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April 29, 2020

**Agenda ID #18373**  
**Ratesetting**

TO PARTIES OF RECORD IN RULEMAKING 19-09-009:

This is the proposed decision of Administrative Law Judge Colin Rizzo. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's June 11, 2020 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, ex parte communications are prohibited pursuant to Rule 8.2(c)(4)(B).

SPT for Anne Simon  
Anne E. Simon  
Chief Administrative Law Judge

AES:avs

Attachment

Decision PROPOSED DECISION OF ALJ RIZZO (Mailed 4/29/2020)

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

Order Instituting Rulemaking  
Regarding Microgrids Pursuant to  
Senate Bill 1339 and Resiliency  
Strategies.

Rulemaking 19-09-009

**DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE  
MICROGRID DEPLOYMENT AND RELATED RESILIENCY SOLUTIONS**

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## **DECISION ADOPTING SHORT-TERM ACTIONS TO ACCELERATE THE DEPLOYMENT OF MICROGRIDS AND RELATED RESILIENCY SOLUTIONS**

### **Summary**

This decision adopts short-term actions related to the acceleration of microgrid deployment and related resiliency strategies for Track 1 of this proceeding, Rulemaking 19-09-009, pursuant to Senate Bill 1339 (Stern, 2018).

First, this decision adopts solutions to accelerate interconnection of resiliency projects in advance of the upcoming wildfire season. Specifically, the large investor-owned utilities must: (a) develop and implement standardized, pre-approved system designs for interconnection of resiliency projects that deliver energy services during grid outages; (b) develop and implement methods to increase simplicity and transparency of the processes by which the utilities inspect and approve a project; and (c) prioritize interconnection of resiliency projects for key locations, facilities, and/or customers.

Second, this decision adopts solutions that modernize tariffs to maximize social resiliency benefits. This includes requiring the large investor-owned utilities to modify their net energy metering tariffs to allow storage devices to charge from the grid during the pre-public safety power shut off window. This decision also requires the large investor-owned utilities to modify their net-energy metering tariffs to remove storage sizing limits.

Third, this decision adopts solutions that promote collaborative engagement between large investor-owned utilities and local and tribal governments. Under this decision, the large investor-owned utilities are required to conduct meetings to educate and inform local and tribal government agencies on vulnerable electric transmission and distribution infrastructure as well as critical operations that service local jurisdictions. This decision also

requires the large investor-owned utilities to develop a resiliency project guide, and to assist local and tribal governments in navigating the large investor-owned utilities' interconnection processes for deploying a resiliency project.

Furthermore, this decision directs the large investor-owned utilities to dedicate staff to manage the intake of local and tribal government resiliency projects; as well as create a separate, access-restricted data portal for local and tribal governments to review data essential for microgrid and resiliency project development.

Finally, this decision conditionally approves an array of resiliency proposals set forth by Pacific Gas and Electric Company and San Diego Gas & Electric Company.

This proceeding remains open.

## **1. Background**

The California Public Utilities Commission (Commission or CPUC) initiated this rulemaking to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018). SB 1339 requires the Commission, in consultation with the California Energy Commission (CEC), and the California Independent System Operator (CAISO), by December 1, 2020, to take specific actions to facilitate the commercialization of microgrids for distribution customers of large electrical corporations. These actions include developing standards, protocols, guidelines, methods, and if appropriate, separate rates and tariffs that serve to support and reduce barriers to microgrid deployment while prioritizing system, public, and worker safety, and avoiding shifting costs between ratepayers.

### 1.1. Procedural Background

Upon initiating this Rulemaking,<sup>1</sup> on October 21, 2019, parties to this rulemaking filed opening comments on Rulemaking (R.) 19-09-009. On November 5, 2019, parties filed reply comments.

An Energy Division staff (Staff) workshop (Workshop) was held on December 12, 2019. At the Workshop, Staff and stakeholders discussed short-term actions related to microgrids and other resiliency strategies that could be initiated in early 2020 to reduce the impact of public safety power shutoff (PSPS) outages or other catastrophic events.

Following the staff workshop, a prehearing conference (PHC) was held on December 17, 2019 to discuss the issues of law and fact, determine the need for hearing, and the schedule for resolving the matter.

On December 20, 2019 the assigned Commissioner's Scoping Memo and Ruling was issued, adopting a schedule for this proceeding, divided into three tracks. The first track of this proceeding, Track 1, addresses the Commission's goal of deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of establishing key microgrid and resiliency strategies as soon as possible.<sup>2</sup> Track 1 is the focus of this proposed decision. As discussed in the assigned Commissioner's Scoping Memo and Ruling, Track 2 and Track 3 of this proceeding are focused on the more complex issues and contours of SB 1339 implementation.<sup>3</sup>

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<sup>1</sup> Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill (SB) 1339 (September 12, 2019).

<sup>2</sup> *Id.* at 3.

<sup>3</sup> *Id.* at 4-5.

## 1.2. Track 1 Staff Proposal Summary

On January 21, 2020, the assigned Administrative Law Judge (ALJ) issued a ruling with a proposal prepared by the Commission's Energy Division, titled, *Short-Term Actions to Accelerate the Deployment of Microgrids and Related Resiliency Solutions* (Staff Proposal).<sup>4</sup>

The Staff Proposal makes recommendations addressing Track 1 issues that help reduce the length of time to interconnect with the utility distribution system, which can be a barrier to deploy distributed energy resources such as microgrids and resiliency projects.<sup>5</sup> The Staff Proposal recommends that reducing the amount of time required to interconnect distributed energy resources including microgrids for the 2020 fire season and beyond is likely increase resiliency of electric service during widespread outages while maintaining the safety and reliability of the grid.<sup>6</sup>

Therefore, the Staff Proposal presents the following recommendations for actions to facilitate the deployment of microgrids and other resiliency solutions in 2020, in partnership with local governments and tribal governments:<sup>7</sup>

- Accelerate Interconnection of Resiliency Projects
  - *Use Pre-Approved Designs in Application Process:* develop and institute standardized, pre-approved system designs in interconnection applications for projects that

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<sup>4</sup> Administrative Law Judge's Ruling requesting comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal (January 21, 2020).

<sup>5</sup> Staff Proposal at 7, stating projects that provide resiliency are more likely to experience interconnection delays than simpler projects that cannot provide resiliency because resiliency-focused projects must have the ability to electronically island distributed generation and energy storage assets. The Staff Proposal also states that projects that island require longer study processes to ensure that there is no inadvertent export of energy to the grid.

<sup>6</sup> *Id.* at 7-8.

<sup>7</sup>The Staff Proposal considers local governments as cities, counties, and community choice aggregators. (*Id.* at 21.)



can deliver energy services during broader grid outages.

- *Expedite Utility Sign-Off on Installed Projects:* (1) publish the specific technical criteria used to determine under which conditions field inspections are necessary for the safety and reliability of the grid; (2) eliminate inspections that are duplicative of those performed by local jurisdictions; and (3) consider “remote inspections” by accepting photos or videos provided by the contractor rather than requiring an in-person inspection.
- *Prioritize Interconnection of Key Location, Facilities, and/or Consumers:* allow projects that meet certain resiliency eligibility criteria to bypass the interconnection queue.
- *Expand Interconnection Staffing and Information Technology Resources:* commit additional resources to their interconnection study and distribution upgrade teams, as well as to the information technology solutions that support these teams, in order to facilitate faster processing for all projects.
- Modernize Tariffs to Maximize Resiliency Benefits
  - *Allow Emergency Grid Charging of Net Energy Metering (NEM) Paired Storage:* modify NEM tariffs to allow storage devices to charge from the grid during the pre-PSPS window.
  - *Remove NEM Paired Storage Sizing Limit for Islandable Systems:* modify NEM tariffs to remove storage sizing limit and to require islanding ability for energy storage systems larger than 10 kilowatts (kW).
- Share Information with Local and Tribal Government Agencies
  - *Conduct Outreach on Utility Infrastructure:* conduct meetings to educate and inform local government agencies and tribal governments on vulnerable electric

transmission and distribution infrastructure and critical operations that serve the local jurisdictions.

- *Develop Engagement Guide:* develop a guide to assist and engage local governments and tribal governments in navigating the utilities' interconnection processes for deploying a resiliency project.
- *Dedicate Staff to Manage Intake:* create a dedicated team of staff to manage the intake of local governments and tribal governments resiliency project inquiries.
- *Create Separate Data Portal for Local & Tribal Governments:* create a separate access-restricted portal, available only to local governments and tribal governments, containing essential data for microgrid and resiliency project development.

### **1.3. Utility Proposal Summary**

In the assigned Commissioner's Scoping Memo and Ruling, the utilities were required to file and serve proposals for immediate implementation of resiliency strategies, including partnership and planning with local governments and tribal governments:

- Pacific Gas and Electric Company (PG&E): proposes the following three components for its immediate implementation plan for resiliency strategies: (1) a permanently enabled Distribution Generation-Enabled Microgrid Services program (DGEMS); (2) a temporary generation program to provide mobile, temporarily-sited distributed generation at substations, mid-feeder line segments serving commercial corridors and commercial facilities, and single-customer critical facilities during PSPS events; and (3) a Community Microgrid Enablement Program.<sup>8</sup> PG&E proposes accounting for recording the actual costs of its three proposed programs. Additionally,

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<sup>8</sup> Track 1 Proposal of PG&E Addressing Immediate Resiliency Strategies for Outages (January 21, 2020).

PG&E seeks to track costs, subject to reasonableness review.<sup>9</sup>

- Southern California Edison Company (SCE): proposes the following resiliency activities in advance of the upcoming wildfire season (1) 2020 PSPS Microgrid Pilot; (2) microgrids and microgrid-related activity currently in development; (3) subsidies for battery back-up solutions for income-eligible, critical care residential customers; and (4) customer resiliency equipment incentive pilot.<sup>10</sup> SCE is not seeking Commission action or cost recovery for these resiliency activities in this proceeding, nor is SCE proposing activity within the context of Track 1.<sup>11</sup>
- San Diego Gas & Electric (SDG&E): proposes to (1) procure a local area distribution controller (LADC) necessary to augment and interoperate with SDG&E's existing Advanced Distribution Management System (ADMS) and Supervisory control and data acquisition (SCADA) system.; and (2) install electric vehicle charging infrastructure at its Cameron Corners microgrid as a pilot project to support customer mobility during disasters.<sup>12</sup> The LADC procurement involves an affiliate transaction for which SDG&E seeks CPUC approval pursuant to the Affiliate Transaction rules. SDG&E is not seeking cost recovery from the Commission for these projects at this time but may do so in a future GRC or other appropriate venue.

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<sup>9</sup> *Ibid* at 7-2.

<sup>10</sup> SCE Resiliency Proposal and Response to Administrative Law Judge's Ruling (January 21, 2020)

<sup>11</sup> *Id.* at 11.

<sup>12</sup> Response of SDG&E with Proposals Requested by Scoping Memo and Information Requested by ALJ Ruling (January 21, 2020).

#### **1.4. Parties' Response to Staff Proposal and Utility Proposals**

Comments were filed on January 30, 2020 by parties. The parties are:

(1)Advanced Energy Management (AEMA) ; (2) American Telephone and Telegraph and Frontier (AT&T and Frontier); (3) Bioenergy Association of California (BAC); (4) Bloom Energy Corporation (Bloom); (5) Bright Canyon Energy (BCE); (6) California Independent System Operator (CAISO); (7) California Cable and Telecommunications (CCTA); (8) California Clean DG Coalition (CCDC); (9) California Energy Storage Alliance (CESA); (10) California Environmental Justice Alliance (CEJA); (11) California Hydrogen Business Council (CHBC); (12) California Large Energy Consumers Association (CHBC); (13) California Solar & Storage Association (CALSSA); (14) Camptonville Community Partnership (CCP); (15) Center for Accessible Technology (CforAT); (16) Center for Energy Efficiency and Renewable Technologies (CEERT); (17) Clean Coalition; (18) Climate Center; (19) Coalition of California Utility Employees (CCUE); (20) Cogeneration Association of California (CAC); (21) Connect California; (22) CTIA; (23) Doosan Fuel Cell America (Doosan); (24) Enchanted Rock; (25) Enel X North America; (26) Fuel Cell Energy Inc.; (27) Green Power Institute (GPI); (28) Grid Alternatives (GRID); (29) Joint CCA; (30) Local Government Sustainable Energy Coalition (LGSEC); (31) City of Long Beach acting by and through its Board of Harbor Commissioners (Long Beach); (32) Mainspring; (33) Marin Clean Energy (MCE); (34) Microgrids Coalition (MRC); (35) National Fuel Cell Research Center (NFCRC); (36) Nevada County Biomass Taskforce (NVBTF); (37) Pacific Gas and Electric Company (PG&E); (38) Placer County Air Pollution Control District (Placer County); (39) Public Advocates Office (Cal Advocates); (40) Rural County Representatives of

California (RCRC); (41) San Diego Gas & Electric (SDG&E); (42) Shell Energy; (43) Sierra Club; (44) Small Business Utility Advocates (SBUA); (45) Southern California Gas Company (SoCalGas); (46) Tesla; (47) The Utility Reform Network (TURN); (48) Utilities Consumers' Action Network (UCAN); (49) Vehicle-Grid Integration Council (VGIC); (50) Wild Tree Foundation.

Reply comments were filed on February 6, 2020. Parties that filed reply comments are: (1) BAC; (2) Bay Area Air Quality Management District (BAAQMD); (3) Bloom; (4) CAC; (5) Cal Advocates; (6) CALSSA; (7) CCDC; (8) CTA; (9) CEERT; (10) CEJA; (11) Center for Sustainable Energy (CSE); (12) CESA; (13) CHBC; (14) Clean Coalition; (15) CLECA; (16) Connect California; (17) Counties of Marin, Napa, and Sonoma (Marin, Napa, Sonoma); (18) CUE; (19) Enel X; (20) GPI; (21) GRID; (22) Joint CCA; (23) Mainspring; (24) MRC; (25) NFCRC; (26) PG&E; (27) SBUA; (28) SCE; (29) SDG&E; (30) Sierra Club; (31) SoCalGas; (32) Tesla; (33) TURN; (34) UCAN; and (35) Vote Solar.

## **2. Issues Before the Commission**

Track 1 of this proceeding addresses the Commission's goal of deploying resiliency strategies in areas that are prone to outage events and wildfires by Summer 2020. With this timeline in mind, the issues within the scope of Track 1 are:<sup>13</sup>

1. Prioritizing and streamlining interconnection applications to deliver resiliency services at key sites and locations;

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<sup>13</sup> For each of the identified issues, the Commission will be considering, but not be limited to, the following elements for key sites and locations: (1) customers with access and functional needs; (2) medical baseline customers; (3) police stations; (4) fire stations; (5) schools (*e.g.*, educational facilities); (6) water and waste water facilities; (7) community centers; (8) senior centers; and (9) disadvantaged and hard to reach communities. Additionally, The Commission is mindful that similar targeting criteria have been previously identified in Decision (D.) 19-05-042, Appendix C at C4; in D.19-09-027; and D.20-02-021 (R.12-11-005).

2. Modifying existing tariffs to maximize resiliency benefits;
3. Facilitating local and tribal government access to utility infrastructure and planning data to support the development of resiliency projects; and
4. Utility proposals for immediate implementation of resiliency strategies, including partnership and planning with local and tribal governments.

Upon issuance of the Assigned Administrative Law Judge's ruling,<sup>14</sup> the following issues were also presented for party comment:

1. How should the utilities track costs associated with the actions the Commission orders utilities to undertake pursuant to the staff proposal?
2. Is Commission direction required for any of the activities that utilities have proposed? If so, should the Commission authorize utilities to undertake any of the actions they propose?
3. Should Commission grant cost recovery sought by PG&E and SDG&E for their proposals?
4. Should Commission approve the affiliate transaction proposed by SDG&E?

We address these issues in our discussion below.

### **3. COVID 19 and Compliance with Executive Orders**

On March 19, 2020, Governor Gavin Newsom signed Executive Order N-33-20<sup>15</sup> requiring Californians to comply with the orders of the California State Public Health Officer and the Director of the California Department of Public Health that all individuals living in the State of California stay home or at their

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<sup>14</sup> Administrative Law Judge's Ruling requesting comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal (January 21, 2020).

<sup>15</sup> Executive Order N-33-20 (March 19, 2020) available at: <https://www.gov.ca.gov/2020/03/19/governor-gavin-newsom-issues-stay-at-home-order/>

place of residence (Stay-At-Home Order), except as needed to maintain continuity of operation of the federal critical infrastructure sectors, in order to address the public health emergency presented by the COVID-19 disease. The Stay-At-Home order is indefinite, and as of the date of the issuance of this decision, it remains in effect.

In furtherance of Executive Order N-33-20 to protect the public health and safety, we direct PG&E, SCE, and SDG&E to take every reasonable effort to fully comply with the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic when implementing the requirements of this decision.

#### **4. Discussion of Commission Track 1 Initiatives**

According to the legislative history of SB 1339, microgrids may help provide communities with additional reliability and resiliency during disasters, like wildfires.<sup>16</sup> Consistent with the legislative history, the Staff Proposal focuses on three broad categories of activity to foster the deployment of microgrids to provide power and support communities and residents during wider grid outages: (1) prioritizing and streamlining interconnection applications to deliver resiliency services at key sites and locations; (2) modifying existing tariffs to maximize resiliency benefits; and (3) facilitating local and tribal government access to utility infrastructure and planning data to support the development of resiliency projects. We discuss the parties' positions with respect to each of these broad issues, below.

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<sup>16</sup> SB 1339 Legislative History, August 31, 2018 Senate Floor Analyses.

#### **4.1. Prioritizing and Streamlining Interconnection Applications to Deliver Resiliency Services at Key Sites and Locations**

Consistent with the Scoping Memo and Ruling,<sup>17</sup> an Administrative Law Judge's Ruling<sup>18</sup> asked parties an array of questions regarding the Staff Proposal's recommendations for prioritizing and streamlining interconnection applications to deliver resiliency services at key sites and locations.

##### **4.1.1. Staff Proposal Summary**

Staff recommend four pathways to accelerate interconnection of resiliency projects: (1) use pre-approved designs in the application process;<sup>19</sup> (2) expedite utility sign-off on installed projects;<sup>20</sup> (3) accelerate interconnections for key locations, customers, and/or facilities;<sup>21</sup> and (4) allow the use of smart meters for electrical isolation.<sup>22</sup>

Proposal 1 - Use Pre-Approved Designs in the Application Process: Staff identified three potential options for the implementation:

- Option 1: require the utilities to informally consult with industry, develop, and publish pre-approved template single line diagrams;
- Option 2: require the utilities, along with stakeholders, to convene an expedited technical working group to develop the single line diagrams; and
- Option 3: require the utilities to develop a process to receive, review, and approve standard diagrams from

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<sup>17</sup> Assigned Commissioner's Scoping Memo and Ruling for Track 1 (December 20, 2019).

<sup>18</sup> Administrative Law Judge's Ruling requesting comments on Track 1 Microgrid and Resiliency Strategies Staff Proposal (January 21, 2020).

<sup>19</sup> Staff Proposal at 7.

<sup>20</sup> *Id.* at 8.

<sup>21</sup> *Id.* at 9.

<sup>22</sup> *Id.* at 10.



individual contractors.<sup>23</sup> The approved templates would be categorized by Contractor or Contractors State Licensing Board Number.

