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Sent: Friday, January 14, 2022 9:33 AM

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Subject: A.20-10-011: Email ruling granting extension requests and amending procedural schedule

To the Service List of A.20-10-011:

This email ruling grants the request of Pacific Gas and Electric Company (PG&E) for an extension of time to file of the marginal generation capacity cost (MGCC) study that is currently underway, authorizes an extension of time for PG&E to file a supplemental to Application (A.) 20-10-011 to address export compensation issues, and adjusts the schedule for the remainder of this proceeding.

The Assigned Commissioner's Amended Scoping Memo and Ruling, dated December 17, 2021 (Amended Scoping Memo) set a deadline of January 18, 2022, for PG&E to file and serve the MGCC study that it agreed to conduct in a stipulation with the Public Advocates Office at the California Public Utilities Commission and the Small Business Utility Advocates (together, the Stipulating Parties).

On January 6, 2022, PG&E filed two motions. The first sought an eight-week extension on each of the deadlines adopted in the Amended Scoping Memo and the second requested a shortened response period for the extension notice, given the pending deadline for filing and service the MGCC study. The second motion was granted on January 7, 2022, through an Administrative Law Judge ruling setting January 11, 2022, as the deadline for responses to the motion for an extension of time and granting PG&E the opportunity to reply to responses no later than January 13, 2022. No party filed a response to PG&E's motion seeking an extension of the deadlines adopted in the Amended Scoping Memo.

In the motion seeking the eight-week extension, PG&E stated that it, the Stipulating Parties, Enel X North America and the California Large Energy Consumers Association (together, the MGCC study participants) have been working to meet the January 18, 2022, deadline but faced up to three months of delays in receiving the data necessary to launch the study. Further, the MGCC study participants stated that the eight-week extension of time to file the study will allow for the completion of several complex analyses that will better identify the inter-annual variability in customers' capacity and generation charges, the associated impact on the grid, and the appropriate formation of a load-based MGCC signal.

Issue 2 of the Amended Scoping Memo asked how commercial electric vehicle customers enrolled in PG&E's day-ahead, hourly, real-time pricing (DAHRTTP) rate could receive compensation for any exports to the grid if they do not participate in net energy metering (NEM), and directed PG&E to file a supplement to A.20-10-011 by January 27, 2022. On January 10, 2022, PG&E filed two motions, one seeking an extension of time for PG&E to file a supplement to A.20-10-011 addressing Issue 2 of the Amended Scoping Memo, related to export compensation, and the second seeking a shortened response period to the motion seeking additional time for PG&E to file a supplemental application addressing export compensation for non-NEM customers.

Rather than addressing PG&E's request for a shortened response period to its January 10, 2022, motion, this ruling grants PG&E's request for additional time to file its supplemental application addressing Issue 2 of the Amended Scoping Memo and provides a list of specific questions it should address related to that issue. To be clear, the export compensation issue identified in the Amended Scoping Memo only applies to the DAHRTTP rate that was approved in D.21-11-017. At a minimum, PG&E shall address the following questions in its supplement to A.20-10-011 related to export compensation:

1. In Exhibit PG&E-1 at 2-15, PG&E indicates that, for NEM customers, exports to the grid will be tracked by the hour and given generation compensation equal to that hourly price.
 - a. Does PG&E propose to use the same export compensation methodology to calculate the export compensation amount for non-NEM customers as it was authorized to offer NEM customers that participate in the DAHRTTP rate?
 - b. If not, PG&E should explain the methodology that would be used to calculate the compensation rate for non-NEM customers on the DAHRTTP rate that provide exports to the grid and provide a detailed analysis on why the compensation rate for non-NEM should differ from the export compensation rate offered for NEM customers.
2. For the generation component of the rate rider, will DAHRTTP customers (NEM and non-NEM) receive export compensation for the generation price that includes: (1) the DA market energy price from California Independent System Operator (CAISO), (2) the capacity adder based on forecasted adjusted net load (ANL) in each hour, and (3) the revenue neutral adder?
3. Will DAHRTTP customers (NEM and non-NEM) receive export compensation for any other components of the DAHRTTP rate (i.e., distribution, transmission, and non-bypassable charges that are part of the Total Energy Rates (\$ per kilowatt hour) of the rate schedule)?
4. Will PG&E be able to distinguish between exports from behind-the-meter solar and exports from other distributed energy resources such as bi-directional electric vehicles?
 - a. If so, how will PG&E differentiate between the exporting resources?
 - b. Will all exports, regardless of which distributed energy resource they are from, be compensated at the same rate?

