

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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COMMISSIONER LIANE RANDOLPH and
ADMINISTRATIVE LAW JUDGE JULIE A. FITCH, presiding

Order Instituting Rulemaking to
Continue Electric Integrated
Resource Planning and Related
Procurement Processes.)
)
) PREHEARING
) CONFERENCE
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)
) Rulemaking
) 20-05-003
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REPORTER'S TRANSCRIPT
TELEPHONIC
July 14, 2020
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Reported by: Carol Ann Mendez, CSR No. 4330

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TELEPHONIC PROCEEDING

JULY 14, 2020 - 10:00 A.M.

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ADMINISTRATIVE LAW JUDGE FITCH: Good morning. This is a Prehearing Conference for the Order Instituting Rulemaking to Continue the Electric Integrated Resource Planning and Related Procurement Processes.

Today is July 14, 2020. I am Administrative Law Judge Julie Fitch and I will oversee and manage this proceeding in consultation with assigned Commissioner Randolph. We are fortunate to have Commissioner Randolph with us today on the phone and she would like to make some opening remarks. So I will pass it over to Commissioner Randolph.

COMMISSIONER RANDOLPH: Good morning, everyone. This is Commissioner Randolph. And I just wanted to take a moment to thank all of the participants who are here virtually today at this PHC and those who submitted comments on the new OIR. Judge Fitch and I were very appreciative of the written comments.

We have certainly come a long way with IRP since 2016, with a lot of big milestones and a lot of important lessons

1 learned. I want to acknowledge all of the
2 effort that many of you have put into this
3 proceeding over the last four years and I
4 look forward to your continued participation
5 and contributions.

6 My goal today is to hear more from
7 the parties about what the future scope and
8 schedule for IRP should look like. And Judge
9 Fitch will be asking particular questions
10 later to direct that discussion. But to help
11 frame our discussion today, I want to begin
12 by reminding the group that we have to
13 balance three equally important and
14 overarching goals. We have to reduce
15 emissions. We have to maintain reliability
16 and we have to keep costs low. We face a
17 number of challenges in pursuing these goals;
18 the challenge of identifying and building the
19 resources we need in an increasingly complex
20 and fragmented retail market, the difficulty
21 of designing policies that result in
22 least-cost solutions and the operational and
23 economic challenges of transitioning away
24 from natural gas power plants while
25 prioritizing retirements in disadvantaged
26 communities.

27 State policy drives us to consider
28 how to retire the gas leak in a way that

1 ensures reliability, and a necessary
2 component of that is determining how to
3 identify appropriate alternatives to those
4 facilities. And that relates to the issues
5 several parties have raised about how to
6 consider locational value in IRP, which is
7 something fundamentally different than the
8 system-wide approach we have had previously
9 in the proceeding and raises a lot of
10 inter-jurisdictional issues about how we
11 better align our forecasting, resource
12 planning and transmission planning.

13 As we discuss today how to address
14 these challenges and achieve our goals, I'd
15 like parties to focus their discussion on
16 what the top priorities should be for this
17 new OIR and how they should be implemented;
18 in particular, how do we strengthen the link
19 between planning and procurement, in
20 particular at the individual LSE level.

21 And to the extent certain parties
22 have proposals on locational planning
23 analysis, it would be helpful to hear about
24 what are the necessary implementation details
25 and practical considerations, including the
26 likely trade-offs this will entail in order
27 to use that analysis in IRP.

28 And with that I turn it back over to

1 Judge Fitch.

2 ALJ FITCH: Thank you, Commissioner
3 Randolph.

4 So the purpose of today's prehearing
5 conference is really to address the scope of
6 issues, schedule, need for hearing and
7 categorization. There will not be any final
8 rulings today regarding the scope or
9 schedule. The assigned Commissioner, who you
10 just heard from, will decide these matters in
11 the scoping memo after hearing your remarks
12 today and also considering any reply comments
13 that were invited to be filed by no later
14 than July 24th, so 10 days from now as
15 indicated in the June 15th ALJ ruling.

16 For the benefit of our court
17 reporter today, I would like to remind
18 everyone to mute your phone, unless you're
19 called upon to speak; speak clearly and
20 slowly and not to interrupt. I note,
21 however, that the court reporter may
22 interrupt you if you're speaking too quickly
23 or if she needs you to repeat something. And
24 if you would like a transcript of today's
25 hearing, including an expedited transcript, I
26 am going to ask that you make that request in
27 a moment when I call the roll. If you happen
28 not to be a speaker today but you are

1 requesting a transcript, you can also e-mail
2 requesting a transcript to
3 reporting@cpuc.ca.gov.

4 And as I stated in the June 15th ALJ
5 ruling, I don't want to spend time today
6 taking oral motions for party status. A
7 number of parties have already filed motions
8 for party status and I have ruled on all of
9 the motions that have been filed so far as of
10 yesterday morning. I think there may have
11 been a few more yesterday afternoon so I will
12 rule on those shortly as soon as they're
13 formally accepted as filed by our Docket
14 Office.

15 On the service list, respondents
16 named in this Order Instituting Rulemaking
17 have automatically been made parties to the
18 proceeding, so no further action is needed by
19 those load-serving entities respondents; that
20 includes all entities currently serving
21 electric load or planning to serve load in
22 2021 within the Commission's Integrated
23 Resource Planning purview. So that is
24 investor-owned utilities, including smaller
25 multi-jurisdictional community choice
26 aggregators, electric service providers and
27 small electric cooperatives.

28 Also, pursuant to Article 1.4 of the

1 Commission's Rules of Practice and Procedure,
2 if you filed comments or reply comments in
3 response to the rulemaking itself, you're
4 also a party to this proceeding.

5 I heard from a few parties already
6 who filed comments on the OIR but still
7 appear as Information Only on the service
8 list. I will be following up with the
9 Process Office to make sure that those
10 corrections or changes to party status get
11 made for anyone who filed comments on the
12 OIR.

13 If there's anyone else, if you want
14 to become a party to the proceeding, you can
15 do so by submitting a motion for party status
16 in writing in accordance with Rule 1.4 of the
17 Commission's Rules of Practice and Procedure.

18 You can also follow the proceeding
19 but not become a formal party by requesting
20 that the Commission's Process Office add your
21 name to the service list in the Information
22 Only category.

23 I will also remind everyone that we
24 encourage and require participation in order
25 to develop a clear and robust record in order
26 to arrive at a decision in this proceeding or
27 multiple decisions.

28 If you don't actively participate or

1 make a substantial contribution in the
2 proceeding, your party status may also be
3 moved to Information Only.

4 Next I am going to move on to
5 appearances and I am going to call the name
6 of individuals. When I do that, please state
7 your appearance for the record by responding
8 "present." Note that I am only listing those
9 representatives and parties that have
10 indicated that they intend to make comments
11 today. So therefore this may not be an
12 exhaustive list of all formal parties, some
13 of them whom were not available to attend or
14 join us today.

15 Also, when I call your name, in
16 addition to calling "present," if you could
17 also state whether you're ordering a
18 transcript of today's PHC and specify whether
19 it's a regular transcript or an expedited
20 transcript. No need to give your e-mail
21 address. The court reporter already has
22 those. So with that, I am going to go down
23 the list of names; if you can say "present"
24 and specify about your transcript preference,
25 that would be great.

26 So first is Aimee Smith representing
27 SDG&E.

28 MS. SMITH: Good morning, your Honor.

1 I am present. We would like to order an
2 expedited transcript, please.

3 ALJ FITCH: Thank you.

4 Next is Brian Cragg representing
5 Independent Energy Producers.

6 MR. CRAGG: Present, your Honor. We
7 would like a regular transcript, please.

8 ALJ FITCH: Thank you.

9 Next is Cathy Karlstad from Southern
10 California Edison.

11 MS. KARLSTAD: Present, your Honor.
12 And we would also like an expedited
13 transcript.

14 ALJ FITCH: Thank you.

15 Damon Franz from Tesla.

16 MR. FRANZ: Present, your Honor. And
17 we are fine with a regular transcript.

18 ALJ FITCH: Thank you.

19 Next is Dan Kim from Golden State
20 Clean Energy.

21 MR. KIM: Present, your Honor. And we
22 would like a regular transcript.

23 ALJ FITCH: Thank you.

24 Deborah Behles representing the
25 California Environmental Justice Alliance.

26 MS. BEHLES: Good morning, your Honor.
27 I am present and we would like to order a
28 regular transcript.

1 Thank you.

2 ALJ FITCH: Thank you.

3 Next is Diana Lee from the Public
4 Advocates Office.

5 (No response.)

6 ALJ FITCH: She is not here. One more
7 time. Diana Lee.

8 MS. LEE: I am sorry. I was on "mute."
9 I am present and we would like an expedited
10 transcript.

11 Thank you very much.

12 ALJ FITCH: Thank you.

13 Next is Doug Karpa from Peninsula
14 Clean Energy.

15 MR. KARPA: Present, your Honor and I
16 think we would like a regular transcript.

17 ALJ FITCH: Thank you.

18 Next is Edward Hsu from Southern
19 California Gas.

20 MR. HSU: Good morning, your Honor. I
21 am present and we would like a regular
22 transcript, please.

23 ALJ FITCH: Great.

24 Next is Elise Torres from the
25 Utility Reform Network.

26 MS. TORRES: Thank you, your Honor. I
27 am present and we would like a regular
28 transcript, please.

1 ALJ FITCH: Thank you.

2 Next is Ms. Evelyn Kahl from
3 California Community Choice Association.

4 MS. KAHL: Thank you, your Honor.
5 Present. And we would like a regular
6 transcript, please.

7 ALJ FITCH: Thank you.

8 Next is Gregg Morris from the Green
9 Power Institute. And for Mr. Morris, I also
10 understand that he, at 12:30, in case we are
11 still going at 12:30, will be replaced by
12 Zoey Harrold.

13 MR. MORRIS: Yes. Thank you, your
14 Honor. Present, and a regular transcript
15 would be appreciated.

16 ALJ FITCH: Thank you.

17 Next is Jan Reid representing
18 himself.

19 MR. REID: Hi, yes. Present, and I
20 would like a regular transcript via e-mail at
21 no cost because I am an intervenor for this
22 and all other future hearings in this
23 proceeding.

24 ALJ FITCH: Okay. Thank you. Next is
25 Jean Merrigan representing Women's Energy
26 Matters.

27 MS. MERRIGAN: Good morning. Present.
28 And WEM would like a regular transcript.

1 Thanks.

2 ALJ FITCH: Thanks.

3 Next is Jed Gibson from the
4 California Association of Small and
5 Multi-Jurisdictional Utilities.

6 MR. GIBSON: Present. We will not be
7 requesting a transcript.

8 ALJ FITCH: Thank you.

9 Next is Jennifer Weberski from the
10 Small Business Utility Advocates.

11 MS. WEBERSKI: Present. A regular
12 transcript will be fine. And also, your
13 Honor, it does not appear that we are listed
14 on the service list of the parties. I know
15 you had said you were going to follow up for
16 some parties. We appear to be one of those.

17 ALJ FITCH: Okay. I will check on you
18 as well. Thank you.

19 MS. WEBERSKI: Thank you.

20 ALJ FITCH: Next is Jin Noh from the
21 California Energy Storage Alliance.

22 MR. NOH: Thank you, your Honor. I am
23 present and I would like to request a regular
24 transcript.

25 ALJ FITCH: Thank you. Next is John
26 Leslie from Shell Energy North America.

27 MR. LESLIE: Good morning, your Honor.
28 I am present and I do not need a transcript.

1 Thank you.

2 ALJ FITCH: Thank you.

3 Next is Jordan Pinjuv from the
4 California Independent System Operator.

5 MR. PINJUV: Good morning, your Honor.
6 Present. And we would request a regular
7 transcript.

8 ALJ FITCH: Thanks.

9 Next is Katie Ramsey from Sierra
10 Club.

11 MS. RAMSEY: Good morning, your Honor.
12 I am present and I would like a regular
13 transcript, please.

14 ALJ FITCH: Great.

15 Next is Mark Specht from Union of
16 Concerned Scientists.

17 MR. SPECHT: Good morning. I am
18 present and a regular transcript script is
19 fine.

20 ALJ FITCH: Thank you.

21 Next Megan Myers representing both
22 the California Energy -- sorry, the Center
23 for Energy Efficiency and Renewable
24 Technologies, as well as the California
25 Energy -- sorry, Efficiency and Demand
26 Management Council. Council.

27 MS. MYERS: Present and no transcript
28 needed. Thank you.

1 ALJ FITCH: Thank you.

2 Next is Michael Alcantar
3 representing Cogeneration Association of
4 California.

5 MR. ALCANTAR: Present, your Honor. No
6 transcript. Thank you.

7 ALJ FITCH: Thank you.

8 Next Mr. Mohit Chhabra from the
9 Natural Resources Defense Council.

10 MR. CHHABRA: Present, your Honor, and
11 a regular transcript would be appreciated.

12 ALJ FITCH: Great. Thank you.

13 Next is Nancy Rader from the
14 California Wind Energy Association.

15 MS. RADER: Good morning, present, and
16 no transcript needed.

17 ALJ FITCH: Thank you.

18 Next is Mr. Steve Metague from
19 Western Grid Development.

20 MR. METAGUE: Good morning, your Honor.
21 Present and yes we would like a transcript,
22 regular transcript. Thank you.

23 ALJ FITCH: Thank you.

24 Next is Sue Mara from Alliance for
25 Retail Energy Markets.

26 MS. MARA: Thank you, your Honor.
27 Present and no transcript needed.

28 ALJ FITCH: Thank you.

1 Next is Mr. Tom Beach from the Solar
2 Energy Industries Association.

3 MR. BEACH: Your Honor, I am present
4 and I have no need for a transcript. Thank
5 you.

6 ALJ FITCH: Thanks.

7 Next is Ty Tosdal from San Diego
8 Community Power.

9 MR. TOSDAL: Present, your Honor. No
10 transcript necessary. Thank you.

11 ALJ FITCH: Thanks.

12 Next is Tyson Siegele. I'm not sure
13 if I am pronouncing your last name correctly
14 from Protect Our Communities Foundation.

15 MR. SIEGELE: Good morning, your Honor.
16 Yes, Tyson Siegele here with Protect our
17 Communities. No transcript needed. Thank
18 you.

19 ALJ FITCH: Thanks.

20 Next is Tyson Smith from Pacific Gas
21 and Electric.

22 MR. SMITH: Yes. Good morning.
23 Present. And, yes, we would like to request
24 an expedited transcript.

25 ALJ FITCH: Thank you.

26 And last but not least, we have
27 Yochi Zakai from Environmental Defense Fund.

28 (No response.)

1 ALJ FITCH: Mr. Zakai, are you here?

2 (No response.)