Staff recommends the adoption of Option 1 only.<sup>24</sup>

Proposal 2- Expedite Utility Sign-Off on Installed Projects: Staff identified three potential options:

- Option 1: require the utilities publish the specific technical criteria they use to determine where field inspections are necessary for the safety and reliability of the grid;
- Option 2: require the utilities to eliminate inspections that duplicate those conducted by local jurisdictions, if any. This option would prohibit the utilities from carrying out inspections of system elements that have been previously inspected by local jurisdictions unless the inspection is substantively different; and
- Option 3: in cases where an inspection is necessary, require the utilities to consider accepting photos or videos, along with attestations of their accuracy, from the contractor rather than requiring an in-person inspection.<sup>25</sup> Additionally, Option 3 requires the utilities to coordinate with local jurisdictions to enforce the same inspection requirements and eliminate duplicative efforts.

Staff recommends the Commission adopt Options 1, 2, and 3.<sup>26</sup>

Proposal 3 - Accelerate Interconnections for Key Locations, Customers, and/or Facilities: Staff identified three potential options for the implementation:

- Option 1: while the existing queue is formed on a first-come-first-served basis, require the utilities to develop

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<sup>23</sup> *Id.* at 7-8.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.* at 8-9.

<sup>26</sup> *Id.* at 9.

- new rules to allow eligible projects to move ahead of other projects in the queue (referred to as "queue jumping");
- Option 2: require utilities to develop a second “priority” queue for eligible projects, which effectively works in parallel with the existing queue. This would require the utilities to allocate dedicated staff and information technology resources to this “priority queue;” and
  - Option 3: rather than altering the queueing process, require the utilities to commit additional staff and information technology resources to their interconnection study and distribution upgrade teams, as well as to the information technology solutions that support these teams, in order to facilitate faster queue processing for all projects.<sup>27</sup>

Staff recommends the Commission adopt Option 1 and 3.<sup>28</sup>

Proposal 4 - Allow the use of Advanced Metering Infrastructure for Electric Isolation: Staff noted the possibility of allowing the use of advanced metering infrastructure (*i.e.*, smart meters) for electrical isolation or islanding.<sup>29</sup> However, Staff did not recommend the Commission adopt this approach for Track 1 but advised that the Commission’s Energy Division continue to monitor development of this technology for this approach.<sup>30</sup>

#### **4.1.2. Parties’ Positions**

Generally, parties support Proposal 1 but had various positions about the options presented by the Staff Proposal. The following list summarizes parties’ positions:

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<sup>27</sup> *Id.* at 9.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.* at 10.

<sup>30</sup> *Id.*

- BAC,<sup>31</sup> supporting Options 2 and Options 3;
- CALSSA,<sup>32</sup> supporting Options 1 and Options 2;
- CforAT,<sup>33</sup> supporting Options 1 and 2;
- CEERT,<sup>34</sup> Options 1, 2, and 3;
- CESA,<sup>35</sup> supporting Option 1;
- Clean Coalition,<sup>36</sup> supporting Option 1;
- Climate Center,<sup>37</sup> supporting Options 1, 2, and 3;
- CUE,<sup>38</sup> supporting Options 1, 2, and 3;
- Enchanted Rock,<sup>39</sup> supporting Option 1;
- Enel,<sup>40</sup> supporting Options 1, 2, and 3.
- Fuel Cell,<sup>41</sup> supporting Option 1
- GPI,<sup>42</sup> supporting Option 1;
- Joint CCA,<sup>43</sup> supporting Option 1;
- PG&E,<sup>44</sup> supporting Option 1;

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<sup>31</sup> BAC at 8-9.

<sup>32</sup> CALSSA at 2.

<sup>33</sup> CforAT at 3.

<sup>34</sup> CEERT at 2-3.

<sup>35</sup> CESA at 9.

<sup>36</sup> Clean Coalition at 3-5.

<sup>37</sup> Climate Center at 3-4.

<sup>38</sup> CUE at 1-2.

<sup>39</sup> Enchanted Rock at 2-3.

<sup>40</sup> Enel at 3.

<sup>41</sup> Fuel Cell Energy at 4.

<sup>42</sup> GPI at 6.

<sup>43</sup> Joint CCA at 8-9.

<sup>44</sup> PG&E at 5.

- Placer County,<sup>45</sup> supporting Option 2;
- RCRC,<sup>46</sup> supporting Option 1;
- SBUA,<sup>47</sup> supporting Options 1, 2, and 3;
- SCE,<sup>48</sup> supporting Option 1;
- SDG&E<sup>49</sup> supporting Options 1, 2, and 3;
- Shell Energy,<sup>50</sup> supporting Option 1, 2, and 3;
- Sierra Club,<sup>51</sup> supporting Options 1, 2, and 3;
- Tesla,<sup>52</sup> supporting Option 1;
- TURN,<sup>53</sup> supporting Options 1, 2, and 3; and
- Wild Tree Foundation,<sup>54</sup> supporting Options 1, 2, and 3.

Parties generally support Proposal 2 but had various positions about the options presented by Staff. The following list summarizes parties' positions:

- BAC,<sup>55</sup> supporting Options 1, 2, and 3;
- Cal Advocates,<sup>56</sup> supporting Options 1 and 3;
- CALSSA,<sup>57</sup> supporting Options 1, 2, and 3;

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<sup>45</sup> Placer County at 15.

<sup>46</sup> RCRC at 4.

<sup>47</sup> SBUA at 3.

<sup>48</sup> SCE at 2-3.

<sup>49</sup> SDG&E at 5.

<sup>50</sup> Shell Energy at 2-3.

<sup>51</sup> Sierra Club at 2-3.

<sup>52</sup> Tesla at 3.

<sup>53</sup> TURN at 3.

<sup>54</sup> Wild Tree Foundation at 7.

<sup>55</sup> BAC at 11.

<sup>56</sup> Cal Advocates at 9

<sup>57</sup> CALSSA at 2-3.

- CforAT,<sup>58</sup> supporting Options 1 and 2 but opposing Option 3;
- CEERT,<sup>59</sup> supporting Options 1, 2, and 3;
- CESA,<sup>60</sup> supporting Options 1,2, and 3;
- Clean Coalition,<sup>61</sup> supporting Options 1, 2, and 3;
- Climate Center,<sup>62</sup> supporting Options 1, 2, and 3;
- Enchanted Rock,<sup>63</sup> supporting Options 1, 2, and 3;
- Enel X,<sup>64</sup> supporting Options 1, 2, and 3;
- GPI,<sup>65</sup> supporting Options 1, 2, and 3;
- Joint CCA,<sup>66</sup> supporting Options 1, 2, and 3;
- PG&E,<sup>67</sup> supporting Options 1 and 3 but opposing Option 2;
- Placer County,<sup>68</sup> supporting Options 1, 2, and 3;
- RCRC,<sup>69</sup> supporting Options<sup>70</sup> 1, 2, and 3;
- SBUA,<sup>71</sup> supporting Options 1, 2, and 3;

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<sup>58</sup> CforAT at 6 and 9.

<sup>59</sup> CEERT at 2.

<sup>60</sup> CESA at 9.

<sup>61</sup> Clean Coalition at 10.

<sup>62</sup> Climate Center at 3-4.

<sup>63</sup> Enchanted Rock at 3-4.

<sup>64</sup> Enel X at 3.

<sup>65</sup> GPI at 3.

<sup>66</sup> Joint CCA at 7.

<sup>67</sup> PG&E at 6 - 8.

<sup>68</sup> Placer County at 15-18.

<sup>69</sup> RCRC at 4.

<sup>70</sup> Placer County at 15-18.

<sup>71</sup> SBUA at 3.

- SCE,<sup>72</sup> supporting Options 1 and 3 but opposing Option 2;
- SDG&E,<sup>73</sup> supporting Options 1 and 3 but opposing Option 2;
- Shell Energy,<sup>74</sup> supporting Options 1, 2, and 3;
- Tesla,<sup>75</sup> supporting Options 1, 2, and 3;
- TURN,<sup>76</sup> supporting Options 1, 2, and 3; and
- Wild Tree Foundation,<sup>77</sup> supporting Option 1, 2, and 3.

Parties support Proposal 3, but had various positions about the options presented by Staff. The following list summarizes parties' positions:

- BAC,<sup>78</sup> supporting Options 2 and 3 but opposing Option 1;
- Cal Advocates,<sup>79</sup> supporting Option 3 but opposing Options 1 and 2;
- CALSSA,<sup>80</sup> supporting Option 3 but opposing Options 1 and 2;
- CforAT,<sup>81</sup> supporting Option 3 but opposing Options 1 and 2;
- CEERT,<sup>82</sup> supporting Options 1, 2, and 3;

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<sup>72</sup> SCE at 3-4.

<sup>73</sup> SDG&E at 2.

<sup>74</sup> Shell Energy at 2-3.

<sup>75</sup> Tesla at 7.

<sup>76</sup> TURN at 3.

<sup>77</sup> Wild Tree Foundation at 6-7.

<sup>78</sup> BAC at 12.

<sup>79</sup> Cal Advocates at 11.

<sup>80</sup> CALSSA at 3-4.

<sup>81</sup> CforAT at 12-13.

<sup>82</sup> CEERT at 2.

- CESA,<sup>83</sup> supporting Option 3 but opposing Options 1 and 2;
- Clean Coalition,<sup>84</sup> supporting Options 1, 2, and 3;
- Climate Center,<sup>85</sup> supporting Options 1, 2, and 3;
- Enchanted Rock,<sup>86</sup> supporting Option 3 but opposing Options 1 and 2
- Enel,<sup>87</sup> supporting Options 2 and 3 but opposing Option 1.
- Fuel Cell Energy,<sup>88</sup> supporting Option 1.
- GPI,<sup>89</sup> supporting Options 1 and 3.
- Joint CCA,<sup>90</sup> supporting Options 1 and 3;
- Mainspring,<sup>91</sup> supporting Option 3;
- MRC,<sup>92</sup> supporting Options 1, 2, and 3;
- PG&E,<sup>93</sup> supporting Options 1 and 3;
- Placer County,<sup>94</sup> supporting Options 1, 2, and 3;
- RCRC,<sup>95</sup> supporting Options 1 and 3;

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<sup>83</sup> CESA at 10.

<sup>84</sup> Clean Coalition at 3-4.

<sup>85</sup> Climate Center at 3-4.

<sup>86</sup> Enchanted Rock at 3-4.

<sup>87</sup> Enel at 4.

<sup>88</sup> Fuel Cell Energy at 3.

<sup>89</sup> GPI at 8.

<sup>90</sup> Joint CCA at 8-9.

<sup>91</sup> Mainspring at 3.

<sup>92</sup> MRC at 3 and 11.

<sup>93</sup> PG&E at 8.

<sup>94</sup> Placer County at 15.

<sup>95</sup> RCRC at 4-5.

- SBUA,<sup>96</sup> supporting Options 1, 2, and 3;
- SCE,<sup>97</sup> opposing Proposal 3;
- SD&GE,<sup>98</sup> opposing Proposal 3;
  - Shell Energy,<sup>99</sup> supporting Option 3;
- Sierra Club,<sup>100</sup> supporting Option 3;
- Tesla,<sup>101</sup> supporting Option 3;
- TURN<sup>102</sup> supporting Options 1, 2, and 3;
- Wild Tree Foundation,<sup>103</sup> supporting Options 1, 2, and 3.

Finally, we turn to Proposal 4. CforAT,<sup>104</sup> CESA,<sup>105</sup> Clean Coalition,<sup>106</sup> ConnCA,<sup>107</sup> Sierra Club,<sup>108</sup> and VGIC<sup>109</sup> support Proposal 4. PG&E,<sup>110</sup> SBUA,<sup>111</sup> SCE<sup>112</sup> and SDG&E<sup>113</sup> oppose Proposal 4.

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<sup>96</sup> SBUA at 3.

<sup>97</sup> SCE at 6.

<sup>98</sup> SDG&E at 1.

<sup>99</sup> Shell Energy at 2.

<sup>100</sup> Sierra Club at 2.

<sup>101</sup> Tesla at 10-11.

<sup>102</sup> TURN at 4.

<sup>103</sup> Wild Tree Foundation at 7-8.

<sup>104</sup> CforAT at 17.

<sup>105</sup> CESA at 11.

<sup>106</sup> Clean Coalition at 4.

<sup>107</sup> ConnCA at 5-6.

<sup>108</sup> Sierra Club at 2.

<sup>109</sup> VGIC at 2.

<sup>110</sup> PG&E at 9.

<sup>111</sup> SBUA at 4.

<sup>112</sup> SCE at 7.

<sup>113</sup> SDG&E at 1.



#### **4.1.3. Analysis: The Utilities Shall Prioritize, Streamline, and Expedite Applications and Approval for Key Resiliency Projects**

We discuss our adopted approach, and our reasoning, below.

Proposal 1 requires PG&E, SCE, and SDG&E to work with stakeholders to develop, if not already available, a template-based application processes for interconnection of Rule 21 non-export storage, NEM and Paired Storage and NEM solar since utilities require interconnection applications include single line diagrams of the proposed project to determine the safety and effectiveness of the project for the local purposes and within the grid. Staff suggested three options:

- Option 1: require the utilities to informally consult with industry, develop, and publish pre-approved template single line diagrams;
- Option 2: require the utilities, along with stakeholders, to convene an expedited technical working group to develop the single line diagrams; and/or
- Option 3: require the utilities to develop a process to receive, review, and approve standard diagrams from individual contractors.<sup>114</sup> The approved templates would be categorized by Contractor or Contractors State Licensing Board Number.

Parties offered varying support and opposition for the each of option Staff proposed, but generally supported Proposal 1. Staff recommended that the Commission adopt Option 1 only.

We adopt an approach that blends Option 1 and Option 2 to develop single line diagrams for Proposal 1. We are persuaded by the recommendations of SCE and CALSSA,<sup>115</sup> who suggest the utilities should first informally consult

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<sup>114</sup> *Id.* at 7-8.

<sup>115</sup> CALSSA at 1-2.

with key stakeholders to develop acceptable template designs, and then share those designs with stakeholders through a technical meeting to solicit feedback and finalize templates.<sup>116</sup> We agree that the utilities should informally consult with industry to develop such preapproved template single line diagrams in order to get a basic set of designs in use as quickly as possible. We direct the utilities to collaborate and develop consistent, single line diagrams across their systems to ensure transparency, continuity, and simplicity. SCE stated that this informal collaboration should take no more than three weeks. However, to ensure timeliness of implementation prior to the upcoming fire season, we direct that this informal consultation should take no more than 10 days.

Then, we direct the utilities and stakeholders to formally engage with each other at technical meetings, sponsored by the Commission's Energy Division following this initial stakeholder work. To ensure speed and efficiency, parties should prepare for participation in no more than two Energy Division working technical meetings to complete the formal engagement process. During the technical meetings, we direct the utilities and parties to discuss the single line diagrams proposals, discuss any revisions to existing Interconnection Agreements, as well as any other necessary process modifications such as Commission-approved interconnection applications and related tariffs. In its comments, Tesla asked us to affirm that the template-based approach could be utilized by projects eligible for fast track interconnection process.<sup>117</sup> We affirm that that the template-based approach can be utilized by projects eligible for fast track interconnection process.

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<sup>116</sup> SCE at 3.

<sup>117</sup> Tesla at 4.

In adopting a hybrid of Options 1 and 2, we direct the utilities to create a template-based application process for specific behind-the-meter project types. These behind-the-meter projects types are: (1) Rule 21 non-export storage, (2), NEM and paired storage, and (3) NEM Solar.<sup>118</sup> The utilities shall develop templates that will address 80 percent or more of potential interconnection projects, and that those template designs be standardized across utilities, based on historical interconnection projects. The remaining 20 percent or less will continue to be evaluated through existing utility processes. The adoption of an 80/20 guideline approach will limit the complexity of single line diagram designs and shorten the time required to develop and implement them.

Once the utility and stakeholder consultation is completed, the utilities shall file a Tier 2 Advice Letter seeking Commission approval for the inclusion of the template-based designs as an option within their application process, along with any other modifications to Commission-approved applications and tariffs. Should the utilities see a need for an update to their NEM and Rule 21 interconnection portals, the utilities may conduct those updates in parallel with the single line diagram development. When implementing these requirements, we remind staff, the utilities and stakeholders to adhere to the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

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<sup>118</sup> We adopt these size restrictions to ensure implementation before the upcoming fire season. Additionally, while we adopt the single line diagrams for these particular behind-the-meter projects, we recognize that fuel-cell installation requirements may need to be considered at a later time, along with other technologies that meet California Air Resources Board distributed generation standards. We also recognize that greater than 10 kW storage must be considered. These considerations may be addressed in subsequent tracks of this proceeding.

In summary, upon date of issuance of this decision, the utilities are directed to submit Tier 2 Advice Letter(s), within 30 days of this decision's effective date that:

- Indicates when the informal consultation and technical meetings occurred;
- Lists who attended the meetings;
- Provides technical details specific to the single line diagrams, including the types of permitted devices, the processes for assessing the devices, and the device certification requirements;
- If any proposals were rejected, the utility shall explain the reasoning for the rejection(s);
- Provides updates to interconnection agreement terms as well as any other Commission-approved forms in order to implement the requirements adopted, here; and
- Requests authorization of the single line diagrams and discusses any updates required to the interconnection portals, along with a timeline for when the updates will take place.

Proposal 2<sup>119</sup> identifies methods to increase the simplicity and transparency of the process that utilities use to inspect and sign-off on a project to reduce delays arising from utility site inspections.<sup>120</sup> Parties offered varying

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<sup>119</sup> Proposal 2 included the following: Option 1, require the IOUs publish the specific technical criteria they use to determine where field inspections are necessary for the safety and reliability of the grid; Option 2, require the IOUs to eliminate inspections that duplicate those conducted by local jurisdictions, if any. This option would prohibit the IOUs from carrying out inspections of system elements that have been previously inspected by local jurisdictions unless the inspection is substantively different; and Option 3, in cases where an inspection is necessary, require the IOUs to consider accepting photos or videos, along with attestations of their accuracy, from the contractor rather than requiring an in-person inspection. Additionally, Option 3 requires the IOUs to coordinate with local jurisdictions to enforce the same inspection requirements and eliminate duplicative efforts.

<sup>120</sup> Staff Proposal at 8.

degrees of support and opposition for the each of the options Staff proposed, but generally supported the adoption of Proposal 2. Staff recommended that the Commission adopt Options 1, 2, and 3 for Proposal 2.

We adopt Proposal 2, with Options 1 and 3. PG&E, SCE, and SDG&E shall submit Tier 2 advice letters within 30 days of this decision's effective date that: (1) provides specific technical criteria used to determine where field inspections are necessary for grid safety and reliability; and (2) in cases where an inspection is deemed necessary, the process for which utilities will accept videos, photos, and virtual inspection, along with attestations of authenticity and accuracy from the contractor. We direct the utilities to adopt these approaches to the extent that safety and reliability are not compromised.

We note the utilities reservations regarding some application of Options 1 and 3. For example, SCE asserts that projects have diverse and varying characteristics and need to be evaluated on a project-by-project basis to determine if a field inspection is required.<sup>121</sup> SCE also argues that the utilities should not be not be required in all instances to accept photos, technical information and other information in lieu of a field inspection.<sup>122</sup> We agree. In adopting Proposal 2, Options 1 and 3, our aim is to enhance transparency of technical information that may help developers construct their projects to minimize the need for field inspections while still promoting and ensuring the safety and reliability of the grid.

