further herein and in the prepared testimony served in support of this application, developers terminated two of the contracts recited in the last biennial report, leaving SDG&E about 6 MW short of its target. Accordingly, this application and supporting testimony describes how SDG&E plans to replace the capacity represented by the terminated projects and meet its AB 2514 procurement obligation in its 2020 solicitation cycle. Based on the previously-approved storage projects, projects approved in SDG&E’s 2016 Preferred Resource application,⁶ and the procurement plans described herein and in supporting testimony, SDG&E expects to meet its AB 2514 target by 2021. This application asks the Commission to approve SDG&E’s plan and confirm that the plan will discharge SDG&E’s AB 2514 obligation.

⁵ D.17-04-039 established a process to implement AB 2868 (stats. 2016, ch 681, *codified at* P.U. Code §§ 2838.2 and 2838.3). which required the utilities to propose “programs and investments” up to 500 megawatts (“MW”) of *distributed* energy storage resources in addition to the AB 2514 statewide target of 1,325 MW for energy storage generally. D.17-04-039 (at 19) determined that the AB 2868 applications should be incorporated into the existing AB 2514 schedule for the biennial utility energy storage procurement plans. SDG&E’s 2018 biennial application (A.18-02-016) included proposals for distributed energy storage under AB 2868, which were rejected by D.19-06-032. This application submits no proposals under AB 2868.

⁶ A.17-04-017, *approved*, D.18-05-024.

II. CONTENTS OF THIS APPLICATION

This application includes a summary of the projects, plans for which approval is sought, and the information to satisfy the Commission's procedural and statutory requirements for applications under Articles 2 and 3 of the Commission's Rules. In addition, in support of this application, SDG&E has served concurrently the following prepared direct testimony:⁷

- AB 2514 procurement progress and compliance – Don Balfour
- Procurement methodology – Nuo Tang

Pursuant to Rule 1.7(b), SDG&E asks that the Commission consider this testimony as part of the subject application.

III. SDG&E PLANS TO COMPLY WITH ITS AB 2514 PROCUREMENT GOAL

AB 2514 and the Energy Storage Decision require SDG&E to provide a biennial solicitation cycle update in 2020. Based on projects and programs approved pursuant to the Energy Storage Decision,⁸ and the projects approved in SDG&E's 2016 procurement cycle, SDG&E asks the Commission to approve the following tables summarizing SDG&E's progress towards satisfying its AB 2514 storage procurement target of 165 MW:⁹

A. Progress Towards AB 2514 Targets Across all Domains

Based on previously approved storage projects¹⁰ and projects approved in SDG&E's 2016 Preferred Resource application,¹¹ SDG&E has a 6 MW shortfall in meeting its AB 2514

⁷ References to "testimony" herein are to the prepared direct testimony served in support of this application.

⁸ D.13-10-040, Appendix A at 2 and 3-5 (Adjustments to Targets).

⁹ See, testimony of Donald Balfour at DB-3-DB-5.

¹⁰ A.18-02-016, approved, D.18-10-036, *Decision Approving AB 2514 Energy Storage Procurement Framework for the 2018 Biennial Procurement Period*.

¹¹ D.18-05-024 approved certain energy storage projects as counting towards the AB 2514 goal.

target, because two previously approved storage contracts, with capacities of 3 MW and 4 MW each, have been terminated by the developers. Table DB-1 below outlines SDG&E’s progress toward AB 2514, by domain: transmission, distribution, and customer.¹²

**Table DB-1
SDG&E’s 2020 Proposed Procurement Table – All Domains**

Procurement Targets and Current Progress	Transmission	Distribution	Customer	Total
Established Target	80.00 MW	55.00 MW	30.00 MW	165.00 MW
Less Existing Projects as authorized	78.85 MW	50.15 MW	23.19 MW	152.19 MW
Less expected offsets from 2018/2019 procurement and installations	0.00 MW	0.00 MW	6.81 MW	6.81 MW
Net Target for 2020¹³	1.15 MW	4.85 MW	0.00 MW	6.00 MW

B. Existing Projects Authorized to Count Toward SDG&E’s AB 2514 Target

As set forth in Table DB-2 below,¹⁴ SDG&E’s planned and existing energy storage consists of 78.85 MW in the transmission connected domain, 50.15 MW in the distribution-connected domain, and 30 MW in the customer-connected domain, for a total of 159 MW of eligible procurement.

¹² These are the domains defined in D.18-01-003, *Decision on Multiple-Use Application Issues*, Table 1 at 10 and ordering paragraph (“OP”) 1 at 28.

¹³ D.13-10-040 allows for flexibility amongst the grid domains, subject to certain requirements. These requirements allow for up to 80% of the MWs to be shifted between transmission and distribution domains.

¹⁴ The testimony of Donald Balfour at Appendix A provides supporting detail for this table.

