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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Consider Streamlining Interconnection of Distributed Energy Resources and Improvements to Rule 21.

Rulemaking 17-07-007

**SCOPING MEMO OF ASSIGNED COMMISSIONER
AND ADMINISTRATIVE LAW JUDGE**

Summary

This Scoping Memo and Ruling sets forth the category, issues, need for hearing, schedule, and other matters necessary to scope this proceeding pursuant to Public Utilities Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure.¹

1. Background

On July 13, 2017, the Commission issued the Order Instituting this Rulemaking (OIR) in order to consider a variety of refinements to the interconnection of distributed energy resources under Electric Tariff Rule 21 of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities), and the equivalent tariff rules of the small and multi-jurisdictional electric utilities. The OIR instructed parties to file comments on the OIR no later than August 2, 2017 and reply comments no later than August 14, 2017. The following parties timely filed comments: Bioenergy Association of California; Bear Valley Electric Service; California Solar Energy Industries Association; California Energy Storage

¹ California Code of Regulations, Title 20, Division 1, Chapter 1; hereinafter, Rule or Rules.

Association; Chargepoint, Inc.; Clean Coalition; Green Power Institute; Independent Energy Producers Association; Interstate Renewable Energy Council, Inc.; Liberty Utilities; Office of Ratepayer Advocates (ORA); Office of Safety Advocates; Pacificorp; Robert Bosch, LLC; Solar Energy Industries Association; Sunverge Energy, Inc.; Tesla; and the Utilities. The following parties filed timely reply comments: Bosch, Inc.; California Energy Storage Association, California Solar Energy Industries Association, Green Power Institute, Clean Coalition, Interstate Renewable Energy Council, Inc., ORA, and the Utilities.

On September 13, 2017, the prehearing conference was held to determine parties, discuss the scope, the schedule, and other procedural matters.

2. Scope

Based on the OIR, party comments, and the discussion at the prehearing conference, there will be three phases of this proceeding. The following sets of issues are within the scope of this proceeding:

PHASE ONE

Urgent and/or Quickly Resolved Issues (Working Group One/ Smart Inverter Working Group)

- 1) Should the Commission modify Fast Track Screen Q to minimize the number of distributed energy resource projects subjected to transmission cluster studies and, if so, how?
- 2) Should the Commission clarify the definition of “complex metering solutions” for storage facilities and, if so, how?
- 3) How should the Commission clarify the definition of a “material modification” to a project and what should be the procedures for processing these modifications?
- 4) As the penetration levels of distributed energy resources increase, what changes to telemetry requirements should

the Commission adopt to ensure adequate visibility while minimizing cost?

- 5) Should the Commission require activation of advanced functionality in Phase 1-compliant inverters installed before September 9, 2017 and, if so, how?
- 6) Should the Commission require the Utilities to develop forms and agreements to allow distributed energy resource aggregators to fulfill Rule 21 requirements related to smart inverters? If yes, what should be included in the forms and agreements?
- 7) Is there inconsistent application of the requirement to pay the Income Tax Component of Contribution charges across the Utilities? If yes, how should the Commission address this inconsistency?

Integration Capacity Analysis and Streamlining Interconnection Issues

(Working Group Two)

- 8) How should the Commission incorporate the results of the Integration Capacity Analysis into Rule 21 to inform interconnection siting decisions, streamline the Fast Track process for projects that are proposed below the integration capacity at a particular point on the system, and facilitate interconnection process automation?
- 9) What conditions of operations should the Commission adopt in interconnection applications and agreements to allow distributed energy resources to perform within existing hosting capacity constraints and avoid triggering upgrades?
- 10) How can the Commission coordinate the Integration Capacity Analysis and each Utility's Rule 21 processes with the Rule 2, Rule 15, and Rule 16 processes in order to improve efficiency of the overall interconnection process? This is a coordination issue at this time.

However, modifications to Rules 2, 15, or 16 will be addressed if necessary.²

- 11) Should the Commission adopt a notification-based approach in lieu of an interconnection application for non-exporting storage systems that have a negligible impact on the distribution system? If so, what should the approach entail?