Within 60 days upon date of issuance of this decision, Energy Division shall host a meeting where the utilities shall:

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<sup>121</sup> SCE at 4.

<sup>122</sup> *Id.*

- Demonstrates what updates they have made to their technical documents and handbooks to reflect this decision; and
- Provide examples of the project types the utilities expect to accept virtual inspections.<sup>123</sup>

When implementing these requirements, we remind staff, the utilities, and stakeholders to adhere to the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

Proposal 3 offers Option 1, that allows eligible projects to move ahead of other projects in the queue, Option 2 that requires the utilities to develop a priority queue, and/or Option 3, that requires the utilities to increase staff resources and information technology resources to their interconnection study and distribution upgrade teams in order to facilitate faster queue processing for all projects. Staff recommended that the Commission adopt Options 1 and 3.

We adopt Option 3 with modification. We decline to adopt Option 1, as we agree with parties that queue jumping may result in significant cost allocation and administrative issues that should be dealt with prior to queue jumping implementation.<sup>124</sup> We agree with parties that each utility's ability to reliably meet the interconnection timelines established in Rule 21 should be used to determine compliance with this order.<sup>125</sup>

Upon the date of issuance of this decision, the utilities are directed to submit Tier 2 Advice Letter(s) within 45 days of this decision's effective date that

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<sup>123</sup> The utilities should prepare material for this meeting that describes the circumstances where virtual expectations may be reduced, what types of virtual inspections are possible, and under what conditions a field verification is required.

<sup>124</sup> CESA at 10; Tesla at 10; and SCE at 6.

<sup>125</sup> CALSSA at 4.

Proposes plans to acquire additional staff, as needed, to fulfill the goals of this decision.

Additionally, on February 15, 2021, the utilities shall file an information only compliance filing in this proceeding, describing the results of the expedited interconnection process. In this Advice Letter, the utilities should describe the number of projects that utilized the expedited interconnection process and the success in meeting the expedited timeliness. If a project experienced a delay, the utility shall provide an explanation about why the project was delayed.

When implementing these requirements, we remind staff, the utilities, and stakeholders to adhere to the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

Proposal 4 raised the possibility of allowing the use of advanced metering infrastructure for electrical isolation. Ultimately, Staff did not recommend the adoption of this for Track 1. Staff recommended, however, that Energy Division continue to monitor the evolving technology and its application for widespread market use and consequently, defer potential Commission action for consideration in the latter portions of this proceeding.

At this time, we decline to adopt Proposal 4. We agree, however, with Staff and parties that allowing advanced metering infrastructure to enable electrical isolation may be a viable, emerging resiliency strategy in the context of public safety power shutoff mitigation. We are persuaded by CESA that a pilot program to use smart meters for intentional islanding should be considered<sup>126</sup> because it may provide data to determine whether this is a cost-effective but real,

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<sup>126</sup> CESA at 4.

resiliency resource that can alleviate reliability concerns.<sup>127</sup> CforAT and SBUA contend that a pilot project under Proposal 4 should occur as part of Track 2. We agree that Commission attention is warranted in this area prior to adopting a pilot program. Therefore, we defer consideration of Proposal 4 to a later track of this proceeding.

#### **4.2. Tariff Modernization to Maximize Resiliency Benefits**

Consistent with the Scoping Memo and Ruling, an Administrative Law Judge's Ruling asked parties an array of questions regarding the Staff Proposal's recommendations for modernizing tariffs to maximize resiliency benefits.

##### **4.2.1. Staff Proposal Summary**

The Staff Proposal focuses on two core barriers inherent in current NEM tariff that inhibit broader deployment and use of energy storage systems for resiliency.<sup>128</sup> The first barrier is the limit on storage charging.<sup>129</sup> The second barrier is the limit on storage sizing and capacity.<sup>130</sup>

Limits on Storage Charging (Tariff Problem 1): To resolve the first barrier for broader deployment and use of energy storage systems for resiliency in the NEM tariff, the Staff Proposal recommended two solutions. To help reduce Tariff Problem 1 (limited storage charging), utilities could be required to allow

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<sup>127</sup> *Id.*

<sup>128</sup> Staff Proposal at 15; NEM is tariff that allows a customer to received credits for self-generation at one time and use the credit associated with that generation to offset the cost of electric service received from the grid at another time.

<sup>129</sup> *Id.*

<sup>130</sup> *Id.*



energy storage systems to, in advance of a PSPS event, import power from and export power to the grid.<sup>131</sup>

Alternatively, to address storage charging limits, staff suggests requiring the utilities to, in advance of PSPS events, to allow energy storage systems to import from the grid, but not to export to the grid.<sup>132</sup> This would be effectuated by transitioning storage systems into non-export mode ahead of PSPS events.

To help ameliorate the effects of storage charging limits Staff recommends we adopt the latter proposal, to allow energy storage systems to import from but not export to the grid in advance of PSPS events because this would improve the ability of energy storage systems to provide backup power while preserving the NEM tariff's prohibition on compensation for exporting stored energy that originated from the grid.<sup>133</sup>

Limits on Storage Sizing and Capacity (Tariff Problem 2): To allow broader deployment and use of energy storage systems for resiliency in the NEM tariff, the Staff Proposal recommended two options. The Staff Proposal proposes to modify the NEM tariff to remove storage sizing limit and to require islanding ability for energy storage systems larger than 10 kW.<sup>134</sup>

Alternatively, the Staff proposes to modify NEM rules to remove storage sizing limits.<sup>135</sup> Staff recommends the adoption of Tariff Problem 2, Proposal 1, summarized above.<sup>136</sup>

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<sup>131</sup> *Id.* at 16.

<sup>132</sup> *Id.* at 15-16.

<sup>133</sup> *Id.* at 16

<sup>134</sup> *Id.* at 17.

<sup>135</sup> *Id.* at 18.

<sup>136</sup> *Id.* 19.

#### 4.2.2. Parties' Positions

Generally, parties support Staff's recommendation to remove storage sizing limits and to require islanding ability for energy storage systems larger than 10 kW, but held various positions regarding the options presented by the Staff Proposal. The following list summarizes parties' positions:

Generally, in response to Staff Tariff Problem 1, Proposal 1, the following parties are in support:

- CALSSA,<sup>137</sup>
- CESA,<sup>138</sup> and
- Tesla.<sup>139</sup>

However, in response to Staff Tariff Problem 1, Proposal 2, the following parties supported Proposal 2:

- CALSSA,<sup>140</sup>
- Cal Advocates,<sup>141</sup>
- CAISO,<sup>142</sup>
- CESA,<sup>143</sup>
- Clean Coalition,<sup>144</sup>
- GPI,<sup>145</sup>

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<sup>137</sup> CALSSA at 6.

<sup>138</sup> CESA at 23, Reply at 6.

<sup>139</sup> Tesla at 13, Reply at 3.

<sup>140</sup> CALSSA at 6.

<sup>141</sup> Cal Advocates at 2.

<sup>142</sup> CAISO at 3.

<sup>143</sup> CESA at 23, Reply 6.

<sup>144</sup> Clean Coalition at 5.

<sup>145</sup> GPI at 18.

- GRID,<sup>146</sup>
- Joint CCA,<sup>147</sup>
- PG&E,<sup>148</sup>
- SCE,<sup>149</sup>
- Shell Energy,<sup>150</sup>
- Sierra Club,<sup>151</sup>
- Tesla,<sup>152</sup>
- TURN,<sup>153</sup> and
- Vote Solar.<sup>154</sup>

Generally, in response to Staff Tariff Problem 2, Proposal 1, the following parties are in support:

- Cal Advocates,<sup>155</sup>
- CEERT,<sup>156</sup>
- Clean Coalition,<sup>157</sup>
- GPI,<sup>158</sup>

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<sup>146</sup> GRID at 5.

<sup>147</sup> Joint CCA at 13.

<sup>148</sup> PG&E at 2, Reply at 24.

<sup>149</sup> SCE at 34, Reply at 8.

<sup>150</sup> Shell Energy at 3.

<sup>151</sup> Sierra Club at 3.

<sup>152</sup> Tesla at 13, Reply at 3.

<sup>153</sup> TURN at 4, Reply at 2.

<sup>154</sup> Vote Solar at 9.

<sup>155</sup> Cal Advocates at 2.

<sup>156</sup> CEERT at 2, Reply 2.

<sup>157</sup> Clean Coalition at 10.

<sup>158</sup> GPI at 18.

- Grid,<sup>159</sup>
- PG&E,<sup>160</sup>
- SCE,<sup>161</sup>
- SDG&E,<sup>162</sup>
- Shell Energy,<sup>163</sup>
- Sierra Club,<sup>164</sup>
- Tesla,<sup>165</sup>
- TURN,<sup>166</sup> and
- Vote Solar.<sup>167</sup>

In response to Staff Tariff Problem 2, Problem 2, the following parties are in support: CALSSA,<sup>168</sup> CESA,<sup>169</sup> and Climate Center.<sup>170</sup> SDG&E<sup>171</sup> and CUE<sup>172</sup> oppose Proposal 2 for Problem 2.

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<sup>159</sup> Grid at 5.

<sup>160</sup> PG&E at 2, Reply 24.

<sup>161</sup> SCE at 44.

<sup>162</sup> SDG&E at 13.

<sup>163</sup> Shell Energy at 3.

<sup>164</sup> Sierra Club at 3.

<sup>165</sup> Tesla at 20.

<sup>166</sup> TURN at 4, Reply at 4.

<sup>167</sup> Vote Solar at 9.

<sup>168</sup> CALSSA at 11.

<sup>169</sup> CESA at 29.

<sup>170</sup> Climate Center at 2.

<sup>171</sup> SDG&E at 13 of Attachment A.

<sup>172</sup> CUE at 3.

**4.2.3. Analysis: The Utilities Shall Allow Energy Storage Systems, in advance of Announced PSPS Events, to Import from but not Export to the Grid and the Utilities Shall Modify the NEM Tariff to Remove Storage Sizing Limits**

Tariff Modernization Problem 1: The question presented to the Commission is how to resolve barriers to broader deployment and use of energy storage systems for resiliency caused by the NEM tariff limit on storage charging. To remove the barrier for broader deployment and use of energy storage systems, Staff recommends that the Commission adopt Tariff Modernization Problem 1, Proposal 2 – to allow temporary transition to non-export mode during the pre-PSPS window. Most parties agree with Staff’s recommendation that the Commission should adopt Tariff Modernization Problem 1, Proposal 2. We agree.

We adopt Tariff Modernization Problem 1, Proposal 2 and direct the utilities to allow energy storage systems, in advance of announced PSPS events, to import from – but not export to – the grid. Tariff Modernization Problem 1, Proposal 2 supports the Commission’s goal of preparedness in advance of a grid outage, which may occur rapidly. Furthermore, we find Tariff Modernization Problem 1, Proposal 2 enables existing solar-plus-storage<sup>173</sup> systems to better provide backup power during PSPS events while preserving NEM program goals by limiting the ability to charge from the grid to only during pre-PSPS periods. Preserving NEM’s integrity ensures that individuals are only receiving NEM bill credits for the electricity being produced on site by a NEM eligible

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<sup>173</sup> D.19-01-030 defines “solar-plus-storage” as: “generating facilities with NEM-paired storage.”

generator. This prevents individuals from receiving NEM credits for electricity imported from the grid.

We agree with Staff and parties that Proposal 2, unlike Proposal 1, prevents energy storage systems that are not properly reset after PSPS events to continue exporting energy derived from the grid in violation of NEM requirements.

As Staff and many parties argue, the full value of this proposal – for example, the benefits to the NEM customer (*i.e.*, critical facilities such as grocery stores) of having fully charged on-site energy storage at the start of a planned PSPS event – has yet to withstand the test of implementation during the actual PSPS events. Therefore, the Commission’s Energy Division, in consultation with the utilities and stakeholders, shall monitor and gather information arising from pre-PSPS energy storage from the grid for oversight of for the next two years. If necessary, the Commission may revisit this storage charging proposal for modifications.

In summary we direct the utilities to take the following action. First, the utilities shall coordinate with developers and aggregators to form a process that allows energy storage systems, in advance of an announced PSPS event, to import from (but not export to) the grid. Second, the utilities shall present the processes to the Smart Inverter Working Group. This will ensure transparency as well as a meaningful opportunity for the utilities and stakeholders to build consensus so that specific design proposals are vetted by stakeholders in another forum outside of the formal Commission processes. Once these proposed processes have been presented to the Smart Inverter Working Group, the utilities shall file, within 30 days of this decision’s effective date, Tier 2 advice letters that propose the necessary modifications to their NEM tariffs.

When implementing these requirements, we remind staff, the utilities, and stakeholders to adhere to the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

Tariff Modernization Problem 2: Solving Tariff Modernization Problem 2 centers on realizing the potential for locally generated renewable energy paired with storage to provide backup power in the event of a grid outage. We consider two proposals from Staff: removing the storage sizing limit for large NEM-paired storage, maintaining existing metering requirements, and requiring large NEM-paired storage be designed to operate independently from the grid in the event of a grid outage. Alternatively, Staff propose removing the storage sizing limit for large NEM-paired storage and maintaining existing metering requirements. Staff, along with most parties, recommend that the Commission adopt Proposal 1.

We note that Proposal 1 is identical to Proposal 2 with the exception that Proposal 1 requires systems to be capable of islanding. We depart from Staff's and parties' recommendation and adopt Proposal 2. In adopting Proposal 2, we reduce the risk of implementation complexity that the islanding requirement presents. At this point in time, the islanding requirement presents a potential risk of causing undue delays in providing resiliency in the face of the upcoming wildfire season and potential grid outage events. For the long-term, adding the islanding requirement appears to be appropriate for Commission consideration with further development of implementation details and accordingly, we defer consideration of this topic to Track 2 or Track 3 of this proceeding.

Within 30 days upon date of issuance of this decision, the utilities are directed to submit Tier 2 Advice Letters proposing the necessary modifications to

their NEM tariffs to make the changes described in Tariff Modernization Problem 2, Proposal 2 (removing the storage sizing limit for large NEM-paired storage and maintaining existing metering requirements).

When implementing these requirements, we remind staff, the utilities, and stakeholders to adhere to the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

#### **4.3. Information Sharing with Local and Tribal Governments**

Consistent with the Scoping Memo and Ruling, an Administrative Law Judge's Ruling asked parties an array of questions regarding the Staff Proposal's recommendations for increased access for local and tribal governments to electric distribution and infrastructure information to facilitate deployment of resiliency projects.

##### **4.3.1. Staff Proposal Summary**

The Staff Proposal identified five options to increase local and tribal government access to data. These proposals are intended to foster collaborative problem solving by utilities, local agencies, tribal governments, and state government and build upon existing emergency planning exercises already conducted pursuant to General Order (GO) 166:<sup>174</sup>

1. Develop and ensure effective outreach and communication between the utilities, local, and tribal governments through workshops;<sup>175</sup>

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<sup>174</sup> Staff Proposal at 22.

<sup>175</sup> *Id.* at 22-24.



2. Require the utilities to develop a resiliency project engagement guide;<sup>176</sup>
3. Require the utilities to dedicate an internal team for local and tribal government projects;<sup>177</sup>
4. Require the utilities to develop an interconnection orientation training program for vendors and developers operating in California;<sup>178</sup> and
5. Require the utilities to create a separate access-restricted portal, available only to local and tribal governments, containing essential data for identification of in-front of the meter microgrid development opportunities.<sup>179</sup>

Staff recommends the adoption of Proposals 1, 2, 3, and 5.<sup>180</sup> Staff also recommends that the implementation of Proposals 1, 2, 3 and 5 occur concurrently and in coordination with the Commission's Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions, R.18-12-005.<sup>181</sup>

#### **4.3.2. Proposal 1, Outreach and Communication**

In large part, parties supported Proposal 1, which requires utilities to conduct outreach and engagement on utility infrastructure. Parties in support of

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<sup>176</sup> *Id.* at 24.

<sup>177</sup> *Id.* at 24-25.

<sup>178</sup> *Id.* at 25.

<sup>179</sup> *Id.* at 25-26.

<sup>180</sup> *Id.* at 26.

<sup>181</sup> *Id.* at 26.

Proposal 1 are: BAC;<sup>182</sup> CALSSA;<sup>183</sup> CCTA;<sup>184</sup> CEERT;<sup>185</sup> CEJA;<sup>186</sup> CESA;<sup>187</sup> Climate Center;<sup>188</sup> Joint CCAs;<sup>189</sup> GPI;<sup>190</sup> LGSEC;<sup>191</sup> MRC;<sup>192</sup> PG&E;<sup>193</sup> Placer County;<sup>194</sup> RCRC;<sup>195</sup> SCE;<sup>196</sup> SDG&E;<sup>197</sup> and Wild Tree Foundation.<sup>198</sup>

**4.3.2.1. Analysis: The Utilities Shall Effectively Collaborate with Local Jurisdictions to Support Community Resiliency Efforts and Pre-PSPS Event Planning**

Proposal 1 considers how to best address the interest from local and tribal government agencies – including cities and counties, tribal governments, and community choice aggregators (CCAs) – in microgrid and resiliency project planning as part of a larger community resiliency strategy to minimize the impact of grid outages.

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<sup>182</sup> BAC at 15.

<sup>183</sup> CALSSA at 12.

<sup>184</sup> CCTA at 5.

<sup>185</sup> CEERT at 3.

<sup>186</sup> CEJA at 11.

<sup>187</sup> CESA at 32.

<sup>188</sup> Climate Center at 6.

<sup>189</sup> Joint CCA at 14.

<sup>190</sup> GPI at 10.

<sup>191</sup> LGSEC at 8.

<sup>192</sup> MRC at 16.

<sup>193</sup> PG&E at 43.

<sup>194</sup> Placer County at 9.

<sup>195</sup> RCRC at 5.

<sup>196</sup> SCE at 48, Reply at 10.

<sup>197</sup> SDG&E at Appendix A, 17.

<sup>198</sup> Wild Tree Foundation at 5.

In order to address such interest, engagement between the utilities and local and tribal government agencies and CCAs is critical. Staff proposes that the utilities : (1) develop or ensure effective internal processes to interact with local and tribal governments; (2) inform local and tribal governments about electric transmission and distribution investment and operational plans that would help minimize the use of PSPS events; and (3) hold face-to-face workshops<sup>199</sup> to educate local jurisdictions on electric transmission and distribution infrastructure serving their communities. An array of parties' support Proposal 1, with either recommendations or modifications that we discuss below.

We adopt Proposal 1 with modification. Our goal is to empower local jurisdictions with a better understanding of utility infrastructure, weather events, grid operations, and PSPS mitigation initiatives. In this way, local jurisdictions will be positioned to make informed decisions on where to focus their resiliency planning efforts, capital investments, and pre-event operations. The information provided by the utilities will also improve local and tribal governments' ability to make both operational (short-term) and investment (long-term) planning decisions regarding how to protect the safety of their residents during grid outages. Adoption of this proposal will ensure that the utilities are taking local and tribal government perspectives into account when making operational and investment decisions. Although local jurisdictions are pre-empted from regulating electric facilities subject to the Commission's jurisdiction, consulting with local agencies regarding land use matters is required by Commission GO 131-D.<sup>200</sup>

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<sup>199</sup> Meetings should be held virtually if required by public health directives.