**Table DB-2
SDG&E's Projects Authorized to Count Towards AB 2514**

Project Name	Location	Domain	MW Capa city	Technology	Status
Lake Hodges Pumped Hydro	Escondido, CA	Transmission	40.00	Pumped Hydro	Operational
Miramar	San Diego, CA	Transmission	30.00	Battery - Li Ion	Construction
Fallbrook	Fallbrook, CA	Transmission	8.85	Battery - Li Ion	Construction
Borrego Springs Unit 1	Borrego Springs, CA	Distribution	0.50	Battery - Li Ion	Operational
Borrego Springs Unit 2	Borrego Springs, CA	Distribution	0.025	Battery - Li Ion	Operational
Borrego Springs Unit 3	Borrego Springs, CA	Distribution	0.025	Battery - Li Ion	Operational
Borrego Springs Unit 4	Borrego Springs, CA	Distribution	0.025	Battery - Li Ion	Operational
GRC Energy Storage Program Unit 1	Pala, CA	Distribution	0.50	Battery - Li Ion	Operational
GRC Energy Storage Program Unit 2	San Diego, CA	Distribution	0.025	Battery - Li Ion	Retired
GRC Energy Storage Program Unit 3	Clairemont, CA	Distribution	0.025	Battery - Li Ion	Retired
GRC Energy Storage Program Unit 4	Poway, CA	Distribution	0.025	Battery - Li Ion	Retired
GRC Energy Storage Program Unit 5	Borrego, CA	Distribution	1.00	Battery - Li Ion	Operational
GRC Energy Storage Program Unit 6	San Juan Capistrano, CA	Distribution	1.00	Battery - Li Ion	Operational
GRC Energy Storage Program Unit 7	Pala, CA	Distribution	1.00	Battery - Li Ion	Operational
GRC Energy Storage Program Unit 8	San Juan Capistrano, CA	Distribution	1.00	Battery - Li Ion	Operational
GRC Energy Storage Program Unit 9	San Diego, CA	Distribution	1.00	Battery - Li Ion	Operational

El Cajon	El Cajon, CA	Distribution	7.50	Battery – Li Ion	Operational
Escondido	Escondido, CA	Distribution	30.00	Battery – Li Ion	Operational
Don Lee Storage Project	Escondido, CA	Distribution	6.50	Battery – Li Ion	Development
Customer Installation	Various	Customer	30.00	Various	Installed

SDG&E’s planned an existing energy storage consists of 78.85 MW in the transmission-connected domain, 57.15 MW in the distribution-connected domain, and 30 MW in the customer-connected domain, for a total of 166 MW of eligible procurement.

C. SDG&E’s Process for Procuring the 6 MW to Meet the Target

As discussed above and in Mr. Balfour’s testimony, because the developers terminated 7 MW of contracted storage resources prior to project completion, SDG&E must procure additional energy storage to meet its AB 2514 target. SDG&E is seeking to procure additional energy storage to replace the terminated projects and fulfill its AB 2514 target by pursuing three paths to secure the least-cost, best-fit solution. The testimony of Nuo Tang details SDG&E’s process for replacing the terminated storage capacity. In sum, SDG&E is pursuing the following paths:

First, SDG&E will conduct a solicitation in the 2020 energy storage solicitation cycle, SDG&E will continue to employ a procurement methodology that supports the guiding principles in the Energy Storage Decision, procuring resources intended to further: (1) optimize the grid, including peak reduction, contribute to reliability, and defer transmission and distribution upgrade investments; (2) integrate renewable energy; and (3) reduce greenhouse gas emissions.¹⁵ Additionally, the Commission adopted eleven interim rules to direct the utilities on how to promote the ability of storage resources to realize their full economic value when they are

¹⁵ D.13-10-040 at 9-10.

capable of providing multiple benefits and services to the electric system.¹⁶ SDG&E reflects these eleven rules in its processes in which energy storage may be procured.¹⁷

Second, SDG&E will consider projects qualifying under AB 2514 that submit offers in solicitations under other Commission mandates apart from AB 2514 in which energy storage resources are eligible. SDG&E has held, or is scheduled to hold, other solicitations in 2020 where energy storage resources may qualify. The following SDG&E solicitations are currently planned or in process and are open to energy storage resources: a resource adequacy solicitation is anticipated in 2020, a 2021 demand response auction mechanism, and a 2021 – 2023 Integrated Resource Plan (“IRP”) Reliability Procurement solicitation, where SDG&E was ordered to procure at least 292.9 MW of incremental capacity from all resource types to be online by August 1, 2023 to support system reliability.¹⁸ SDG&E received offers in this solicitation on February 7, 2020 and expects to execute contracts by August 3, 2020. Due to the nature of the modified Cost Allocation Mechanism (“CAM”),¹⁹ applicable to only bundled and a subset of unbundled customers, for the IRP Reliability Procurement, it is uncertain whether energy storage contracted as part of IRP Reliability Procurement would qualify to count towards the AB 2514 targets, because cost allocation under AB 2514 is through traditional CAM, applicable to all bundled and all unbundled customers.²⁰

Third, SDG&E is examining its existing AB 2514-qualified contracts, to determine whether there may be opportunities to negotiate augmentation of any such contracts to fulfill the

¹⁶ D.18-01-003 at 2.

