

COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE:

Energy Storage and Distributed Energy Resources Enhancements

Phase 1 Tariff Language

| Submitted by | Company | Date Submitted |
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| Alex J Morris 510.665.7811 x110 amorris@storagealliance.org | California Energy Storage Alliance (CESA) | April 18, 2015 |

The California Energy Storage Alliance (CESA)¹ offers these brief comments on the California Independent System Operator’s (CAISO) Energy Storage and Distributed Energy Resources (ESDER) Initiative’s Phase 1 Draft Tariff Language. CESA appreciates consideration of these comments.

As the CAISO and stakeholders tune the ESDER-related Tariff language, CESA respectfully urges the CAISO to eliminate inappropriate policy-related input and views during the Tariff Language development process. Such efforts thwart timely progress on Tariff language and are inappropriate for the tariff language development phase of an initiative. The Tariff language process should focus on drafting and finalizing tariff language to represent the Board-approved policy. Naturally, as part of this process, some judgements among the CAISO and stakeholders are needed as to how to reasonably represent the Board-approved design, but explicit efforts to ‘re-work’ policy issues in this Tariff language development process should be prohibited.

¹ The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>)