<sup>200</sup> CPUC GO 131-D, Section XIV – Complaints and Pre-emption of Local Authority.

For implementation of Proposal 1, we direct the utilities to conduct semi-annual face-to-face county-level workshops to ensure the utilities and local entities are sharing valuable information and taking a collaborative approach to planning grid resiliency measures that are responsive to local needs. In order to make these face-to-face workshops productive and useful for all parties involved, the utilities shall first develop or ensure effective internal communication processes exist for managing the interface with local and tribal governments. This may include, but should not be limited to: (1) designating utility interface roles and responsibilities; (2) managing engagement with local and tribal government and building and sustaining effective relationships; (3) establishing and maintaining open, accurate, and consistent lines of communication; (4) involving local and tribal government in planning and vetting of utility actions impacting local and tribal government; and (5) executing and following-through on agreements impacting local and tribal government. Setting clarity, expectations for roles within the utilities, and having effective and coordinated processes in place will give the face-to-face workshops the best chance of success.

Furthermore, we direct the utilities to incorporate their electrical and distribution investment and operation plans into the semi-annual workshops. This will ensure that the utilities fully communicate and solicit input from local and tribal governments about their portfolio of projects intended to minimize the use of PSPS events. The information communicated should include, but should not be limited to: (1) identifying the projects (as applicable to each utility, *i.e.*, reconductoring, transmission line exclusion, transmission line switching, distribution segmentation, distributed generation enabled microgrids, temporary generation, and substation make-ready); (2) identifying projects by county and

providing geographic location; (3) describing scope, schedule, cost, and number of customers impacted by the project; and (4) confirming potential for minimizing customer outages due to PSPS events.

We believe that these semi-annual workshops are the best venue for the utilities to present this information to local and tribal governments. As a central venue, it will ensure that the local entities obtain the data they need to craft community resiliency strategies. We agree with the Joint CCAs that these conversations are essential to efficient resiliency resource planning and deployment.<sup>201</sup> Having a transparent understanding of the utilities' planned resiliency upgrades and projects may reduce or eliminate the need for local and tribal government or CCA resiliency projects in some areas. Additionally, these workshops provide a forum where the local and tribal governments may provide input and feedback to the utilities based on localized community needs and perspectives, prior to the utilities' plans becoming finalized.

Next, we discuss the how the content of these workshops should be framed. The content of these workshops should broadly follow the requirements as set forth in the staff proposal with the inclusion of the requirement that the utilities inform local and tribal governments about their electric transmission and distribution investment and operational plans. Thus, the workshop agenda should include, but is not limited to, the following items: (1) explanations of how the electric transmission system and distribution system operates in the area; (2) explanations of local grid topology and circuit configuration; (3) information about the utility's electric transmission and distribution infrastructure investment and operational plans; (4) discussion and visualization,

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<sup>201</sup> Joint CCAs at 15.

for context purposes, of prior PSPS events; (5) weather and climatology analysis predictions for future PSPS events; (6) case studies of outage scenarios a county may experience based on predicted weather events; (7) granular, local reporting of reliability statistics; and (8) how the utility plans incorporate and reflect local and tribal government input. Consistent with the Staff Proposal, the workshop should conclude with a collaborative planning session about enhancing grid resilience within a subject county, in and across all local and tribal government agency jurisdictions. The utilities should refer to the guidance in the Staff Proposal to set requirements for collaborative planning session.<sup>202</sup>

Ideally, the workshops should be facilitated and/or moderated by county emergency services (County OES) or other organizations created by county governments to carry out the State Emergency Plan, consistent with the requirements codified in the California Emergency Services Act Section 8568. We believe that the local jurisdictions have the best understanding of local issues and response capabilities and are, therefore, best able facilitate the discussion of such coordination. Should the County OES or other county emergency organization decline to take on the role of moderator and facilitator, the utility should then perform those functions for the meeting.

We believe inclusivity is essential to enhancing the value of the joint County OES and utility meetings. We support effective communication and collaboration between local and tribal governments, their County OES counterparts, and utilities. To that end, we direct the utilities to invite any tribal government agencies as well as CCAs in their service territories to these discussions. We direct the utilities to contact any other community organization

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<sup>202</sup> Staff Proposal at 23-24.

– such as those that represent and support vulnerable populations like disadvantaged communities and access and function needs populations<sup>203</sup> – that could provide input to enhance engagement on effective selection and implementation of community resiliency for context discussion at these meetings.

The utilities should ensure that operational and technical subject matter experts are available at these workshops to answer questions for and engage with local and tribal government representatives. Additionally, these experts need to be skilled in communicating complex technical concepts to a general audience.

Due to overlap in scope and complimentary purpose, these face-to-face workshops to educate local jurisdictions in utility territory should be coordinated with PSPS working group meetings required in R.18-12-005, and any subsequent guidance arising from that proceeding.<sup>204</sup> These workshops should also coordinate with the disaster response plan requirements of GO-166. Additionally, Section 956.5<sup>205</sup> requires natural gas utilities to hold annual workshops for local fire departments regarding emergency planning. We recommend the utilities and their local and tribal government counterparts to refer to Section 956.5 meetings for reference in forming the first of these mandated workshops. These workshops should also be coordinated with utilities' annual reliability reporting obligations as required by D.16-01-008, pursuant to Section 2774.1. Finally, these workshops should be coordinated with land use consultation requirements set forth in GO 131-D, Section XIV.

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<sup>203</sup> Counites of Marin, Napa, and Sonoma Reply at 3; CforAT at 19; and CEJA at 10.

<sup>204</sup> Administrative Law Judge's Ruling, January 30, 2020.

<sup>205</sup> All subsequent references are to the Public Utilities Code unless otherwise specified.

To ensure accountability and effectiveness in execution of these meetings, Commission staff shall audit compliance with the workshop requirements adopted here. Staff audits shall hold the utilities accountable for the quality and content of the meetings.<sup>206</sup> To this end, the utilities shall notify Energy Division staff at least one (1) month in advance of upcoming meetings. Additionally, the utilities must submit after meeting reports to ensure the following goals and outcomes were achieved at each meeting: (1) local and tribal government inputs were considered when planning resiliency measures; (2) current resiliency and hardening projects plans/active project statuses were shared; (3) data was made available to local and tribal governments about projects and efforts; and (4) technical staff were made available to answer questions and engage with local and tribal governments.

In summary, upon date of issuance of this decision, the utilities are directed to submit Tier 2 advice letters within 30 days of this decision's effective date. In each utility advice letter, the utilities shall document their plans to conduct semi-annual workshops that will help empower local jurisdictions with a better understanding of grid operations, utility infrastructure, and the nature of weather events alongside utilities' PSPS mitigation initiatives in order to make informed decisions on where to focus their resiliency planning efforts, capital investments, and pre-PSPS event operations. This advice letter should specifically address how the utilities plan to develop or ensure that effective internal communication processes exist for managing the interface with local and tribal government by enumerating how they will achieve the outcomes below:

- Designating utility interfaces roles and responsibilities;

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<sup>206</sup> Counties of Marin, Napa, and Sonoma Reply at 5.



- Managing engagement with local and tribal government and building and sustaining effective relationships;
- Establishing and maintaining open, accurate, and consistent lines of communication;
- Involving local and tribal government in planning and vetting of utility actions impacting local and tribal government; and
- Executing agreements with local and tribal government.

Additionally, in this same Advice Letter filing, the utilities are directed to include draft agendas for local and tribal government engagement meetings and discuss how they plan to meet the specific content requirements of the workshops through examples of draft agenda items. Agenda items shall include, but not be limited to:

- Explanations of how the electric transmission system and distribution system operates in the area;
- Explanations of local grid topology and circuit configuration;
- Informing local and tribal governments about electric transmission and distribution infrastructure investment and operational plans;
- Discussion and visualization, for context purposes, of prior PSPS events;
- Weather and climatology analysis predictions and scenarios for future PSPS events;
- Case studies of outage scenarios a county may experience based on predicted weather events;
- Granular, local reporting of reliability statistics; and
- How the utility plans incorporate and reflect local and tribal government input.

Furthermore, the utilities shall use this advice letter filing to enumerate how they plan to coordinate the workshop collaborative planning session about

enhancing grid resilience within the county. The utilities shall discuss how this planning session will reflect:

- Outreach to County OES or other, similar county organizations responsible for implementing the State Emergency Plan;<sup>207</sup>
- Moderated by county OES administrator (unless administrator specifically declines invitation to do so);
- Outreach to community organizations, including representation of disadvantaged communities and access and functional needs populations;
- Considers relevant elements of a community-based collaborative planning framework as suggested by the Staff Proposal<sup>208</sup> (*i.e.*, as the National Institute of Standards and Technology Community Resilience Planning Guide or its Resilient Communities Toolkit);<sup>209</sup> and
- Predicated upon best practices such as SDG&E community engagement.<sup>210</sup>

The utilities shall use this advice letter to discuss how they intend to coordinate and harmonize these workshops with existing requirements and how they could incorporate Section 956.5 to implement the requirements of this decision. The utilities shall discuss the following existing requirements:

- PSPS working group meetings, as required by R.18-12-005;
- Disaster response plan requirements pursuant to GO 166;

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<sup>207</sup> California Emergency Services Act Section 8568.

<sup>208</sup> Staff Proposal at 23.

<sup>209</sup> <https://www.nist.gov/topics/community-resilience/planning-guide> The planning guide recommends methods for forming collaborative planning teams to help a community improve their resilience by setting priorities and allocating resources to manage risks for their prevailing hazards.

<sup>210</sup> Staff Proposal at 24.

- Annual reliability reporting obligations pursuant to D.16-01-008 and Section 2774.1; and
- Land use consultation requirements as laid out in GO 131-D, Section XIV.

In a separate informational filing, the utilities shall submit after-meeting reports, no later than five business days after the meeting was held. These after meeting reports shall demonstrate:

- CPUC staff were notified at least one (1) month prior to meeting date;
- Contact information was solicited for meeting attendees, with copies of any sign-in sheet circulated;
- Workshop agenda;
- Workshop minutes or transcript;
- Any presentations shown at the workshop; and
- Any data provided to stakeholders at the workshop.

Finally, the utilities shall file a Tier 1 Advice letter on the first day of each yearly quarter, that compiles all of the after-meeting reports. This requirement will have an end date after three years. In the event of conflict between requirements laid out in the staff proposal and this decision, the language of this decision shall control.

When implementing these requirements, we remind staff, the utilities, and stakeholders to adhere to the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

#### **4.3.3. Proposal 2, Resiliency Project Engagement Guide**

Generally, the following parties supported requiring utilities to develop a resiliency project management guide. The parties that support Proposal 2 are:

BAC;<sup>211</sup> CEERT;<sup>212</sup> CEJA;<sup>213</sup> CforAT;<sup>214</sup> Climate Center;<sup>215</sup> GPI;<sup>216</sup> MRC;<sup>217</sup> Placer County;<sup>218</sup> RCRC;<sup>219</sup> SCE;<sup>220</sup> and Wild Tree Foundation.<sup>221</sup> SDG&E opposed Proposal 2.<sup>222</sup>

**4.3.3.1. Analysis: The Utilities Shall Prepare a Resiliency Project Engagement Guide that Assists Local Jurisdictions with Selecting Resiliency Project Designs and Implementation**

Proposal 2 addresses the lack of information from utilities regarding front-of-the-meter projects. Local governments, CCAs, and tribal governments have expressed interested in obtaining this information to further distributed energy resources, including microgrids, that interconnect both behind and in-front of the customer meter. Staff suggests each utility develop a resiliency project engagement guide which focuses on these key elements to resolve this problem: (1) developing a flowchart depicting how to engage the utilities on resiliency projects; and; and (2) listing a set of best practices for successful project implementation. An array of parties supports this proposal, with modifications that we discuss below.

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<sup>211</sup> BAC at 14.

<sup>212</sup> CEERT at 3.

<sup>213</sup> CEJA at 11.

<sup>214</sup> CforAT at 23.

<sup>215</sup> Climate Center at 5.

<sup>216</sup> GPI at 10.

<sup>217</sup> MRC at 16.

<sup>218</sup> Placer County at 9.

<sup>219</sup> RCRC at 6.

<sup>220</sup> SCE at 50.

<sup>221</sup> Wild Tree Foundation at 5.

<sup>222</sup> SDG&E at 17.

We adopt Staff's Proposal 2, with some of the parties' additional recommendations. In adopting Proposal 2 with modification, we assist local and tribal governmental entities and their community members in the early stages of resiliency project planning to better prepare for emergencies, including wildfires, and PSPS outages. While historically, in-front-of-the-meter projects were primarily implemented as part of the utilities' own grid management practice or pilot project, the time is ripe to revisit that approach. In this way, local jurisdictions will be enabled to identify potential in-front-of-the-meter resiliency solutions. That said, in-front-of-the-meter resiliency solutions can range widely in complexity from multi-customer in-front-of-the meter microgrids to individual distribution switches. Hence, it is in the public interest to require utilities to prepare a guide to help local and tribal governments navigate such complexity.

We direct the utilities to develop a written guide to help local and tribal governments navigate the utilities' interconnection and other, relevant processes, for deploying a resiliency project. Specifically, we direct the utilities to develop a guide for local and tribal governments that includes, but is not limited to:

- (1) flowcharts depicting how to engage with the utility depending on the type of resiliency project being planned, such as whether it is an in-front-meter or behind-the-meter project;
- (2) best practices for successful implementation; and
- (3) a list of data required by the utilities from local and tribal governments and tribal governments at each step of the utility's process.

Within 30 days upon the date of issuance of this decision, the utilities are directed to submit Tier 2 Advice Letter(s) for the resiliency project engagement guide. The advice letter must, at least, include the following: (1) mockup showing how data will be presented (flow chart, list, etc.); (2) list of precisely

what data will be in the guides, including but not limited to: (a) the types of resiliency projects appropriate for the guide as well as a description of the types of projects not appropriate for the guide; (b) draft flowcharts for the project types including project/interconnection milestones and timelines; (c) list of data required by utilities from local and tribal governments at each step in the process; and (d) current list of engagement best practices; (3) a plan for how the guides will be made available to the public; (4) a description of how the guides will be kept current with program modification(s); and (5) a timeline for release of the guides. The resiliency project engagement guide should enable communities to have not only a partnership with the utilities but also, tools to make informed decisions for reducing risk and enhancing resiliency.

We anticipate benefits of a resiliency project engagement guide to be at least threefold: (1) assisting local and tribal governments with selecting configurations and project designs that are as economic as possible; (2) reducing interconnection delays associated with behind-the-meter projects by helping interested agencies identify locations where it is feasible to interconnect; and (3) minimizing costs and delays by pre-screening projects for issues that require substantial redesign or cancellation.

In summary, within 30 days upon the date of issuance of this decision, the utilities are directed to submit Tier 2 Advice Letters for their resiliency project engagement guide. In this filing, the utilities shall demonstrate their plan for developing an effective guide to enable communities to make informed decisions about future resiliency project investments. At the minimum, this advice letter shall include:

- Mockup showing how data will be presented (flow chart, list, etc.);

- List of precisely what data will be in the guides, including but not limited to:
  - Listing of the types of resiliency projects covered by the guide and not covered by the guide;
  - Draft flowcharts for the above project types including project/interconnection milestones and timelines;
  - List of specific data required by utilities from local and tribal governments at each step in the process; and
  - Current list of engagement best practices.
  - Plan for how the guides will be made available to the public;
  - How the guides will be kept current with program modification(s); and timeline for release of guides in compliance with this decision.

#### **4.3.4. Proposal 3, Dedicated Utility Team for Local and Tribal Government Projects**

Generally, the following parties supported Proposal 3: BAC;<sup>223</sup> CALSSA;<sup>224</sup> CEERT;<sup>225</sup> CEJA;<sup>226</sup> CESA;<sup>227</sup> Climate Center;<sup>228</sup> GPI;<sup>229</sup> LGSEC;<sup>230</sup> Long Beach;<sup>231</sup>

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<sup>223</sup> BAC at 14.

<sup>224</sup> CALSSA at 12.

<sup>225</sup> CEERT at 3.

<sup>226</sup> CEJA at 10.

<sup>227</sup> CESA at 32.

<sup>228</sup> Climate Center at 6.

<sup>229</sup> GPI at 10.

<sup>230</sup> LGSEC at 8.

<sup>231</sup> Long Beach at 4.

MRC;<sup>232</sup> Placer County;<sup>233</sup> RCRC;<sup>234</sup> SCE;<sup>235</sup> TURN;<sup>236</sup> and Wild Tree Foundation.<sup>237</sup> SDG&E opposes Proposal 3.<sup>238</sup>

**4.3.4.1. Analysis: The Utilities Shall Dedicate Staff to their Distribution Planning Teams that Specialize in Resiliency Project Development for Local Jurisdictions**

Proposal 3 provides a one-stop resource for reliable guidance and expertise for microgrid and resiliency project development and implementation at the local and tribal level. Staff's Proposal 3 focuses on two key elements: (1) create a dedicated team of utility staff to manage intake of local and tribal government resiliency projects; and (2) provide a single point of contact for local and tribal governments to receive pre-application consulting services. An array of parties support this proposal, with additions, while SDG&E opposes<sup>239</sup> Proposal 3.

We adopt Proposal 3 with modification for SCE and SDG&E. We decline to adopt Proposal 3 for PG&E because of the significant overlap, and potential for duplication, between Staff Proposal 3 and PG&E's proposed Community Microgrid Enablement Program. We discuss PG&E's Community Microgrid Enablement Program in greater detail, later in this decision. We direct SCE and SDG&E to file Tier 2 Advice Letters for implementation of a dedicated utility team for local and tribal government projects within 30 days of upon the date of

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<sup>232</sup> MRC at 16.

<sup>233</sup> Placer County at 9.

<sup>234</sup> RCRC at 6.

<sup>235</sup> SCE at 50.

<sup>236</sup> TURN at 7.

<sup>237</sup> Wild Tree Foundation at 5.

<sup>238</sup> SDG&E at 17.

<sup>239</sup> SDG&E at 17.



issuance of this decision. The advice letter shall discuss how SCE and SDG&E intend to implement compliance with Proposal 3 or how current organizational structures comply with requirements. Both SDG&E and SCE's advice letter must detail how each utility will implement the following:

- Providing advice and guidance before planning and proposal development begins;
- Prioritizing projects to ensure that resources are directed to the most urgent for public health, safety, and public interest;
- Assisting the local jurisdictions with consulting advice on the types of resiliency projects that can be expedited through the permitting and interconnection process;
- Providing pre-project information about load points, customer connectivity, load profiles, and the relevant maps and infrastructure data to facilitate local jurisdiction planning;
- What, if any, staffing requirements are necessary to establish such a team;
- What, if any, training requirements are necessary to train the team;
- Organizational structure of the team; and
- Operational plan of the team including, but not limited to:
  - How the team will intake and process applications;
  - How team will engage local and tribal governments; and
  - Timeline for full implementation.

Establishing a dedicated team builds specialized expertise within each utility and provides organizational stability to support community resiliency projects on an ongoing basis. This, in turn, should improve the confidence of local and tribal governments and market providers to explore and develop

microgrid and resiliency projects. A dedicated team with specialized expertise may enable processing of a larger volume of projects with greater rapidity. The cost associated with establishing dedicated teams should be achievable within existing general rate case funding levels. In subsequent general rate cases, the utilities may request augmentation to these resources.

