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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.

Rulemaking 14-08-013

And Related Matters.

Application 15-07-002

Application 15-07-003

Application 15-07-006

(NOT CONSOLIDATED)

In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.

Application 15-07-005

And Related Matters.

Application 15-07-007

Application 15-07-008

**ADMINISTRATIVE LAW JUDGE'S RULING ON JOINT PARTIES' MOTION
FOR AN ORDER REQUIRING REFINEMENTS TO THE INTEGRATION
CAPACITY ANALYSIS**

Summary

This *Ruling* grants, in part, Joint Parties' *Motion for an Order Requiring Refinements to the Integration Capacity Analysis*.

1. Background

Decision (D.) 17-09-026 approved the Integration Capacity Analysis (ICA) to address the primary interconnection use case which includes 1) transparent display of ICA maps to aid third party Distributed Energy Resource (DER) developers in identifying interconnection locations where their projects are less likely to trigger costly distribution upgrades; and 2) providing ICA data that is sufficiently robust to be relied upon to streamline the Rule 21 interconnection of DERs. While the actual streamlining of Rule 21 occurs in the Rulemaking (R.) 17-7-07, this proceeding is responsible for the methodological development of the ICA and the publication of the ICA data and maps to support the streamlining of Rule 21. The Commission ordered the Investor-owned Utilities (IOUs) to update their publicly posted ICA data monthly.

On October 9, 2020, California Solar & Storage Association, Interstate Renewable Energy Council, Inc., and California Energy Storage Alliance (hereinafter Joint Parties) filed their *Motion for an Order Requiring Refinements to the Integration Capacity Analysis (Motion)*, in which Joint Parties asked the Commission to order the IOUs to refine the ICA in order to “avoid the undetected presence of problems with ICA results in the future” by issuing the following 13 orders: (1) Order IOUs to enhance their data validation plans and submit a report annually detailing validation efforts. (2) Order IOUs to hire a technical expert to review the IOUs data validation plans and validation efforts. (3) Order the IOUs to continue publishing shapefiles with ICA data. (4) Order the IOUs to identify three-phase feeder names and line segment numbers.

(5) Order IOUs to memorialize a requirement for the IOUs to update user guides when map functionality changes. (6) Order the IOUs to use consistent terminology in the maps and downloadable data. (7) Order San Diego Gas & Electric Company (SDG&E) to include an image layer on its web-based map, update. (8) Order the IOUs to display the location of substations on the Distribution Resources Plan (DRP) maps. (9) Order the IOUs to make continuous improvements to the IOU's ICA processes. (10) Order Pacific Gas & Electric Company (PG&E) to display existing generation, queued generation, total generation, and relevant notes in the substation pop-up box for every substation. (11) Order SDG&E and PG&E to cease redacting information that the Commission ordered be available. (12) Order the IOUs to display transmission lines as a layer in the web-based maps, downloadable files, and the API. (13) Find that the Uniform Load results provided today do not comply with the Commission's requirement to provide operational and reliable ICA results for Uniform Load.

On October 26, 2020, the IOUs PG&E, SDG&E, and Southern California Edison Company (SCE) filed their oppositions and asked that the Commission deny the *Motion* in its entirety.

On October 26, 2020, California Public Utilities Commission (Cal Advocates) filed its Response which supported the *Motion*.

On November 5, 2020, Joint Parties filed their Reply in support of their *Motion*.

On November 5, 2020, PG&E filed its Reply to Cal Advocates' Response.

2. Discussion

This *Ruling* groups Moving Parties 13 requests into in three categories: ICA Data Validation Refinements, Continuing Improvements to the DRP Data Portals, and Compliance issues. A discussion of the three categories follows.

I. ICA Data Validation Refinements

Joint Parties request that the Commission:

1. Order IOUs to enhance their Data Validation plans and submit a report annually detailing the IOUs validation improvement efforts.
2. Order IOUs to hire a technical expert to review the IOUs data validation plans.

Party Positions

The Joint Parties argue that the data validation plans filed by the IOUs on September 30, 2019 were cursory. While they acknowledge that there isn't an order in place which requires the utilities to continue to validate their results as they are updated and to report on the results of those validation efforts, they nonetheless request that the Commission order the IOUs to file, within 30 days of issuing its order, refined data validation plans that ensure ICA results for each line segment are useful to determine the need for additional screening in the interconnection process.

Joint Parties further argue that the Commission should hire a consultant to help it understand and suggest best practices for the plans. Joint Parties claim that without a documented validation process, future problems with the ICA could go undetected and negatively impact the interconnection process. Moreover, nothing in the decision authorizing the use of ICA in Rule 21 requires a robust validation process.