Planning, Construction, and Billing of Distribution Upgrades Issues (Working Group Three)

- 12) How can the Commission improve certainty around timelines for distribution upgrade planning, cost estimation, and construction? Should the Commission consider adopting enforcement measures with respect to these timelines? If so, what should those measures be?
- 13) Should the Commission adopt a process for distribution upgrade cost sharing among developers, and if so, what should the process be?
- 14) Should the Commission establish a forum to ensure coordination between this proceeding and other proceedings or venues where the Commission is addressing the resolution of disputes and facilitation of interconnection agreements for forest bioenergy facilities in high hazard zones, pursuant to the Governor's Emergency Order on Tree Mortality?
- 15) Should the Commission require itemized billing for distribution upgrades to enable customer comparison between estimated and billed costs and verification of the accuracy of billed costs?
- 16) Should the Commission encourage third party construction of upgrades to support more timely and cost-effective interconnection, and if so, how?

² Parties to prior proceedings adopting Rules 2, 15, and 16 have been notified of this scoping memo.

- 17) Utilities commonly require wholesale systems interconnecting under Rule 21 to install separate interconnection facilities when existing facilities serving on-site load may have sufficient capacity. Is the requirement to install separate facilities necessary to support safe and reliable interconnection? If not, how should the Commission address this utility practice?

Application Processing and Review Issues (Working Group Four)

- 18) Should the Commission adopt changes to anti-islanding screen parameters to reflect research on islanding risks when using UL 1741-certified inverters in order to avoid unnecessary mitigations? If yes, what should those changes entail?
- 19) Should the Commission adopt streamlined interconnection procedures (e.g. standard configurations eligible for expedited review) to facilitate implementation of California Zero Net Energy building codes and, if so, what should those procedures entail?
- 20) How should the Commission coordinate Commission-jurisdictional and Federal Energy Regulatory Commission-jurisdictional interconnection rules for behind-the-meter distributed energy resources, including modification of queuing rules for Rule 21 and Wholesale Distribution Access Tariff (WDAT) projects seeking to interconnect at the same location, clarification of the rules for projects wanting to transfer between the Rule 21 and WDAT queues, and streamlining of the transfer process?
- 21) How should the Commission implement determinations to be made in Rulemaking 15-03-011 regarding measurement and metering of storage facilities to enable multi-use applications and track station power consumption?
- 22) Should the Commission require the Utilities to make improvements to their interconnection application portals? If yes, what should those improvements be?

- 23) Should the Commission consider issues related to the interconnection of electric vehicles and related charging infrastructure and devices and, if so, how?
- 24) Should the Commission modify the formula for calculating the Cost-of-Ownership charge and, if so, how?
- 25) Should the Commission make any revisions to the expedited process for eligible non-exporting storage facilities in response to pilot program data collected by the Utilities between July 1, 2017 and June 30, 2018, in order to support tariff principles of technological neutrality and consistency across the Utilities?
- 26) Should the Commission adopt a direct current (DC) metering standard for DC applications, including Net Energy Metering (NEM)-paired storage systems and microgrids? If so, what should that standard be?

Smart Inverter Issues and Coordination with Rulemaking 14-10-003 (Working Group Five/Smart Inverter Working Group)

- 27) What should be the operational requirements of smart inverters? What rules and procedures should the Commission adopt for adjusting smart inverter functions via communication controls?
- 28) How should the Commission coordinate with the Integrated Distributed Energy Resource proceeding to ensure operational requirements are aligned with any relevant valuation mechanisms? **Safety and Environmental Issues (Working Group Six)** Should the Commission establish a forum, either within this proceeding or externally, to develop interconnection safety standards to address safety and environmental risks as the interconnection of distributed energy resources devices grows?

PHASE TWO

Ratesetting Issues Requiring Coordination with Rulemaking 14-08-013 (Working Group Seven)

- 29) Should the Commission address cost allocation issues that arise in connection with new upgrade practices in distribution resource planning?

PHASE THREE

Small and Multi-Jurisdictional Utility Rules (Working Group Eight)

- 30) What revisions to Rule 21 and equivalent tariffs are required for small and multi-jurisdictional utilities?

3. Categorization

The Commission in the OIR issued on July 13, 2017, preliminarily determined that the category of the proceeding is quasi-legislative.

This scoping memo confirms the categorization with the exception of Phase Two, which will be categorized as ratesetting. Anyone who disagrees with this categorization must file an appeal of the categorization no later than ten days after the date of this scoping ruling. (*See* Rule 7.6.)