In summary, within 30 days upon the date of issuance of this decision, SCE and SDG&E are directed to submit Tier 2 Advice Letter(s), where SCE and SDG&E shall demonstrate how they intend to implement compliance with the requirements of Section 4.3.4.1 of this decision or how current organizational structures comply with requirements. Both SDG&E and SCE's Advice Letter must detail how the utility will implement the following in compliance with this decision:

- Providing advice and guidance before planning and proposal development begins;
- Prioritizing projects to ensure that resources are directed to the most urgent for public health, safety, and public interest;
- Assisting the local jurisdictions with consulting advice on the types of resiliency projects that can be expedited through the permitting and interconnection process;
- Providing pre-project information about load points, customer connectivity, load profiles, and the relevant maps and infrastructure data to facilitate local jurisdiction planning;
- What, if any, staffing requirements are necessary to establish such a team;
- What, if any, training requirements are necessary to train the team;
- Organizational structure of the team; and
- Operational plan of the team including, but not limited to:

- How the team will intake and process applications;
- How team will engage local and tribal governments;  
and
- Timeline for full implementation.

#### **4.3.5. Proposal 5, Separate Portal for Local and Tribal Governments**

Generally, the following parties supported Proposal 5: BAC;<sup>240</sup> CEERT<sup>241</sup>; CEJA;<sup>242</sup> CESA;<sup>243</sup> CforAT;<sup>244</sup> Climate Center;<sup>245</sup> GPI;<sup>246</sup> LGSEC;<sup>247</sup> MRC;<sup>248</sup> Cal Advocates;<sup>249</sup> PG&E;<sup>250</sup> Placer County;<sup>251</sup> RCRC;<sup>252</sup> and Wild Tree Foundation.<sup>253</sup> CUE;<sup>254</sup> CCTA;<sup>255</sup> SCE;<sup>256</sup> and SDG&E<sup>257</sup> oppose Proposal 5.

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<sup>240</sup> BAC at 13.

<sup>241</sup> CEERT at 3.

<sup>242</sup> CEJA at 10.

<sup>243</sup> CESA at 32.

<sup>244</sup> CforAT at 24.

<sup>245</sup> Climate Center at 5.

<sup>246</sup> GPI at 10.

<sup>247</sup> LGSEC at 9.

<sup>248</sup> MRC at 16.

<sup>249</sup> Cal Advocates at 13.

<sup>250</sup> PG&E at 47.

<sup>251</sup> Placer County at 9.

<sup>252</sup> RCRC at 6.

<sup>253</sup> Wild Tree Foundation at 5.

<sup>254</sup> CUE at 3.

<sup>255</sup> CCTA at 4.

<sup>256</sup> SCE at 51.

<sup>257</sup> SDG&E Comments at Appendix A, 18.

**4.3.5.1. Analysis: The Utilities Shall Develop a Separate, Access-Restricted Portal for Local Jurisdictions that Gives Information to Support Local Community Resiliency Projects**

Proposal 5 supports the ability of local and tribal governments to design microgrid and related resiliency projects on their own prior to engaging directly with utilities. Proposal 5 requires the utilities to develop a separate, access-restricted portal for local and tribal governments to access utility data to help identify microgrid and resiliency project development opportunities. The information provided through the portal should enable the development of higher quality interconnection applications that take less process cycle time for the utilities to approve. An array of parties supports this proposal, with additions or modifications, while CUE,<sup>258</sup> SCE,<sup>259</sup> and SDG&E<sup>260</sup> oppose Proposal 5.

We adopt Proposal 5 with modification. While party comments highlight no broad consensus on what data should be made available through such a portal, we adopt some data requirements with the anticipation that either Track 2 or Track 3 will further develop supplementary parameters for the platform's growth. For Track 1 purposes, the utilities are directed to create a separate, access-restricted portal for local and tribal governments to access utility data to help identify microgrid development opportunities. For the near-term, access to the portal should not require the execution of a non-disclosure agreement, but should still be subject to confidential treatment and shall be restricted to County

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<sup>258</sup> CUE at 3.

<sup>259</sup> SCE at 51.

<sup>260</sup> SDG&E Appendix A, at 18.

OESs or organizations created by county government to carry out the State Emergency Plan.<sup>261</sup>

The tool at a minimum must include:

- A layer showing utility planned work and grid investments in both tabular and geographic information system (GIS) format (pursuant to utility obligations contemplated in GO 131-D (Standard 1, Section E) and GO-166 (Section XI));
- Data about individual projects should include at a minimum:
  - Location of the project;
  - Project description (what is being upgraded/built, why it is being upgraded/built);
  - Project timeline; and
  - Project completed.
- Layer showing High Fire Threat Districts;
- Layer(s) showing electrical infrastructure:
  - All substations and distribution circuits, including subtransmission lines and stations; and
  - All transmission lines feeding distribution; subtransmission substations.
- Layer showing weather polygons from each prior PSPS event and resulting distribution and transmission line outages (Transmission line de-energization visualizations should only be included to the extent that they will result in distribution outages); and

Within 30 days upon the date of issuance of this decision, the utilities are directed to submit Tier 2 Advice Letter(s) discussing their plan for developing a separate, access-restricted data portal for sharing information with local and

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<sup>261</sup> California Emergency Services Act section 8568.

tribal governments. This Advice Letter shall include an implementation plan for the requirements from Section 4.3.5.1 of this decision, as well as: (1) a work plan and budget estimate for developing a data portal that provides all the data and meets all the requirements listed in this section; and (2) a narrative description of how the work plan relates to any other planned work on related systems. The work plan shall include a list of tasks, a schedule for each task, any interdependencies among tasks, and key milestones Use of the existing Distribution Resources Plans (DRP) Data Portals should be carefully considered by the utilities.<sup>262</sup> PG&E and SDG&E require registration and a login to access data on their DRP Data Portals, for example. This approach could be used to restrict access to certain data while making the same data available to specific users.

## 5. Discussion of Utility Initiatives

In the Scoping Memo and Ruling, and Administrative Law Judge's Ruling the utilities were directed to submit proposals for immediate implementation of resiliency strategies, including partnerships and planning with local and tribal governments.

In response, PG&E and SDG&E submitted such proposals for stakeholder review and subsequent Commission approval. SCE did not request such relief

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<sup>262</sup> Pursuant to proceeding R.14-08-013, the DRP Data Portals hosted by the three utilities provide Integrated Capacity Analysis, Locational Net Benefit Analysis, Grid Needs Assessment/Distribution Deferral Opportunity Report, and other data to the public to support, among other goals, the siting and sizing of customer-owned DERs, public vetting of the utilities filings, and third-party bidding on distribution deferral opportunities as part of the Distribution Investment Deferral Framework. The portals are available as follows: SCE at <https://ltmdrpep.sce.com/drpep>; PG&E at [https://www.pge.com/en\\_US/for-our-business-partners/distribution-resource-planning/distribution-resource-planning-data-portal.page](https://www.pge.com/en_US/for-our-business-partners/distribution-resource-planning/distribution-resource-planning-data-portal.page); and SDG&E at <https://www.sdge.com/more-information/customer-generation/enhanced-integration-capacity-analysis-ica>.

from the Commission for Track 1. Nevertheless, we will obtain lessons learned from SCE – as well as PG&E and SDG&E – to inform Track 2 and Track 3 of this proceeding. Next, we discuss each of the utilities proposals, in turn, below.

### 5.1. PG&E Proposal Summary

PG&E seeks authorization and incremental cost recovery for three components of a larger strategy for addressing grid outage events by deploying Distributed Generation Enabled Microgrid Services (DGEMS) at PG&E substations. The three components for which PG&E has requested authorization and rate recovery are: (1) Make-Ready Program; (2) Temporary Generation Program; and (3) Community Microgrid Enablement Program (CMEP).

The following chart illustrates PG&E’s total forecasted costs (in thousands) by each program:

#### PG&E Total DGEMS Forecasted Costs

Description	2020 (\$000)	2021 (\$000)	2022 (\$000)	Total (\$000)
Make-Ready Program	\$ 135,975	-	-	\$135,975
Temporary Generation	\$ 173,300	-	-	~\$ 173,300
Community Microgrids Enablement Program	\$ 9,750	\$ 30,000	\$ 30,000	\$ 69,750
Total Forecasted	\$ 319,025	\$ 30,000	\$ 30,000	\$ 379,025

Make-Ready Program: The DGEMS Make-Ready Program involves engineering and constructing additional infrastructure, with \$136 million in estimated costs. PG&E argues that the Make-Ready Program enables each of the prioritized substations to operate in islanded mode when the transmission line serving the substation is de-energized, such as during a PSPS event or other loss of transmission line (*i.e.*, severe weather, earthquake, physical or cyber security event). The component facilities that PG&E would equip at the prioritized substations may include ground grids, circuit breakers or line reclosers with sync

scope capability, fuse disconnect switchgear, additional substation bus infrastructure and other electrical infrastructure.

Temporary Generation Program: PG&E proposes to lease up to 300 megawatts (MW) of mobile generators for temporary use during the 2020 wildfire season. The Temporary Generation Program proposes to deploy temporary mobile distributed generation as a critical near-term stop-gap solution for serving three PSPS mitigation use cases. The use cases and estimated MWs to reserve are based in part on PG&E's 2019 PSPS event experience during which PG&E deployed temporary generation to re-energize safe-to-energize substations (220 MW), temporary microgrids such as mid-feeder line segments serving commercial corridors and critical facilities (*i.e.*, "resilience zones" similar to the pilot at Pacific Union College in Angwin, California), and societal continuity sites (40 MW) which would be single-customer critical facilities where existing backup power supplies have failed or were insufficient for a prolonged unplanned outages (*i.e.*, hospitals, transmission-level customers, major transportation, water and wastewater treatment facilities).

The Temporary Generation Program requires PG&E to pay an annual reservation fee quoted at \$94 million to provide certainty that the generators (typically 2 MW in size) will be available on standby for use when required during a PSPS event. In addition to the standby rate, implementing the program involves a third-party rental contract to procure equipment and services such as temporary infrastructure, a temporary ground grid, step-up transformer, temporary cabling, operations personnel, California Air Resources Board (CARB) permitting application process, fuel and mobilization costs.

Community Microgrids Enablement Program (CMEP): Finally, PG&E's proposed CMEP provides incremental technical and financial support on a



prioritized basis for community requested microgrids for PSPS mitigation purposes. Generally, the proposed eligibility criteria for this program includes community proposed microgrids serving multiple critical facilities located in Tier 2 or Tier 3 high fire threat districts as well as written support of local and tribal government. The CMEP contemplates utility technical support, such as project scoping, pre-application technical project design guidance, and a dedicated PG&E project management office to provide support for CMEPs projects. One-time matching funds of up to \$60.75 million would be made available as matching grants to defray the cost of special facilities or distribution system upgrades. PG&E proposes that eligibility criteria and detailed program implementation details should be made available after PG&E refines this program with input from local and tribal governments and communities, followed by an implementation Advice Letter 60 days following Commission approval.

#### **5.1.1. Parties Positions**

Generally, the following parties support PG&E's Make-Ready program proposal, with modification or upon condition:

- AT&T and Frontier,<sup>263</sup>
- Bright Canyon,<sup>264</sup>
- CCDC,<sup>265</sup>
- CLECA,<sup>266</sup>
- CUE,<sup>267</sup>

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<sup>263</sup> AT&T and Frontier at 3-4.

<sup>264</sup> Bright Canyon at 4.

<sup>265</sup> CCDC at 7.P

<sup>266</sup> CLECA at 4.

<sup>267</sup> CUE at 4.

- Doosan,<sup>268</sup>
- Enchanted Rock,<sup>269</sup>
- GPI,<sup>270</sup>
- Joint CCAs,<sup>271</sup>
- LGSEC,<sup>272</sup>
- MCE,<sup>273</sup>
- NFCRC,<sup>274</sup>
- Placer County,<sup>275</sup>
- Cal Advocates,<sup>276</sup>
- RCRC,<sup>277</sup>
- SBUA,<sup>278</sup>
- TURN,<sup>279</sup> and
- Wild Tree Foundation.<sup>280</sup>

The following parties are opposed to PG&E's Make-Ready program proposal:

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<sup>268</sup> Doosan at 11.

<sup>269</sup> Enchanted Rock at 6.

<sup>270</sup> GPI at 11.

<sup>271</sup> Joint CCAs at 4.

<sup>272</sup> LGSEC at 4.

<sup>273</sup> MCE at 3.

<sup>274</sup> NFCRC at 13.

<sup>275</sup> Placer County at 11 and 15-16.

<sup>276</sup> Cal Advocates at 16.

<sup>277</sup> RCRC at 10.

<sup>278</sup> SBUA at 9.

<sup>279</sup> TURN at 7.

<sup>280</sup> Wild Tree Foundation at 5-6.

- CEERT,<sup>281</sup>
- CESA,<sup>282</sup>
- Clean Coalition,<sup>283</sup>
- CC,<sup>284</sup>
- Shell Energy,<sup>285</sup>
- Sierra Club,<sup>286</sup> and
- Tesla.<sup>287</sup>

Temporary Generation Program: With respect to the Temporary Generation Program, the following parties are in support, with modification or upon condition:

- AT&T and Frontier,<sup>288</sup>
- Bright Canyon,<sup>289</sup>
- CCDC,<sup>290</sup>
- CESA,<sup>291</sup>
- CLECA,<sup>292</sup>

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<sup>281</sup> CEERT at 4.

<sup>282</sup> CESA at 35.

<sup>283</sup> Clean Coalition at 10.

<sup>284</sup> CC at 11.

<sup>285</sup> Shell Energy at 5.

<sup>286</sup> Sierra Club at 4.

<sup>287</sup> Tesla at 25.

<sup>288</sup> AT&T and Frontier at 3-4.

<sup>289</sup> Bright Canyon at 4.

<sup>290</sup> CCDC at 7.

<sup>291</sup> CESA at 36.

<sup>292</sup> CLECA at 4.

- CUE,<sup>293</sup>
- Enchanted Rock,<sup>294</sup>
- LGSEC,<sup>295</sup>
- MCE,<sup>296</sup>
- MRC,<sup>297</sup>
- Placer County,<sup>298</sup>
- Cal Advocates,<sup>299</sup>
- RCRC,<sup>300</sup>
- Tesla,<sup>301</sup>
- TURN,<sup>302</sup> and
- Wild Tree Foundation.<sup>303</sup>

While the following parties are opposed:

- CEERT,<sup>304</sup>
- CEJA,<sup>305</sup>

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<sup>293</sup> CUE at 4.

<sup>294</sup> Enchanted Rock at 6.

<sup>295</sup> LGSEC at 5-6.

<sup>296</sup> MCE at 8-9.

<sup>297</sup> MRC at 20.

<sup>298</sup> Placer County at 13, and 15-16.

<sup>299</sup> Cal Advocates at 15-16.

<sup>300</sup> RCRC at 10.

<sup>301</sup> Tesla at 27.

<sup>302</sup> TURN at 7.

<sup>303</sup> Wild Tree Foundation at 5-6.

<sup>304</sup> CEERT at 4.

<sup>305</sup> CEJA at 12.

- Clean Coalition,<sup>306</sup>
- GPI,<sup>307</sup>
- Shell Energy,<sup>308</sup> and
- Sierra Club.<sup>309</sup>

Community Microgrids Enablement Program: With respect to the Temporary Community Microgrids Enablement Program, the following parties are in support, with modification or upon condition:

- AT&T and Frontier,<sup>310</sup>
- BAC,<sup>311</sup>
- CALSSA,<sup>312</sup>
- CEJA,<sup>313</sup>
- CESA,<sup>314</sup>
- CC,<sup>315</sup>
- Doosan,<sup>316</sup>
- Enchanted Rock,<sup>317</sup>

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<sup>306</sup> Clean Coalition at 10.

<sup>307</sup> GPI at 11.

<sup>308</sup> Shell Energy at 5.

<sup>309</sup> Sierra Club at 8-9.

<sup>310</sup> AT&T and Frontier at 3-4.

<sup>311</sup> BAC at 15.

<sup>312</sup> CALSSA at 13.

<sup>313</sup> CEJA at 18.

<sup>314</sup> CEA at 37.

<sup>315</sup> CC at 13.

<sup>316</sup> Doosan at 12.

<sup>317</sup> Enchanted Rock at 6.

- GPI,<sup>318</sup>
- GRID,<sup>319</sup>
- LGSEC,<sup>320</sup>
- NFCRC,<sup>321</sup>
- Placer County,<sup>322</sup>
- Cal Advocates,<sup>323</sup>
- RCRC,<sup>324</sup>
- SBUA,<sup>325</sup> and
- TURN.<sup>326</sup>

The following parties are opposed:

- CforAT<sup>327</sup> and
- Vote Solar.<sup>328</sup>

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<sup>318</sup> GPI at 11.

<sup>319</sup> GRID at 10.

<sup>320</sup> LGSEC at 4-5.

<sup>321</sup> NFCRC at 16.

<sup>322</sup> Placer County at 13, and at 15-16.

<sup>323</sup> Cal Advocates at 20.

<sup>324</sup> RCRC at 11.

<sup>325</sup> SBUA at 10-11.

<sup>326</sup> TURN at 10-11.

<sup>327</sup> CforAT at 30.

<sup>328</sup> Vote Solar at 12.

**5.1.2 Analysis: PG&E's Make-Ready Program and Community Microgrid Enablement Program are Conditionally Approved Subject to Full Commission Reasonableness Review; and PG&E's Temporary Generation Program is Authorized for Interim, Short-Term Use Only**

Section 451 requires us to regulate public utilities to ensure that customers receive safe and reliable service at just and reasonable rates. With Section 451 in mind, we highlight that PG&E's 2019 PSPS events were the largest in California history. This deliberate action shut-off power for extended periods to approximately 738,000 PG&E customers in 35 counties, impacting more than two million people. The scope, scale, and complexity of these events affected people's lives, business, and the economy.

Yet, during the 2019 PG&E PSPS events, some PG&E customers in Angwin, Grass Valley, Calistoga, and Placerville, were served by resilience solutions including temporary microgrids or resilience zones that kept these customers in service, avoiding outages that averaged 4.8 days elsewhere.

We directed PG&E to submit resiliency strategies in this rulemaking to mitigate the impact of PSPS events. We did not direct PG&E to file supplemental testimony on April 1, 2020 and therefore, do not consider the content of that supplemental testimony for purposes of this decision.

Through Section 451 and with the backdrop of the 2019 PG&E PSPS events, we discuss PG&E's proposed DGEMS Make-Ready Program, Temporary Generation, CMEP, in turn below.

Make-Ready Program: PG&E seeks Commission approval of its plan to make infrastructure upgrades to its distribution system. Having the functionality to island a substation and serve it by temporary or permanent generation provides continuous service to significantly larger populations of

customers (thousands to tens of thousands). The Make-Ready Program would establish substation infrastructure to support the proposed PG&E Temporary Generation Program. The Temporary Generation Program anticipates maintaining service continuity for customers and would be enabled to potentially avoid outage durations for up to 96 hours.

PG&E argues that these upgrades will enable candidate substations to utilize temporary generation or permanently-sited distributed generation to stay in service during a PSPS event.<sup>329</sup> Generally, parties are supportive of PG&E's proposal, but only on a limited or conditional basis.