SCE claims that requiring ICA data validation by each IOU is not appropriate because the values have not been used in the interconnection

process. Requiring SCE to complete detailed validation plans prior to completion of these self-initiated process improvement efforts would result in significant inefficiencies and waste of resources.

PG&E argues that the relief request is not needed since data quality checks and data clean ups have become an integral part of ICA activities. As such, a new order is not necessary to implement data quality checks or require formal submission of “data validation plans.”

SDG&E claims this request is premature and should be rejected because it is only after the reporting on and analysis of the incorporation of ICA data into the Rule 21 interconnection process should further ICA refinements be considered. SDG&E believes that introducing an independent consultant into existing planning processes would provide minimal value as the methodology, inputs, and assumptions have already been vetted by the Commission’s Energy Division staff.

Cal Advocates argue that the enhanced data validation plans must improve upon the content of the IOUs’ initial data plans which were filed on September 30, 2019.

Discussion

This *Ruling* notes that in the September 19, 2019 Reply Comments of The Interstate Renewable Energy Council, Inc. on Refinements to the Integration Capacity Analysis (IREC) states that “the issue of validation was extensively discussed in the Rule 21 Docket, ICA validation was identified as one of the critical ‘threshold considerations’ that the utilities had insisted must be done for the ICA results to be used.”¹ While the IOUs have shown that they are currently

¹ Reply Comments of The Interstate Renewable Energy Council, Inc. on Refinements to the Integration Capacity Analysis, at 7.

in compliance with current data validation plan requirements and are proactively engaged in improving the ICA and willing to work with stakeholders to improve their ICA, this *Ruling* believes that the best way to improve the reliability of the ICA data for the core use case of streamlining Rule 21 interconnection is through independent validation to establish confidence in the reliability of the ICA data.

Accordingly, this *Ruling* orders the IOUs to do the following:

Within 60 days of this *Ruling*, the IOUs shall retain an independent technical expert to review ICA data validation plans and review the IOU's data validation efforts. The technical expert's scope of work and project timeline shall be shared with Energy Division staff for review and approval before being finalized. 60 days thereafter, the IOUs must submit their improved ICA data validation plans and file them in a Tier 1 Advice Letter. The IOUs updated ICA data validation plans shall document the results of the IOUs data validation efforts to date, deficiencies discovered, or efficiencies realized in ICA implementation, and plans for ICA improvements. The plans shall also address how each utility's ICA can or cannot address the objectives of the interconnection use case which has the goal of supporting the streamlining Rule 21 interconnection.

Within 30 days after submitting data validation plans, the technical expert shall provide a report to Energy Division's DRP Section at the conclusion of the review process. The report should provide a review of the IOUs resubmitted data validation plans, share recommendations on best practices for data validation, areas for improvement of the data validation plans, and the report shall also discuss the sufficiency of the IOUs data validation efforts and if additional verification of the data is required.

II. Continuing Improvements to the DRP Data Portal

The Joint Parties request that the Commission:

3. Order the IOUs to continue publishing shapefiles with ICA data.
4. Order the IOUs to continue identify three-phase feeder names and line segment numbers.
5. Order IOUs to memorialize a requirement for the IOUs to update user guides when map functionality changes.
6. Order the IOUs to make continuous improvements to the IOU's ICA processes.
7. Order the IOUs to use consistent terminology in the maps and downloadable data.
8. Order PG&E to display existing generation, queued generation, total generation, and relevant notes in the substation pop-up box for every substation.
9. Order SDG&E to include an image layer on its web-based map, update.
10. Order the IOUs to display the location of substations on the DRP maps.

Party Positions

The Joint Parties justify their request for the above improvements as follows: (1) PG&E and SDG&E should include a search functionality that allows a user to query and sort by available hosting capacity because the query and search functionality is essential to effectively locating optimal interconnection locations; (2) The IOUs should be required to use consistent terminology in the maps and downloadable data because users would benefit from the IOUs having certain map features and functionality standardized; (3) SDG&E should be required to include an image layer on its web-based map, reasoning that satellite image layers assist developers with site assessment, and therefore make the map more useful for interconnection customers; (4) PG&E's substation pop-up boxes

should include relevant data because it would improve the maps' functionality and usability.

SCE argues that terminology changes on the DRP External Portal and downloadable results files require time for development and therefore require additional cost.

PG&E notes that the time of its Response, it has not received a single complaint directly from developers regarding issues with data access.