3 ALJ FITCH: Okay. It sounds like not.

4 So that's everyone I had on my list.

5 So, now let's move on to the issues
6 of scope and schedule for the proceeding,
7 which are inextricably linked.

8 As set forth in the OIR, the
9 Commission will be examining issues of
10 long-term resource planning to support the
11 achievement of the state's greenhouse gas
12 goals for the electric sector, while
13 maintaining reliability and considering
14 lowest cost to ratepayers. These three
15 goals, as Commissioner Randolph said earlier,
16 continue to be our guiding principles for
17 this endeavor of IRP.

18 At the outset, I wanted to thank all
19 the parties for their very thoughtful written
20 comments, both in response to the OIR itself,
21 as well as to the proposed three-year
22 schedule that was attached to the July 15th
23 ALJ ruling that scheduled this prehearing
24 conference. I have read all of those
25 comments and I know Commission staff have as
26 well. And after reading all of those
27 comments, it leaves us with a dilemma that I
28 wanted to lay out briefly which may help

1 parties focus and hone your comments during
2 this PHC.

3 But first I will start with a couple
4 of items on which I at least read basic
5 consensus among the commenters. I will
6 invite anyone who wants to disagree with that
7 to say so during your opportunity to speak.

8 But I think we found in the comments
9 general consensus on the following issues:

10 First, most parties seem to agree
11 that there needs to be a tighter link in the
12 proceeding between planning and procurement.
13 I think it's safe to say that Commission
14 staff also agree with that as do I and I will
15 say more about that in a few minutes.

16 There also seems to be general
17 consensus that any analysis that's done
18 should include a planning horizon out to
19 2045, even if the actions or the procurement
20 are focused in the shorter term. In other
21 words, I think we would continue to do what
22 we did in preparation for -- of the most
23 recent Reference System Portfolio, where the
24 models are run with an end date out to 2045,
25 even though nearer-term targets were still
26 set for 2030. So I think in this next cycle
27 of IRP, I would expect that the targets would
28 be set probably for 2045, but we would still

1 include the longer planning horizon in the
2 modeling analysis.

3 In addition, numerous parties
4 mentioned the need to incorporate the
5 impacts, particularly on load forecasting of
6 the COVID-19 pandemic. We agree and note
7 that that although this rulemaking was opened
8 after the onset of the pandemic, it was
9 actually largely drafted before that. So it
10 did not include the real-time reality as it
11 was unfolding in the world around us and as
12 evidenced in this PHC itself. But of course
13 we are all aware of it and we intend to take
14 that into account, especially in coordination
15 with the California Energy Commission and
16 with the development of the Integrated Energy
17 Policy report forecasts and planning
18 assumptions that the CEC does.

19 So with that I will move on to what
20 I see as the central dilemma in terms of how
21 we organize and tackle this proceeding.

22 There seem to be two distinct paths
23 forward that we can take. The first, which I
24 will characterize generally as the path we
25 have been on so far, is supported primarily
26 but not exclusively by many of the
27 load-serving entities that would actually
28 like us to analyze their individual

1 integrated resource plans that are due
2 September 1st, 2020 in a robust way, taking
3 into account the individual LSE preferences,
4 analyzing any shortfalls and basing a
5 Preferred System Portfolio on the aggregation
6 of those plans.

7 This approach gives the plan adopted
8 by the Commission a solid basis in reality,
9 instead of just theoretical modeling and
10 would also have the associated transmission
11 planning conducted by the ISO that emanates
12 from what the LSEs actually plan to do in
13 terms of generation or other resource
14 investment.

15 The second option which is clearly
16 supported by a broad coalition of parties
17 with many diverse interests, both in comments
18 on the OIR and in response to the three-year
19 schedule proposal, this option I would
20 broadly characterize as a proposal for the
21 Commission to conduct better long-term
22 locational planning analysis, followed by
23 giving planning and procurement direction to
24 LSEs in the IRP proceeding.

25 There are several aspects of this
26 locational analysis that I think parties are
27 requesting. I have a list of five.

28 The first is analysis of specific

1 individual gas plant retirements that will be
2 necessary by 2030, with particular attention
3 to plants located in disadvantaged
4 communities.

5 The second is specific analysis of
6 long-term local reliability needs in local
7 capacity areas. Several parties suggested a
8 sort of phased approach starting with the LA
9 Basin or Greater Fresno local areas, since
10 these are load pockets of known and
11 long-standing air quality issues.

12 The third is replacement power for
13 Diablo Canyon.

14 The fourth is designation of the
15 need to procure specific, or at least
16 specific amounts of long-duration storage,
17 which would likely be large and location
18 specific.

19 And then fifth is designation of the
20 need for out-of-state wind and/or offshore
21 wind in particular geographic areas to
22 support transmission development to access
23 the resources.

24 So, I note that that second large
25 set of options would require some analytical
26 tools that we have not yet either developed
27 or utilized in the IRP proceeding since to
28 date most of our analysis here has been at

1 the system level and has not involved
2 locational constraints, power flow analysis
3 or the like.

4 We have done some location-specific
5 work when it comes to busbar mapping of new
6 renewables and storage, but it's not really
7 been comprehensive and has not been in the
8 context of an overall optimization exercise.

9 So the analysis being suggested by
10 parties in the second option would need to be
11 fairly fundamentally different from what we
12 have tackled to date in IRP, which is not to
13 say it's impossible but it would require a
14 fairly major shift.

15 I should also say that we appreciate
16 the proposal put forward by several parties
17 to have us conduct a stakeholder process to
18 figure out exactly how to tackle all of these
19 complex issues and in what order. While we
20 very-much appreciate the input and thoughtful
21 proposals on the scope and schedule of issues
22 from parties, we have talked about it and
23 generally find that the decisions we have to
24 make about how to proceed and ultimately how
25 to come down on questions, it comes down to
26 questions of allocating finite resources, in
27 this case largely human resources at the
28 Commission.

1 So, while parties can and hopefully
2 weigh in, we ultimately have to make a call
3 about how to tackle the issues with the
4 resources that we have available at the
5 Commission.

6 I will just note, for example, that
7 several comments had fairly unrealistic
8 expectations about the ability for the
9 Commission to make decisions on very weighty
10 topics by this summer or this fall. There's
11 a lot of things and comments that are easy to
12 say but not necessarily easy to do.

13 This team at the Commission relative
14 to many others is actually very
15 well-resourced -- resourced, very
16 hard-working. A lot of you have known me for
17 a while and know that I don't shy away from
18 tackling difficult tasks, but we still have
19 limits to the number of issues that we can
20 tackle at once simultaneously.

21 So having said all that, the one
22 thing I can say for sure is that we don't
23 have the ability, do not have the ability to
24 proceed on both of the options that I have
25 laid out simultaneously.

26 In other words, we can't do both a
27 robust analysis of the aggregated integrated
28 resource plans and put together a Preferred

1 System Portfolio at the same time that we are
2 conducting locational analysis and powerful
3 modeling on gas retirements, LA Basin, the
4 Fresno local needs, Diablo Canyon
5 replacement, long-duration storage project
6 and out-of-state and offshore wind.

7 So while we might be able to do some
8 of those last few items in the procurement
9 track or through scenario analysis while
10 working at the aggregation of individual
11 plans, and while the ISO's transmission
12 planning process does include power flow
13 modeling, it's likely that we'll have to do
14 some of these analyses sequentially and not
15 simultaneous. So we're going to have to make
16 some hard choices about how to proceed and
17 what our end goal will be, at least by the
18 end of 2021, the end of next year and what
19 we'll do in the next cycle of IRP and not
20 this one.

21 In addition to all of that, I note
22 that I did not read any comments on the
23 proposed three-year cycle schedule a
24 groundswell of enthusiasm for parties. It
25 seems that most parties were most comfortable
26 with the two-year cycle to avoid outdated
27 assumptions, changed circumstances that might
28 lead to an obsolete decision-making, et

1 cetera. And even among parties who supported
2 the three-year schedule, most have caveats
3 or, you know, things that they wanted to have
4 included there.

5 So, another option the Commission
6 staff has discussed at a fair amount of
7 length is to eliminate the reference to
8 support portfolio portion of the proceeding
9 current two-year schedule altogether. I
10 noted San Diego's comments suggested that as
11 well. If we did that, then we would utilize
12 the individual IRPs from each LSE every two
13 years and then move forward with cyclical
14 planning based on those individual IRPs.

15 PG&E proposed another variation
16 which would have us doing planning for the
17 early years in one cycle and then later years
18 in the next cycle and rolling that forward on
19 a cyclical basis.

20 All of these options and probably
21 many others are worthy for discussion and
22 consideration. But with my basic
23 introduction of the two paths forward, I want
24 to now invite parties to comment,
25 specifically on which of the two options you
26 prefer, whether staying the course with
27 Preferred System Portfolio development or
28 shifting to a more granular location analysis

1 for long-term needs. And also feel free to
2 add your thoughts on how to stay on a
3 two-year cycle or shift to a three-year cycle
4 if you prefer.

5 Finally, I will also note that
6 parties are also invited to file
7 post-prehearing conference statements, as I
8 said earlier, on July 24th, 2020, the
9 deadline as I indicated in the June 15th ALJ
10 ruling.

11 So anything that is more complex
12 that you can't fit into approximately two
13 minutes now, you can put in your written
14 comments due July 24th.

15 So with that, I will stop talking
16 and open it up to the first speaker to talk
17 about scope and schedule, which is Ms. Aimee
18 Smith from San Diego Gas & Electric.

19 MS. SMITH: Thank you, your Honor.
20 Aimee Smith appearing for San Diego Gas &
21 Electric. Good morning, Commissioner
22 Randolph. Good morning, Judge Fitch.

23 I was quickly taking notes on the
24 two path-forward options that you described
25 and I think that I'll hold off on detailed
26 comments pending further discussion with our
27 internal subject matter experts. And we'll
28 plan to address sort of the pros and cons in

1 our July 24th comments.

2 More generally, I, you know, SDG&E I
3 think would strongly agree with the points
4 that Commissioner Randolph made and in
5 particular the notion that it's critical to
6 strengthen the link between planning --
7 resource planning and resource procurement.
8 And our comments focused on schedule, while
9 procedural in nature, are also intended to
10 accomplish that goal.

11 So I -- my intent had been to sort
12 of briefly walk through some of the requests
13 that SDG&E has made related to schedule. You
14 know, to the extent a decision is made to
15 sort of take a different approach, then it's
16 possible that some of the actions that were
17 described in the proposed schedule and then
18 in SDG&E's proposed schedule and our
19 comments, some of those actions may look a
20 little different, but I think
21 generally-speaking the goal of having, you
22 know, a robust analysis that underlies a need
23 determination that drives procurement
24 decisions, you know, what we support and what
25 our proposals and our comments were designed
26 to accomplish.

27 So, you know, just briefly, in terms
28 of sequencing, SDG&E strongly agrees that

1 their reliability procurement, if any, should
2 come after adoption of a Preferred System
3 Portfolio or whatever direction the
4 Commission provides related to sort of a need
5 analysis; we think that having reliability
6 procurement that is based on, you know, a
7 Preferred System Plan or need analysis is
8 more aligned with the goals of the IRP and
9 will help to avoid unnecessary procurement.
10 And like I said, the schedule proposed in our
11 opening comments is designed to accomplish
12 that. So it places the resource planning
13 piece before the procurement piece for that
14 reason.

15 Related to, you know, the analysis
16 that drives the need determination, we
17 strongly, you know, believe and urge the
18 Commission to undertake development of
19 reliability assessment methodology and we
20 think at a minimum that methodology would,
21 should, must include a Loss of Load and
22 Expectations study, LOLE Study. You know, to
23 date the methodology or the analysis that has
24 been produced has been directional and
25 helpful from a directional perspective, but
26 it doesn't actually translate into actual
27 procurement targets that will, you know,
28 further the goal of climate reduction and

1 ensure optimization of resource procurement.
2 So we think a reliability assessment
3 methodology is a really important part of the
4 IRP process. And I think that that is true
5 regardless of what that process looks like.
6 But reliability, you know, as your Honor and
7 Commissioner Randolph indicated is, you know,
8 a critical goal within the IRP process.

9 We also think that there is a need
10 for --

11 ALJ FITCH: Can I ask you to wrap it up
12 quickly?

13 MS. SMITH: Oh, sure. Okay. So we
14 would like a methodology to allocate
15 procurement obligation.

16 And also I just want to say that we
17 strongly support the three-year cycle
18 proposal, but we would like an opportunity to
19 provide some comment on sort of the details
20 of it, but we are very supportive of the
21 three-year proposal. Thank you.

22 ALJ FITCH: Okay. Thanks.

23 I am going to move on to Mr. Brian
24 Cragg from the Independent Energy Producers.
25 Thanks.

26 MR. CRAGG: Thank you, your Honor.
27 This is Brian Cragg, with the Independent
28 Energy Producers Association which as you

1 know is a trade association representing all
2 types of energy providers, renewables,
3 conventional and storage.

4 In looking at the two paths you've
5 outlined, I am intrigued by the second path
6 focused on the long-term locational analysis.
7 But I am a little concerned that the focus
8 there is maybe a little bit unrealistic.
9 There seems to be -- and may be inefficient.
10 There seems to be, at least in the comments,
11 an idea that the results of this analysis
12 would result in a -- would be a Commission
13 order for certain gas-fired plants to retire.
14 I would just like to point out that the
15 Commission doesn't have that authority and
16 can't order privately-owned power plants to
17 shut down. So let's try to be realistic
18 about it.

19 My other concern is that the focus
20 may be a little bit too narrow in a sense.

21 Local reliability areas are created
22 because there is a lack of adequate -- a
23 combination of a lack of adequate
24 transmission and the lack of adequate
25 generation. That's a pretty complicated
26 analysis to figure out how to carry that out.

27 And if the concern is the effect on
28 disadvantage communities, there might be a

1 more efficient, more effective option for the
2 Commission to pursue, which is to be prepared
3 for the electrification of the transmission
4 -- or the transportation sector which is
5 where a lot of the reduction in greenhouse
6 gas emissions and criteria pollutants could
7 occur.

8 I noted in our comments that CARB
9 had adopted a standard for zero emission
10 heavy and medium-duty trucks. This morning
11 14 states in the District of Columbia said
12 that they're going to follow CARB's lead and
13 adopt similar standards. That is going to
14 hit in 2024.

15 Part of what we should be focusing
16 on in this proceeding is getting prepared for
17 the increased demand that will be associated
18 with the electrification of the
19 transportation sector and also the building
20 sector.

21 On a statewide basis, that is where
22 a lot of the benefits can come and I think
23 that in many ways that would be much more
24 efficient and more effective for the local
25 communities than focusing on major individual
26 power plants.