4. Need for Hearing

The Commission in the OIR also preliminarily determined that hearings are not required. An evidentiary hearing is not necessary at this time, but may be needed at a later date.

5. *Ex Parte* Communications

In Phases One and Three of this proceeding, *ex parte* communications with the assigned Commissioner, other Commissioners, their advisors and the

Administrative Law Judge are permitted without restriction or reporting as described at Public Utilities Code § 1701.4(c) and Article 8 of the Rules.³

In Phase Two, *ex parte* communications with the assigned Commissioner, other Commissioners, their advisors and the Administrative Law Judge are only permitted as described at Public Utilities Code § 1701.3(h) and Article 8 of the Rules.⁴

6. Intervenor Compensation

Pursuant to Public Utilities Code § 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by October 13, 2017, 30 days after the prehearing conference.

7. Assigned Commissioner, Presiding Officer

Michael Picker is the assigned Commissioner and Kelly A. Hymes is the assigned Administrative Law Judge. Pursuant to Public Utilities Code § 1701.3(b) and Rule 13.2(b), Administrative Law Judge Kelly A. Hymes is designated as the Presiding Officer in Phase Two of this proceeding.

8. Filing, Service and Service List

The official service list has been created and is on the Commission's website. Parties should confirm that their information on the service list is correct, and serve notice of any errors on the Commission's Process Office, the

³ Interested persons are advised that, to the extent that the requirements of Rule 8.1 et seq. deviate from Public Utilities Code sections 1701.1 and 1701.4 as amended by Senate Bill 215, effective January 1, 2017, the statutory provisions govern.

⁴ Interested persons are advised that, to the extent that the requirements of Rule 8.1 et seq. deviate from Public Utilities Code sections 1701.1 and 1701.3 as amended by Senate Bill 215, effective January 1, 2017, the statutory provisions govern.

service list, and the Administrative Law Judge. Persons may become a party pursuant to Rule 1.4.

When serving any document, each party must ensure that it is using the current official service list on the Commission's website.

This proceeding will follow the electronic service protocols set forth in Rule 1.10. All parties to this proceeding shall serve documents and pleadings using electronic mail, whenever possible, transmitted no later than 5:00 p.m., on the date scheduled for service to occur. Additionally, Rule 1.10 requires service on the Administrative Law Judge of both an electronic and a paper copy of filed or served documents.

Persons who are not parties but wish to receive electronic service of documents filed in the proceeding may contact the Process Office at process_office@cpuc.ca.gov to request addition to the "Information Only" category of the official service list pursuant to Rule 1.9(f).

9. Discovery

Discovery may be conducted by the parties consistent with Article 10 of the Commission's Rules. Any party issuing or responding to a discovery request shall serve a copy of the request or response simultaneously on all parties. Electronic service under Rule 1.10 is sufficient, except Rule 1.10(e) does not apply to the service of discovery and discovery shall not be served on the Administrative Law Judge. Deadlines for responses may be determined by the parties. Motions to compel or limit discovery shall comply with Rule 11.3.

10. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or who has questions about the electronic filing procedures is encouraged to obtain more information at

<http://consumers.cpuc.ca.gov/pao> or contact the Commission's Public Advisor at 866-849-8390 or 415-703-2074 or 866-836-7825 (TTY), or send an e-mail to public.advisor@cpuc.ca.gov.

11. Working Group Structure

In this proceeding, the Commission will utilize working groups to develop proposals to address the issues of that working group. The eight working groups authorized in this Ruling are identified by the heading to each set of issues listed above. Four issues will be addressed by the Smart Inverter Working Group, as discussed below.⁵ All parties may participate in any or all of the working groups, including the Smart Inverter Working Group.

The Director of the Commission's Energy Division is authorized oversight of the working groups. Oversight shall include providing guidance on: i) meeting agendas; ii) the process for consensus; iii) documentation of different viewpoints; and iv) the format of reports and proposals. The Utilities shall manage the working groups at this time with direction from the Energy Division. The Utilities are responsible for scheduling the meetings and confirming meeting locations. Working Group meetings shall be public. At the direction of the assigned Commissioner or Administrative Law Judge, Energy Division or external facilitation may assume management of the working groups.

