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OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to
Modernize the Electric Grid for a High
Distributed Energy Resources Future.

Rulemaking 21-06-017

**THE PUBLIC ADVOCATES OFFICE COMMENTS
ON PRELIMINARY SCOPING MEMO AND SCHEDULE**

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits the following comments in response to the *Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future* (OIR), which was issued on July 2, 2021. The OIR invites comments on the schedule and scope of this proceeding.

This proceeding is intended to build on and address the unresolved and ongoing issues within the Commission's Distribution Resources Plans (DRP)¹ and Integrated Distributed Energy Resources (IDER)² proceedings. The DRP and IDER proceedings focus on the distribution deferral value of distributed energy resources (DERs), integrating DERs into investor-owned utility (IOU) electric distribution planning, and procuring cost-effective DERs.³ The instant proceeding seeks to prepare the grid to accommodate an expected high-DER future and capture as much value as possible from DERs.⁴ Therefore, efforts in this proceeding will require significant coordination, collaboration, and alignment across other Commission proceedings such as General Rate Cases (GRCs), and with other entities, including the California Independent System Operator (CAISO), and the California Energy Commission (CEC).⁵

In response to the OIR, Cal Advocates provides the following comments and recommendations:

¹ *Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769*, Rulemaking (R.) 14-08-013, issued August 14, 2014.

² *Order Instituting Rulemaking to Create a Consistent Regulatory Framework for the Guidance, Planning, and Evaluation of Integrated Demand Side Resource Programs*, R.14-10-003, issued October 2, 2014.

³ OIR, pp. 2, 3, and 12.

⁴ OIR, p. 10.

⁵ OIR, pp. 12, 15, and 25.

- The scope of Tracks 1, 2, and 3 of this proceeding should specifically include an evaluation of affordability and how costs associated with regulatory and operational reforms can be reasonably and equitably allocated across customer classes.
- The scope of Track 1 should include an examination of the legal, technical, procedural, regulatory, and financial barriers to redefining the roles and responsibilities of the IOUs.
- The scope of Track 2 should include an evaluation of how the current DER framework (including the DRP⁶ and IDER proceedings, as well as related proceedings such as the Net Energy Metering,⁷ Self-Generation Incentive Program,⁸ and Demand Response⁹ proceedings) have contributed to DER integration goals.
- Consideration of proposals for new DER tariff pilots should be deemed out of scope for this proceeding.
- The scope of Track 3 should include the development of smart inverter operationalization implementation guidelines, specific milestones, and use cases.
- The scope of Track 3 should include an evaluation of whether operational flexibility, as described in the Rule 21 Working Group Four report, can be balanced with DER integration objectives.
- The scope of Track 3 should include an evaluation of whether smart inverter operationalization should be included in the IOUs' Grid Modernization Plans, and whether it would be more appropriate for the IOUs' Grid Modernization Plans to

⁶ Where text in quotation marks is proposed to be added to the OIR, terms defined in Appendix 1 of the OIR have not been defined again here.

⁷ *Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address other Issues related to Net Energy Metering*, R.20-08-020, issued September 3, 2020.

⁸ *Order Instituting Rulemaking regarding Policies, Procedures and Rules for the Self-Generation Incentive Program and Related Rules*, R.20-05-012, issued June 8, 2020.

⁹ *Order Instituting Rulemaking to Enhance the Role of Demand Response in Meeting the State's Resource Planning Needs and Operational Requirements*, R.13-09-011, issued September 19, 2013.

be managed as applications separate from the IOUs' General Rate Cases (GRCs).

- The scoping memo should provide detail regarding stakeholder engagement opportunities throughout the proceeding, including through formal written comments, workshops, and working groups.