27 I think it is good to plan for the
28 retirement of the plants, gas-fired power

1 plants, because that will be occurring over
2 the next 10 to 25 years, whatever time frame
3 you want to choose and especially at the end
4 of 2023, even if the once-through-cooling
5 extensions are granted, there will be several
6 thousand megawatts of retirements at that
7 point and we have to start planning for their
8 replacement.

9 But focusing too much on individual
10 plants I think could be a distraction, could
11 really create a lot of extra work that would
12 expand the scope of the proceeding
13 unnecessarily and I instead urge focusing on
14 being prepared for the electrification of the
15 transportation sector and the building sector
16 that's going to be upon us in just a couple
17 of years. Thank you.

18 ALJ FITCH: Thank you. All right.

19 Next we'll hear from Cathy Karlstad
20 from Southern California Edison.

21 MS. KARLSTAD: Thank you, your Honor.
22 I will focus on the dilemma that you
23 identified.

24 And I think SCE would strongly
25 support in the near term focusing on the LSE
26 -- aggregation of LSE plans and identifying
27 the resource needs from a system perspective
28 that are identified through that process.

1 You know, the Commission's Reference
2 System Portfolio identified a need for system
3 resources in the 2024 to 2026 time frame to
4 deal with the OTC retirements and Diablo
5 Canyon retirement and SCE's preliminary
6 analysis supports that. And if we're going
7 to meet those needs, the Commission does need
8 to focus on those system reliability needs in
9 the near future.

10 So we strongly support focusing on
11 that for the remainder of this cycle.

12 With respect to natural gas
13 retirements and local area needs, SCE agrees
14 that the IRP is the right venue to address
15 natural gas retirements through scenario
16 analyses and look at what resources are
17 needed in the local areas and we support
18 taking a systematic approach to those issues
19 in coordination with the CAISO's transmission
20 planning process. But we don't really think
21 there's a process that up to do that or the
22 time to do that in the remainder of this IRP
23 cycle and we also don't want to focus on
24 local areas to delay addressing the system
25 procurement that's really needed relatively
26 soon.

27 So, as I said, we strongly support
28 the LSE aggregation process and also as we

1 stated in our comments, we really think now
2 is the time to take a look at the current IRP
3 process overall and consider how it may be
4 redesigned to make it more effective and also
5 more efficient, which could include looking
6 at, you know, the length of the cycle; are
7 both the Reference System Portfolio and the
8 Preferred System Portfolio still needed in
9 their current forms? And it can also look at
10 how to incorporate these local issues.

11 So I think this dilemma kind of
12 emphasizes the need to do that before the
13 next IRP cycle. And we would continue to
14 support adding that to the scope.

15 Finally, on the two versus
16 three-year cycle, we do have some real
17 concerns with the three-year cycle leading to
18 outdated data being incorporated and into the
19 Preferred System Portfolio and also within
20 the transmission planning process. So we
21 continue to support a two-year cycle, but
22 focusing on how that two-year cycle could be
23 redesigned to make it work better.

24 Thank you.

25 ALJ FITCH: Thank you.

26 Next is Mr. Damon Franz from Tesla.

27 MR. FRANZ: Thank you, ALJ Fitch and
28 Commissioner Randolph.

1 I want to support the second of the
2 two options that you referenced focusing on
3 granular locational analysis and local area
4 need.

5 From a high-level, I think it's
6 going to be much more difficult to meet
7 climate goals if we are setting preferred
8 resources only at the system level but we
9 still need fossil plants to meet local area
10 capacity requirements.

11 And just sort of stepping back to
12 the OIR stating that the RA and local
13 capacity areas would continue to be addressed
14 in the Resource Adequacy proceeding, I just
15 want to point out that the RA proceeding has
16 historically been and continues to be the
17 venue for addressing short-term contracting
18 of existing resources only and does not
19 identify the need for new resources or
20 authorized procurement of those resources in
21 local areas.

22 So to the extent that there are
23 shortfalls of capacity in local areas due to
24 load growth transportation electrification or
25 other factors, there doesn't appear to
26 currently be a process to identify those
27 trends on a long-term basis and to authorize
28 procurement of new resources in this local

1 area.

2 And I would also note that the LDCP
3 and now the IRP has sort of always been the
4 venue for assessing the need and directing
5 procurement as new generating capacity at
6 both the system and the local level, and I am
7 not aware of any decision that has relegated
8 the IRP to system procurement only. So I
9 think there is a concern that to the extent
10 that needs arise in local areas, there
11 currently isn't a venue at the Commission to
12 plan for meeting those needs.

13 In terms of process and schedule, we
14 agree with the recommendations of Cal
15 Advocates that the IRP could incorporate the
16 CAISO's 10-year LCR assessment into the IRP
17 models. And we also agree with the comments
18 put forth by Sierra Club, NRDC, CEJA and
19 Cal-Environmental Justice that the Commission
20 could work with the CAISO to target specific
21 local areas and create studies to assess how
22 to use preferred resources to alleviate the
23 need for specific plants in local areas
24 similar to the studies that were conducted
25 for the Moorpark area back in 2017.

26 So with that, I will conclude my
27 comments and thanks again for the
28 opportunity.

1 ALJ FITCH: Next we'll move on to Dan
2 Kim from Golden State Clean Energy.

3 MR. KIM: Thank you, Judge Fitch and
4 Commissioner Randolph for creating this. And
5 my name is Daniel Kim with Golden State Clean
6 Energy. We are developers of the Western
7 Solar Park in California Central Valley and
8 the only renewable energy zone that is
9 consistently analyzing the portfolios north
10 and northern Central California.

11 First, before I jump into just a
12 couple of my prepared comments about the
13 scope, to answer your question about the
14 system priority versus the study of more
15 granular local reliability areas, I don't
16 really have a -- I think a clear answer to
17 where we fall on the preference of the two,
18 but will provide those after speaking to our
19 team and, you know, putting those in our
20 comments.

21 But off the top of my head, I would
22 like to -- based on the comments from SDG&E,
23 IEP, Edison and Tesla before me, I think
24 there is a theme that I would like to at
25 least acknowledge for you and the Commission
26 to consider is the theme of maybe identifying
27 least regrets, opportunities that can tackle
28 both the system priority planning needs as

1 well as the local granular needs, all in kind
2 of conformance with the other three goals
3 that Commissioner Randolph identified,
4 because I do believe that there are least
5 regrets kind of projects, opportunities,
6 investments that can be put together and, you
7 know, done so pretty quickly because we have
8 done quite a bit of analysis of I think
9 through the Commission's previous work in the
10 IRP about, you know, kind of where these --
11 you know, where these opportunities for
12 investment are.

13 So, I will just kind of leave it at
14 that.

15 The two comments that I would like
16 to kind of make regarding the scope is, you
17 know, one, we believe at Golden State Clean
18 Energy that the issue of excess curtailments
19 and the overreliance of energy-only
20 assumptions need to be dealt with in this IRP
21 process. We will provide more details as to
22 why we believe that outside of our opening
23 comments, but the current level of solar
24 curtailment is dramatically increasing as we
25 all know and it's far outstripping the
26 benefits that, you know, we have been
27 assuming from programs like the energy
28 imbalance markets and I think having a more

1 permanent kind of mechanism to address this
2 issue is going to be important, especially as
3 it also intersects with our need to reduce
4 fossil emissions long term. We can't do that
5 if we're --

6 ALJ FITCH: I am going to need to get
7 you to wrap it up soon.

8 MR. KIM: Oh, sorry. And on
9 energy-only assumptions, I also believe from
10 our perspective that we need to address the
11 overreliance of energy-only assumption.

12 And then on the schedule, finally,
13 we do support the two year and we believe
14 that there is risk to doing a longer IRP
15 cycle.

16 Thank you, Commissioner.

17 ALJ FITCH: Thank you.

18 Next is Deborah Behles from the
19 California Environmental Justice Alliance.

20 MR. BEHLES: Good morning, ALJ Fitch,
21 Commissioner Randolph and parties.

22 We urge you to implement the second
23 option; the option that would look at
24 procurement in specific areas, the types of
25 procurement, smart procurement.

26 To date the IRP process has been
27 largely reactive when it comes to
28 procurement. When there is an immediate

1 need, the IRP process has reacted. It hasn't
2 been proactive in considering how to meet
3 greenhouse gas goals, air quality
4 minimization, achieve ratepayer objectives.

5 The Preferred System Plan last cycle
6 did not meet greenhouse gas requirements for
7 the RPS, was not as reliable and arguably
8 cost more.

9 And so when the question arises of
10 how to spend limited resources, I urge the
11 Commission to focus on how to be smart about
12 procurement. We need to procure a
13 significant amount of resources in the
14 upcoming years in order to retire facilities
15 that are already slated for retirement, to
16 ensure that the OTC facilities, that Diablo
17 can require.

18 And then along with that, gas
19 facilities will retire, whether for economic
20 reasons or whether because we have replaced
21 the need for those facilities.

22 The question is: Is whether that
23 retirement will be orderly; whether that
24 procurement will be smart; whether we will
25 procure the types of resources that are
26 necessary to actually retire those plants in
27 a way that the CAISO can -- does not have to
28 RMRR those units because we haven't procured

1 the right type of resources.

2 And I urge the Commission when
3 looking at resources to look at what's
4 already been done by the CAISO and to work
5 hand-in-hand with the CAISO. There already
6 is analyses; for example, of charging
7 limitations for local areas. And that type
8 of analysis can be used to start directing
9 where procurement needs to go.

10 And the worst-case scenario would be
11 if LSEs finally procure resources in the
12 wrong location and for example procure
13 four-hour energy storage when in reality
14 local areas need, for example, six-hour
15 energy storage to meet reliability. That
16 would not only cost the ratepayers more but
17 likely worsen air quality, where
18 disadvantaged communities already breathe
19 some of the worst air in the country and not
20 ultimately move us forward in meeting our
21 greenhouse gas goals.

22 And with relation to the schedule,
23 we, in our comments, we urge the Commission
24 to first look at what needs to be
25 accomplished, rather in the natural time
26 frame. And we think that smart procurement,
27 along with ensuring that the procurement is
28 actually meeting greenhouse gas requirements,

1 when verified with actual emission is
2 critical.

3 So we urge the Commission to first
4 look at meeting those and then develop a
5 schedule based on meeting those overall
6 requirements.

7 Thank you for your time.

8 ALJ FITCH: Thank you.

9 Next is Diana Lee from the Public
10 Advocates Office.

11 MS. LEE: Thank you, Judge Fitch. Good
12 morning, Commissioner Randolph.

13 We appreciate the comments that the
14 dilemma that you have pointed out and we
15 recognize the finite resources of the IRP
16 team and the incredible hard work that they
17 put in in trying to accomplish all the goals
18 of the proceeding. And so it is a tough
19 decision to make a choice between the first
20 option and the second option, but it's more
21 -- we think it's more important to do the
22 detailed kind of long-term planning that will
23 help this proceeding achieve the goals of SB
24 350. And so the studies of how to retire gas
25 plants in local areas; how to meet long-term
26 reliability needs in LCR areas, looking at
27 offshore winds, the retirement at Diablo
28 Canyon and the need to provide studies of

1 long-term storage, we think that deferring
2 those issues for yet another cycle would be a
3 step in the wrong direction.

4 With that said, we will try to come
5 up with constructive solution in our reply
6 comments, try to balance those two competing
7 goals. But at this point, we strongly
8 recommend that the Commission proceed on a
9 path of longer-term planning.

10 And we agree with other parties,
11 everybody apparently, that recognizes there's
12 issues with the schedule and with -- there's
13 efficiencies in this proceeding that could be
14 achieved and so we recommend that in the
15 third and fourth quarter 2021 we take a look
16 at what we've learned, try to find
17 efficiencies, consider whether a three-year
18 cycle would be better.

19 At this point, Public Advocates
20 Office is inclined to think a two-year cycle
21 is better for data freshness that others have
22 mentioned.

23 But towards the end of next year, we
24 think looking at it could provide the
25 opportunity to improve efficiencies and
26 hopefully accomplish the goals with the
27 resources that we have.

28 Thank you.

1 ALJ FITCH: Thank you.

2 Next is Doug Karpa from Peninsula
3 Clean Energy.

4 MR. KARPA: Good morning, your Honor.
5 Thanks so much for the opportunity to speak.

6 I want to I think start out by
7 really emphasizing that we are pretty excited
8 actually I think to be working with the
9 Commission and coordinating as a sister
10 agency with you to solve a lot of the
11 long-term problems that California faces.

12 I noted today that Vice President
13 Biden is announcing a 2035 decarbonization
14 target, which I look at and think that will
15 be exciting to do. So I'm definitely looking
16 forward to that.

17 And I think in sort of with that
18 context, I am very sensitive I think to the
19 tremendous workload that Energy Division has
20 in pulling all of this off, but certainly I
21 want to support I think the continued
22 emphasis on making sure that, you know, the
23 system stays reliable and that our
24 procurement that we are doing fits in well
25 with the overall statewide plans.

26 But I think I would question a
27 little bit to what extent the two options
28 laid out necessarily have to be

1 contradictory. If only because I think we
2 can, you know, if we continue the way we're
3 going in terms of modeling statewide
4 reliability and I think some of the other
5 functionalities that we need to have at a
6 system level, I wonder to what extent we may
7 also be able to at minimum establish a policy
8 of what natural gas retirements should be
9 prioritized. I note that like CAISO, for
10 example in it's current transmission planning
11 process is, you know, planning for I think in
12 one of the policies the case is six gigawatts
13 of retirement. And it's basically just like
14 "we're taking the oldest ones out first,"
15 which may not be the most intelligent
16 approach. So I think even just having a
17 policy without analysis of what the priority
18 should be would be a help.

19 And then I think also, I would point
20 out to a certain extent we have already been
21 doing this sort of walk-and-chew-gum thing by
22 doing IRP, but then also the example of
23 Moorpark was mentioned as like identify one
24 instance and model for that.

25 I also would point to the
26 collaboration between East Bay Clean Energy
27 and PG&E around the Oakland Clean Energy
28 Initiative. So that might provide a model

1 for a more sort of limited and discreet
2 analysis of particular instances so that when
3 load-serving entities are developing our
4 portfolios, we can -- you know, we are
5 ordering procurement now, doing contracts
6 now. We can prioritize those locations as
7 opposed to flying blind. So we may be able
8 to, you know, thread the needle and do both.

9 The second piece that I really
10 wanted to raise and I don't think I've really
11 heard so far is to draw your attention to
12 AB-1584 in the new Public Utility Code 397
13 calling for an assessment and an allocation
14 of electrical system integration resource
15 responsibilities. I think we are probably --
16 coming up we're going to be doing a lot of
17 the work of identifying each load serving
18 entity and how much we are each individually
19 contributing to reliability and other
20 functions like ramping and certainly I note
21 PCE is part of a group of four CCAs who were
22 jointly doing our IRPs. We're very concerned
23 about making sure that our portfolios are
24 beneficial to the system as a whole from
25 reliability perspective. And so in our
26 conversations with Energy Division, I know
27 there's a lot of brain power being used to
28 kind of develop those methodologies and they

1 are new. So I just really want to, you know,
2 bring a little bit of attention that we have
3 some work to do to get more granular
4 methodologies and analysis to really try and
5 piece out like what each of us should be
6 doing as load-serving entities. And I think
7 that will go a long way to making sure that
8 when it comes to 2035, we're going to like
9 pick the landing and actually get all this
10 stuff done.