All scoping issues related to smart inverters will be resolved in the Smart Inverter Working Group, i.e., issues 5, 6, 27, and 28. The Smart Inverter Working

⁵ The Smart Inverter Working Group grew out of a collaboration between the Commission and the California Energy Commission in early 2013 that identified the development of advanced inverter functionality as an important strategy to mitigate the impact of high penetrations of distributed energy resources. The Smart Inverter Working Group has pursued development of advanced inverter functionality over three phases.

Group will act as Working Group Five. Any party may participate in the Smart Inverter Working Group.

Given the aggressive schedule, working group members should begin working prior to initial working group meetings. In preparation for the first meeting of each working group, working group members should prepare a summary of each of the issues assigned to the working group as well as relevant framing questions or considerations to move forward with the issue.

Working Groups One and Two shall each be responsible for developing a final report for recommending proposals to address the issues posed in each of the two working groups, as indicated in Section 2. Scope, above. The Smart Inverter Working Group shall be responsible for providing proposals on issues 5 and 6 to Working Group One, within the same timeline and format. The Utilities, on behalf of Working Group One and Working Group Two, shall serve and file a report for each of these two working groups no later than the date indicated on the schedule below.

For Working Groups Three through Six, the working groups are responsible for developing a status report and a final report, as indicated on the schedule below. Again, the Smart Inverter Working Group is Working Group Five. The Utilities, on behalf of Working Groups Three through Six, shall file and serve the working groups' status reports together as one report. Each working group's status report shall succinctly describe: i) the issues assigned to the working group; ii) discussions, relevant framing questions or considerations to move discussions forward from the outset for each issue; and iii) an outline and schedule showing how the group proposes to move toward resolution of its assigned issues. The status reports should also include all disputes that have arisen. Guidance on the format of the report will be provided by the Energy

Division. The assigned Administrative Law Judge will utilize the status reports to ensure each working group is accomplishing its tasks in a timely manner.

Working Groups Three through Six shall each develop a final report proposing recommendations for resolving the issues assigned to the working group. Each working group report shall describe consensus items and, where consensus was not reached, descriptions of the various options for resolving the issue. Further guidance for the final report shall be provided at a later date, but all individual working group reports shall utilize the same format. The Utilities, on behalf of Working Groups Three through Six, shall file and serve the individual working group reports together as one complete report.

Working Groups Seven and Eight will begin to meet following the adoption of a decision in Phase One of this proceeding.

12. Schedule

The working groups created in this Ruling will begin sequentially, with Working Group One to begin meeting no later than October 16, 2017. The Smart Inverter Working Group shall also begin addressing issues 5 and 6 along the same timeline as Working Group One. No later than seven days from the issuance of this Ruling, the Utilities shall contact parties to invite all parties to participate in Working Group One. The first meeting shall occur no later than October 16, 2017; the first meeting may be telephonic. The Smart Inverter Working Group shall coordinate with Working Group One to incorporate proposals for issues 5 and 6 into the Working Group One report in a timely fashion. On behalf of Working Group One, the Utilities shall file a final report no later than February 15, 2018. Parties will be able to comment on this report, as indicated on the schedule below.

No later than January 15, 2018, the Utilities should invite parties to participate in Working Group Two. Working Group Two should begin meeting no later than February 15, 2018. On behalf of Working Group Two, the Utilities shall file its final report no later than August 15, 2018. Parties will be able to comment on this report, as indicated on the schedule below.

Working Groups Three through Six will work simultaneously. Again, the Smart Inverter Working Group will be Working Group Five. No later than August 1, 2018, the Utilities should invite parties to participate in Working Groups Three through Six. Working Group Three through Six should begin meeting no later than September 1, 2018. On behalf of Working Groups Three through Six, the Utilities shall file its status report no later than December 1, 2018. (If necessary, the Administrative Law Judge may schedule a prehearing conference or issue a Ruling to gather additional details on the working groups' activities.) No later than March 1, 2019, the Utilities shall file one combined document providing proposals for each of Working Groups Three through Six. The assigned Administrative Law Judge will facilitate a workshop on March 15, 2019 to discuss the filed proposals; Working Groups Three through Six shall each present an overview of their proposals. A Ruling will be issued requesting comments on the proposals.