5. Will the technical and billing system upgrades PG&E plans to conduct to implement the DAHRTP rate authorized in D.21-11-017 support the potential for export compensation for customers that are enrolled in the DAHRTP rate but do not participate in NEM? If not, what additional investments and associated ratepayer costs does PG&E propose would be necessary to provide export compensation for DAHRTP customers that do not participate in NEM?

The schedule for PG&E and parties to address Issue 2 raised in the Amended Scoping Memo is included below.

Therefore, PG&E’s request for an eight-week extension of time to file and serve the MGCC study is approved. Further, PG&E’s request for an additional eight weeks to develop a supplement to A.20-10-011 that addresses export compensation issues is granted. The bolded dates provided in the right column of the table below are adopted as the schedule for the remainder of this proceeding:

Item	Amended Scoping Memo Deadline	8-week Extension Request	Approved Extension Deadline
MGCC (marginal generation capacity cost) Study filed and served in both A.20-10-011 and A.19-11-019	January 18, 2022	March 15, 2022	March 15, 2022
PG&E supplement to A.20-10-011 proposing an export compensation mechanism for non-NEM customers filed and served	January 27, 2022	March 24, 2022	March 24, 2022
PG&E-hosted Meet-and-Confer session on MGCC Study and export compensation supplement	February 2022	Late March/early April 2022	No later than March 30, 2022
Direct Testimony served. PG&E shall include a meet-and-confer report in its Direct Testimony	February 21, 2022	April 18, 2022	April 13, 2022
Motions for Evidentiary Hearing related to MGCC and export compensation issues filed and served	March 4, 2022	April 29, 2022	April 22, 2022
Rebuttal Testimony served	March 11, 2022	May 6, 2022	April 29, 2022
Status Conference held	March 25, 2022	May 15, 2022	May 10, 2022
Evidentiary Hearing on MGCC and export compensation issues held (if necessary)	April 19 to 22, 2022	June 14 to 17, 2022	May 18 to 20, 2022
Opening Briefs filed and served	May 2022	July 2022	June 3, 2022
Reply Briefs filed and served	June 2022	August 2022	July 1, 2022
Proposed Decision on Phase 2 of A.20-10-011 issued	Q3 2022	Q4 2022	Q3/Q4 2022

Therefore, IT IS RULED:

1. Pacific Gas and Electric Company shall notify all parties to the service list that its extension request was granted, with the modification described in the table above, pursuant to Rule 11.6 of the Commission's Rules of Practice and Procedure.
2. No later than March 15, 2022, Pacific Gas and Electric Company shall file and serve the marginal generation capacity cost study that is underway for consideration in the second phase of Application 20-10-011 to the service list of this proceeding and Application 19-11-019.
3. No later than March 24, 2022, Pacific Gas and Electric Company shall file and serve the supplement to Application 20-10-011 that addresses export compensation for customers that do not participate in net energy metering (NEM). The supplement should address the questions identified in this ruling.
4. The schedule identified in the right column of the table above is adopted for the remainder of this proceeding.

THE DOCKET OFFICE SHALL FORMALLY FILE THIS EMAIL RULING.

Carrie Sisto (*she/her*)
Administrative Law Judge
California Public Utilities Commission
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