SDG&E states that in its daily engagement with actual customers and developers, it is not aware of any additional customer needs from the DRP Data Portal. As such, the numerous other map functionalities requested by the Joint Parties are unwarranted.

Cal Advocates supports these requests and agrees that enhancing the search functions for the ICA maps as well as utilizing consistent terminology across the ICA data access portals will allow the third parties to use the ICA more effectively.

In a moment of cross-party unity, Joint Parties, Cal Advocates, and SCE support an order requiring the IOUs to continue publishing shapefiles with ICA data.

Discussion

This *Ruling* finds that the request for continuing improvements to the ICA would enhance the user's experience but not all of the requests are necessary at this time to make effective use of the maps in their current form. It is also clear, that the IOUs are already actively engaged in making continuous improvements to the IOU's ICA processes.

As such this *Ruling*

Denies the requirement to develop common terminology.

Denies the requirement for SDG&E to include an image layer on its web-based map.

Orders the IOUs to enhance query and search functions.

Orders the IOUs to continue publishing shapefiles with ICA data.

Orders the IOUs to identify three-phase feeder names and line segment numbers.

Orders the IOUs to display existing generation, queued generation, total generation, and relevant notes in the substation pop-up box for every substation.

Orders the IOUs to update user guides when map functionality changes.

Orders the IOUs to display the location of substations on the DRP maps.

III. Compliance

The Joint Parties request the Commission to:

11. Order SDG&E and PG&E to cease redacting information that the Commission ordered be available.
12. Order the IOUs to display transmission lines as a layer in the web-based maps, downloadable files, and the API.
13. Find that the Uniform Load results do not comply with the Commission's requirement to provide operational and reliable ICA results for Uniform Load.

a. Data Redactions

Party Positions

The Joint Parties argue that the Commission should find that SDG&E is not in compliance with the Commission's rulings because it has redacted more than just the load profile and/or Op Flex Gen criteria for line segments, thus violating the 15/15 rule. Joint Parties reason that the cumulative impact of SDG&E's data redaction practice is that when a circuit violates the 15/15 rule, the map appears completely blank where it should show the location of the circuit, and no data about the redacted circuit is available to customers. Joint

Parties also argue that PG&E and SDG&E should be required to display the location of transmission lines in the ICA in conformity with the requirement that IOUs must display the transmission lines, including substations, on the utility's maps.

PG&E asserts that Joint Parties erroneously argue that PG&E is failing to adhere to the Commission's orders. Regarding the Joint Parties request that PG&E display the location of transmission lines on the ICA maps, the location of transmission lines is published on Renewable Auction Mechanism (RAM) maps per previous Commission decisions. PG&E states that it does not display the location of transmission lines on the ICA maps as this has not been required by the Commission. SDG&E asserts that it redacts data if it cannot be further aggregated without compromising ICA and operational flexibility results. When the Rule 15/15 would be violated by public disclosure of information, SDG&E redacts the associated data, including infrastructure and service attributes that can be attributed to specific customer. However, using SDG&E's "heat map," pertinent hosting capacity is still readily available and satisfies the intended use-cases. In its view, SDG&E maintains it has fully complied with the Commission's requirements pertaining to the DRP Data Portal.

Cal Advocates agrees with the Joint Parties' point that SDG&E has not publicly published all the data which previous rulings have compelled it to do.

Discussion

Energy Division staff sent a data request to SDG&E on December 18, 2020 to inquire about SDG&E's ICA data redactions and their justifications.

In SDG&E response's on December 23, 2020, SDG&E acknowledged that their current practice is to redact all data otherwise provided in the ICA when a circuit violates the 15/15 rule. SDG&E did not explain what 15/15 Rule exceptions

justify SDG&E to make the redactions the Joint Parties assert are not in compliance with my *Rulings* from July 24, 2018 and December 17, 2018. This *Ruling* agrees and finds that SDG&E has not complied with the standard practices for asserting and establishing a claim for confidentiality.

As such, SDG&E shall publish substations on its ICA map. Within 30 days of this *Ruling*, SDG&E shall cease redacting ICA data that the Commission has required be made available. In addition, all IOUs shall publish transmission lines on the DRP Portal within 90 days of the *Ruling*.

Finally, SDG&E's and all the IOUs shall include on their ICA maps a footnote explaining why data has been redacted if compliant with the 15/15 rule.