Thirty days following the adoption of a decision on Working Groups Three through Six proposals, the second and third phase of this proceeding will be initiated. These two phases will be conducted simultaneously but separately.

Phase Two will address cost allocation issues that arise in connection with new upgrade practices in distribution resource planning. A prehearing conference will be held on Phase Two issues, after a decision is adopted in Phase One. The schedule for Phase Two will be determined in a subsequent ruling.

Phase Three will address issues in this proceeding as they relate to small and multi-jurisdictional utilities. The small and multi-jurisdictional utilities are responsible for contacting parties to determine interest in participating in Working Group Eight, scheduling meetings, and establishing locations. The small and multi-jurisdictional utilities shall consult with the Commission’s Energy Division, who is responsible for noticing the working group meetings on the Daily Calendar. The small and multi-jurisdictional utilities, on behalf of Working Group Eight, shall file a proposal addressing Working Group Eight issues no later than 120 days after the Phase One decision is adopted.

The adopted schedule for this proceeding is:

Activity	Date
PHASE ONE	
Working Groups One and Two	
Working Group One and Smart Inverter Working Group begin to meet	October 16, 2017
Working Group One Proposal Filed	February 15, 2018
Working Group Two Begins to Meet	February 15, 2018
Comments on Working Group One Filed	March 15, 2018
Working Group Two Proposal Filed	August 15, 2018
Comments on Working Group Two	September 15, 2018
Proposed Decision on Working Groups One & Two Proposals	Fall 2018
Working Groups Three through Six	
Working Groups Three through Six Begin to Meet	September 1, 2018
Status Reports Filed and Served	December 1, 2018
Working Group Three through Six Proposals Filed	March 1, 2019
Workshop to Discuss and Present Proposals	March 15, 2019
Ruling Issued Requesting Comments on Proposals	April 1, 2019
Parties File Comments on Proposals	May 1, 2019

Proposed Decision Issued on Working Groups Three through Six Proposals	Summer 2019
PHASES TWO AND THREE	
Prehearing Conference on Phase Two	TBD
Phase Three Begins and Working Group Eight Begins to Meet	+30 days
Working Group Eight Proposal Filed	+ 90 days
Comments on Working Group Eight Proposal	+30 days
Proposed Decision on Working Group Eight Issued	Spring 2020

The assigned Commissioner or assigned Administrative Law Judge may modify this schedule as necessary to promote the efficient management and fair resolution of this proceeding.

Due to the complexity and number of issues in this proceeding, it is the Commission’s intent to complete the first phase of this proceeding within 24 months of the date this Scoping Memo is filed. This deadline may be extended by order of the Commission. (Public Utilities Code § 1701.5(b).) Phases Two and Three of the proceeding will commence thirty days after a final decision is issued in Phase One of the proceeding.

If there are any workshops in this proceeding, notice of such workshops will be posted on the Commission’s Daily Calendar to inform the public that a decision-maker or an advisor may be present at those meetings or workshops. Parties shall check the Daily Calendar regularly for such notices.

13. Settlement and Alternative Dispute Resolution

While the schedule does not include specific dates for settlement conferences it does not preclude parties from meeting at other times provided notice is given consistent with our Rules.

The Commission offers Alternative Dispute Resolution (ADR) services consisting of mediation, facilitation, or early neutral evaluation. Use of ADR services is voluntary, confidential, and at no cost to the parties. Trained Administrative Law Judges serve as neutrals. The parties are encouraged to visit the Commission's ADR webpage at <http://www.cpuc.ca.gov/adr>, for more information.

If requested, the assigned Administrative Law Judge will refer this proceeding, or a portion of it, to the Commission's ADR Coordinator. Alternatively, the parties may contact the ADR Coordinator directly at adr_program@cpuc.ca.gov. The parties will be notified as soon as a neutral has been assigned; thereafter, the neutral will contact the parties to make pertinent scheduling and process arrangements. Alternatively, and at their own expense, the parties may agree to use outside ADR services.

14. Final Oral Argument

A party in a quasi-legislative proceeding, in which a hearing is held, has the right to make a Final Oral Argument before the Commission, if the argument is requested within the Opening Brief. (Rule 13.13.) If it is later determined that a hearing should be held in this proceeding, a schedule for filing briefs and requesting Final Oral Argument will be established at that time.