11 So I really do appreciate a lot of
12 the work and, you know, I think Commissioner
13 Randolph's comments around both the need for
14 doing that intelligently, addressing not just
15 reliability but also the needs of communities
16 around the state. And actually in that kind
17 of slowing from that, because that is so much
18 work to do in having watched this two-year
19 cycle, because I've really deeply involved in
20 the actual modeling and development of our
21 portfolio planning, I think one of the
22 arguments for a three-year cycle that I
23 haven't heard a whole lot from is that like
24 this current cycle has been sufficiently time
25 compressed that it is compromising our
26 ability to really deliver to the Commission a
27 really well-developed and robust set of
28 portfolios that are well-modeled.

1 Our last --

2 ALJ FITCH: I'm going to have to ask
3 you to wrap it up.

4 MR. KARPA: Okay. Yeah. Just to point
5 out on that like on this cycle, June 15th, we
6 had our last set of requirements and we have
7 to have six weeks or two months for approvals
8 from our Board, so that gives me -- that's
9 like three weeks to incorporate that. So I
10 think more time for modeling would be really
11 helpful. Thank you.

12 ALJ FITCH: Thank you.

13 All right. Next is Edward Hsu from
14 Southern California Gas.

15 MR. HSU: Thank you, your Honor. Ed
16 Hsu for SoCalGas.

17 We don't have a -- comments on any
18 of the particular two options you discussed
19 this morning. I think we'll reserve our
20 comments for written responses on the 24th.
21 But we did want to offer some comments and
22 appreciate the Commission's consideration
23 that provides our perspective as a partner in
24 maintaining electric system reliability now
25 and in future.

26 I think I would like to start off
27 with our support of the three-year cycle
28 proposal.

1 SoCalGas believes that a longer IRP
2 cycle will provide the time necessary to
3 evaluate the impacts that climate change may
4 have on the changing GHG planning targets.
5 And, in addition, what opportunities may be
6 available, including evaluating the role of a
7 more diverse set of energy technologies and
8 framing scenarios under decarbonization.

9 As part of that, we also wanted to
10 voice our support and emphasize the need for
11 the Commission's efforts to examine
12 procurement issues in the procurement track
13 associated with long lead time resources,
14 such as long duration storage as has already
15 been mentioned, including the development of
16 new resource types like hydrogen-fueled
17 resources.

18 We believe that the Commission
19 should consider the leveraging of the
20 existing gas grid for hydrogen usage and
21 storage. Blending offers opportunities for
22 synergy with renewable power generation
23 because hydrogen can be stored in existing
24 natural gas infrastructure and used to
25 generate electricity when renewable energy
26 sources are not available.

27 We believe that this technology as
28 part of a future procurement resource will be

1 an important tool in addressing renewable
2 curtailment as the energy system becomes more
3 and more dependent on renewable sources.

4 We also wanted to point out that
5 given IRP's significant impact on the gas
6 system, we would emphasize that the
7 Commission remember the need to align the
8 long term -- align with the long-term gas
9 planning OIR 20-01-007 as the IRP moves
10 forward.

11 Thank you very much.

12 ALJ FITCH: Thank you.

13 Next we have Elise Torres
14 representing TURN.

15 MS. TORRES: Thank you, your Honor. I
16 am filling in for my colleague today. So I
17 am not prepared to speak to TURN's preference
18 between the two options you laid out, but I
19 will consult with my colleague Matthew
20 Freedman and we may address this issue in our
21 reply comments.

22 Regarding the scheduling issues,
23 TURN does not have a strong preference
24 between the two or three-year cycle, but we
25 do note that it's very important for the
26 Commission to retain regular opportunities to
27 order procurement throughout the process. So
28 if we did move to a three-year cycle, we

1 would not want to only have one opportunity
2 at the end of the process.

3 And that's all I have.

4 ALJ FITCH: Okay. Thank you.

5 Next is Evelyn Kahl representing Cal
6 CCA.

7 MS. KAHL: Thank you, your Honor.

8 Like Mr. Cragg, I'm intrigued by
9 Path 2, but I also understand Ms. Karlstad's
10 perspective on Path 1, but since Cal CCA
11 hasn't had an opportunity to discuss the
12 path, I will have to hold any formal response
13 for reply comments.

14 But like Mr. Karp, I am kind of
15 hoping that the two paths aren't
16 mutually-exclusive, if the two paths could be
17 -- if the Path 2 activities could be
18 narrowly-tailored and perhaps phased in a
19 separate track. So I would like to keep in
20 mind the possibility of trying to address
21 both concerns.

22 And with that clear statement of
23 ambivalence, I will offer three observations.

24 First, we appreciate Commissioner
25 Randolph's comments on the need to address
26 natural gas retirements and we support taking
27 a near-term look at that issue so we don't
28 find ourselves in the same position we did in

1 the last procurement track.

2 And in that regard, we support the
3 CAISO's written comments and Mr. Karpa's
4 recommendation that at a minimum the
5 Commission develop policy guides about how to
6 approach the natural gas phase out over time.
7 So even if you take Path 1, somehow
8 addressing this from a policy standpoint
9 would be important.

10 Second, I echo Mr. Franz' comments
11 on the need to focus on local RA to some
12 degree, noting that the RA proceeding is
13 really focused on short-term needs.

14 Many LSE's are looking for
15 opportunities to develop projects in local
16 areas and more information is better in that
17 regard. And also the local area concerns are
18 related to the natural gas fleet retirement
19 since there's a concentration of gas in local
20 areas.

21 And finally, the CPE decision kind
22 of left unclear what the CPE's role would be
23 in the long-term procurement of local
24 resources. So I think from a policy
25 standpoint, we at least have to address that
26 issue, even if we don't take a deep dive into
27 specific local constraints.

28 And then finally, we appreciated the

1 opportunity to discuss the procurement track
2 process through the July -- or the June 5th
3 ruling that you issued. Generally we support
4 the three-year proposal because it leaves
5 ample time to work through the issues that
6 arise in an IRP, but we want to make sure
7 that in thinking about improvements we focus
8 on how often the procurement orders should
9 take place, what the timing is of those
10 orders with respect to other IRP activities
11 and what are the triggering events. What's
12 the methodology for determining needs? We
13 had hoped to do something a little bit more
14 than the staff analysis that informed the
15 last order. And, finally, what is
16 methodology for allocating procurement
17 responsibility among the LSEs? When should
18 the procurement be targeted as individual
19 entities versus socialized amongst all LSEs?

20 Thank you very much.

21 ALJ FITCH: Thank you.

22 Next we have Gregg Morris from Green
23 Power Institute.

24 MR. MORRIS: Thank you, Judge Fitch --
25 pard me -- Judge Fitch and Commissioner
26 Randolph for this opportunity.

27 We proposed actually adding a third
28 track in our comments to look at the

1 methodology and I do want to emphasize that I
2 think we have had -- we've gone through
3 one-and-a-half tracks at this point and are
4 just sort of using the tools that are already
5 put into place, but I'm not sure that the
6 modeling platform we're using is really what
7 we need in the long run.

8 So I would like to take a look at
9 some point before the next -- before the
10 third IRP cycle to look and see what the
11 really ideal modeling platform ought to be.
12 And also I think we really need to start
13 incorporating uncertainty into the analysis
14 and allowing more flexibility within that
15 band of uncertainty to the various LSEs in
16 their individual preferences for future
17 scenarios.

18 I also think regarding the two-year
19 versus three-year cycle, I certainly
20 recognize the advantages of a three-year
21 cycle but with a market in somewhat chaos and
22 rapid change that we're in right now due to
23 COVID, I think it might be prudent to
24 maintain the two-year cycle at least through
25 the third IRP cycle before we move to a
26 three-year cycle because things are changing
27 so fast that we could very well be losing
28 some things.

1 I agree with the earlier people. I
2 forget now who it was exactly that said we
3 really need to pay attention to both
4 transportation electrification and building
5 electrification because those are likely to
6 be very important elements of future energy
7 system in California.

8 And finally we are still thinking
9 about the two different options, system
10 versus local granular and hope to put some of
11 our thoughts on that into our comments
12 following this PHC.

13 Thank you very much.

14 ALJ FITCH: Thank you. I will just
15 note one comment in response. We are
16 actually de facto in the three-year cycle
17 right now by virtue of having delayed the
18 filing of individual IRPs, so we're not
19 really staying in the two-year cycle even for
20 this one. So, I take your point.

21 Next we have Jan Reid.

22 MR. REID: Hi. First I would like to
23 thank you for doing such a good job
24 organizing this prehearing conference. I
25 certainly appreciate that.

26 Second, I have some concerns about a
27 tight linkage between the planning track and
28 the procurement track. The procurement track

1 should not be used to effectively pre-approve
2 applications which will be filed at a later
3 date or to handle applications -- what should
4 be applications in a fast-track process.

5 Secondly, I would like to make
6 certain arguments concerning the state of the
7 California economy which I think should be a
8 factor in the procurement process.

9 Right as of April, we had 15
10 and-a-half percent unemployment. We lost
11 over two -- over two-and-a-half million jobs
12 and it's probably going to get worse. That
13 could either be as a separate item or it
14 could be subsumed under another -- under
15 another heading.

16 Next, I would support the three-year
17 process because I believe that it would give
18 us more time and everyone would do a much
19 better job with more time. These deadlines
20 tend to be very tight.

21 And last, to do with issue
22 prioritization. Some of the rules such as
23 compliance and enforcement and filing
24 requirements have been set at the end of the
25 IRPs in a very hurried fashion. I think it
26 would be useful if the LSEs knew what the
27 requirements were before the start of LSE
28 modeling.

1 And those are my comments on this
2 schedule and the scope.

3 ALJ FITCH: Thank you.

4 Next is Jean Merrigan for Women's
5 Energy Matters.

6 MS. MERRIGAN: Hi. Thank you.

7 WEM prefers the second option
8 locational analysis, which will, although it
9 may feel like a change of course in the short
10 term, is a needed change of course.

11 In our comments, WEM recommended
12 increased reliance on local resources and
13 less reliance on system power in planning for
14 both the Diablo Canyon retirement and for
15 natural gas plant retirements.

16 The 3,300-megawatt system power
17 procurement that was previously ordered may
18 end up needing to be reconsidered and it's
19 important to find that out sooner rather than
20 later. Locational analysis will necessarily
21 include as part of the analysis looking at
22 that.

23 I also wanted to agree with Doug
24 Karpa of Peninsula Clean Energy when he says
25 that the two different directions that you
26 asked about don't have to be totally distinct
27 processes; that there could be some amount of
28 synthesizing the IRP planning or the, you

1 know, the IRP plans. It will be somewhat of
2 a change but synthesize that process of all
3 the LSEs coming up with their IRPs into going
4 forward with the locational analysis.

5 We also agree with several other
6 parties who recommended doing studies on
7 preferred resources in disadvantaged
8 communities including energy efficiency and
9 rooftop solar with batteries.

10 And let's see, other than that, I
11 will rely on our consultants to add more
12 detail in our comments on July 24th. Thanks.

13 ALJ FITCH: Thank you.

14 Next we have Jed Gibson from CASMU.

15 MR. GIBSON: Thank you, your Honor.
16 Jed Gibson for the California Association of
17 Small and Multi-Jurisdictional Utilities or
18 CASMU.

19 CASMU consists of California's three
20 small and multi-jurisdictional utilities:
21 Bear Valley Electric Service, Liberty
22 Utilities and PacifiCorp.

23 While the three CASMU members are
24 investor-owned utilities, they differ
25 significantly from California's largest
26 investor-owned utilities. All of the CASMU
27 members have less than 50,000 customers.
28 Their locations are generally either at

1 elevation or in relatively rural areas.

2 Given their unique characteristics,
3 we generally have concerns with those of the
4 different paths proposed to move forward. We
5 think that it would be appropriate to provide
6 some flexibility in terms of IRP requirements
7 and avoid a one-size-fits-all approach for
8 any of those requirements. This would help
9 ensure that the unique characteristics of the
10 CASMU members are accounted for.

11 For example, both PacifiCorp and
12 Liberty Utilities are located outside of the
13 California ISO. Much of the IRP planning
14 analysis and studies have been very
15 ISO-focused. Also, all of the CASMU members
16 are subject to different reliability
17 requirements than other PUC jurisdictional
18 LSEs.

19 So given these differences, we are
20 just concerned that neither of the proposed
21 paths forward may not account for the unique
22 characteristics.

23 With respect to the two year versus
24 three-year cycle, I don't think CASMU as a
25 group has a preference one way or the other.
26 I would note that PacifiCorp, which has been
27 conducting a multi-state IRP process long
28 before the Commission implemented its IRP

1 process, they have historically conducted
2 that process on a two-year cycle.

3 Thank you for the opportunity to
4 speak on these issues today.

5 ALJ FITCH: Thank you.

6 Next up we have Jennifer Weberski
7 from Small Business Utilities Advocates.

8 MS. WEBERSKI: Thank you, your Honor.
9 Jennifer Weberski for SBUA.

10 At this point in time, we don't have
11 a preference. We will articulate that in the
12 July 24th comments. However, I will say
13 preliminarily I am concerned that it's an
14 either/or proposition path. It may be more
15 beneficial to have some sort of blended model
16 so the data can be considered.

17 I was very appreciative to hear your
18 Honor discuss the issue of COVID-19 pandemic
19 and it's something we had articulated in our
20 comments on July 6th and is of greater
21 concern to us -- to the small business
22 community, given the governor's order
23 yesterday rolling back the reopening measures
24 throughout the state that the economic impact
25 on small businesses, given the pandemic, is
26 only going to grow given where we are
27 currently in the path going forward. And we
28 believe that the impact of that pandemic need

1 to be considered in the proceeding, whether
2 it be a separate delineated issue or if it is
3 subsumed into other issues, but it does need
4 to be clearly explored at this point.

5 And that's all we have at this time.
6 Thank you, your Honor.

7 ALJ FITCH: Thank you.

8 At this point, we are halfway
9 through the list of speakers. So I think
10 what I am going to do is just keep going
11 through this, but then at the end of this
12 round of speakers, then we'll take about a
13 10-minute break, if that's okay.

14 If the court reporter wants to weigh
15 in, let me know. Otherwise, that is what
16 I'll do.

17 (Interjection by court reporter.)