We conditionally authorize PG&E to implement the Make-Ready Program component of its DGEMS Proposal, from 2020 to 2022.<sup>330</sup> We agree with CforAT that PG&E has not substantially justified the extent to which its portfolio of PSPS mitigations would reduce the utility's reliance on shutting off the power to its customers and/or reduce the numbers of customers affected.<sup>331</sup> Therefore, PG&E shall limit the scope of its Make-Ready Program to include the number of substations necessary to keep customers energized during a PSPS event or other loss of transmission line, as consistent with goals to minimize impact of PSPS.

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<sup>329</sup> PG&E-1,- Chapter 1 at 6.

<sup>330</sup> In response to D.19-11-016, PG&E issued a 2019 System Reliability RFO on December 11, 2019. The RFO scope was to procure resources to provide distributed generation enabled microgrid services. PG&E indicated it was pursuing solutions to narrow the scope of future PSPS events and reduce customer impacts from PSPS outages. PG&E's intent was to equip targeted substation locations with DGEMS to have them online preferably by June 1, 2020, but no later than September 1, 2020. The RFO conducted under D.19-11-016 because PG&E sought to qualify the capacity towards the minimum 716.9 MW of additional procurement.

<sup>331</sup> Center for Assistive Technology at 27.



We agree with TURN that PG&E's costs for the Make-Ready program should be subject to reasonableness review.<sup>332</sup> Therefore, PG&E shall track the Make-Ready Program costs, expenses, and capital expenditures in the Fire Risk Mitigation Memorandum Account. The costs recorded in the Fire Risk Mitigation Memorandum Account for the PG&E Make-Ready Program shall be subject to a full reasonableness review by the Commission through a separate application or in its General Rate Case. This will subject the Make-Ready Program to a full Commission reasonableness review prior to recovering of any costs into rates. To support any requests for cost recovery into rates, PG&E shall file an application with testimony and workpapers that includes, but is not limited to: (1) the scope of the completed Make-Ready projects; (2) the basis for PG&E management justification for the Make-Ready projects, providing the underlying assumptions and data for each Make-Ready project upon which PG&E initiated its DGEMS request for offers; (3) documentation that demonstrates the need for PG&E to minimize PSPS impacts to customers;<sup>333</sup> and (4) data to support program efficacy and usefulness to PG&E customers.<sup>334</sup>

We direct PG&E to collaborate with the CCAs in its service territory for planning and procurement processes for Make-Ready resources that may be deployed in the CCA's service territory.

PG&E shall submit, within 30 days upon the date of issuance of this decision, a Tier 2 advice letter that modifies its Fire Risk Mitigation

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<sup>332</sup> TURN at 2.

<sup>333</sup> This may include, but is not be limited to: letters, notices, and proclamations from the Governor of California, the California Legislature, and Commission investigations.

<sup>334</sup> In the appendix attached to this decision, we delineate more minimum requirements PG&E shall submit with its application.

Memorandum Account preliminary statement for the costs associated with this decision's conditional approval of its Make-Ready Program. PG&E shall record the Make-Ready program costs as a separate subaccount in this memorandum account. The costs recorded in the Make-Ready Program Memorandum Account for the PG&E CMEP shall be subject to a full reasonableness review by the Commission through a separate application or in its General Rate Case.

Temporary Generation Program: Cal Advocates argues that temporary generation may be a viable solution in the short term and may be a bridge, until PG&E provides a transmission and distribution system that is hardened and does not present a de-energization risk.<sup>335</sup> We agree. We approve PG&E's Temporary Generation Program for interim, short-term use for the upcoming 2020 wildfire season. This interim approval is conditional, subject to the following requirements.

We begin with general parameters. First, the Temporary Generation Program shall use temporary microgrids and backup power support for societal continuity and substation microgrids. Second, costs for the Temporary Generation Program shall be tracked in PG&E's existing Fire Risk Mitigation Memorandum Account, subject to a full reasonableness review prior to recovery of costs into rates. The costs recorded in the Fire Risk Mitigation Memorandum Account for the PG&E Temporary Generation Program shall be subject to a full reasonableness review by the Commission through a separate application or in its GRC. Third, on or after January 1, 2021, PG&E shall file an application requesting a reasonableness review and rate recovery for eligible expenses from the Fire Risk Mitigation Memorandum Account. This review will determine

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<sup>335</sup> Cal Advocates at 17.

whether the relevant Fire Risk Mitigation Memorandum Account balance should be amortized into rates, and the appropriate effective date for such amortization into rates. In its application requesting rate recovery, PG&E shall submit information to the Commission to aid its reasonableness review such as testimony, workpapers, and bill impact statements.

Now, we must turn to concerns raised by parties for the use of temporary diesel generation for customers impacted by PSPS outages. PG&E's use of temporary diesel generation for customers impacted by PSPS outages must be limited to one year from execution of vendor agreements enacted within 2020 – it is not a long-term resiliency strategy. Indeed, large diesel generators – even when localized in select areas – present potential health risks for individuals who live or work near a temporary generation site. We weigh this risk presented by limited, localized use of temporary diesel generation against the near-term impact of the upcoming wildfire season and potential PSPS outage events as we calibrate a balanced approach to ensure electrical service necessary for public health, safety, welfare and societal continuity in times of crises.

On balance, for the upcoming fire season, it is necessary to allow the use of localized, temporary diesel generation to ensure the public is prepared for both the 2020 wildfire season and the potential dangers associated with potential PSPS outages, including potential loss of, or damage to, life, health, property, or essential public services. With this short-term, interim and localized use only, electrical service will be preserved for some ratepayers while transmission lines are de-energized due to a PSPS event. We believe this temporary resiliency measure will support those who are disproportionately affected by disasters, such as individuals with access and functional needs and hard-to-reach customers. For purposes of accountability, PG&E shall submit an informational

compliance filing by February 15, 2021 in this proceeding, containing a report detailing the use of temporary emergency generators during the 2020 fire season. This report shall detail the total number of diesel generators employed, a summary of emissions by greenhouse gas (GHG) and criteria air pollutant emissions factors, and lessons learned.

Within 30 days of upon the date of issuance of this decision, PG&E shall submit a compliance filing that includes the following: (1) an action plan, including a timeline, to integrate clean generation into the Temporary Generation Program. The action plan should include: (a) the implementation and deployment plan for PG&E's Temporary Generation Program for 2020; (b) plan and schedule for continued testing and demonstration of technology alternative to diesel; (c) status update of PG&E's system enhancement initiative regarding advancement of the commercialization of non-diesel generation; and (2) a report evaluating the results of the Clean Generation Request for Information (RFI).<sup>336</sup>

Finally, PG&E shall submit, within 30 days upon the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum preliminary statement for the costs associated with this decision's conditional approval of its Temporary Generation Program. PG&E shall record the Temporary Generation Program costs in a separate subaccount in this memorandum account. The costs recorded in the Fire Risk Mitigation Memorandum Account for PG&E's Temporary Generation Program shall be subject to a full reasonableness review by the Commission through a separate application or in its GRC.

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<sup>336</sup> Order Instituting Investigation 19-06-015.

CMEP: PG&E also seeks Commission approval for its community-proposed microgrid program to enhance resilience for critical facilities and vulnerable customer groups.<sup>337</sup> The four main components of its CMEP are: (1) enhanced utility technical support to local and tribal governments to support critical facility microgrid projects; (2) enhanced customer-facing microgrid implementation information and project tools; (3) one-time matching funds to offset some portion of the costs associated with upgrades to PG&E's distribution system and ensure safe operations; and (4) creation of community microgrid tariffs.<sup>338</sup> Generally, most parties support PG&E's proposed community level approach for PSPS mitigation.

We approve PG&E's CMEP subject to certain requirements. We agree with CEJA that eligibility for CMEP should be expanded to all areas prone to all outage events,<sup>339</sup> not just Tier 2 and 3 HFTDs. In this way, we approve the CMEP program for years 2020-2022, after which PG&E shall provide a program evaluation to the Commission in its 2023 GRC application.<sup>340</sup> The GRC evaluation shall enable the Commission to evaluate the efficacy of the program and determine whether the program should continue beyond 2022. Second, we approve PG&E to expand the scope of its CMEP proposal to include technical support and guidance for local and tribal governments as well as CCAs to design and engineer behind-the-meter microgrids, in preparation for the upcoming 2020 fire season and beyond. Community microgrids can be complex to develop and

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<sup>337</sup> PG&E-1, Chapter 5 at 2.

<sup>338</sup> *Id.* at 3-4.

<sup>339</sup> CEJA at 18-19.

<sup>340</sup> Cal Advocates Reply Comments at 7.

interconnect. The technical support and guidance for local and tribal governments and CCAs is essential for collaborative success.

Third, and more broadly, we believe the CMEP program will foster collaboration in a manner that supports local and tribal governments and CCA development of microgrid project to support community resilience. In approving the CMEP, we support communities and critical facilities – such as police stations, schools/education facilities, water and wastewater facilities, community centers, and senior centers - located in areas impacted by outages. PG&E shall give strong consideration for CMEP proposals that serve and keep energized disadvantaged communities, customers with access and functional needs, medical baseline customers, and hard to reach customers located in remote areas. We agree with NFCRC that the CMEP may provide the impetus for microgrids as resiliency solutions for PSPS mitigation purposes. In approving the CMEP we further our intent for Track 1 of this proceeding to deploy microgrids as resiliency solution for 2020 and beyond.

Within 60 days upon the date of issuance of this decision, PG&E shall submit a Tier 2 advice letter that includes CMEP implementation details regarding the program scope, project applicability and eligibility criteria including, but not limited to:

- Report on the outreach conducted to solicit input/feedback from local and tribal governments, as well as CCAs, to refine the program scope, project eligibility, and matching fund applicability.
- Provide agendas, attendees lists, and meeting minutes for the meet and confer sessions.
- Detail project scope and eligibility, which should answer the following questions:

- Should CMEP apply to both behind-the-meter (BTM) and in-front-of-the-meter (IFM) projects? Does CMEP apply to remote grids<sup>341</sup>?
  - Should CMEP apply if a local and tribal government promotes a project that uses private sector assets?
  - Should technical support and matching funds be made available on a first-come, first-served basis based on specific eligibility criteria?
  - If requests exceed funding, should there be criteria for which applicants will be served?
  - Should there be any limitation to types of projects that can be included?
  - Should projects be limited to certain kinds of resiliency projects, microgrids, and technologies using renewable distributed energy resources or fuels?
  - Should projects be prioritized based on feasibility to get online in time for 2020 fire season?
  - Should projects be limited to those needed to address near-term fire season priorities and in sites based on fire prevention within HFTDs?
  - Should projects be limited to sites within Tier 2 and Tier 3 HFTDs?
- **Applicability for Matching Funds:** How should the level of matching funds dedicated to the CMEP Program be determined? Can matching funds be used for any project costs or should matching funds be restricted to funding distribution system upgrades including a cap or threshold?

Finally, PG&E shall submit, within 30 days upon the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum preliminary statement for the costs associated with this decision's conditional approval of its CMEP. PG&E shall record all CMEP costs in a

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<sup>341</sup> PG&E Track 1 Proposal at A-9.

separate subaccount in this memorandum account. The costs recorded in the Fire Risk Mitigation Memorandum Account for PG&E's CMEP shall be subject to a full reasonableness review by the Commission either by way of a separate application or in its General Rate Case before the Commission. .

## **5.2. SDG&E Proposal Summary**

SDG&E highlights the ongoing and authorized projects that it has implemented since the 2007 wildfires that affected its service territory. The summarized list of projects that follows represent SDG&E's ongoing efforts to mitigate the use of PSPS and wildfire events:

- Hired subject matter experts in firefighting, fire science and meteorology who have developed and implemented programs to enhance situational awareness;
- Established customer and local agency outreach programs to educate customers and stakeholders on the wildfire risk and maintain open lines of communication during hazardous conditions;
- Formalized a Fire Science and Climate Adaption department comprised of meteorologists, community resiliency experts, fire coordinators and project management personnel. The focus of this department is to respond to and plan for SDG&E's fire preparedness activities and programs;
- Focused on hardening its electric transmission and distribution systems particularly in rural areas where vegetation, weather conditions and topography often align to increase the potential for catastrophic wildfires;
- Worked to improve its sectionalizing capability enabling it to segment targeted system outages in a more granular fashion, thereby reducing the number of customers affected by PSPS or other events.

In its Track 1 proposal, SDG&E seeks Commission approval for the following:



- Electric vehicle (EV) charging infrastructure to be installed at Cameron Corners microgrid (Cameron Corners Microgrid) to support customer mobility including evacuation as necessary; and
- Procurement of a local area distribution controller – a proprietary software/hardware solution that can enhance microgrid operation;

### 5.2.1. Parties Positions

In general, the following parties are in support of both SDG&E's proposed EV Cameron Corners Microgrid and local area distribution controller, with qualifications and/or desire for more information:

- AT&T and Frontier,<sup>342</sup>
- CforAT,<sup>343</sup>
- CCDC,<sup>344</sup>
- CEERT,<sup>345</sup>
- CEJA,<sup>346</sup>
- CESA,<sup>347</sup>
- Clean Coalition,<sup>348</sup>
- CLECA,<sup>349</sup>
- Climate Center,<sup>350</sup>

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<sup>342</sup> AT&T and Frontier at 3.

<sup>343</sup> CforAT at 31-33.

<sup>344</sup> CCDC at 7.

<sup>345</sup> CEERT at 3, Reply at 4.

<sup>346</sup> CEJA at 24.

<sup>347</sup> CESA at 38, Reply at 1-4.

<sup>348</sup> Clean Coalition at 16.

<sup>349</sup> CLECA at 7.

<sup>350</sup> Climate Center at 15.

- CTIA,<sup>351</sup>
- Doosan,<sup>352</sup>
- Enchanted Rock<sup>353</sup>
- EnelX,<sup>354</sup>
- GPI,<sup>355</sup>
- GRID,<sup>356</sup>
- Cal Advocates,<sup>357</sup>
- SBUA,<sup>358</sup>
- Tesla,<sup>359</sup> and
- UCAN.<sup>360</sup>

In general, the following parties are opposed to SDG&E's proposed EV Cameron Corners Microgrid and local area distribution controller:

- Joint CCAs<sup>361</sup> and
- TURN.<sup>362</sup>

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<sup>351</sup> CTIA at 4.

<sup>352</sup> Doosan at 11.

<sup>353</sup> Enchanted Rock at 7.

<sup>354</sup> EnelX at 2, 7.

<sup>355</sup> GPI at 10, 24, and 25-27.

<sup>356</sup> GRID at 5-7.

<sup>357</sup> Cal Advocates at 3, and 38-45.

<sup>358</sup> SBUA at 9, Reply at 6.

<sup>359</sup> Tesla at 23-24, and 29.

<sup>360</sup> UCAN at 2-7.

<sup>361</sup> Joint CCAs at 28-29.

<sup>362</sup> TURN at 2-7.

**5.2.2. Analysis: SDG&E's Request for a Local Area Distribution Controller is Granted, Conditioned Upon Subsequent Affiliate Transaction Compliance, but SDG&E's Request for Electric Vehicle Charging Infrastructure is Denied Without Prejudice.**

We discuss SDG&E's proposals, as viewed through the Section 451 requirement to regulate public utilities to ensure that customers receive safe and reliable service at just and reasonable rates, in turn below.

Local Area Distribution Controller: SDG&E seeks approval for procurement of a proprietary software and hardware technology called a local area distribution controller (LADC). SDG&E asserts that the LADC will: (1) enhance microgrid operation; and (2) augment and interoperate with SDG&E's existing advanced distribution management system and its Wildfire Mitigation Plan (WMP) microgrid projects and related activities. SDG&E's request must be analyzed under the scrutiny of the Commission's Affiliate Transaction Rules because the winning bidder of the LADC procurement, PXiSE, is a subsidiary of SDG&E's parent company, Sempra Energy.

The Commission adopted its Affiliate Transaction Rules to mitigate the potential for transfer of market power and cross-subsidy of its regulated entities with their unregulated affiliates.<sup>363</sup> As is relevant to this discussion, a key goal of the Affiliate Transaction Rules is to ensure that the regulated utilities do not favor or otherwise engage in preferential treatment of their affiliates in energy resource procurement.<sup>364</sup> These rules help the Commission assure that utility affiliates do not gain an unfair advantage over other market players, and to

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<sup>363</sup> The Affiliate Transaction Rules were adopted in D.06-12-029, *Adopting Revisions to (1) the Affiliate Transaction Rules and (2) General Order 77-L, as Applicable to California's Major Energy Utilities and their Holding Companies*, at Appendices A-3 and B-3.

<sup>364</sup> See Affiliate Transaction Rule III, subd. B, 1.

prevent ratepayers from subsidizing unregulated activities, such as by overpaying for products or services that are otherwise available from non-affiliate providers. An affiliate transaction may be approved by the Commission if the procurement process and agreement comply with the Affiliate Transaction Rules.<sup>365</sup> We subject SDG&E's LADC to the affiliate transaction rules below.

Affiliate Transaction Rule III (Rule III) regarding Nondiscrimination provides that "Transactions between a utility and its affiliates shall be limited to . . . products or services made generally available by the utility or affiliate to all market participants through an open, competitive bidding process . . ." (Rule III, subd. B.) SDG&E's filing in this proceeding included the Independent Evaluator's (IE) report regarding the LADC solicitation. An unredacted version of the IE report was filed on March 5, 2020. SDG&E appears to have undertaken significant outreach to potential bidders for the LADC development. In this RFP process, the most economic bidder that met selection criteria and demonstration testing was the SDG&E affiliate, PXiSE. We agree with the IE's analysis that the RFP appears to have provided a neutral, transparent process, and contract negotiations were overseen by the IE, all of which indicate ratepayers would not be prejudiced by approval of this particular affiliate transaction. Thus, Rule III, subdivision B is satisfied.

Therefore, we conditionally approve the LADC project, subject to future audit for assuring adherence to contract timelines and contracted terms including compensation rates disclosed via Advice Letter filing. We therefore direct SDG&E to submit a Tier 2 Advice Letter within 30 days of adoption of this decision that includes the final contract terms, compensation rates, adherence to

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<sup>365</sup> Rule III, subd. B, 1.

Task Milestone schedule, Target Dates for completion of each task. The LADC (PXiSE) contract will not come into effect until Energy Division approves the Tier 2 Advice Letter that contains the final contract terms for compliance with the Affiliate Transaction Rules.

EV-Enhanced Cameron Corners Microgrid: We decline to adopt SDG&E's proposed EV charging infrastructure at Cameron Corners without prejudice. At this time, SDG&E's proposal lacks a complete description of this project's scope. In order to approve a project, we require, at a minimum, the following information which was not included: (1) total project cost; (2) specification of how many electric vehicle supply equipment (EVSE, *i.e.*, charging stations) SDG&E will need to install and at what charging level (*i.e.*, fast charging, Level 2); (3) workpapers; (4) a description of the targeted vehicle sector (*e.g.*, light-duty, medium-duty, heavy-duty); (5) the project's operation and data reporting duration; (6) a justification that demonstrates this EV charging infrastructure is not duplicative to other EV charging infrastructure initiatives; and (7) the EV-Time of Use rate within the context of mitigating the adverse effects of a PSPS event. Additionally, SDG&E's proposal lacks a discussion of whether it considered the option for site host ownership of this EV infrastructure.