15. Outreach Pursuant to Public Utilities Code Section 1711(a)

Public Utilities Code § 1711(a) states:

Where feasible and appropriate, except for adjudication cases, before determining the scope of the proceeding, the commission shall seek the participation of those who are likely to be affected, including those who are likely to benefit from, and those who are potentially subject to, a decision in that proceeding. The commission shall demonstrate its efforts to comply with

this section in the text of the initial scoping memo of the proceeding.

The Commission's Outreach Office conducted outreach pursuant to Public Utilities Code § 1711(a) by contacting cities and counties through the California League of Cities, which provides advocacy and educational services to all California Cities, and through the California State Association of Counties, which provides advocacy, educational services to California's 58 counties. In addition to the service list for this proceeding, this Scoping Memo will be served on the following service lists, which may be affected by any proposed changes in Electric Rules 2, 15, and 16: A.05-10-016, A.13-11-003, A.15-04-012, A.15-09-001, A.16-09-001, R.08-11-005, R.09-08-009, R.13-11-007, and the General Order 96-B service lists for Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company.

IT IS RULED that:

1. The category of Phases One and Three of this proceeding is quasi-legislative; Phase Two is categorized as ratesetting. Appeals as to category, if any, must be filed and served within ten days from the date of this scoping memo.
2. In Phase Two of this proceeding, Administrative Law Judge Kelly A. Hymes is designated as the Presiding Officer.
3. The scope of the issues for this proceeding is as stated in "Section 2. Scope" of this ruling.
4. An evidentiary hearing is not necessary at this time, but may be needed at a later date.

5. Working Groups One through Eight are hereby established for parties to work together to develop proposals that resolve the issues as indicated in “Section 2. Scope” of this ruling. All working group meetings are public.

6. The schedule for the proceeding is set in “Section 12. Schedule” of this ruling. The assigned Commissioner or Presiding Officer may adjust this schedule as necessary for efficient management and fair resolution of this proceeding.

7. The Director of the Commission’s Energy Division is authorized oversight of the working groups established in this Ruling. Oversight shall include providing guidance on: i) meeting agendas; ii) the process for consensus; iii) documentation of different viewpoints; and iv) the format of reports and proposals.

8. No later than seven days from the issuance of this Ruling, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities) are directed to invite all parties to participate in Working Group One. The first meeting of Working Group One shall occur no later than October 16, 2017; the first meeting may be telephonic. The Utilities are responsible for scheduling meetings, including the meeting date and location. Working Group meetings shall be public.

9. No later than January 15, 2018, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities) are directed to contact parties to invite all parties to participate in Working Group Two. The first meeting of Working Groups Two shall occur no later than February 15, 2018. The Utilities are responsible for setting meetings, including the meeting date and location. Working Group meetings shall be public.

10. No later than August 1, 2018, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities) are directed to contact parties to invite all parties to participate in Working Groups Three through Six. The first meeting of Working Groups Three through Six shall occur no later than September 1, 2018. The Utilities are responsible for setting meetings, including the meeting date and location. Working Group meetings shall be public.

11. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities), on behalf of Working Group One, shall file and serve a Final Report of the Working Group. The Utilities shall file and serve Working Group One's report on February 15, 2018.

12. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities), on behalf of Working Group Two, shall file and serve a Final Report of the Working Group. The Utilities shall file and serve Working Group Two's report on August 15, 2018.

13. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the Utilities), on behalf of Working Groups Three through Six, shall file and serve a Status Report from each of the Working Groups. The Utilities shall file and serve the individual working groups' reports together as one report on December 1, 2018.

14. No later than March 1, 2019, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, on behalf of Working Groups Three through Six, shall file one combined document providing a final report from each of these Working Groups.

15. Thirty days following the adoption of a decision on Working Groups Three through Six proposals, *i.e.*, Phase One decision, the small and multi-

jurisdictional utilities shall contact parties to determine interest in participating in Working Group Eight, schedule meetings, and establish locations for those meeting. Working Group Eight meetings shall be public. The small and multi-jurisdictional utilities shall consult with the Commission's Energy Division.

16. The small and multi-jurisdictional utilities, on behalf of Working Group Eight, shall file proposals addressing Working Group Eight issues no later than 120 days after the Phase One decision is adopted.