18 ALJ FITCH: All right. That is why I
19 said it now. How about we -- could we come
20 back at 11:35? And for folks who are -- you
21 don't need to hang up. Just mute your phone
22 and do what you need to do and we'll come
23 back at 11:35. How's that? Thanks,
24 everyone.

25 (Off the record.)

26 (Recess.)

27 ALJ FITCH: Back on the record.

28 Our next speaker is Mr. Jin Noh from

1 the California Energy Storage Alliance.

2 MR. NOH: Thank you, your Honor,
3 Commissioner Randolph.

4 CESA understands the dilemma --
5 dilemmas that are related to limited time and
6 resources that the Commission and Energy
7 Division have to address all the different
8 items for planning and procurement in this
9 proceeding.

10 To the dilemma of the questions you
11 pose, I wanted to first begin with the issue
12 of near-term and medium-term procurement and
13 build off the earlier point of Golden State
14 Clean Energy's recommendation to consider
15 least-regrets opportunities for procurement.

16 So while detailed analysis is always
17 prudent to best inform and optimize
18 procurement, we believe that a mindset of
19 making timely procurement decisions as being
20 very important in the IRP to address
21 near-term needs; for example, with the Diablo
22 Canyon procurement and to begin procuring new
23 preferred resources to address system and
24 local needs.

25 The current ongoing procurement
26 cycle has been very challenging and has
27 involved very compressed timelines for
28 developers and buyers alike, which would

1 benefit from more lead time to bring a lot of
2 these resources online for any reasonably
3 forecasted needs.

4 So taking this into account, we
5 think it's important to consider how long
6 lead time investments such as transmission
7 and long-duration storage which includes pump
8 hydro storage, it could also include emerging
9 long-duration storage, is really needed.

10 To the question about whether the
11 Commission has bandwidth to conduct robust
12 modeling of the aggregated plans and the
13 assessment of local granular needs, the very
14 issue that, your Honor, you posed to parties
15 here, CESA at this time favors the latter. I
16 think we agree with CEJA's comments on the
17 need for proactive and not reactive
18 procurement.

19 Many other commenters made note of
20 having greater linkages between the IRP and
21 RA proceedings and to Peninsula Clean
22 Energy's points about having policies and
23 principles to guide retirement and new
24 resource procurement that may be
25 self-initiated by LSEs, even without detailed
26 analysis seems like a good approach.

27 So modeling of the aggregated
28 portfolios can be helpful, but as we

1 expressed in our reply comments last week, we
2 think it's unclear how much value it provides
3 relative to maybe focusing on the Preference
4 System Portfolio and directing timely
5 procurement in response.

6 And to, your Honor, your point about
7 managing scope, time and resources,
8 containing the modeling scope may be one way
9 to adhere to a two-year cycle. That will be
10 recommended and to provide additional time
11 resources to focus on granular local needs as
12 well as procurement needs.

13 ALJ FITCH: Okay. Thank you.

14 Next we have John Leslie from Shell.

15 MR. LESLIE: Good morning, Your Honor,
16 and thanks for the opportunity to speak
17 today.

18 From our perspective, what continues
19 to be a fundamental issue in the IRP
20 proceedings and process is this fundamental
21 struggle between individualized LSE choice
22 and centralized planning and procurement.

23 Ms. Kahl for Cal CCA raised the
24 issue of what resources are appropriate or
25 what needs are appropriate for socializing
26 cause. The Commission needs to be aware that
27 every time a central procurement entity or
28 some central entity procures resources on

1 behalf of all LSEs and spreads the costs to
2 all LSEs, it reduces the ability of LSEs to
3 distinguish themselves, reduces the ability
4 of LSEs to provide creative and innovative
5 solutions for the customers that they serve.
6 And we understand that there is a struggle
7 here and a need to achieve statutory-imposed
8 targets for GHG emissions, RPS and all the
9 rest. And we support those targets and
10 intend to meet them, but we ask that the
11 Commission through this process provide LSEs
12 with the flexibility, the freedom and the
13 choice to develop the resources that they
14 believe most economically and most efficiently
15 serve their customers while meeting all of
16 the established targets.

17 And then finally I won't dwell on
18 this because we did file comments, but Shell
19 Energy does support the three-year IRP cycle.
20 And again we ask the Commission to recognize
21 that preparing, developing the IRP is a
22 time-consuming and burdensome process for
23 LSEs and to have more time to develop the
24 scenarios and do the modeling and put
25 together IRPs is most helpful. And to have a
26 three-year cycle rather than a two-year cycle
27 will reduce to some degree the burden that is
28 imposed on LSEs. Thank you.

1 ALJ FITCH: Thank you. Next we have
2 Jordan Pinjuv for the ISO.

3 MR. PINJUV: Good morning. Thank you,
4 your Honor, Commissioner Randolph, for the
5 opportunity to speak today.

6 I acknowledge the hard work that the
7 Commission and IRP staff have put into the
8 IRP to this point. And we certainly
9 understand that the list of issues you have
10 in front of you is significant and there's a
11 substantial amount of work --

12 (Interjection by court reporter.)

13 (Failed speaker audio.)

14 ALJ FITCH: We'll go back on the
15 record.

16 MR. PINJUV: Sure. I will try.
17 Hopefully this is better sound.

18 So, with that, I just want to, you
19 know, talk about a couple of -- with respect
20 to the two lead-out year, I want to echo to a
21 certain extent the comments made by
22 Ms. Karlstad on behalf of Edison.

23 With that said, there are
24 significant symptoms that have been
25 identified in the reference system plans from
26 the last cycle. I believe Ms. Karlstad
27 indicated that Edison's preliminary analysis
28 shows that there are continuing needs both

1 when the OTC units eventually retire in the
2 2023-2024 time frame and again after the
3 Diablo Canyon --

4 (Interjection by court reporter.)

5 (Failed speaker audio.)

6 ALJ FITCH: We'll go off the record.

7 (Off-the-record.)

8 ALJ FITCH: So we'll go back on the
9 record and we'll move to Ms. Katie Ramsey
10 from Sierra Club and then we'll come back to
11 the ISO.

12 Go ahead, Ms. Ramsey.

13 MS. RAMSEY: Okay. Good morning, your
14 Honor and Commissioner. And thank you for
15 managing a very long and unruly call in a
16 very civilized manner.

17 Sierra Club agrees with the other
18 parties that have spoken so far that the two
19 options that you have put out might not be
20 mutually-exclusive, but between the two
21 options that you presented, Sierra Club
22 endorses the second.

23 We see a critical unmet need for
24 improving locational planning and
25 particularly planning for gas plant
26 retirements.

27 CEJA alluded to the fact that the
28 IRP process needs to meet specific statutory

1 directives and that the current pathway isn't
2 setting us up to meet all of those. CEJA
3 highlighted the greenhouse gas targets and
4 Sierra Club completely agrees.

5 In addition, I want to emphasize the
6 statutory directive to minimize emissions in
7 disadvantaged communities. And the current
8 pathway is not yet delivering on this process
9 on its requirements, but a more granular
10 review of local areas that was mentioned in
11 Option 2 would definitely get us much closer.

12 So Sierra Club recommends that the
13 Commission take up this issue of long-term
14 local reliability needs, particularly with
15 respect to the LA Basin and Fresno. Even in
16 cases where load-serving entities want to
17 minimize emissions in disadvantaged
18 communities, there is a collective action
19 problem here where entities could invest in
20 resources that are -- only partly meet local
21 needs or are ineffective at displacing fossil
22 generation.

23 The parties need Commission guidance
24 in order to ensure that their investments in
25 local resources will actually meet localized
26 reliability needs.

27 And so in our written comments, we
28 made a proposal for how to implement this by

1 first prioritizing local capacity areas by
2 analysis and then coordinating with ISO to
3 determine the technical requirements for
4 those areas. We feel that this localized
5 analysis would better inform where and what
6 type of resources are needed and this would
7 result in far more actionable direction for
8 load-serving entities and would effectively
9 grant more tangible improvements for the
10 community in those areas.

11 And at this time I have no comment
12 on the two year versus three-year cycle.

13 ALJ FITCH: Thank you.

14 Operator, do we have Mr. Pinjuv from
15 the ISO back yet?

16 OPERATOR: Just one moment. I think I
17 just put him in. I want to just double check
18 his line opened. Okay.

19 MR. PINJUV: I am here. Can you hear
20 me?

21 ALJ FITCH: Yes, we can hear you. All
22 right. So after some technical change, we're
23 back to you from the ISO. I will let you go
24 ahead.

25 MR. PINJUV: My apologies for the
26 technical difficulties.

27 (Interjection by court reporter.)

28 (Failed speaker audio.)

1 ALJ FITCH: Let's go off the record for
2 a second.

3 (Off the record.)

4 ALJ FITCH: All right. So we'll go
5 back on the record.

6 And next up we have Mr. Mark Specht
7 from the Union of Concerned Scientists.

8 MR. SPECHT: Yes. Thank you, your
9 Honor.

10 First I would like to start by
11 thanking you, Judge Fitch and Commissioner
12 Randolph for all your hard work on the IRP
13 and also for the opportunity for parties to
14 provide feedback today.

15 I'll focus my comments on Option 1
16 versus Option 2 that you've laid out.

17 And I want to agree with Doug Karpa
18 of Peninsula Clean Energy that it shouldn't
19 be a binary choice between the two. UCS
20 believes that we do need a strong connection
21 between planning and procurement and so we
22 shouldn't totally abandon Option 1 since
23 those individual IRPs have some of the best
24 information about LSEs procurement intention
25 and we should really use that information to
26 inform transmission planning, et cetera.

27 However, at the same time, UCS
28 agrees with Deborah Behles of CEJA and Katie

1 Ramsey of Sierra Club that the PUC should
2 immediately pursue at least some components
3 of Option 2.

4 And, for instance, the PUC could
5 develop a gas retirement policy in
6 conjunction with existing studies to guide
7 LSE procurement in local reliability areas
8 that have high levels of air pollution in
9 disadvantaged communities.

10 UCS does recognize that very soon
11 the IOP is likely to order additional
12 procurement to address Diablo's retirement
13 and UCS believes that the PUC shouldn't waste
14 this procurement opportunity that could meet
15 multiple objectives. Basically at least some
16 of those new resources could go in local
17 reliability areas and it could serve as a
18 down payment on a replacement plan for gas
19 plants in disadvantaged communities.

20 So overall UCS really doesn't see
21 how the CPUC can actually put an early
22 priority on reducing emissions in
23 disadvantaged communities without performing
24 the locational analysis laid out in Option 2.

25 So, in short, UCS does urge the
26 Commission to immediately pursue at least
27 some of the Option 2 locational analysis to
28 inform planning and procurement that enables

1 gas plant retirements in disadvantaged
2 communities. Thank you.

3 ALJ FITCH: Thank you.

4 Next we'll hear from Megan Myers and
5 I will let you say who you represent.

6 MS. MYERS: Thank you. Pardon me.
7 Thank you, your Honor. This is Megan Myers.
8 I am going to speak first for the Center for
9 Energy Efficiency and Renewable Technologies.
10 The acronym for that is CEERT, C-E-E-R-T.
11 And of the two options presented today by
12 your Honor, we support comments made by other
13 parties that support Option No. 2,
14 specifically would love analysis of the
15 individual gas plant retirements, long-term
16 local reliability needs and replacement power
17 for Diablo Canyon and any -- and procurement
18 evaluated in this proceeding regarding
19 preferred resources.

20 One other thing I wanted to note
21 that I was hoping to see in the scoping memo
22 when it is issued and we have set forth in
23 our comments, so I won't spend too long on
24 this, is that we think that the Commission,
25 the Energy Commission and CAISO at the
26 minimum should hold a joint agency en banc to
27 an LL and exchange of ideas before undergoing
28 this next IRP cycle. This would be a public

1 en banc. There would be stakeholder
2 participation, but we think it's really
3 important for the agencies to get together
4 and exchange their ideas and that an en banc
5 would be the best way to do that and if that
6 could be scheduled into the scoping memo, we
7 highly recommend that.

8 The next party I represent is the
9 California Efficiency and Demand Management
10 Council and I will refer to them as the
11 Council.

12 The Council also supports Option 2
13 that was set forth today. Specifically, any
14 studies and work done to conduct better
15 long-term locational planning analysis. We
16 think that's really important and echo
17 comments made by numerous parties today,
18 Tesla, CEJA, and appreciated CEJA's comments
19 about how the IRP should be more proactive
20 instead of reactive.

21 So those are my comments, thank you.

22 ALJ FITCH: Thank you. I am going to
23 go off the record for a second and check with
24 the operator if Mr. Pinjuv from the ISO is
25 back.

26 (Off the record.)

27 ALJ FITCH: Great. Okay. We'll go
28 back on the record and we'll go back to

1 Mr. Pinjuv from the ISO and hope that we can
2 hear him better.

3 MR. PINJUV: Okay. Thank you. So, I'm
4 on a new phone so I hope everyone can hear me
5 better.

6 ALJ FITCH: That's much better. Thank
7 you.

8 MR. PINJUV: Great. Okay. I am just
9 going to recap a little bit of what I said
10 before.

11 First, just on the system
12 procurement side, we do agree that there's an
13 immediate need for system procurement
14 resources, especially related to the
15 retirement of the upcoming OTC units and the
16 Diablo Canyon Power Plant.

17 And we believe to a certain extent
18 that the issues outlined in the second tract
19 that you have outlined the locational issues
20 are also of significant importance, but that
21 the Diablo Canyon issue specifically I will
22 just note is one that does have a system
23 impact and not necessarily a locational
24 impact, although the resources that are
25 selected to ultimately replace Diablo Canyon
26 can and will have an impact on locational
27 needs to the extent that they are procured in
28 the local areas.

1 And so to that effect, I would say
2 on a locational issues side, the issues there
3 seem to be more around optimizing the actual
4 procurement that comes out of IRP.

5 So, to that extent, I would agree
6 with previous comments by Ms. Kahl and
7 Dr. Karpa regarding the fact we need to work
8 in concert with the needs that are identified
9 in the system needs and try to intertwine
10 those with the local procurement that best
11 suits our locational needs.

12 With respect to the two year versus
13 three-year cycle, the ISO does continue to
14 support a two-year cycle and believes that
15 the three-year cycle with essentially
16 introduce fiscal issues regarding the use of
17 appropriate inputs and updated inputs,
18 interagency coordination and GPP portfolio
19 developments.

20 We do believe this: In the context
21 of a two-year cycle, the Commission should
22 review whether to have both a Reference
23 System Plan and a Preferred System Plan going
24 forward or whether the IRP can suffice with
25 just one of those on a going-forward basis.

26 That would be all we have at this
27 time. We will supplement in our post-hearing
28 comments on July 24th.

1 ALJ FITCH: Thank you. Thanks for your
2 patience in calling back in.

3 MR. PINJUV: I apologize about the
4 issue.

5 MS. MYERS: Your Honor, this is Megan
6 Myers. I was wondering if I could add just
7 one thing really quickly. I apologize.