However, EV charging appears to augment resiliency if the Cameron Corners microgrid is built. Therefore, we encourage SDG&E to timely file a complete proposal for the Cameron Corners microgrid project in this proceeding, that also resolves the electric vehicle infrastructure ambiguity that was presented before us. In this way, we can timely consider the Cameron Corners microgrid and project as well as the proposed EV charging station.

## 6. Conclusion

In conclusion, this decision adopts short-term actions related to the acceleration of microgrid deployment and related resiliency strategies for Track 1 of this proceeding, R.19-09-009, pursuant to SB 1339 (Stern, 2018).

First, this decision adopts solutions to accelerate interconnection of resiliency projects in advance of the upcoming wildfire season. Specifically, this decision requires the large investor-owned utilities to: (a) develop and implement standardized, pre-approved system designs for interconnection resiliency project applications that deliver energy services during broader grid outages; (b) develop and implement methods to increase simplicity and transparency of the processes by which the utilities inspect and approve a project; and (c) prioritize interconnection of resiliency projects for key locations, facilities, and/or customers.

Second, this decision adopts solutions that modernize tariffs to maximize social resiliency benefits. This includes requiring the large investor-owned utilities to modify their net energy metering tariffs to allow storage devices to charge from the grid during the pre-PSPS window. This decision also requires the large investor-owned utilities to modify their net energy metering tariffs to remove the storage sizing limit.

Third, this decision adopts solutions that promote collaborative engagement between large investor-owned utilities and local and tribal governments. Under this decision, the large investor-owned utilities are required to conduct meetings to educate and inform local and tribal government agencies on vulnerable electric transmission and distribution infrastructure as well as critical operations that service local jurisdictions. This decision also requires the large investor-owned utilities to develop a resiliency project guide,

and to assist local and tribal governments in navigating the utilities' interconnection processes for deploying a resiliency project. Furthermore, this decision directs the large investor-owned utilities to dedicate staff to manage the intake of local and tribal government resiliency projects; as well as create a separate, access-restricted data portal for local and tribal governments to review data essential for microgrid and resiliency project development.

Finally, this decision conditionally approves an array of resiliency proposals set forth by PG&E as well as SDG&E.

### **7. Comments on Proposed Decision**

The proposed decision of ALJ Rizzo in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on \_\_\_\_\_, and reply comments were filed on \_\_\_\_\_ by \_\_\_\_\_.

### **8. Assignment of Proceeding**

Genevieve Shiroma is the assigned Commissioner and Colin Rizzo is the assigned ALJ in this proceeding.

### **Findings of Fact**

1. The Commission initiated R.19-09-009 to design a framework surrounding the commercialization of microgrids pursuant to SB 1339, as well as to account for the Commission's commitment toward utilizing additional technologies and activities to achieve resiliency goals.

2. Public Safety Power Shutoffs (PSPS) events severely impact customer safety, comfort, convenience and commercial concerns.

3. Experience from recent fire seasons indicate some areas are more frequently impacted by PSPS events than others.
4. Experience from recent fire seasons indicate power outages such as PSPSs at certain key types of critical facilities and infrastructure, such as hospitals, safety-related facilities, and suppliers of basic life necessities may create especially adverse impacts on local and regional communities during energy outages, such as PSPSs.
5. Commercializing microgrids, utilizing other resiliency technologies, and related utility activities is likely to mitigate the negative impacts of PSPS outage events and wildfires.
6. Properly designed and configured systems of distributed energy resources (DERs), including microgrids, can provide energy services during widespread outages such as PSPS events.
7. The length of time to interconnect with the utility distribution system can be a barrier to deploy DERs.
8. Projects that provide resiliency are more likely to experience interconnection delays than simpler projects that cannot provide resiliency because resiliency-focused projects must have the ability to electronically island distributed generation and energy storage assets.
9. Projects that island require longer study processes to ensure that there is no inadvertent export of energy to the grid.
10. Reducing the amount of time required to interconnect DERs including microgrids for the 2020 fire season and beyond, is likely to increase resiliency of electric service during widespread outages while maintaining the safety and reliability of the grid.



11. Utility development of single-line diagram templates for Rule 21 non-export storage, net energy metering (NEM), Paired Storage, and NEM solar is likely to facilitate a project's eligibility for expedited interconnection.

12. Utility site inspections may lead to interconnection delays for resiliency projects.

13. Informal consultation between industry and the utilities may facilitate the development of single-line diagram templates for Rule 21 non-export storage, NEM paired storage, and NEM solar to aid a project's eligibility for expedited interconnection.

14. Simple and transparent utility site inspection processes may facilitate expedited utility approval for a resiliency project.

15. Requiring the utilities to describe specific technical criteria the utility uses to determine conditions under which inspections are necessary for grid safety and reliability will likely promote transparency and speed of interconnection for resiliency project developers.

16. Requiring the utilities to implement a system that facilitates accepting videos, photos, and/or virtual inspections in cases where the utility asserts a necessary site inspection may expedite approval for and interconnection of a resiliency project.

17. The time required for microgrid developers to move through the utility interconnection queue could significantly delay a new project's ability to reduce the impact of a PSPS event or other outage in 2020.

18. An accelerated interconnection queue for projects that serve key locations, facilities, and/or customers impacted by outage events or wildfires may increase resiliency and reduce adversity during PSPS events or other outages.

19. Requiring the utilities to transparently describe project type eligibility for relatively simple microgrids and expedite review timelines for such projects will likely accelerate interconnections at key locations, for key customers, and for key facilities.

20. Properly designed and configured solar-paired energy storage systems are examples of DERs that may provide energy services during a wider grid outage for customer-specific resiliency.

21. The NEM tariff, as modified, may facilitate broader deployment of resiliency solutions and use of energy storage systems for resiliency.

22. Maintaining the integrity of existing tariffs that are intended to reward production of on-site renewable energy is critical for public health, safety, and welfare.

23. Maintaining the safety and reliability of the electric grid is critical.

24. Providing flexibility to customers to improve their own resiliency may mitigate the adversity arising from a public safety power shutoff event or other outage.

25. Allowing energy storage systems, in advance of an announced PSPS event, to import from – but not export to – the grid, may facilitate interconnection of energy storage systems to provide resiliency benefits.

26. Removing the storage sizing limit for large NEM-paired storage while maintaining existing metering requirements may also facilitate interconnection of energy storage systems to provide resiliency benefits.

27. As demonstrated by the performance of local microgrids such as Pacific Union College in Angwin, California during the 2019 PG&E PPS events, DERs, including microgrids, can be community resiliency solutions that minimize the impact of PPS events.

28. Local and tribal governmental collaboration with the utilities could lead to the development of additional community resiliency solutions that minimize the impact of PSPS events.

29. Effective outreach and communication from the utilities to local and tribal governments will foster collaborative problem solving for community resiliency planning, facilitate the ability of local and tribal governments to protect the safety, quality of life and health of their communities, and support equitable access to utility information across local and tribal governments.

30. A utility resiliency project engagement guide may assist local and tribal governments in development of successful microgrid projects.

31. Adding additional utility staff to utility distribution planning teams that specialize in resiliency project development for local jurisdictions could help local and tribal governments deploy community resiliency microgrids.

32. Creating a separate access-restricted portal, available only to local and tribal governments, containing essential data for identification of microgrid development opportunities, may support community resiliency projects and planning.

33. PG&E's Make-Ready Program may help the utility reduce its reliance on PSPSs in duration and/or reduce the numbers of customers affected.

34. PG&E's Temporary Generation Program is necessary to support communities in the utility's service territory during likely PSPS events through localized, temporary use of diesel generation only for the 2020 wildfire season and potential PSPS events and is necessary to avoid or mitigate potential loss of, or damage to, life, health, property, or essential public services.

35. PG&E's Community Microgrid Enabled Program may help community-proposed microgrids to enhance resiliency for critical facilities and vulnerable populations.

36. SDG&E's Local Area Distribution Controller may enhance microgrid operations and augment and interoperate with the utility's existing advanced distribution management system, as well as its Wildfire Mitigation Plan related projects.

37. SDG&E complied with the Affiliate Transaction Rules, which assures the Commission that its affiliates did not gain an unfair advantage over other market participants and San Diego ratepayers are not subsidizing unregulated activities.

38. The outcomes of this decision are necessary to maintain electric service essential to public health, safety, and welfare, as well as to prevent and mitigate emergencies created by both the 2020 wildfire season and potential PSPS events.

39. This decision does not approve any projects within the meaning of the California Environmental Quality Act (CEQA) because the outcomes of this decision are necessary to prevent and mitigate emergency conditions at existing utility transmission and distribution facilities arising from imminent, severe wildfire conditions within the meaning of CEQA Guidelines, Section 15269.

40. On March 19, 2020 Governor Gavin Newsom signed Executive Order N-33-20 in response to COVID 19.

41. Executive Order N-33-20 requires all individuals living in the State of California to stay home or stay at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors, in order to address the public health emergency presented by COVID-19.

42. The stay-at-home order is indefinite, and as of the date of the issuance of this decision it remains in effect.

**Conclusions of Law**

1. It is reasonable to consider strategies in Track 1 of R.19-09-009 that support the commercialization of microgrids pursuant to SB 1339, as well as to account for the Commission's commitment toward utilizing additional technologies and activities to maintain energy grid resiliency at just and reasonable rates.

2. It is reasonable for the Commission to consider the use of DERs, including microgrids, to increase energy service reliability during widespread outages anticipated during the 2020 fire season.

3. It is reasonable to require PG&E, SCE, and SDG&E to collaborate and develop consistent, single line diagrams to ensure transparency, continuity, and simplicity for Rule 21 non-export storage, NEM Paired, and NEM solar interconnection procedures.

4. It is reasonable for PG&E, SCE, and SDG&E to informally consult with key stakeholders to develop template designs and then share those designs through a technical meeting to finalize the templates for Commission approval.

5. It is reasonable for PG&E, SCE, and SDG&E's informal consultation with key stakeholders to take no more than ten days to ensure timeliness of implementation for the 2020 wildfire season.

6. It is reasonable to require the Commission's Energy Division to facilitate no more than two working technical meetings where PG&E, SCE, SDG&E, and stakeholders discuss the single line diagrams as well as any other forms applicable to Commission-approved interconnection applications and related tariffs.

7. It is reasonable to require PG&E, SCE, and SDG&E to create a template-based application process for specific behind-the-meter project types, such as:

- (a) Rule 21 non-export storage (<10 kW);

- (b) NEM Paired storage (AC Coupled and DC coupled) (with <30 kW solar and <10 kW storage); and
- (c) NEM Solar (<30 kW).

8. It is reasonable to direct PG&E, SCE, and SDG&E to approach the template design with a goal that the template serves 80 percent or more of potential interconnection projects, and that those template designs be standardized across the utilities.

9. It is reasonable to require PG&E, SCE, and SDG&E to each submit a Tier 2 Advice Letters, within 30 days upon the date of issuance of this decision that:

- (a) Indicates when the informal consultation and technical meetings occurred;
- (b) Lists who attended the meetings;
- (c) Provides technical details specific to the single line diagrams, including the types of permitted devices, the processes for assessing the devices, and the device certification requirements;
- (d) If any proposals were rejected, explains the reasoning for the rejection;
- (e) Provides updates to interconnection agreement terms as well as any other Commission-approved forms in order to implement the requirements adopted, here; and
- (f) Requests authorization of the single line diagrams and discusses any updates required to the interconnection portals, along with a timeline for when the updates will take place.

10. It is reasonable to reduce delays arising from utility site inspections to support the deployment of resiliency projects where those site visits are not required for grid safety and reliability.

11. It is reasonable to enhance transparency of utility technical standards for interconnection that may help developers design projects and minimize the need for field inspections.

12. It is reasonable to require PG&E, SCE, and SDG&E to each submit Tier 2 advice letter within 30 days of the date of issuance of this decision that:

- (a) Provide specific technical criteria used to determine where field inspections are necessary for grid safety and reliability; and
- (b) In cases where an inspection is deemed necessary, the process for which utilities will accept videos, photos, and virtual inspection, along with attestations of authenticity and accuracy from the contractor.

13. It is reasonable for Energy Division, within 60 days of the date of issuance of this decision, to host a meeting where the utilities demonstrate that they have updated their technical documents and handbooks to reflect this decision and provide examples of the project types for which the utilities expect to accept virtual inspections.

14. It is reasonable to require PG&E, SCE, and SDG&E to accelerate interconnection for key locations, customers, and/or facilities by requiring the utilities to increase staff resources and information technology resources to their interconnection study and distribution upgrade teams, in order to facilitate faster queue processing for all projects.

15. It is reasonable to require PG&E, SCE, and SDG&E to each submit Tier 2 advice letter(s) within 45 days upon the date of issuance of this decision that:

- (a) Proposes plans to acquire additional staff, as needed, to fulfill the goals of this decision;
- (b) Describes the expedited-resiliency review process along with corresponding timelines; and
- (c) Describes technical criteria of what types of projects will qualify and benefit from this expedited process.

16. It is reasonable to require PG&E, SCE, and SDG&E on February 15, 2021 to file an information only filing in this proceeding, describing the results of the expedited interconnection process; including:

- (a) Describing the number of projects that utilized the expedited interconnection process;
- (b) Describing frequency of meeting the expedited timeliness; and
- (c) For any projects that fit the expedited criteria, but nonetheless experienced a delay, the utility shall provide an explanation about why the project was delayed.

17. It is reasonable to allow qualifying energy storage systems, in advance of an announced PSPS event, to import from but not export to the grid to enhance resiliency during a PSPS event or other grid outages.

18. It is reasonable to require PG&E, SCE, and SDG&E to modify their NEM tariffs, in advance of a PSPS event, to allow energy storage systems to import from the grid, but not to export to the grid.

19. It is reasonable to require PG&E, SCE, and SDG&E to coordinate with developers and aggregators to formulate a process that allows energy storage systems, in advance of an announced PSPS event, to import from (but not export to) the grid.

20. It is reasonable to require PG&E, SCE, and SDG&E to present to the Smart Inverter Working Group, the proposed processes for allowing energy storage systems, in advance of an announced PSPS event, to import from but not export to the grid for their input.

21. It is reasonable to require PG&E, SCE, and SDG&E each to file, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letters that propose the necessary modifications to their NEM tariffs to allow qualifying energy



storage facilities to import from the grid in advance of announced PSPS events. Such Advice Letters shall be served on current and prior NEM proceeding Service Lists.

22. It is reasonable to require PG&E, SCE, and SDG&E to modify their NEM tariffs to remove the storage sizing limit for large NEM-paired storage and maintain existing metering requirements.

23. It is reasonable to require PG&E, SCE, and SDG&E, within 30 days of the date of issuance of this decision, each to submit a Tier 2 Advice Letters proposing the necessary modifications to their NEM tariffs to make the changes that remove the storage sizing limit for large NEM-paired storage and maintain existing metering requirements. Such Advice Letters shall be served on current and prior NEM proceeding Service Lists.

24. It is reasonable to support local and tribal government investment in distributed energy resources, including microgrids, as a community resiliency solution to minimize the impacts of PSPS events by permitting those governments to have access to various types of utility information in order to plan, design, budget, and implement cost-effective and operative community resiliency solutions through a secure internet portal.

25. It is reasonable to require PG&E, SCE, and SDG&E to engage with local and tribal governments through effective and collaborative outreach and communication to support community resiliency efforts and pre-PSPS event planning by conducting workshops to educate local entities in their respective service territories about PSPS event outage coordination and opportunities for investment.

26. It is reasonable to require PG&E, SCE, and SDG&E, to each submit Tier 2 Advice Letters within 30 days of the date of issuance of this decision, that

explains their plans to conduct semi-annual workshops designed to effect the following:

- (a) Designation of utility/local and tribal government interface roles and responsibilities;
- (b) Engagement with local and tribal governments to build and sustain effective relationships;
- (c) Establishing and maintaining open, accurate, and consistent lines of communication with local and tribal governments;
- (d) Including local and tribal government input in planning and vetting of utility actions that are anticipated to impact local and tribal government concerns;
- (e) Executing agreements impacting local and tribal governments;
- (f) Describing draft agendas for local and tribal government engagement meetings that include education about, at a minimum, how the electric transmission system and distribution system operates in the area, local grid topology and circuit configuration, electric transmission and distribution infrastructure investment and operational plans, weather and climatology analysis predictions for future PSPS events, predictive scenarios, and a reflection on local and tribal government input.

27. It is reasonable to require PG&E, SCE, and SDG&E to convene additional coordination meetings under the direction of local and tribal governments and county emergency services.

28. It is reasonable to require PG&E, SCE, SDG&E to develop a resiliency project engagement guide to help local and tribal governments navigate the utilities' interconnection processes for design and deployment of a resiliency project that includes, but is not limited to:

- (a) Flowcharts depicting how to engage with the utility depending on the type of resiliency project being planned;
- (b) Best practices for successful implementation;
- (c) A list of the types of resiliency projects appropriate for inclusion in expedited processes; and
- (d) A list of data required by the utilities from local and tribal governments and/or tribal governments at each step of the utility's interconnection process.

29. It is reasonable to require PG&E, SCE, and SDG&E each to submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter for the resiliency project engagement guide that:

- (a) Describes how information shall be presented in the resiliency guide;
- (b) Describes various types of resiliency projects a community could implement, including flowcharts for resiliency project types including milestones and timelines;
- (c) Lists requiring data and information for successful project implementation;
- (d) Describes the utility's plan to effectively publicize the resiliency engagement guide to target local and tribal governments; and
- (e) Describes the process for updating or modifying the resiliency guide.

30. It is reasonable to require SCE and SDG&E to add additional positions to their distribution planning teams that specialize in resiliency project development for local and tribal jurisdictions.

31. It is reasonable to require SCE and SDG&E to each submit a Tier 2 Advice Letters within 30 days of the date of issuance of this decision, that describes how the utility will implement the requirement to create dedicated local and tribal government team(s).

32. It is reasonable to require PG&E, SCE, and SDG&E each to develop a separate access-restricted portal, available only to local and tribal governments, containing essential data to identify in front of the meter microgrid development opportunities that may support community resiliency projects and planning.

33. It is reasonable to require PG&E, SCE, and SDG&E to each submit Tier 2 Advice Letters that describe their plan for developing a separate, access-restricted data portal for sharing information with local and tribal governments. This Advice Letter shall include, at a minimum:

- (a) A work plan (including a list of tasks, a schedule for each task, any interdependencies among tasks, and key milestones) and budget estimate for developing a data portal that provides all the data and meets all the requirements listed in this section; and
- (b) A narrative description of how the work plan relates to any other planned work on related systems.

34. It is reasonable to conditionally authorize the PG&E Make-Ready Program from 2020 through 2022 and to limit the scope of PG&E's Make-Ready Program to the number of substations necessary to keep customers energized during PSPS events or other loss of transmission line events, consistent with the goal to minimize the impact of PSPS.

35. It is reasonable to require PG&E to submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum Account preliminary statement for the costs associated with this decision's conditional approval of its Make-Ready Program.

36. It is reasonable for PG&E to record the Make-Ready cost in a subaccount of the Fire Risk Mitigation Memorandum Account, which will be subject to a full reasonableness review either via separate application or in its next General Rate Case.