17. *Ex parte* communications with the assigned Commissioner, other Commissioners, their advisors and the Administrative Law Judge are permitted without restriction or reporting as described at Public Utilities Code § 1701.4(c) and Article 8 of the Rules for Phase One and Three of this proceeding.

18. With limited exceptions that are subject to reporting requirements, *ex parte* communications are prohibited in Phase Two of this proceeding. (*See* Public Utilities Code § 1701.3(h); Article 8 of the Commission's Rules of Practice and Procedure.)

19. A party shall submit request for Final Oral Argument in its opening briefs, but the right to Final Oral Argument ceases to exist if hearing is not needed.

20. Parties shall comply with Commission filing requirements as described above in Section 8 (Filing, Service and Service List) and Appendix A of this Scoping Memo, if a hearing is held.

21. In addition to the service list for this proceeding, this Scoping Memo shall be served on the following service lists: Application (A.) 05-10-016, A.13-11-003, A.15-04-012, A.15-09-001, A.16-09-001, Rulemaking (R.) 08-11-005, R.09-08-009,

R.17-07-007 MP6/KHY/ek4

R.13-11-007, and the General Order 96-B service lists for Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company.

Dated October 2, 2017 at San Francisco, California.

/s/ MICHAEL PICKER
Michael Picker
Assigned Commissioner

/s/ KELLY A. HYMES
Kelly A. Hymes
Administrative Law Judge

APPENDIX A

1. Electronic Submission and Format of Supporting Documents

The Commission's web site now allows electronic submittal of supporting documents (such as testimony and work papers).

Parties shall submit their testimony or workpapers in this proceeding through the Commission's electronic filing system.⁶ Parties must adhere to the following:

- The Instructions for Using the "Supporting Documents" Feature, (<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=158653546>) and
- The Naming Convention for Electronic Submission of Supporting Documents (<http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&DocID=100902765>).
- The Supporting Document feature does not change or replace the Commission's Rules of Practice and Procedure. Parties must continue to adhere to all rules and guidelines in the Commission's Rules of Practice and Procedures including but not limited to rules for participating in a formal proceeding, filing and serving formal documents and rules for written and oral communications with

⁶ These instructions are for submitting supporting documents such as testimony and work papers in formal proceedings through the Commission's electronic filing system. Parties must follow all other rules regarding serving testimony.

Any document that needs to be formally filed such as motions, briefs, comments, etc., should be submitted using Tabs 1 through 4 in the electronic filing screen.

Commissioners and advisors (*i.e.* “*ex parte* communications”) or other matters related to a proceeding.

- The Supporting Document feature is intended to be solely for the purpose of parties submitting electronic public copies of testimony, work papers and workshop reports (unless instructed otherwise by the Administrative Law Judge), and does not replace the requirement to serve documents to other parties in a proceeding.
- Unauthorized or improper use of the Supporting Document feature will result in the removal of the submitted document by the CPUC.
- Supporting Documents should not be construed as the formal files of the proceeding. The documents submitted through the Supporting Document feature are for information only and are not part of the formal file (*i.e.* “record”) unless accepted into the record by the Administrative Law Judge.

All documents submitted through the “Supporting Documents” Feature shall be in PDF/A format. The reasons for requiring PDF/A format are:

- Security – PDF/A prohibits the use of programming or links to external executable files. Therefore, it does not allow malicious codes in the document.
- Retention – The Commission is required by Resolution L-204, dated September 20, 1978, to retain documents in formal proceedings for 30 years. PDF/A is an independent standard and the Commission staff anticipates that programs will remain available in 30 years to read PDF/A.

- Accessibility – PDF/A requires text behind the PDF graphics so the files can be read by devices designed for those with limited sight. PDF/A is also searchable.

Until further notice, the “Supporting Documents” do not appear on the “Docket Card”. In order to find the supporting documents that are submitted electronically, go to:

- Online documents, choose: “E-filed Documents”,
- Select “Supporting Document” as the document type, (do not choose testimony)
- Type in the proceeding number and hit search.

Please refer all technical questions regarding submitting supporting documents to:

- Kale Williams (kale.williams@cpuc.ca.gov) 415 703- 3251 and
- Ryan Cayabyab (ryan.cayabyab@cpuc.ca.gov) 415 703-5999

(END OF APPENDIX A)