



March 3, 2025

California Public Utilities Commissions  
Electric Safety and Reliability Branch (ESRB)  
Safety and Enforcement Division (SED)  
505 Van Ness Avenue  
San Francisco, CA 94102

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**RE: CESA Final Comments – Draft Resolution ESRB 13**

The California Energy Storage Alliance (“CESA”) appreciates the opportunity to provide comments on the draft resolution to implement changes to General Order (“GO”) 167-B (now “GO 167-C”). These changes are meant to implement SB 1383 (Chapter 725, Statutes of 2022) to include energy storage systems in GO 167-C operation and maintenance standards.

CESA is a 501(c)6 membership-based organization committed to advancing the role of energy storage in the electric power sector. We strive to advance a more affordable, efficient, reliable, safe, and sustainable electric power system for all Californians. Our membership includes technology manufacturers, project developers, systems integrators, electrical contractors, software developers, professional services firms, and other clean tech industry leaders. CESA supports the safe operation of energy storage systems in California with reasonable and consistent requirements for storage owners and operators.

**Ongoing Engagement**

CESA appreciates the changes the CPUC has made to the draft over the last year based on stakeholder input. We welcomed the opportunity to collaborate and provide our technical expertise and input into the update of this General Order. Our members have expertise specific to innovations in technology and industry standards related to the operations, maintenance, and monitoring of these systems. To this end, we ask that the CPUC create a more systematic and structured forum for the storage industry to provide regular input to the ESRB to update Commission staff on the implementation of these regulations and any updates in industry practices related to the maintenance and operation of BESS facilities.

## **Timeline and Clarity**

CESA members are eager to comply with the requirements set forth in GO 167-C. We appreciate the Commission's updated implementation timeline, allowing existing facilities 180 days to comply with the requirements set forth in the Order.

However, we recognize that facilities coming online in the very near term but potentially after the approval of these new requirements will require more than the 30-day deadline to file the Verified Statement for Logbook Standards and the 90-day requirement for Initial Certification of Maintenance and Operations Standards. As this was not a formal rule-making process, it was unclear when the Commission would release the final draft resolution and if any additional changes would be made. Facilities that are coming online in the next six months present the newest in technology and safety standards. Allowing these facilities the same implementation timeline as existing facilities will ensure that they also have the time to comply with the Order as changes may be needed to update contracts with Remote Operation Centers ("ROCs") and other contractors. Facility staff will also require training and time to implement the requirements associated with new rules and regulations.

CESA supports the 180-day implementation timeline for existing facilities and recommends the same compliance date for new facilities with a Commercial Operation Date ("COD") within 180-days of the final approval of GO 167-C. For example, if an asset has a COD date 60 days after the Commission approves the resolution, the asset owner would then have 120 days to comply.

In terms of overall clarity and transparency (particularly for the Generating Assets and ESS Logbook Standards), terms require clearer definitions to ensure consistent interpretation such that plant owners and operators understand exactly what is needed to be compliant. For example, the term "equipment" is referred to several times throughout the logbook standard<sup>1</sup> with no clear definition, thus making it unclear what, precisely, needs to be documented for compliance. Additionally, with respect to Generating Assets and ESS Logbook Standards, we ask that there be a fourth acceptable exception (Exception 4) pertaining to facility status entry requirements detailed in Renewable Generating Assets and Energy Storage Systems Control Operator Log Requirements.<sup>2</sup>

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<sup>1</sup> See several instances of 'equipment' on pages A-6 and A-8.

<sup>2</sup> Appendix A-III-B. 1) ROCC's typically oversee a large portfolio of renewable sites. In lieu of providing a facility status for each site as a logbook entry, we ask that CPUC be open to allow flexibility to provide the facility status data as a separate, standalone report. Such a report could then be auto-generated while meeting all GO-167 requirements in an efficient manner no matter the portfolio size. Such an exception would be congruent with the current exceptions already defined in the logbook standards.

Thank you for the opportunity to provide these comments. We appreciate the Commission's hard work to ensure the safety of California's energy storage fleet. We look forward to continuing to work with you on this critical issue.

Sincerely,

A handwritten signature in black ink that reads "Scott Murtishaw". The signature is fluid and cursive, with the first name "Scott" written in a larger, more prominent script than the last name "Murtishaw".

Scott Murtishaw  
Executive Director  
California Energy Storage Alliance