¹⁷ *Id.*, Appendix A at 1-2.

¹⁸ D.19-11-016, OP 3 at 80-81.

¹⁹ D.19-11-016 at 67.

²⁰ D.14-03-004, finding of facts 50-51 at 129.

target. In sum, SDG&E is actively pursuing the options as described above to comply with its AB 2514 procurement targets.

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rules 2.1 (a) – (c)

In accordance with Rules 2.1 (a) – (c), SDG&E provides the following information.

1. Rule 2.1 (a) - Legal Name

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E's attorney in this matter is E. Gregory Barnes, at the address set forth in the next section.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

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3. Rule 2.1 (c)

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting as defined in Rule 1.3(f), because it is the most appropriate of the available categories.

b. Need for Hearings

SDG&E believes that hearings may be required in this matter in the event there are contested issues of fact that turn on witness credibility and cross examination.

c. Issues to be Considered, Including Relevant Safety Considerations

The issues to be considered are described in this application and the accompanying testimony are whether the Commission should approve SDG&E's 2020 Energy Storage Procurement and Investment Plan and confirm that the Commission will discharge SDG&E's obligation under AB 2514. SDG&E does not believe there are any safety considerations that this application must address.

d. Proposed Schedule

SDG&E proposes the following schedule, based on the schedule set in the scoping memo for the last biennial solicitation:²¹

ACTION	DATE
Application filed	March 2, 2020
Protests or response/replies filed	April 1, 2020
Prehearing conference	May 2020
Parties' comments (testimony if needed)	June 8, 2020
Reply comments (rebuttal testimony if needed)	June 18, 2020
Evidentiary hearings (if needed)	Early July 2020
Concurrent opening briefs	July 13, 2020

²¹ A.18-02-016, *et al.*, *Assigned Commissioner's Scoping Memo and Ruling* (May 24, 2018) at 7.

Concurrent reply briefs	July 22, 2020
Proposed Decision	Target August 28, 2020
Commission Decision	No sooner than 30 days after the Proposed Decision

B. Rule 2.2 – Articles of Incorporation

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on September 10, 2014 in connection with SDG&E's Application No. 14-09-008, and is incorporated herein by reference.

C. Rule 3.2 (a) – (d) – Authority to Increase Rates

SDG&E is not seeking a rate change in this Application, and therefore Commission Rule 3.2 does not apply. Any rate recovery for resources procured per the plan submitted in this Application will be sought in other proceedings.

V. SERVICE

This is a new application. No service list has been established. Accordingly, SDG&E will serve this Application on all parties to the service lists of R.15-03-011 and A.18-02-016. Hard copies will be sent by overnight mail to the Assigned Commissioner and to the Assigned Administrative Law Judge in those dockets, and to the Chief Administrative Law Judge, Anne Simon.

VI. CONCLUSION AND SPECIFIC REQUEST FOR RELIEF

For the foregoing reasons and those set forth in the direct testimony served in conjunction with the filing of this Application and other testimony eventually received into the record, SDG&E respectfully requests that the Commission approve this Application in all respects. Specifically, in accordance with the foregoing proposed schedule, SDG&E requests the following specific relief:

1. Approval of SDG&E’s plan as described in the application to comply with AB 2514;

2. A finding that the plan in this application, if executed, will discharge of SDG&E's obligation under AB 2514; and

3. Granting such other relief as is necessary and proper.

Respectfully submitted,

/s/ E. Gregory Barnes

E. Gregory Barnes

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March 2, 2020

Officer Verification

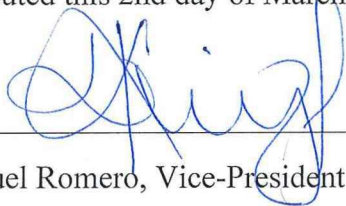
VERIFICATION

I am Miguel Romero, Vice-President - Energy Supply for San Diego Gas & Electric Company ("SDG&E"). I am an officer of SDG&E and am authorized to make this verification for and on behalf of said corporation. The content of this application is true, except as to matters that are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 2nd day of March, 2020 at San Diego, California.

By:



Miguel Romero, Vice-President - Energy Supply, San Diego Gas & Electric Company

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of San Diego Gas & Electric
Company (U 902 M) for approval of Its 2020
Energy Storage Procurement Framework and
Program.

Application No. 20-03-____
(Filed March 2, 2020)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **APPLICATION OF San Diego Gas & Electric Company (U 902 M) FOR APPROVAL OF ITS 2020 ENERGY STORAGE PROCUREMENT FRAMEWORK AND PROGRAM** on all parties of record in R.15-03-011 and A.18-02-016 by electronic mail and hard copies will be sent to the Chief Administrative Law Judge, Anne Simon, Administrative Law Judge Brian Stevens, Gabriel Petlin and Kanya Dorland of the CPUC Energy Division.

Executed this 2nd day of March 2020 at San Diego, California.

/s/ Darleen Evans
Darleen Evans



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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