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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)
And Related Matters	Application 15-07-002 Application 15-07-003 Application 15-07-006 (Filed July 1, 2015)
(NOT CONSOLIDATED)	
In the Matter of the Application of PacificCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005 (Filed July 1, 2015)
And Related Matters	Application 15-07-007 Application 15-07-008

**REPLY COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL,
INC. ON PROPOSED DECISION ON TRACK 1 DEMONSTRATION PROJECTS A & B**

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INTRODUCTION

The Interstate Renewable Energy Council, Inc. (IREC) continues to support the proposed decision¹ as written, with the minor modifications IREC proposed in its opening comments.² The investor owned utilities (IOUs) sought various changes to the Proposed Decision’s treatment of Integration Capacity Analysis (ICA).³ IREC provides reply comments on two particularly

¹ Proposed Decision on Track 1 Demonstration Projects A (Integration Capacity Analysis) and B (Locational Net Benefits Analysis) (Proposed Decision), R.14-08-013 (Aug. 25, 2017).

² See Comments of the Interstate Renewable Energy Council, Inc. on Proposed Decision on Track 1 Demonstration Projects A and B (IREC Comments), R.14-08-013 (Sept. 14, 2017).

³ Joint Opening Comments of Pacific Gas and Electric Company (U 39 E), San Diego Gas & Electric Company (U 902 E), and Southern California Edison Company (U 338 E) on Proposed

concerning issues: the IOUs' proposals to make the disclosure requirements open-ended and to allow pre-approval of costs.

REPLY COMMENTS

I. The Decision Should Include Explicit ICA Disclosure Requirements.

The IOUs argue that the proposed decision's disclosure requirements for the ICA should be replaced with general direction to provide "relevant attributes," in order to protect privacy.⁴ While IREC agrees that disclosure requirements should not compromise privacy, it is not reasonable to replace the numerous explicit disclosure requirements in the proposed decision with the open-ended language the IOUs propose.⁵ If the Commission finds that specific proposed disclosure requirements pose legitimate privacy concerns, its decision should include a process for exploring this issue in more detail, such as further working group discussion, rather than approving wide-open IOU flexibility with no accountability that could undermine the value and usability of the ICA data.

II. The Commission Should Not Allow Pre-Approval of ICA Implementation Costs.

The IOUs request that the proposed decision be modified to allow pre-approval of ICA implementation costs.⁶ However, such an approach would be inappropriate here, given the wide range of preliminary cost estimates the IOUs have provided. As IREC noted in its opening comments, this variation warrants scrutiny over time, to determine whether costs are actually reasonable.⁷

Decision on Track 1 Demonstration Projects A (Integration Capacity Analysis) and B (Locational Net Benefits Analysis) (IOU Comments), R.14-08-013 (Sept. 14, 2017).

⁴ IOU Comments at 3, Appendix at 2-3.

⁵ See IOU Comments, Appendix at 2-3.

⁶ IOU Comments at 5, 13-14, Appendix at 1, 5.

⁷ See IREC Comments at 5.

The IOUs' analogy to the IDER Pilot decision is inapt.⁸ The IDER Pilot involves a competitive solicitation process designed to drive costs below the costs of a previously authorized distribution project.⁹ The ICA project includes no similar mechanism for controlling costs. Thus, the Commission should not allow pre-approval of ICA implementation costs based on IOU estimates.

CONCLUSION

The Commission should adopt the proposed decision with the minor modifications and flexibility provisions IREC proposed in its opening comments.

DATED: September 19, 2017

Respectfully submitted,

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⁸ See IOU Comments at 14.

⁹ D.16-12-036 (Dec. 22, 2016) at 58-59.