With respect to the redaction of allegedly market sensitive information, in D.18-02-004, Ordering Paragraph 2.q., this Commission ordered that the actual cost of distribution system upgrades be considered public information as part of the ongoing Distribution Investment Deferral Framework, and in associated DRP tools such as the Locational Net Benefit Analysis. IOUs are not permitted to withhold publication of data such as project cost caps with the unsubstantiated claim that the information is confidential. Such a claim does not establish the burden of proof that the Commission adopted in General Order 66-D for establishing a claim of confidentiality. The IOUs are aware that this proceeding adopted the Commission's confidentiality showing requirements in my *Rulings* of July 24, 2018 and December 17, 2018, and they have failed to make a credible explanation for their failure to satisfy their evidentiary burden to justify withholding the actual cost of distribution system upgrades. While the cost of a distribution upgrade is useful to disclose to Distribution Planning Advisory Group members and the public, it is equally important to publish the deferral value of each planned investment and the cost

cap figure for use in the evaluation of bid cost-effectiveness for each deferral project. I hereby order the utilities to publish the deferral value and the cost cap of each planned investment in their RFO solicitation materials.

b. Uniform Load Results

Party Positions

Joint Parties ask that the Commission order the IOUs to investigate whether their Uniform Load results accurately reflect the available capacity for new load. If not accurate, they should be improved since accurate ICA Uniform Load results could help the state and the California Energy Commission achieve the State's decarbonization goals by enabling customers to efficiently site and design electric vehicle charging stations without incurring the cost and delays associated with grid upgrades. Joint Parties request the following relief: (1) the IOUs must develop a description of the Uniform Load methodology, inputs, and assumptions; (2) the IOUs must explain how the Uniform Load results provided today can be used by customers and the utility, *i.e.*, what the results provided today mean; (3) the IOUs must explain what modifications are necessary in order to refine the Uniform Load analysis to provide results that are useful for customers evaluating locations to interconnect new load (*e.g.*, electric vehicle chargers, battery storage, and the electrification of buildings).

30 days after the IOUs have filed their written responses to the explaining their Uniform Load results, Joint Parties request that the Energy Division host a workshop where stakeholders and the IOUs discuss potential Uniform Load refinements. 60 days after receiving written responses, the Commission should permit response comments from parties identifying proposals for Uniform Load refinements. The Commission should the issue an order requiring specific

refinements so that the ICA can be used to accelerate the deployment of charging stations for electric vehicles and other new load.

SCE claims that due to the absence of an agreed upon use case for the application of Load ICA results, the Load ICA values have not been of focus. SCE also argues that the reliable results from the Grid Needs Assessment already provides the information the Joint Parties seek from the ICA Uniform Load Results.

PG&E argues that changes to uniform load data would require a multi-year and costly effort. PG&E believes that current Load ICA data is of good quality and sufficient for the ICA use-cases. Yet, PG&E argues that it was never intended to be a highly dynamic tool including or integrated with work management systems, and does not include things like: 1) switching, 2) future planned distribution planned and temporary switching, or 3) future planned and still uncertain/incomplete distribution system upgrades/changes. In PG&E's view, the initial development of the ICA methodology within the DRP proceeding was primarily focused on the interconnection use-case accommodating new generation resources on the grid with minimal distribution upgrades.

SDG&E states that it is currently implementing the ICA into the interconnection use-case pursuant to the recent D.20-09-035 in the Rule 21 proceeding. Due to the absence of an agreed-upon use-case for the application of Load ICA results, SDG&E has not focused on the Load ICA values.

Cal Advocates supports the Joint Parties' request that the Commission require refinements to the Uniform Load results as it believes that the IOUs' refinement of the Uniform Load results will allow for better identification of

areas on the grid that should be targeted for distributed energy resources (DERs) more quickly at lower costs.

Discussion

D.17-09-026 established that ICA values, including Uniform Load, must be adequately representative to inform a DER developer's project design and siting for use in the interconnection process. Despite their claim that the Load Results are not particularly useful outside of "informational-only" purpose, it appears that the IOUs are open to improving the Uniform Load results.

As such, this *Ruling* orders the following:

Adopts Joint Parties proposal to have the IOUs develop a description of the Uniform Load methodology, inputs, and assumptions, which shall be filed and served within 60 days of this *Ruling*.

30 days thereafter, the IOUs shall hold a workshop to discuss what the use case of the Uniform Load results will be and determine what modifications are necessary to refine the Uniform Load analysis to provide results that are useful for customers evaluating locations to interconnect new load.

30 days after the workshop, the parties may file and serve proposals for Uniform Load refinements. Joint and consensus proposals from the parties are encouraged.

IT IS SO RULED.

Dated January 27, 2021, at San Francisco, California.

/s/ ROBERT M. MASON III

Robert M. Mason III
Administrative Law Judge