37. It is necessary to approve PG&E's Temporary Generation Program to maintain services essential for the public health, safety, and welfare for the 2020 wildfire season only, subject to the following requirements:

- (a) The Temporary Generation Program shall use temporary microgrids and backup power support for societal continuity and substation microgrids;
- (b) PG&E shall submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum Account preliminary statement for the costs associated with this decision's conditional approval of its Temporary Generation Program; and
- (c) PG&E shall record the Temporary Generation Program costs in a Temporary Generation Program subaccount in this memorandum account. The costs recorded in the Fire Risk Mitigation Memorandum Account, sub-account for PG&E's Temporary Generation Program shall be subject to a full reasonableness review either via separate application or in its General Rate Case before the Commission.

38. It is reasonable to require PG&E, within 30 days of the date of issuance of this decision, to submit a Tier 2 Advice Letter that includes an action plan to integrate clean generation into the Temporary Generation Program. The action plan should include:

- (a) A plan for implementation and deployment for PG&E's Temporary Generation Program for 2020;
- (b) A plan and schedule for continued testing and demonstration of technology alternatives to diesel;
- (c) A status update of PG&E's system enhancement initiative regarding advancement of the commercialization of non-diesel generation; and
- (d) A report evaluating the results of the Clean Generation Request for Information.

39. It is reasonable to require PG&E to submit a compliance filing that contains a report of PG&E's use of temporary generators during the 2020 wildfire season, including:

- (a) The total number of diesel generators employed and hours operated;
- (b) A summary of emissions by greenhouse gas and criteria air pollutant emissions factors; and
- (c) Lessons learned.

40. It is reasonable to approve PG&E's Community Microgrid Enabled Program for enhanced resiliency for critical facilities and customer groups for all areas prone to outage events through 2020-2022.

41. It is reasonable to require PG&E, within 60 days of the date of issuance of this decision, to submit a Tier 2 Advice Letter that includes the Community Microgrid Enablement Program implementation plan regarding the program scope, project applicability and eligibility criteria as directed in Section 5.1.2 of this decision.

42. It is reasonable to require PG&E to submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum Account preliminary statement to allow PG&E to record the Community Microgrid Enablement Program cost associated with this decision in a Community Microgrid Enablement Program subaccount subject to a full reasonableness review either in a separate application or in its General Rate Case before the Commission.

43. It is reasonable to conditionally approve SDG&E's Local Area Distribution Controller (LADC) project, subject to future audit to assure adherence to contract timelines and contracted terms, including compensation rates.

44. It is reasonable to direct SDG&E to submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision, demonstrating progress on the LADC project, including:

- (a) Adherence to Task Milestone schedule;
- (b) Target Dates for completion of each task; and
- (c) Any deviations from contracted compensation schedule included in the contract submitted to Staff.

45. The actions directed in this decision constitute emergency repairs necessary to maintain service essential to the public health, safety, and welfare that require a reasonable amount of planning to address an anticipated emergency, and/or specific actions necessary to prevent and/or mitigate the effects of imminent, widespread wildfires and potential PSPS events and are, therefore, statutorily exempt from the requirements of CEQA pursuant to Section 15269, Title 14 of the California Code of Regulations.

46. The actions directed in this decision require PG&E, SCE, and SDG&E to comply with the Governor's Executive Order N-33-20, the orders of the California State Public Health Officer and the Director of the California Department of Public Health that all individuals living in the State of California stay home or at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors, in order to address the public health emergency presented by the COVID-19 disease.

47. It is reasonable to require PG&E, SCE, SDG&E, and stakeholders, when implementing the requirements of this decision, to comply with the direction from public health officials regarding shelter-in-place, social distancing, or other measures that may need to be taken in response to the COVID-19 pandemic, consistent with Executive Order N-33-20.

**O R D E R****IT IS ORDERED** that:

1. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit Tier 2 Advice Letters within 30 days of the date of issuance of this decision, that proposes pre-approved template single-line diagrams for the interconnection application process. Each utility shall demonstrate in its advice letter that the pre-approved template single line diagrams were designed in compliance with Section 4.1.3 of this decision and that the utility: (a) informally consulted with stakeholders and vetted the diagrams through technical meetings; (b) must provide a list of who attended the meetings; and (c) must provide technical details specific to the single line diagrams, including the types of permitted devices, the processes for assessing the devices, and the device certification requirements. If any proposals were rejected, the utility shall: (a) explain the reasoning for the rejection; (b) provide updates to interconnection agreement terms as well as any other Commission-approved forms in order to implement the requirements adopted, here; (c) request authorization of the single line diagrams; and (d) discuss any updates required to the interconnection portals, along with a timeline for when the updates will take place. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 1.

2. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision that demonstrates their compliance with Section 4.1.3 of this decision, to expedite utility approval of interconnection projects by: (a) providing specific



technical criteria used to determine where field inspections are necessary for grid safety and reliability; and (b) in cases where an inspection is deemed necessary, the process for which utilities will accept videos, photos, and virtual inspection, along with attestations of authenticity and accuracy from the contractor. We direct the utilities to adopt these approaches to the extent possible while assuring that safety and reliability are not compromised. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 2.

3. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 45 days of the date of issuance of this decision, that demonstrates their compliance with Section 4.1.3 of this decision to facilitate acceleration interconnections for key locations, customers, and/or facilities. Each Advice Letter shall specifically propose plans to acquire additional staff as needed to fulfill the goals of Section 4.1.3 of this decision, and describe the expedited resiliency review process along with corresponding timelines, in addition to what types of projects will qualify for this process. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 3.

4. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit information only filings on February 15, 2021 in this proceeding, that:

- (a) describe the results of the expedited interconnection process under Section 4.1.3;
- (b) describe the number of projects that utilized the expedited interconnection process;
- (c) the success in meeting the expedited timeliness; and
- (d) if any project experienced a delay, the utility shall provide an explanation

about why the project was delayed. In this advice letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 4.

5. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision that: (1) proposes the necessary modifications to their Net Energy Metering tariffs to allow energy storage systems, in advance of an announced Public Safety Power Shutoff (PSPS) event, to import from – but not export to – the grid, consistent with Section 4.2.3 of this decision; (2) discuss how the utility coordinated with developers and aggregators to create a process that allows energy storage systems, in advance of an announced PSPS event, to import from (but not export to) the grid; and (3) summarize how the utility consulted on this process with the Smart Inverter Working Group. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 5.

6. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision, that propose necessary modifications, in compliance with Section 4.2.3 of this decision, to their Net Energy Metering (NEM) tariffs that remove the storage sizing limit for large NEM-paired storage while maintaining existing metering requirements. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 6.

7. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each

submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision, that document their plans to conduct semi-annual workshops designed to help empower local and tribal jurisdictions with a better understanding of grid operations, utility infrastructure, and the nature of weather events alongside utilities' Public Safety Power Shutoff (PSPS) mitigation initiatives in order to make informed decisions on where to focus their resiliency planning efforts, capital investments, and pre-PSPS event operations consistent with Section 4.3.2.1 of this decision. This Advice Letter should specifically address how the utilities plan to develop and ensure that effective internal communication processes exist for managing interface with local and tribal government by enumerating how they will achieve the outcomes below:

- a) Designating utility interface roles and responsibilities;
- b) Managing engagement with local and tribal government and building and sustaining effective relationships;
- c) Establishing and maintaining open, accurate, and consistent lines of communication;
- d) Involving local and tribal government in planning and vetting of utility actions impacting local and tribal government; and
- e) Executing agreements impacting local and tribal governments.

Additionally, in this advice letter filing, the utilities are directed to include draft agendas for local and tribal government engagement meetings and discuss how they plan to meet the specific content requirements of the workshops through examples of draft agenda items. Agenda items shall include, but not be limited to:

- a) Explanations of how the electric transmission system and distribution system operates in the area;

- b) Explanations of local grid topology and circuit configuration;
- c) Informing local and tribal governments about electric transmission and distribution infrastructure investment and operational plans;
- d) Discussion and visualization for context purposes of prior PSPS events;
- e) Weather and climatology analysis predictions for anticipated PSPS events;
- f) Case studies of outage scenarios a county is likely to experience based on predictable weather events;
- g) Granular, local reporting of reliability statistics; and
- h) How the utility plans to incorporate and reflect community and local and tribal government input.

Furthermore, the utilities shall use these Advice Letter filings to explain how they plan to coordinate the collaborative planning session about enhancing grid resilience within the local and tribal government area (*i.e.*, a county). This explanation should include how this planning session will achieve the following:

- a) Outreach to county office of emergency services or other, similar government organizations responsible for implementing the State Emergency Plan;<sup>366</sup>
- b) Moderated by county office of emergency services administrator, or other similar government organization, (unless administrator specifically declines invitation to do so);
- c) Outreach to community and tribal organizations, including representation of disadvantaged communities and access and functional needs populations;
- d) Incorporate relevant elements of a community-based collaborative planning framework as suggested by the Energy Division Staff Proposal (*i.e.*, as the National

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<sup>366</sup> California Emergency Services Act, Section 8568.

Institute of Standards and Technology Community Resilience Planning Guide or its Resilient Communities Toolkit); and

- e) Based on best practices such as San Diego Gas & Electric Company's community engagement.

The utilities shall use this Advice Letter to discuss how they intend to coordinate and harmonize these workshops with existing requirements and how they could incorporate Public Utilities Code Section 956.5-type parameters to implement the requirements of this decision. The utilities shall discuss how they plan to effectuate the following requirements:

- a) Public Safety Power Shutoff working group meetings, as required by Rulemaking 18-12-005 and any subsequent requirements arising from that proceeding;
- b) Disaster response plan requirements pursuant to General Order (GO) 166;
- c) Annual reliability reporting obligations pursuant to Decision 16-01-008 and Public Utilities Code Section 2774.1; and
- d) Land use consultation requirements as laid out in GO 131-D, Section XIV.

In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 7.

8. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit informational filings in this proceeding, no later than five business days after the local and tribal government semi-annual meetings are held. These after-meeting reports shall demonstrate compliance with Section 4.3.2.1 of this decision by showing:

- a) Commission staff were notified at least one (1) month prior to the meeting date;

- b) Contact information for meeting attendees, with a copies of a sign-in sheet;
- c) Workshop agenda;
- d) Workshop minutes or transcript;
- e) Any presentations shown at the workshop; and
- f) Any data formally provided to stakeholders at the workshop.

PG&E, SCE, and SDG&E shall each file a Tier 1 Advice Letter on the first day of each yearly quarter, that compiles all after-meeting reports. This requirement will have an end date after 3 years. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 8.

9. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision, showing how they plan to develop a resiliency project engagement guide consistent with Section 4.3.3.1 of this decision. This Advice Letter shall include, at minimum:

- a) Mockup showing how data will be presented (flow chart, list, etc.);
- b) List of what data will be in the guides, including but not limited to:
  - i. listing of the types of resiliency projects;
  - ii. draft flowcharts for the above project types including project/interconnection milestones and timelines;
  - iii. lists of data required by utilities from local and tribal governments at each step in the process; and
  - iv. lists of engagement best practices.

- c) Plans for how the guides will be made available to the public; and
- d) How the guides will be kept current with new modifications; and
- e) Timeline for release of guides in compliance with this Decision.

In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 9.

10. Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter for implementation of a dedicated staff team for local and tribal government projects within 30 days of the date of issuance of this decision. The Advice Letters shall discuss how SCE and SDG&E plan to implement compliance with Proposal 3, or how current organizational structures comply with such requirements. SDG&E and SCE's Advice Letters must detail how the utility will each implement the following:

- a) Providing advice and guidance before proposal development begins;
- b) Prioritizing projects to ensure that resources are directed to the most urgent needs of public health, safety, and public interest;
- c) Assisting local jurisdictions with consulting advice on the types of resiliency projects that can be expedited through the permitting and interconnection processes;
- d) Providing pre-project information about load points, customer connectivity, load profiles, and the relevant maps and infrastructure data to facilitate local jurisdiction planning;
- e) Describing what, if any, staffing requirements are necessary to establish and complete such a team;
- f) Describing what, if any, training requirements are necessary to prepare the team;

- g) Describing organizational structure of the team; and
- h) Describing operational plans of the team including, but not limited to:
  - i. How the team will intake and process applications,
  - ii. How team will engage local and tribal governments,
  - iii. Timelines for implementation.

In this Advice Letter submittal, SCE and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 10. The cost associated with establishing dedicated teams should be achievable within existing general rate case (GRC) funding levels. In subsequent GRCs, the utilities may request augmentation to these resources.

11. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit Tier 2 Advice Letters within 30 days of the date of issuance of this decision, providing their plan for developing a separate, access-restricted data portal for sharing information with local and tribal governments. This Advice Letter shall include, at a minimum: (1) a work plan and budget estimate for developing a data portal that provides appropriate information and meets the requirements listed in section 4.3.5.1 of this decision; and (2) a narrative description of how the work plan relates to any other planned work on related systems. The work plan shall include a list of tasks, a schedule for each task, any interdependencies among tasks, and key milestones. These Advice Letters shall demonstrate compliance with Section 4.3.5.1 of this decision, which requires the access-restricted portal for local and tribal governments to include:

- a) Access to the tool available to county office of emergency services or government organizations that carry out the State Emergency Plan (California Emergency Services Act Section 8568);



- b) Local and tribal government access to this tool should not require the execution of a non-disclosure agreement, but should be subject to confidential treatment;
- c) The portal at a minimum should include:
  - i. Layer showing utility planned work/grid investments in both tabular and geographic information system format, pursuant to utility obligations under General Order (GO) 131-D, Standard 1, Section E and GO-166, Section XI.
    - a. Data about individual projects should include at a minimum:
      - 1. location;
      - 2. project descriptions (what is being upgraded/built, why is it being upgraded/built);
      - 3. project timelines; and
      - 4. projected completion date.
        - i. Layer showing High Fire Threat Districts;
        - ii. Layer(s) showing electrical infrastructure;
          - a. substations and distribution circuits, including subtransmission lines and stations;
          - b. transmission lines feeding distribution; subtransmission substations
        - iii. Layer showing weather polygons from each prior public safety power shutoff event and resulting distribution and transmission line outages (transmission line de-energization visualizations should only be included to the extent that they will result in distribution outages).

In this advice letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 11.

12. Pacific Gas and Electric Company's (PG&Es) Make-Ready Program is conditionally approved from 2020-2022. PG&E shall submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum Account preliminary statement for the costs associated with this decision's conditional approval of its Make-Ready Program. PG&E shall record the Make-Ready costs in a separate subaccount in the Fire Risk Mitigation Memorandum Account. The costs recorded in the Fire Risk Mitigation Memorandum Account for PG&E's Make-Ready Program shall be subject to a full reasonableness review either through a separate application or in its General Rate Case before the Commission. In this advice letter submittal, Pacific Gas & Electric shall reference compliance with this decision pursuant to Ordering Paragraph 12.

13. Pacific Gas and Electric Company shall, 30 days after the date of issuance of this decision, submit an informational compliance filing that discusses whether there are any alternatives to its Make-Ready Program that enable candidate substations to safely remain energized through deploying other PSPS mitigation strategies. This compliance filing discussion should include, but not be limited to: (1) transmission line exclusion; (2) enhanced vegetation management; and (3) transmission switching. In this compliance filing, PG&E shall include information about its plans for hardening transmission and distribution infrastructure connected to the substations where PG&E proposed to site Make-Ready projects along with cost comparisons. In this Advice Letter submittal, PG&E shall reference compliance with this decision pursuant to Ordering Paragraph 13.

14. Pacific Gas and Electric's Temporary Generation Program is approved for interim, short-term use for the 2020 wildfire season only.

15. Pacific Gas & Electric Company (PG&E) shall submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum Account preliminary statement for the costs associated with this decision's conditional approval of its Temporary Generation Program. PG&E shall record the Temporary Generation Program cost in a separate subaccount in this memorandum account. The costs recorded in the Fire Risk Mitigation Memorandum Account for PG&E's Temporary Generation Program shall be subject to a full reasonableness review either through a separate application or in its next General Rate Case before the Commission. In this Advice Letter submittal, PG&E shall reference compliance with this decision pursuant to Ordering Paragraph 15.

16. Pacific Gas and Electric Company (PG&E) shall, within 30 days of the date of issuance of this decision, submit an informational compliance filing that includes: (1) a plan to integrate clean generation into the Temporary Generation Program; (2) a detailed implementation plan for the 2020 Temporary Generation Program; (3) a plan and schedule for continued testing and demonstration of technologies alternative to diesel; (4) a schedule for status updates of PG&E's system enhancement initiative regarding advancement of the commercialization of non-diesel generation; and (5) a report evaluating the results of the Clean Generation Request for Information.<sup>367</sup> In this compliance filing submittal, PG&E shall reference compliance with this decision pursuant to Ordering Paragraph 16.

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<sup>367</sup> Order Instituting Investigation 19-06-015.

17. Pacific Gas and Electric Company (PG&E) shall submit an information only filing by February 15, 2021 in this proceeding, containing a report detailing the use of temporary emergency generators during the 2020 wildfire season. This report shall detail the total number of diesel generators employed, a summary of emissions by greenhouse gas and criteria air pollutant emissions factors, and lessons learned. In this compliance filing submittal, PG&E shall reference compliance with this decision pursuant to Ordering Paragraph 17.

18. PG&E's Community Microgrid Enablement Program is approved from 2020-2022 for use to all areas prone to outage events, not just Tier 2 and 3 high fire threat districts and subject to program evaluation. PG&E shall submit, within 30 days of the date of issuance of this decision, a Tier 2 Advice Letter that modifies its Fire Risk Mitigation Memorandum Account preliminary statement for the costs associated its Community Microgrid Enablement Program. PG&E shall record the Community Microgrid Enablement Program costs as a separate subaccount in this memorandum account. The costs recorded in the Fire Risk Mitigation Memorandum Account for PG&E's Community Microgrid Enablement Program shall be subject to a full reasonableness review either through a separate application or in its General Rate Case before the Commission. In this Advice Letter submittal, PG&E shall reference compliance with this decision pursuant to Ordering Paragraph 18.

19. Pacific Gas and Electric Company (PG&E) shall submit a Tier 2 Advice Letter, within 60 days of the date of issuance of this decision, that includes Community Microgrid Enablement Program implementation details regarding the program scope, project applicability and eligibility criteria including, but not limited to the requirements listed in Section 5.1.2 of this

decision. In this Advice Letter submittal, PG&E shall reference compliance with this decision pursuant to Ordering Paragraph 19.

20. San Diego Gas & Electric Company (SDG&E) shall submit a Tier 2 Advice Letter within 30 days of the date of issuance of this decision disclosing final contractual terms related to its proposed acquisition of a Local Area Distribution Controller project Task Milestone schedule, Target Dates for completion of each task. In this Advice Letter submittal, SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 21.

21. Utilities are permitted to consolidate Advice Letter filings related to information sharing as directed in Ordering Paragraphs 7-11 to aid efficient processing.

22. Pacific Gas and Electric Company is permitted to consolidate Advice Letter filings in Ordering Paragraphs 12-19 to aid efficient processing.

23. Upon the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company, when implementing the requirements of this decision, shall comply with the orders of the Governor's Executive Order N-33-20, the California State Public Health Officer, and the Director of the California Department of Public Health shelter-in-place directives, social distancing directives, and/or other measures that may need to be taken in response to the COVID-19 pandemic.

24. Rulemaking 19-09-009 remains open.

This order is effective today.

Dated \_\_\_\_\_, at San Francisco, California.