8 ALJ FITCH: Sure. We'll go back to
9 Ms. Myers.

10 MS. MYERS: This is on behalf of CEERT.
11 We also echo comments made by other
12 parties about coordination between the IRP
13 and RA proceeding. Thank you. That's all.

14 ALJ FITCH: Okay. Thank you.

15 Our next speaker is Michael Alcantar
16 from the Cogeneration Association of
17 California.

18 MR. ALCANTAR: Thank you, your Honor.

19 We will consider more-detailed
20 comments for the July 24th reply comments and
21 the PHC comments in deference to the
22 necessary limits on the time for this call.

23 However, I wanted to stress two
24 points briefly.

25 First, and as folks are looking at
26 retirement issues related to so-called fossil
27 plants, it's important to recognize the
28 distinction between relative climate

1 emissions, operational demands in the
2 assessment of such designated facilities.

3 For example, the way the IRP
4 modeling has been in the past combined heat
5 and power CHP units have been identified or
6 lumped in, if you will, with any and all
7 forms of natural gas generation.

8 But CHP provides both thermal and
9 electric power supply to industry that
10 supports employment in many of the societal
11 benefits, as well as electric grid support.
12 And those facilities are looking for a better
13 direction than what has been provided to date
14 on the retention of those existing efficient
15 and comparatively clean electric generation
16 facilities.

17 So the IRP analysis going forward
18 should certainly recognize the distinction
19 between these resources and any modeling
20 procurement assessment in the IRP.

21 The second point is that the IRP
22 docket should include, as I think it
23 essentially has in the past although I think
24 there's some frustration from parties, that
25 there are regular phases to address remedial
26 steps or changes in course on resource
27 procurement to meet identified goals and
28 objectives that have been well-established in

1 this discussion.

2 Many or most of the comments made by
3 parties so far, certainly those of Cal CCA,
4 really look like requests for specific
5 reviews of issues to frame remedial
6 procurement actions and directions and we
7 encourage that objective.

8 Lastly, as to the two-year,
9 three-year window, we are more in support of
10 the points made by the Cal ISO that being the
11 closer, tighter more directive between
12 decision-making and procurement is critical
13 now as we are looking at many more challenges
14 for our grid and its operation.

15 Thank you, your Honor.

16 ALJ FITCH: Thank you.

17 Next speaker is Mohit Chhabra from
18 NRDC.

19 MR. CHHABRA: Good afternoon,
20 Commissioner Randolph and your Honor. This
21 is Mohit with NRDC.

22 To start with the judge's dilemma,
23 we support the comments of UCS and Peninsula
24 Clean Energy and others regarding that it's
25 not a strict choice between the two paths.
26 The question is more about the limits of
27 central planning versus bottom-up planning.
28 And whichever path the Commission decides to

1 take, the five key areas described in Path 2
2 shouldn't be ignored.

3 The Commission can and should work
4 with the individual LSEs and CAISO to
5 leverage their local knowledge and knowledge
6 of other aspects of planning to be able to
7 answer those five key questions.

8 On the emissions target, along with
9 modeling to 2045, the 2030 emissions target
10 needs to be aligned with the pathway to get
11 to 2045. This hasn't been indicated in the
12 past.

13 On the connection between planning
14 and procurement, we'd like to add that the
15 relationship between the IRP proceeding and
16 the RPS proceeding needs to be further
17 strengthened. The IRP figures out what mix
18 of clean energy resources are needed and how
19 many are needed to get to our
20 carbon-reduction goals and the RPS is the
21 main venue for clean energy procurement. So
22 we would like to see further connection
23 there.

24 Now that we have all been through an
25 IRP cycle, the Commission should start
26 thinking through how to track the rate of
27 clean energy procurement against what the
28 plans require. And without procurement being

1 conducted that align with our planning goals,
2 all the hard work that we do in this
3 proceeding may have limited meaning. So
4 thank you for recognizing that.

5 We agree with parties' comments on
6 the importance for procuring for Diablo. I
7 would like to add that recent research has
8 shown that Germany's retirement of nuclear
9 plants without proper planning led to an
10 increase in coal and gas use in neighboring
11 countries. And California has all the
12 resources to avoid this fate and we should do
13 so.

14 We request that the Commission
15 continue to integrate demand-side resources
16 into the IRP analysis and in doing so
17 evaluate them fairly with supply-side
18 resources, with a common resource evaluation
19 method that conducts cost-effectiveness
20 accurately and fairly across all resources.

21 And finally we support the comments
22 made on gas plant retirement by CEJA, UCS and
23 Sierra Club. Thank you.

24 ALJ FITCH: Thank you.

25 The next speaker is Nancy Rader from
26 Cal WEA.

27 MS. RADER: Thank you, Judge Fitch.

28 Cal WEA agrees also with the second

1 path that you outlined. This path will
2 enable the Commission to make meaningful
3 planning and procurement decisions in the
4 next 6 to 12 months, putting the Commission
5 in the driver's seat so that it can ensure
6 timely achievement of an optimal portfolio,
7 rather than react to the sum of fragmented
8 individual plans, which is likely to produce
9 suboptimal results and is unlikely to lead to
10 the major planning decisions that are needed
11 to drive major system investments, which is
12 after all the main purpose of IRP.

13 Specifically, the Commission should
14 add to the scope and prioritize planning for
15 local reliability areas, including a decision
16 to achieve gas plant retirements in one or
17 two specific areas that bring local air
18 quality benefits to disadvantaged
19 communities.

20 The Commission's own analysis shows
21 that two gigawatts of gas-fired capacity must
22 be retired to achieve the 38 MMT target.
23 It's become very clear that these
24 retirements, particularly in local areas, are
25 very unlikely to occur, unless and until the
26 Commission gives the CAISO clear direction.

27 We know that transmission upgrades
28 will be needed, whether this gas plant

1 capacity is replaced mostly with local
2 batteries to provide charging capacity or a
3 broader set of resources outside the local
4 area.

5 And as we also know, transmission
6 upgrades have a long lead time. Notably
7 these transmission upgrades could also
8 simultaneously support the development of
9 either out-of-state or offshore wind.

10 All of this underscores the need to
11 address gas plant retirements immediately for
12 resolution early next Spring in time to be
13 considered in the CAISO's 2021 - '22
14 transmission planning cycle.

15 The CAISO's already provided
16 substantial information to inform these
17 decisions and it will provide additional
18 information about battery charging
19 requirements in September. We believe the
20 Commission can use this information in the
21 stakeholder process during the rest of this
22 summer and throughout the Fall, focusing on
23 retirements in one or two areas that will
24 produce the record necessary to support an
25 early Spring decision.

26 Responding to IEP, we believe that
27 it may not be necessary for the Commission to
28 plan for the retirement of specific plants.

1 That issue can be addressed in the
2 stakeholder process.

3 This process can be replicated then
4 for other areas in later IRP cycles. The
5 Commission does not have to address all
6 gas-fired capacity at once, as I think Mark
7 Specht of UCS suggested.

8 Individual LSEs will need this
9 planning direction to effectively plan for a
10 38 MMT portfolio, if they decide -- desire to
11 achieve such a portfolio. Even if the
12 Commission does not adopt a 38 MMT target for
13 all LSEs in 2030, we will need to achieve
14 that target in the years immediately
15 following 2030. So we need to get going on
16 the infrastructure that will be required.

17 Thank you.

18 ALJ FITCH: Thank you.

19 Our next speaker is Steve Metague
20 for Western Grid Development.

21 MR. METAGUE: Thank you, your Honor.
22 Steve Metague with Western Grid.

23 I am pleased to have this
24 opportunity to share comments with you. And
25 I was also extremely pleased to hear
26 Commissioner Randolph at the outset observe
27 the groundswell of comments already received
28 by the Commission, that of urged

1 location-specific planning.

2 Western Grid stands firmly in that
3 camp. We believe that it is urgent that
4 long-term location planning begin and --
5 locational planning begin and that long-term
6 planning should immediately occur in the
7 planning track.

8 More specifically, we would like to
9 make sure that the Commission includes
10 location-specific gas plant retirements and
11 develops the policy and criteria for
12 retirements, including effect on
13 disadvantaged communities.

14 Of the 10 or so LCRAs that exist in
15 California, given the bandwidth challenges,
16 we would urge that the Commission focus on
17 one or two LCRAs for specific planning and as
18 others observe, some obvious criteria might
19 include poor air quality and of the LCRA as
20 well as where disadvantaged communities are
21 adversely affected. It seems to us the LA
22 Basin and perhaps Fresno are obvious choices.

23 And finally we need to make resource
24 decisions in close coordination with the
25 CAISO and provide the needed guidance to the
26 CAISO to allow orderly transmission planning.

27 Western Grid's Sub C transmission
28 project, and this is the project we are

1 proposing, but I want to highlight it for a
2 moment because it seems to provide such a
3 tangible example of why location-specific
4 planning is needed and why orderly, long-term
5 plans for gas plant retirements is required.
6 The project we're proposing is a
7 2000-megawatt high-voltage 500 kV sub C
8 direct current transmission cable. It's from
9 the retiring Diablo Canyon switch yard to
10 three coastal gas plants in the LA Basin.
11 The project takes full advantage of the
12 existing transmission system in California
13 where three 500 kV circuits tie to the Diablo
14 Canyon switch yard creating an exceptionally
15 robust node for delivering and receiving
16 power from California Central Valley and in
17 fact all of NP-15.

18 The landfalls of this particular
19 project, coastal areas in the LA Basin,
20 delivering renewable clean power directly to
21 the LCRA and similarly delivering the power
22 to the exact locations where the grid was
23 originally designed to receive the power.

24 I would also note that the CAISO did
25 take a look at our study in the last TPP -- a
26 look at our project, and found it to be more
27 cost-effective than in-Basin battery
28 solutions for meeting the LCRA needs.

1 There is not going to be time to
2 obviously spend a lot describing all of the
3 benefits of our project, but let me pick them
4 off really quickly.

5 ALJ FITCH: Yeah, really quickly,
6 because I need you to wrap it up.

7 MR. METAGUE: Reduce congestion on Path
8 26, wildfire risk reduction. And perhaps
9 just as importantly, an option for offshore
10 wind, where some of the best wind resources
11 off the California coast can be actually
12 accessed through a project like this.

13 As compelling as all this may seem,
14 I believe it's critical, as I started by
15 saying, that the Commission must give the
16 guidance to the CAISO to allow this project
17 and others to be evaluated or else it
18 continues to sit on the sidelines.

19 So there's a sense of urgency about
20 this and I know the bandwidth is short at the
21 Commission. I'd just like to conclude by
22 saying that we believe that this is
23 achievable; as a shortcut by focusing on just
24 one or two LCRAs, the Commission can create a
25 record it needs, based on -- marginally on
26 data already collected in previous IRPs,
27 studies already completed by the CAISO,
28 studies underway at the CAISO.

1 And the focus should be on
2 decision-quality spreadsheet analysis, not
3 necessarily developing new models regarding
4 power flow analysis. Harvest the information
5 we already have. Use qualitative and
6 quantitative evaluation methods and make the
7 decision on a timely basis.

8 Thank you, all. I will conclude
9 there.

10 ALJ FITCH: Thank you.

11 Our next speaker is Sue Mara from
12 that Alliance for Retail Energy Markets.

13 MS. MARA: Thank you, your Honor,
14 Commissioner Randolph. I obviously have to
15 consult with the AREM members regarding your
16 two options.

17 My initial reaction is that Option 2
18 is a significant departure from what is done
19 for the current IRP process and also would
20 require significantly more complex modeling
21 and analysis, more so than what is done today
22 for the existing IRP.

23 I echo the comments of Mr. Leslie
24 from Shell that LSEs spend a lot of time
25 preparing their IRPs and it's important that
26 the IRP process be robust and that LSEs have
27 the flexibility to procure resources that fit
28 their portfolios and that meet their

1 customers' needs. The basic IRP process
2 which needs to be done on those IRPs should
3 require -- should include sufficient time and
4 analysis to ensure for a robust process
5 before any procurement decisions are made --
6 directed.

7 So, I believe it's important to
8 focus on that and the basic IRP process
9 ensuring it's robust and conducted in a way
10 that ensures adequate analysis before
11 procurement is directed.

12 AReM did support in comments the
13 three-year IRP cycle and also mention I think
14 others in their comments as well that it
15 would be important, it is important to align
16 the IRP and the RPS processes, which today
17 have different timelines and different filing
18 requirements. So if those could be aligned,
19 that would certainly improve efficiency of
20 the overall process.

21 And I am sure AReM will be
22 submitting post-hearing comments on
23 July 24th. Thank you.

24 ALJ FITCH: Thank you.

25 Next is Tom Beach from the Solar
26 Energy Industries Association.

27 MR. BEACH: Thank you, ALJ Fitch and
28 Commissioner Randolph for this opportunity.

1 I will note that SEIA filed its
2 comments in conjunction with Vote Solar and
3 the large-scale solar association.

4 I think I will first address the two
5 options that ALJ Fitch laid out and we really
6 hope that they're not utility-exclusive. We
7 think that it is valuable for the Commission
8 to get feedback from LSEs in the form of
9 these individual LSE plans, but we also agree
10 that especially in the first three of the
11 five issues that you laid out, the gas plant
12 retirements, the long-term local reliability
13 needs and replacing Diablo Canyon are also
14 critical issues that the Commission needs to
15 address in the near future.

16 If doing both of these necessitates
17 a three-year IRP cycle, then we would support
18 that. In our comments we suggested that we
19 recognize that there's an issue with inputs
20 and assumptions becoming stale over three
21 years and we suggested that there could be
22 kind of an intermediate update on inputs and
23 assumptions.

24 In the middle of the three-year
25 process, it would not be a complete fresh
26 look at inputs and assumptions but as an
27 example, for example, it's -- let's say solar
28 and wind tax credits were extended or there

1 was a major change in either the load
2 forecast or the natural gas forecast that
3 those kinds of changes and inputs and
4 sensitivities could be run on the most
5 recently adopted RSP, but if they're much
6 smaller changes, than there would be no need
7 to change the RSP.

8 If the Commission decides to stick
9 with a two-year cycle, we very strongly want
10 to retain the Reference System Portfolio. We
11 think that debating the Reference System
12 Portfolio allows for proactive planning
13 rather than reacting to a lot of different
14 IRPs filed by LSEs. We think it's very
15 important for that proactive planning step to
16 occur. I think it enables the Commission to
17 get the broadest range of input from the
18 widest range of parties. So we would be very
19 concerned if the RSP were eliminated.

20 Finally, there were your -- the OIR
21 asked, the preliminary scoping memo asked for
22 additional proceedings that should be
23 incorporated into the IRP and I just wanted
24 to mention two.