II. BACKGROUND

The California Public Utilities Commission (Commission) issued the OIR on July 2, 2021. The OIR seeks stakeholder comments on the preliminary scope and schedule for this proceeding. As stated above, the purpose of this proceeding is to prepare the electric grid for a high number of DERs and to address unresolved issues from the DRP and IDER proceedings.¹⁰ The OIR anticipates a high-penetration DER future and seeks to optimize the integration of DERs while achieving affordable rates.¹¹ The OIR will focus on preparing the grid to accommodate a high number of DERs in the future, capturing as much value as possible from DERs, and mitigating unintended negative impacts.¹²

The OIR identifies both substantive and process-related scoping matters. The substantive matters are broken into three tracks, and the OIR includes a series of questions addressing the different issues within the three tracks. The OIR proposes process-related activities and a preliminary schedule for implementing those activities. Finally, the OIR includes a series of questions regarding how the tracks should be managed.¹³

The OIR invites stakeholders to comment on both the substantive and process-related scoping matters to inform the Scoping Memo. Cal Advocates provides the following comments and recommendations.

¹⁰ OIR, p. 2.

¹¹ OIR, p. 9.

¹² OIR, p. 10.

¹³ OIR, pp. 30-31.

III. GENERAL COMMENTS

A. Consolidating and continuing to address the policy issues examined in the DRP and IDER proceedings is appropriate

Cal Advocates supports the overall intent of the proceeding to prepare the electric grid for a high number of DERs and to address unresolved issues from the DRP and IDER proceedings. While the DRP and IDER proceedings originally started with separate focuses as outlined in the OIR,¹⁴ over time the overlap between the two proceedings has become evident. For example, the process by which IOU grid needs and opportunities for deferral are identified in the DRP proceeding is closely linked to the procurement of DER solutions adopted in the IDER proceeding. Also, the pilots to test frameworks for procuring DER resources that avoid or defer IOU capital investments adopted in the IDER proceeding have required changes to the current request for offer (RFO) process adopted in the DRP proceeding.¹⁵ Resolving and continuing these two proceedings as a single successor proceeding allows for better coordination and stakeholder involvement.

B. The OIR sets out appropriate objectives for the proceeding

The OIR provides appropriate objectives for this proceeding. Specifically, this proceeding should focus on creating a framework to accommodate the expected high-DER future and cost-effectively use DERs to maximize grid benefits, accomplish the state's environmental goals, and ensure long-term electricity affordability.¹⁶ Moreover, Cal Advocates supports the OIR's determination that this proceeding will not seek to set specific number goals for DERs nor seek to increase or decrease the desired level of

¹⁴ OIR, p. 4.

¹⁵ D.21-02-006, p. 53.

¹⁶ OIR, pp. 9, 10.

DERs.¹⁷ DER growth will continue to be driven by technological improvements and federal and state policies, even if no additional incentives or tariffs are introduced through this proceeding.¹⁸ Consistency should be achieved between this proceeding and other proceedings that could impact DERs to ensure equity across ratepayer groups, avoid cost-shifts, and ensure long-term electricity affordability.

C. Cal Advocates supports the organization of tracks proposed in the OIR

The OIR proposes that the work be broadly grouped into three tracks:¹⁹

- Track 1: distribution system operator (DSO) roles, and IOU and aggregator business models;
- Track 2: electric distribution system planning and management frameworks and related analytical tools; and
- Track 3: electric distribution grid modernization and smart inverters.

The three proposed tracks provide an appropriate framework to organize the work in this proceeding; however, the Commission should recognize that the different tracks involve different types of work. For example, the work on Track 1 regarding DSO roles and IOU aggregator business models will be more conceptual (at least initially) and could ultimately lead to significant changes to existing regulatory frameworks, while the work on Track 3 regarding electric distribution grid modernization and smart inverters will be more technical and a continuation of existing distribution planning and DER integration workstreams. Accordingly, the Commission should allow the work on the different tracks to proceed at different paces. The preliminary schedule²⁰ appears to allow this across the three Tracks, though there is a lack of detail on Track 1. As the Commission

¹⁷ OIR, p. 10.

¹⁸ OIR, pp. 8, 9.

¹⁹ OIR, pp. 14-16.

²⁰ OIR, p. 27.

further develops the schedule for Track 1, it should recognize that the concepts in Track 1 may not reach the same level of development as those in Tracks 2 and 3 by the end of the proceeding. The tracks should be periodically revisited to allow for further adjustments to the scope and schedule as the work progresses, such as through the creation of sub-tracks.