25 The first is that in Decision
26 19-05-019 in the IDER docket, the Commission
27 adopted a societal cost test and said in that
28 order that it would pilot the use of the

1 societal cost test in the IRP in 2020 and
2 then evaluate a pilot in 2021 and decide how
3 to use this cost test with additional
4 societal benefits in the IRP case.

5 We don't want this to fall through
6 the cracks. This is -- we think this is an
7 important extension of the Commission's cost
8 protectiveness analyses that progress needs
9 to continue to be made in this area.

10 Then the second proceeding as we
11 would agree although perhaps for different
12 reasons with SoCalGas, that the Gas OIR that
13 is going on R.20-01-007 also needs to be
14 coordinated with and considered in the IRP.
15 There are some significant issues with the
16 natural gas forecast that's used in the IRP.
17 It does not assume any escalation in the
18 future in gas transportation rates in
19 California, even though those rates have been
20 increasing at a fast clip over the last 10
21 years and will be increasing in the future as
22 we decarbonize.

23 So those are my comments. Thank you
24 very much.

25 ALJ FITCH: Thank you.

26 Next speaker is Ty Tosdal for
27 San Diego Community Power.

28 MR. TOSDAL: Commissioner Randolph,

1 your Honor, thank you. Ty Tosdal on behalf
2 of San Diego Community Power.

3 As you may already know, SDCC has a
4 new CCA program that is launching next year
5 and the member cities include some of the
6 major cities in the San Diego area, including
7 the City of San Diego.

8 Regarding the questions that were
9 raised at the beginning of the call, we do
10 not currently have a comment on whether to
11 prioritize the planning and procurement
12 versus locational benefits approaches for the
13 duration of the IRP cycle, but we may address
14 those issues at a later date.

15 Instead, we would like to address a
16 discreet issue and that is the bundled
17 procurement plan or BPP is the wording. That
18 issue has been identified in the OIR as one
19 of the issues that's relevant and may be
20 considered in the proceeding. And the point
21 we want to emphasize is that there is good
22 reason to address this issue early in the
23 proceeding rather than later.

24 The last review of the BPP authority
25 in the Commission proceeding occurred in 2015
26 and since that time there has been a
27 substantial customer migration to CCA
28 programs.

1 By way of example based on the
2 amended load forecast that was adopted on May
3 20 in the predecessor IRP proceeding, SDCP
4 will be serving 7,400 gigawatt hours at full
5 enrollment in 2022.

6 Based on the magnitude of the load
7 departure, there are serious implications for
8 SDG&E's portfolio and for bundled and
9 departed-load rates.

10 Failure to address these
11 implications in the near-term could lead to
12 procurement that proves to be unnecessary for
13 both bundled and departing-load customers and
14 could have adverse rate impacts that
15 ultimately affect affordability.

16 Given these significant changes and
17 the potential impacts, there's good reason to
18 conduct a review of BPPs early in the first
19 phase of the proceeding to ensure that BPP
20 procurement is reasonable and aligned with
21 anticipated load forecast.

22 My understanding is that SDG&E
23 supports addressing the BPP early on in the
24 course of this proceeding. And I also want
25 to mention that we raise this issue in our
26 comments in the OIR.

27 One final additional item, SDCP also
28 supports comments from Cal CCA and Silicon

1 Valley regarding the development of policy or
2 natural gas facility phase-outs. Policy
3 guidance is important for the resource
4 planning process and to ensure that
5 phase-outs are managed in a cost-effective
6 manner. Thank you.

7 ALJ FITCH: Thank you.

8 Our next speaker is Tyson Siegele
9 for the Protect Our Communities Foundation.

10 MR. SIEGELE: Thank you, your Honor and
11 thank you, Commissioner Randolph and all the
12 Energy Commission staff for all the great
13 work that has been done over the years in the
14 proceeding.

15 We have a few issues that we would
16 like to highlight today, a couple of them.

17 So, the first one. A two-year cycle
18 has many benefits on its ability to address
19 issues more regularly. However, we also see
20 benefits in a three-year plan, a three-year
21 cycle, or from the perspective of increasing
22 time to complete each needed task during the
23 cycle. Regardless of which way the
24 Commission ends up going with the number of
25 years in a cycle, we believe that there is a
26 critical change that should be made and it is
27 that every year should include updates to the
28 inputs and assumptions.

1 We think that -- I think we all know
2 that technology is changing quickly and in
3 turn electricity generation costs are
4 changing just as quickly. And, you know, for
5 instance just from the last IRP cycle and to
6 the 2019-2020 cycle, the inputs and
7 assumptions revised costs for solar down by
8 approximately 50 percent. And, you know,
9 that's in a two-year cycle. A three-year
10 cycle would be even more outdated assumptions
11 than a two-year cycle had and at a time when
12 the Commission will be increasing procurement
13 through the coming-back date. So we
14 recommend a yearly review of inputs and
15 assumptions, regardless of two-year or
16 three-year cycles.

17 The next issue that I'm going to
18 speak about is bundled procurement plans. As
19 the representative from San Diego Community
20 Power just mentioned, bundled procurement
21 plans are relevant to the IRP proceeding and
22 they are definitely in need of updating.

23 The bundled procurement plan --
24 bundled procurement plans are currently under
25 consideration in Draft Resolution E-5083;
26 however, the plans need proceeding review not
27 just evergreening through Commission
28 resolution. For instance, the BPPs are

1 currently on a 2014 version with extremely
2 minimal updates via advice letters. Those
3 BPPs do not conform to State law.

4 For instance, the BPPs do not
5 include requirements pass after 2014, such as
6 SB 350 or SB 100.

7 So we recommend for review of the
8 BPPs to be added to the schedule and the
9 review to be placed into a BPP-specific
10 track.

11 Next, the Protect our Communities
12 Foundation requests that the IRP proceeding
13 addresses quantifying how LSEs must meet
14 various applicable statutory mandates from SB
15 350 and SB 100.

16 And one of the items we see as the
17 most important for that is defining terms
18 that are in those two -- those two laws.
19 And, for instance, terms minimizing and
20 priority and sections referring to how LSEs
21 must minimize local air pollutants and other
22 greenhouse gas emissions with early priority
23 on disadvantaged communities. Without
24 defining minimizing and priority, the LSEs
25 won't know whether or not they're actually
26 meeting the minimum statutory requirements.

27 In addition to that, the term
28 resource shuffling also must be addressed in

1 the -- for the same reason, which is that
2 without a clear definition and quantifiable
3 metrics, the LSEs will not be able to say
4 whether or not they are actually meeting
5 their requirements of SB 100.

6 There clearly are other definitions
7 that would be needed as well and those can be
8 reviewed for -- are discussed further in our
9 written comments.

10 So in summary, the Protect our
11 Communities Foundation, requests, number one,
12 regardless of two or three-year cycle, the
13 input and assumptions should be updated
14 yearly; number two, bundled procurement plans
15 should be reviewed immediately in their own
16 track of the proceeding. And, number three,
17 setting clear definitions of terms that
18 should be prioritized so LSEs can quantify
19 and determine if they are meeting minimum
20 legal requirements for procurement.

21 So those are our comments for today.
22 I appreciate the time.

23 ALJ FITCH: Thank you.

24 The next speaker is Tyson Smith from
25 Pacific Gas and Electric.

26 MR. SMITH: Thank you, Judge Fitch and
27 good afternoon.

28 Starting with your essential

1 dilemma, PG&E generally supports continuing
2 with Option 1. But we believe that
3 improvements and refinements over the coming
4 cycles can begin to accomplish some of what
5 Option 2 would be designed to address
6 starting with local capacity planning. But
7 that really requires a deeper analysis in the
8 IRP. And so we support moving to a
9 three-year cycle to give time to incorporate
10 for specific recommendations.

11 First, there needs to an analysis of
12 the need for additional procurement, such as
13 a loss of load expectation study and then a
14 stakeholder input and review process that
15 precedes any procurement decision.

16 In our view, the 2019 procurement
17 track order and the lack of that analysis and
18 the rushed timeline didn't really allow for a
19 healthy stakeholder input and review. So we
20 would like to see that resolved.

21 Second, there needs to be a process
22 for allocating system procurement
23 requirements to LSEs. There needs to be a
24 stakeholder-driven process to develop the
25 methodology to allocate the requirements to
26 LSEs based on need and our view that the
27 load-share allocation used previously doesn't
28 ensure fair allocation and it doesn't present

1 cost shifting.

2 Third, there should be coordination
3 with CAISO's transmission planning process
4 and integration of local capacity assessments
5 into the IRP as mentioned earlier to allow
6 for sort of an orderly retirement of existing
7 gas-fired resources and to plan for load
8 growth due to electrification in local areas.
9 We believe that local area capacity planning
10 should be incorporated into the IRP
11 framework. And that should include working
12 with CAISO on trade-offs between new
13 generation and transmission solutions for
14 local areas.

15 And then finally consistent with the
16 notion of continual improvement of this IRP
17 process, we think that we should build in a
18 specific review and improvement element to
19 each IRP cycle.

20 This process is clearly still
21 evolving and is going to continue to evolve,
22 given the scope and impact of this proceeding
23 to our electric supply here in California.

24 So, for example, as we pursue better
25 integration and alignment between the IRP and
26 RA proceedings, we think that incorporating a
27 specific element at the end of process will
28 facilitate continual improvement going

1 forward.

2 And that is our comments for this
3 section. Thank you.

4 ALJ FITCH: Thank you.

5 After I called the roll earlier, I
6 learned that Mr. Zakai, on behalf of the
7 Environmental Defense Fund, was unexpectedly
8 not available. He is at the hospital with a
9 new baby.

10 So in his place, we have Michael
11 Colvin, who I believe is going to speak on
12 behalf of EDF. And that will be our final
13 speaker for this round.

14 MR. COLVIN: Thank you, your Honor.
15 Can you hear me?

16 ALJ FITCH: Yes.

17 MR. COLVIN: Fantastic. So my name is
18 Michael Colvin, C-o-l- v like in Victor -
19 i-n. I'm with the Environmental Defense
20 Fund.

21 Thank you so much for accommodating
22 this last-minute switch.

23 As a preliminary housekeeping
24 matter, as this was discussed during the roll
25 call, EDF would appreciate getting a copy of
26 the transcript but does not need an
27 expedited.

28 Going into the more substantive

1 issues, regarding the two options, EDF
2 supports the second option with a focus on
3 local analysis and requirements. Recognizing
4 that the PUC has to prioritize scope within
5 this extensive list and reflecting on some of
6 the comments offered this morning, EDF has
7 two areas that we think the scoping memo
8 should specifically cover.

9 The first area, EDF encourages that
10 the scope and schedule of the proceeding
11 coordinate with Rulemaking 20-01-007 the
12 docket on long-term system gas planning.

13 EDF suggests that as the IRP is
14 prioritizing local areas for fossil gas
15 generator retirements that it send a clear
16 signal to focus on where fossil generators
17 will no longer be operating. And
18 pragmatically, we think that that can be done
19 in a series of buckets or tranches. That way
20 the Commission can plan for the transition
21 and associated ratemaking changes and other
22 things that are going to be required on cost
23 recovery, pipeline planning, et cetera. And
24 they can do that in the most efficient way
25 possible.

26 As the PUC is prioritizing this list
27 and developing these tranches, EDF suggests
28 considering both the LCRs and also fossil

1 generators that are located more broadly just
2 in disadvantaged communities.

3 The PUC may also want to consider
4 safety records and other planned major work
5 of pipelines that are feeding generators to
6 see if the new procurement ordered as part of
7 the integrated resources plans can defer new
8 pipeline investments.

9 The scope of the proceeding should
10 just be thought of as an output which will
11 then be a critical input into that new
12 long-term planning gas docket.

13 At the same time, as alluded to by
14 Mr. Beach and a few others, EDF encourages
15 that the scoping memo in this proceeding
16 recognize that pipeline access tariffs for
17 households generators and other rules are
18 going to be updated in the near term and so
19 that some of the existing cost assumptions
20 are -- may no longer be relevant.

21 EDF encourages the scoping memo to
22 consider ways of integrating these new rules
23 into the planning process so that ratepayer
24 cost exposure is more accurate. This should
25 be thought of as a feedback loop.

26 So as you are designing the schedule
27 for this proceeding, think about how to use
28 as an input the decision from Track 1(d) of

1 Rulemaking 20-01-007.

2 The second area that we wanted to
3 briefly mention was EDF anticipates that
4 California is going to need new investments
5 in clean burn power and that could include
6 new resources such as long-duration energy
7 storage or offshore wind.

8 As Commissioner Randolph alluded to
9 in her opening comments this morning, clean
10 burn power is the critical way to ensure that
11 we have a clean reliable grid and that it
12 remains affordable.

13 I think that this is, you know,
14 excuse me. The scoping memo should recognize
15 that this is a new resource and that some of
16 the existing rules, whether it's contracting
17 cost allocation to use or perform a contract
18 contracting across multiple LSEs are going to
19 be different for the new resources. And we
20 don't have an existing template for some of
21 this. So we are going to need to consider
22 how we integrate some of the things that we
23 say that we want and we are going to have to
24 kind of figure out and do that kind of
25 meat-and-potato work.

26 The Commission may benefit, as it is
27 considering the newer emerging technologies,
28 whether it be long-duration storage or

1 offshore wind or expanded use of geothermal
2 or whatever else that is out there that can
3 help complement the state's heavy reliance on
4 solar and other intermittent variable
5 resources, the Commission may want to
6 consider a series of technical workshops just
7 to help level set all of the parties on some
8 of the fundamental issues, so that way when
9 it comes time for record development, we are
10 not using comments as a place of learning,
11 but rather comments as a place to help
12 propose new concrete ideas.

13 ALJ FITCH: If you can wrap it up.

14 MR. COLVIN: Yeah, thank you.

15 And last but not least, we concur
16 with a lot of other statements previously
17 given on the two versus three-year cycle and
18 we'll do what we can to help move the
19 Commission's goals forward as expeditiously
20 as possible. Thank you.

21 ALJ FITCH: Thank you.

22 With that, we have concluded the
23 first round of comments. Thank you everybody
24 for your pithy and concise input.

25 Mainly for the benefit of myself and
26 the court reporter, I am going to take a
27 another very short break. So we will go off
28 the record now and come back at about 12:40.

1 And we'll do one more round on the category
2 and need for hearings.

3 So, mute your phones and I will talk
4 to you again at 12:40. Thank you.

5 (Recess.)

6 ALJ FITCH: All right. So we'll be
7 back on the record.

8 And now, thank you all for your
9 patience and for moving expeditiously through
10 the first round of comments.

11 Let's move on to the next round
12 which will be on proceeding category and the
13 need for hearings.

14 The OIR preliminarily categorized
15 this proceeding as ratesetting. Therefore
16 ex-parte communications are restricted,
17 pursuant to Article 8 of the Rules.