D. The OIR must prioritize affordability and equity issues

The OIR seeks comment on, among other things, how to prioritize the issues to be resolved.²¹ Affordability and equity are raised throughout the OIR, but not in a way that sufficiently prioritizes these important issues.²² Managing the cost and equity impacts on ratepayers is critical to the success of any reforms that are implemented under the auspices of this proceeding. For example, the OIR refers to redefining “electric distribution roles” in Track 1.²³ This would be a very large reform that could reshape the electric utility and regulatory landscape and have significant implications for ratepayers. The cost impacts on IOU customers of any reform should be estimated as accurately as possible up front, including both the transition costs and the ongoing costs once a reform is implemented. Further, the Commission should evaluate how costs associated with regulatory and operational reforms can be fairly allocated across customer classes before any reforms are implemented. Even the relatively minor reforms anticipated for Tracks 2 and 3 could have significant cost implications for IOU customers and should be subject to a rigorous assessment of affordability and equity issues.

E. Cal Advocates’ recommendations

Cal Advocates recommends that the scope of Tracks 1, 2, and 3 of this proceeding specifically include an evaluation of affordability and how costs associated with

²¹ OIR, p. 30.

²² OIR, p. 17, 24.

²³ OIR, p. 16.

regulatory and operational reforms can be reasonably and equitably allocated across customer classes.

IV. COMMENTS ON SUBSTANTIVE MATTERS - TRACK 1

The OIR proposes that Track 1 will evaluate a range of DSO models and other reforms that could alter IOU operations and business process.²⁴ These reforms could be very consequential for all stakeholders in the electricity market. The costs of the reforms could be high, and reversing course would be difficult if the reforms do not result in the desired effect.

Before implementing any reforms to the existing IOU business model, the Commission must undertake a rigorous analysis of the legal, technical, procedural, regulatory, and financial barriers to redefining the roles and responsibilities of IOUs. Such an analysis will provide insights into how reforms can best be developed. A similar analysis should be undertaken more generally of the barriers to achieving a high-DER future; this is discussed in section V below.

The Commission's analysis should include the following:

- Federal Energy Regulatory Commission (FERC) Order 2222 – FERC Order 2222 enables DERs to participate alongside traditional resources in regional wholesale (that is, transmission level) markets.²⁵ To the extent that reform of IOUs considered in the OIR involves creating a new market (or markets) at the distribution level, this could involve an overlap with FERC Order 2222. The impact of FERC Order 2222 on any reform of IOUs must be understood.
- IOU ownership – The IOUs are, by definition, investor-owned and seek to maximize returns for their shareholders. Some of the reforms contemplated in Track 1²⁶ could require

²⁴ OIR, p. 14.

²⁵ FERC Fact Sheet, *FERC Order 2222: A New Day for Distributed Energy Resources*, available at: <https://www.ferc.gov/media/ferc-order-no-2222-fact-sheet#>.

²⁶ OIR, p. 14.

the IOUs to perform new roles, such as performing the function of an independent DSO. On one extreme, this could result in the IOU taking a similar role in a distribution market that the CAISO has for the wholesale (transmission-level) market. Transitioning an IOU to performing the function of a DSO could be problematic if the DSO needs to be independent and cannot be a private profit-seeking entity.

- DER provider technical capability – As described above, reforms could include a new market at the distribution level in which DER providers and aggregators would participate. Market rules, however, may create barriers for market participation by DER providers and aggregators. For example, some commentators have observed barriers to DER participation in wholesale (transmission level) markets because of the regulatory requirements of the wholesale market. This can include the requirement that DER providers and aggregators that participate in the market must be available for settlement on a 24/7 basis.²⁷ The Commission must fully understand the regulatory burden on DER providers and aggregators that new markets may create.

Cal Advocates recommends that the scope of Track 1 include an examination of the legal, technical, procedural, regulatory, and financial barriers to redefining the roles and responsibilities of IOUs.

V. COMMENTS ON SUBSTANTIVE MATTERS - TRACK 2

A. The Commission Must Analyze Barriers to Integrating and Optimizing DERs

The OIR proposes that Track 2 will evaluate electric distribution system planning and management frameworks and related analytical tools.²⁸ As an initial step in developing policies for Track 2, the Commission should evaluate existing frameworks in California for integrating DERs into the grid. Evaluation of the existing frameworks will

²⁷ Justin Grundlach and Romany Webb, *Distributed Energy Resource Participation in Wholesale Markets: Lessons from the California ISO* (2018) Vol. 39:1 Energy Law Journal 47, p. 68.

²⁸ OIR, p. 15.

assist stakeholders and the Commission in understanding strengths and weaknesses of these frameworks and why they may or may not have worked as intended. For example, a key element of the DRP proceeding is the Distribution Investment Deferral Framework (DIDF), by which cost-effective DER solutions can be implemented to defer the need for grid investments. The following table is based on Cal Advocates’ analysis and shows for each IOU, per DIDF cycle, the number of deferral projects²⁹ included in the final RFO and the total number of DER solutions contracted to implement those deferral projects:³⁰

DER Projects in RFO / Contracted*

DIDF Cycle	SCE: Projects in RFO / DER Solutions Contracted	PG&E: Projects in RFO / DER Solutions Contracted	SDG&E: Projects in RFO / DER Solutions Contracted
2017 IDER Pilot	2/4	1/2	1/0
DIDF 2018/2019	2/0	3/3	0/0
DIDF 2019/2020	4/1	3/0	0/0
DIDF 2020/2021	2/0	7/**	0/0

* By definition if no deferral projects were included in an RFO then no DER projects could have been contracted.

** No details are available of the outcomes of the PG&E 2020/2021 process in terms of DER solutions contracted.

This proceeding should analyze these outcomes. For example, a survey of DER providers and aggregators should be undertaken to understand their perception of barriers to DER integration and participation.

²⁹ A deferral project is a proposed grid investment to meet a grid need and for which a DER solution is sought via an RFO.

³⁰ Note that there can be multiple DER solutions contracted in respect of one deferral project. For example, for one IOU for one DIDF cycle, assume there are 4 deferral projects (A, B, C and D) that go to an RFO. 2 DER solutions are contracted for project A, 1 for project B and none for projects C and D. In this case the values identified in the table would be 4/3.

This proceeding should also analyze DER programs and tariffs authorized in other Commission proceedings that develop DER programs and tariffs to assess their impact on the integration of DERs. These programs and tariffs include Net Energy Metering (NEM),³¹ the Self Generation Incentive Program (SGIP),³² the Demand Response proceeding,³³ and the Transportation Electrification Framework (TEF).³⁴ Additionally, the scope of this proceeding should include an evaluation of current rates and tariffs that are designed to influence the use and deployment of DERs.³⁵ If analyses of these programs and tariffs identify any concerns related to DER integration, those analyses should be considered in the originating DER programs and tariffs proceeding.³⁶

Cal Advocates recommends that the scope of Track 2 include an evaluation of how the current DER framework (including the DRP and IDER proceedings, as well as related proceedings such as the Net Energy Metering, Self-Generation Incentive Program and Demand Response proceedings) has contributed to DER integration goals.

³¹ *Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address other Issues related to Net Energy Metering*, R.20-08-020, issued September 3, 2020.

³² *Order Instituting Rulemaking regarding Policies, Procedures and Rules for the Self-Generation Incentive Program and Related Rules*, R.20-05-012, issued June 8, 2020.

³³ *Order Instituting Rulemaking to Enhance the Role of Demand Response in Meeting the State's Resource Planning Needs and Operational Requirements*, R.13-09-011, issued September 25, 2013.

³⁴ *Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification and Closing Rulemaking 13-11-007*, R.18-12-006, issued December 19, 2018.

³⁵ For example, on May 25, 2021, Commission staff presented a new vision for rates to improve demand-side resource management that could have impacts on DERs. The presentation is available at: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/demand-response/demand-response-workshops/advanced-der---demand-flexibility-management/slides-unide-workshop_gupta.pdf.

³⁶ For instance, a joint ruling could be issued to enable coordination, record development, and resolution of identified issues.