18 It appears as though most parties
19 agree with that categorization. So I will
20 invite individual comments, verbal comments
21 now only if you want to state disagreement
22 with that category.

23 In addition, as with the previous
24 IRP rulemaking and the previous long-term
25 procurement planning rulemaking, we always
26 reserve the possibility of holding hearings
27 if there are disputed facts, but we hope to
28 be able to resolve the proceeding without

1 hearings, especially as they have become
2 logistically much more challenging during the
3 COVID-19 pandemic.

4 So as I said right now, if you want
5 to make comments on categorization, feel free
6 to do so, if you want to disagree with
7 ratesetting as a category. And if you want
8 to comment on the need for hearings, I would
9 like to request that you say something
10 specific about what factual issues you
11 anticipate maybe needing hearings that we may
12 not be able to address through either written
13 comments or workshop discussions and then
14 related filings afterwards.

15 So with that, I am going to go down
16 the speakers' list. Again, I expect this
17 round is probably going to be much shorter.

18 So the first speaker up now is Aimee
19 Smith from SDG&E.

20 MS. SMITH: Thank you, your Honor.
21 SDG&E supports categorizing the proceeding as
22 ratesetting.

23 And just briefly with regard to
24 hearings, SDG&E's position is that given the
25 scope of the proceeding and the need to allow
26 adequate time for modeling and analysis, it
27 is very important to prevent unnecessary
28 delays along the way.

1 SDG&E believes that evidentiary
2 hearings can be a useful tool in specific
3 instances but notes that hearings are
4 time-consuming and resource-intensive so
5 should be scheduled sparingly, if at all.
6 Hearings are appropriate only where there are
7 material facts in dispute. There may be
8 issues that parties believe are very
9 important and that require careful vetting;
10 for example, there are differing opinions for
11 example as to the correct import limitation
12 to use for reliability modeling, but those
13 types of issues can often be resolved more
14 effectively through workshops.

15 So, we urge the Commission to
16 carefully scrutinize party requests for
17 hearings and to order them only where
18 appropriate.

19 That's all my remarks.

20 ALJ FITCH: Okay. Thank you.

21 Mr. Cragg for IEP.

22 MR. CRAGG: Thank you, your Honor.

23 As I've listened to the parties'
24 comments, I have been impressed of how
25 ambitious the potential scope of this
26 proceeding is.

27 It occurs to me also that to the
28 extent that the proceeding looks -- gets more

1 granular and prescriptive, essentially that's
2 when you get closer to the need for
3 evidentiary hearings and maybe that argues
4 for maybe a less ambitious approach, a more
5 general approach, so it can be completed more
6 on time and would not require evidentiary
7 hearings.

8 But I am a little concerned that
9 some of the issues that have been raised are
10 specific enough that I think evidentiary
11 hearings might be required. I can't at this
12 point predict whether that is true or not,
13 but I think it's been, at least in my
14 opinion, it argues for maybe backing off a
15 little bit on the ambition and coming up with
16 a scope of the proceeding that is something
17 that is manageable within the two year or if
18 chosen that way a three-year period.

19 Those are my comments. Thank you.

20 ALJ FITCH: Okay. Thank you.

21 Ms. Karlstad for SCE.

22 MS. KARLSTAD: Thank you, your Honor.

23 SCE supports the OIR's treatment of
24 proposed categorization and determination
25 that hearings should only be conducted if a
26 party identifies a disputed issue of material
27 facts.

28 So I have no additional comments.

1 Thank you.

2 ALJ FITCH: Thank you.

3 Mr. Franz for Tesla.

4 MR. FRANZ: Thank you, your Honor.

5 Tesla supports the categorization as
6 ratesetting and the initial view that
7 hearings --

8 (Interjection by court reporter.)

9 (Failed speaker audio.)

10 ALJ FITCH: Off the record.

11 (Off the record.)

12 ALJ FITCH: We'll be back on the
13 record.

14 MR. FRANZ: Tesla supports the initial
15 categorization and need for hearing.

16 ALJ FITCH: All right.

17 Next we'll go to Mr. Kim for Golden
18 State Clean Energy. Thanks.

19 MR. KIM: Your Honor, we have no
20 comments on either the two questions.

21 ALJ FITCH: Okay. Thank you.

22 Ms. Behles for CEJA.

23 MS. BEHLES: Thank you, your Honor.

24 We agree with the categorization as
25 ratesetting. We have not identified any
26 issues for evidentiary hearing at this time.
27 But I would also like to urge the Commission
28 to not try to limit the scope, to limit the

1 possibility of evidentiary hearings because
2 this is the one proceeding where this type of
3 planning can occur, so we urge the Commission
4 to not factor that into what the eventual
5 scope of the proceeding is.

6 ALJ FITCH: Okay. Thank you, your
7 Honor.

8 Ms. Lee for Public Advocates Office.

9 MS. LEE: Thank you, your Honor.

10 The Public Advocates Office agrees
11 with the categorization, but we think it may
12 be possible that hearings may be necessary if
13 the Commission authorizes procurement or
14 orders procurement and if the Commission
15 considers the need based on allocation
16 mechanism mentioned by PG&E and SCE.

17 Thank you.

18 ALJ FITCH: All right. Thank you.

19 Mr. Karpa for Peninsula Clean
20 Energy. Mr. Karpa, are you there?

21 MR. KARPA: I --

22 ALJ FITCH: There we go. Go ahead.

23 MR. KARPA: (Inaudible.)

24 ALJ FITCH: Mr. Karpa, you're breaking
25 up. Can you speak closer to the phone or I
26 am not sure what to suggest. Can you try
27 again?

28 MR. KARPA: Let me try that. Is that

1 better?

2 ALJ FITCH: Yes.

3 MR. KARPA: Oh, good. Yeah. We
4 support the categorization and also would
5 echo the request that the scope of the
6 proceeding not be limited out of concern for
7 evidentiary hearings, but that the general
8 approach of we probably don't need them at
9 this time seems reasonable.

10 ALJ FITCH: All right. Thank you.

11 Mr. Hsu for Southern California Gas.

12 MR. HSU: Thank you, your Honor.

13 Edward Hsu for SoCalGas.

14 We agree with the categorization of
15 the proceeding and also agree with San Diego
16 Gas & Electric's position that hearings
17 should be held sparingly as needed. Thank
18 you.

19 ALJ FITCH: Thank you.

20 Ms. Torres for TURN.

21 MS. TORRES: Thank you, your Honor.

22 TURN supports the ratesetting
23 categorization for this proceeding and at
24 this time we do not believe that evidentiary
25 hearings will be necessary.

26 ALJ FITCH: Thank you.

27 Next is Ms. Kahl for Cal CCA.

28 MS. KAHL: Thank you, your Honor.

1 Cal CCA supports your proposal
2 regarding category and hearings.

3 ALJ FITCH: Thank you.

4 Mr. Morris, I believe had to head
5 out. So Ms. Harrold for Green Power
6 Institute.

7 (No response.)

8 ALJ FITCH: You may not be on, so I
9 will move on to Mr. Reid.

10 MR. REID: Hello. I agree with the
11 categorization of ratesetting, but I do not
12 agree with the very-limited standard of
13 concerning the need for hearings. There's no
14 mention that I'm aware of that standard in
15 State law or in the Commission's Rules.

16 In particular, Public Utilities Code
17 Section 1701.1(a) states that:

18 The Commission, consistent
19 with due process, public
20 policy, and statutory
21 requirements, shall
22 determine whether a
23 proceeding requires a
24 hearing.

25 In my view, the Commission must
26 consider these three factors when making a
27 decision. And I urge the Commission to
28 request that parties address due process

1 public policy and statutory requirements when
2 making filings requesting evidentiary
3 hearings or opposing evidentiary hearing.

4 That conclude my comments.

5 ALJ FITCH: Thank you.

6 Ms. Merrigan for Women's Energy
7 Matters.

8 MS. MERRIGAN: Hi. WEM agrees with
9 ratemaking as the category and I guess we
10 don't see need for hearing at this point in
11 time but don't want to give up the right if
12 there were important issues that they were
13 needed for. Thanks.

14 ALJ FITCH: Okay. Thank you.

15 Mr. Gibson for CASMU.

16 MR. GIBSON: Thank you, your Honor.

17 CASMU supports the categorization
18 and similarly hopes to resolve the proceeding
19 without hearings.

20 ALJ FITCH: Thank you.

21 Ms. Weberski for Small Business
22 Utility Advocates.

23 MS. WEBERSKI: Thank you, your Honor.
24 Jennifer Weberski for SBUA.

25 SBUA supports categorization and as
26 the previous speakers said, we do hope that
27 the issues can be resolved without hearing.

28 ALJ FITCH: Thank you. Mr. Noh for

1 CESA.

2 MR. NOH: Thank you, your Honor. CESA
3 supports the ratesetting categorization and
4 sees no need for evidentiary hearings at this
5 time.

6 ALJ FITCH: Thank you.

7 Mr. Leslie for Shell.

8 MR. LESLIE: Thank you, your Honor.

9 Shell Energy supports the
10 categorization and has no comment on the
11 issue of hearings at this point.

12 ALJ FITCH: All right.

13 Mr. Pinjuv for the California ISO.

14 MR. PINJUV: Thank you. The ISO
15 supports the categorization and has no
16 comment on the need for hearings at this
17 time.

18 ALJ FITCH: Thank you.

19 Ms. Ramsey for Sierra Club.

20 MS. RAMSEY: Sierra Club supports the
21 ratesetting categorization and has no comment
22 on hearing. Thank you.

23 ALJ FITCH: Thank you.

24 Mr. Specht for UCS.

25 MR. SPECHT: Yes, thank you, your
26 Honor.

27 UCS wants to echo the comments of
28 Deborah Behles of California Environmental

1 Justice Alliance. Thanks.

2 ALJ FITCH: Thank you.

3 Ms. Myers.

4 MS. MYERS: CEERT and the Council agree
5 with the categorization of ratesetting and
6 make no comment at this time about
7 evidentiary hearing. Thank you.

8 ALJ FITCH: Great. Thank you.

9 Mr. Alcantar for Cogeneration
10 Association of California.

11 MR. ALCANTAR: Thank you, your Honor.

12 CAC agrees with your conditional
13 stated reservation for evidentiary hearings.
14 It is impossible to foresee what may happen.
15 So we support that view and the ratesetting
16 categorization is also supported.

17 ALJ FITCH: Thank you.

18 Mr. Chhabra for NRDC.

19 MR. CHABBRA: I agree with the
20 categorization and no comments on hearing.
21 Thank you.

22 ALJ FITCH: Thank you.

23 Ms. Rader for Cal WEA.

24 MS. RADER: I would support the
25 comments made by San Diego Gas & Electric and
26 CEJA. Thank you.

27 ALJ FITCH: Thank you.

28 Mr. Metague for Western Grid

1 Development.

2 MR. METAGUE: Western Grid supports the
3 initial categorization as ratesetting. We
4 are not aware or we don't believe there is a
5 need for hearings at this time. We believe
6 that workshops and comments will do and
7 building on this morning recommend a
8 coordination workshop with the CPUC, CAISO in
9 coordination. Thank you.

10 ALJ FITCH: Thank you.

11 Ms. Mara for AReM.

12 MS. MARA: Thank you, your Honor.

13 AReM supports categorization for
14 ratesetting and has no comments on hearings.

15 ALJ FITCH: Thank you.

16 Mr. Beach for SEIA.

17 MR. BEACH: Yes, SEIA supports the
18 categorization as ratesetting and I think we
19 would agree with the comments of CEJA and
20 SDG&E on the need for hearings.

21 ALJ FITCH: Okay. Thank you.

22 Mr. Tosdal for SDCP.

23 MR. TOSDAL: Thank you, your Honor.

24 SDCP supports the proposed
25 categorization and the proposed approach to
26 hearings as needed.

27 ALJ FITCH: Thank you.

28 Mr. Siegele for Protect our

1 Communities Foundation.

2 MR. SIEGELE: Thank you, your Honor.

3 Protect our Communities supports the
4 categorization and we strongly recommend for
5 evidentiary hearings where needed.

6 We believe that there are a few
7 different places where there are likely to be
8 disputes of a factual nature. And one of
9 those areas is in the inputs and assumptions
10 that the Commission uses for modeling.

11 We have seen in the past a few
12 different issues where the assumptions for
13 pricing for various components of generation
14 are off by factors of two or three compared
15 to what we see as the factually-correct
16 inputs and assumptions.

17 So we would like to propose that
18 evidentiary hearings remain in scope.

19 ALJ FITCH: Okay. Thank you.

20 Mr. Smith for PG&E.

21 MR. SMITH: Thank you.

22 PG&E agrees with the categorization
23 as ratesetting. With respect to the need for
24 hearings, PG&E believes that expert testimony
25 and hearings are necessary to support any
26 procurement decision and that's including
27 both a determination of a need for
28 procurement and the allocation of procurement

1 responsibility among LSEs.

2 ALJ FITCH: Okay. Thank you.

3 Finally, Mr. Colvin for EDF.

4 MR. COLVIN: EDF does not believe that
5 any evidentiary hearings are required and we
6 support the categorization of ratesetting.
7 We do note that a series of staff-led
8 workshops may be of benefit -- may be
9 beneficial.

10 ALJ FITCH: Great. Thank you. With
11 that --

12 MS. HARROLD: Excuse me, your Honor.
13 Zoey Harrold on behalf of Green Power
14 Institute. Sorry. The phone kicked me off.

15 ALJ FITCH: Go ahead.

16 MS. HARROLD: Zoey Harrold with Green
17 Power Institute on behalf of Gregg Morris.
18 He had to leave. We have no comments on
19 either of these two topics.

20 ALJ FITCH: Okay. Thank you. All
21 right. So I think we have made it
22 through two rounds of comments.

23 Thank you everybody for your
24 patience and your input. As I said earlier,
25 all the issues that people have commented on
26 today will be addressed in the forthcoming
27 scoping memo. In advance of that, we will
28 look forward to reading any final comments

1 due next week July 24th. That will be your
2 last opportunity to weigh in on these issues,
3 especially taking into account anything you
4 heard today from other parties that you may
5 not have had a chance to respond to because
6 of our stilted format here today.

7 So, again, I appreciate your time
8 and patience today and please stay safe and
9 well.

10 And with that, we are adjourned.

11 Thank you very much.

12 (Whereupon, at the hour of 12:57
13 p.m., this matter having concluded, the
Commission then adjourned.)

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, CAROL ANN MENDEZ, CERTIFIED SHORTHAND REPORTER
NO. 4330, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON JULY 14, 2020.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.

EXECUTED THIS JULY 21, 2020.


CAROL ANN MENDEZ
CSR NO. 4330

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