B. Track 2 of this proceeding should be broadened to focus on the Distribution Planning Process (DPP) and comprehensive DER integration strategies in addition to deferral of grid solutions

In section 5.2 of the OIR, question 1 for Track 2 asks: “To what extent should this proceeding further examine the utility DPP, moving beyond the current DIDF focus?”³⁷ The DPP is an appropriate process to examine as part of this proceeding. The DIDF process, by which DER solutions are sought to defer grid investments, should continue; however, additional strategies for integrating DERs should also be evaluated in Track 2 of this proceeding. The example given in the OIR – DER siting optimization³⁸ – should be examined.

C. The Integration Capacity Analysis must be within the scope of the OIR

Question 7 on page 21 of the OIR focuses on the Integration Capacity Analysis (ICA) and includes three sub-questions relating to: the alignment of the ICA and the GNA; the utility of the ICA data; and the DRP Data Portals.

The ICA is a valuable tool that facilitates the interconnection of DERs to the distribution grid by identifying the capacity of the distribution grid to accommodate additional DERs at different locations. The accuracy of the ICA and the underlying data is critical to the usefulness of the ICA.

D. No new DER tariff pilots should be authorized until the outcomes of the current pilots are known

Question 8n on page 22 of the OIR asks whether additional DER tariff pilots should be implemented to extract more value from behind-the-meter (BTM) DERs and further expand the DIDF program.

³⁷ OIR, p. 18.

³⁸ OIR, p. 18.

As discussed in section III above, the focus of this proceeding is on creating the best framework to accommodate the expected high-DER future, rather than developing programs and policies to encourage greater adoption of DERs.

Over time, policies guiding DER deployment may shift to focus on achieving a certain level of DER penetration. If that occurs it may be appropriate to revisit the question of whether additional tariff pilots are needed. At that time, more information may also be available from the ongoing deferral tariff pilots such as the Pilots to Test Two Frameworks for Procuring Distributed Energy Resources that Avoid or Defer Utility Capital Investments.³⁹ Therefore, additional DER tariff pilots should be deemed out of scope for this proceeding.

VI. COMMENTS ON SUBSTANTIVE MATTERS - TRACK 3

A. The Scoping Memo should include additional questions on smart inverter operationalization

The OIR proposes that Track 3 will evaluate electric distribution grid modernization and smart inverter operationalization.⁴⁰ The OIR currently includes, in question 4 regarding Track 3,⁴¹ a general question about how the development and implementation of smart inverter operationalization (SIO) capabilities should be accomplished. As referred to in the OIR at page 23, this question and the concept of a roadmap for implementing SIO was discussed in the Rule 21 Working Group 4 final report^{42,43} SIO implementation should be considered further within this proceeding in order to optimize the use of smart inverter functionality to advance DER integration. In

³⁹ See D.21-02-006.

⁴⁰ OIR, pp. 15, 16.

⁴¹ OIR, p. 23.

⁴² *Rule 21 Working Group Four Final Report*, August 12, 2020, California Public Utilities Commission Interconnection Rulemaking (R.17-07-007).

⁴³ *Rule 21 Working Group Four Final Report*, p. 99.

particular, the scope of this proceeding should include the development of implementation guidelines, milestones, and use cases for SIO. SIO is critical to the integration of DERs, and a roadmap or timeline is needed for getting to a point where smart inverter functions can be actively used to support one or more use cases.

The scope of Track 3 should include the development of smart inverter operationalization implementation guidelines, specific milestones, and use cases.

B. The Scoping Memo should include an additional question relating to the relative benefits of operational flexibility

The OIR does not specifically identify operational flexibility as within scope of this proceeding. Operational flexibility is the ability for grid operators to maintain system stability and reliability in response to fluctuations in electricity demand and generation that can occur with high DER penetration, including reconfiguring distribution feeders and transferring loads to reduce the extent and/or duration of a power outage. Operational flexibility was discussed in the Rule 21 Working Group 4 final report, which stated a central assumption that operational flexibility would need to be preserved even if operational flexibility reduces the allowable penetration of DERs.⁴⁴ This assumption can be used to justify grid investments such as new feeders; however, by prioritizing grid investments over DER solutions, operational flexibility could adversely affect DER integration.

The scope of Track 3 should include an evaluation of whether operational flexibility, as described in the Rule 21 Working Group Four report, can be balanced with DER integration objectives.

⁴⁴ Rule 21 Working Group Four Final Report, p. 99.

C. The proceeding should re-evaluate what grid modernization and smart inverter operationalization issues should be included in the IOU general rate cases

D.18-03-023⁴⁵ requires the IOUs to include a Grid Modernization Plan (GMP) in their GRC applications.⁴⁶ The GMP is a useful mechanism for transparency and oversight of grid modernization work by the IOUs. D.18-03-023, however, does not require a plan for SIO to be included in the GMP. Given the relevance of SIO to grid modernization and specifically to DER Management Systems (DERMS), it would be useful to consider in this proceeding whether an IOU's plan to develop its capability to support SIO should be included in an IOU's GMP.

However, a distinction should be drawn between the *costs* that an IOU recovers through the GRCs and, therefore, rates and policy guidance determining *the overall approach* to DER integration. Given that the GMPs set out a 10-year vision for how the distribution grid should be upgraded to integrate DERs,⁴⁷ the costs recovered in a GRC represent only one aspect of the activities documented in an IOU's GMP. This proceeding should consider whether the GMPs (including a plan for SIO, if that is included in the GMPs) are best evaluated elsewhere, such as in a separate application.

The scope of Track 3 should include an evaluation of whether smart inverter operationalization should be included in the IOUs' Grid Modernization Plan, and whether it would be more appropriate for the IOU's Grid Modernization Plans to be managed as separate applications separate from the GRCs.

⁴⁵ This is part of the DRP proceeding.

⁴⁶ D.18-03-023 p. 29.

⁴⁷ D.18-03-023, p. 35.

VII. COMMENTS ON PROCESS-RELATED MATTERS

A. Sufficient stakeholder engagement throughout the proceeding will be critical

The OIR seeks feedback on the anticipated activities in this proceeding.⁴⁸ Some of these activities are set out in the Preliminary Schedule at page 27 of the OIR. Some opportunities for stakeholder engagement are included in the Preliminary Schedule, including working groups and workshops. In general, however, specific opportunities for stakeholder engagement are not provided in the OIR's Preliminary Schedule.

As discussed above, the preliminary scope of this proceeding as identified in the OIR is broad and could result in significant reforms. The potential changes anticipated in the OIR could have significant rate and bill, safety, reliability, and environmental impacts. It is critical for stakeholders to provide input into the reforms as the proceeding progresses in order to identify the best policy reforms and ensure stakeholder acceptance of the final outcomes of this proceeding.

More specifically, while working groups and workshops can be good ways to engage with stakeholders; the objectives, agenda, and scope of a working group and workshop should be well-defined and (in the case of working groups) regularly reviewed in order to keep the working group or workshop focused on the task at hand.

Other forms of stakeholder engagement should be used in addition to working groups and workshops, including regular opportunities for written comments on consultant reports and policy reforms under consideration.

The scoping memo should provide detail regarding stakeholder engagement opportunities throughout the proceeding, including through formal written comments, workshops, and working groups.

⁴⁸ OIR, p. 30.

B. A consultant-led process for Track 1 is appropriate

The OIR, at page 30, asks whether Track 1 of the OIR should be addressed through a consultant-led process including a white paper followed by workshops and culminating in a third-party consultant report providing findings and recommendations.

Track 1 has a broad scope that will be conceptual in nature. It is appropriate for a consultant to facilitate this work. As described in section VII (A) above, the consultant should ensure that there is sufficient stakeholder engagement throughout the process, including stakeholder input for how the Track will be organized and facilitated.

C. Track 3 should include development of an SIO Working Group

The Preliminary Schedule at page 28 of the OIR refers to a SIO working group. An SIO working group is appropriate way for stakeholders to have input on SIO issues. The concept of an SIO working group was discussed in the Rule 21 Working Group 4 Final Report and received support from working group members.⁴⁹

As discussed in section VII.A above, to the extent that a SIO working group is established, its agenda and scope should be well-defined.

VIII. CONCLUSION

Cal Advocates respectfully requests that the Commission incorporate these recommendations into the scoping memo.

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⁴⁹ Rule 21 Working Group Four Final Report, August 12, 2020, California Public Utilities Commission Interconnection Rulemaking (R.17-07-007), pp. 92-94.

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