

FILED

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIAPM

R2106017

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

Rulemaking 21-06-017

## ADMINISTRATIVE LAW JUDGE'S RULING ON RECOMMENDED REFORMS FOR THE DISTRIBUTION INVESTMENT DEFERRAL FRAMEWORK PROCESS, THE PARTNERSHIP PILOT AND THE STANDARD-OFFER-CONTRACT PILOT

This Ruling implements reforms to three solicitation frameworks: the Distribution Investment Deferral Framework (DIDF), the Partnership Pilot, and the Standard Offer Contract pilot. Reforms have been proposed by the Independent Professional Engineer (IPE), Independent Evaluators (IE), and parties to this proceeding. As discussed herein, while this Ruling sets forth certain reforms, other proposed reforms are deferred to allow for further review by the Commission.

## 1. Background

This Ruling continues the practice begun in Rulemaking (R) 14-08-013 to annually consider improvements to the DIDF process. The November 15, 2021 *Assigned Commissioner's Scoping Memo and Ruling* set forth the scope of R.21-06-017 and includes Phase 2: Distribution Planning Process Improvement with subtopics such as the annual DIDF process (including its annual reform process) and two pilots from R.14-10-003: the Standard-Offer-Contract pilot and the Partnership Pilot. This Background section provides a description of the

procedural background of the reform process and how the various elements from R.14-08-013 and R.14-10-003 come together in R.21-06-017.

In Decision (D) 18-02-004 of R.14-08-013, the Commission adopted the DIDF process, which built on the Competitive Solicitation Framework pilot previously adopted by the Commission in R.14-10-003. The purpose of DIDF is to identify, review, and select opportunities for third party-owned distributed energy resources to defer or avoid traditional capital investments by the investor-owned utilities (Utilities) on their electric distribution systems. D.18-02-004 established DIDF as part of the annual utility distribution planning process. DIDF results in the identification of traditional distribution upgrades that may be deferrable through a competitive solicitation for distributed energy resources.

Also in D.18-02-004, the Commission concluded that "an open pathway for modifying various elements of the DIDF is needed."<sup>1</sup> This open pathway was established through the February 29, 2019 *Ruling Requesting Answers to Improve the Distribution Investment Deferral Framework Process*, which invited parties to comment on possible changes and improvements to the DIDF process. Subsequent rulings revised the DIDF process including the May 7, 2019 *Ruling Modifying the Distribution Investment Deferral Framework Process*; the April 13, 2020 *Ruling Modifying the Distribution Investment Deferral Framework Process*; the May 11, 2020 *Ruling Modifying the distribution Investment Deferral Framework Process*; the

<sup>&</sup>lt;sup>1</sup> D.18-02-004 at Conclusion of Law 15. *See* also Ordering Paragraph 2.gg. ordering the creation of an open pathway for modifying various elements of the DIDF and ordering the Utilities to propose modifications in the advice letters filed to request approval of distribution deferral projects.

and Process Requirements; and the June 21, 2021 Ruling on Recommended Reforms for the Distribution Investment Deferral Framework Process.

Related to this Ruling, the April 13, 2020 Ruling authorized Energy Division staff to manage the IPE scope of work and make modifications, when needed, to the DIDF and Distribution Planning Advisory Group (DPAG) schedules.<sup>2</sup> The May 11, 2020 Ruling authorized Energy Division staff to manage the IE scope of work.<sup>3</sup>. The June 21, 2021 Ruling reiterated that Energy Division may modify the DIDF and DPAG schedule as needed but requires that advance notice to the service list be provided.<sup>4</sup>

Also related to this ruling, on January 27, 2022, the Commission adopted Resolution E-5190, which approved, with modifications, evaluation criteria for the Partnership Pilot and Standard-Offer-Contract pilot pursuant to D.21-02-006 in R.14-10-003. Briefly, the Partnership Pilot is a five-year pilot for behind-the-meter distributed energy resources where an aggregator enrolls new and existing distributed energy resource customers to meet one or more grid needs. The Standard-Offer-Contract pilot is a three-year pilot, limited to in-front-of-the-meter distributed energy resources, that streamlines the existing DIDF Request for Offer procurement method.

Resolution E-5190 explained that the evaluation of the two pilots will occur during annual reviews, with midstream evaluations and final evaluations occurring during the annual DIDF reform process. Resolution E-5190 adopted a timeline for the pilot evaluation activities that aligns with the annual DIDF reform process. This timeline modified the DIDF schedule previously

<sup>&</sup>lt;sup>2</sup> Reform 4 in April 13, 2020 Ruling at 12 and 15.

<sup>&</sup>lt;sup>3</sup> May 11, 2020 Ruling at 86.

<sup>&</sup>lt;sup>4</sup> June 21, 2021 Ruling at 12.

established in the June 21, 2021 Ruling in R.14-08-013. Hence, the annual reforms process will now address reforms to the Partnership Pilot and the Standard-Offer-Contract pilot, in addition to the DIDF process.

The 2022/2023 annual reform process began on February 14, 2022, with the individual filing of Independent Evaluator Interim Reports (IE Reports) on DIDF Request for Offers and the Standard-Offer-Contract pilot by Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) (together, Utilities). Pursuant to Resolution E-5190, the IPE submitted the 2022 Independent Professional Engineer Post DPAG Report (IPE Report), dated March 17, 2022. Parties were invited to file comments on potential improvements to the Year 2 Standard-Offer-Contract pilot based on the IPE Report and annual reports from the utilities on the Standard-Offer-Contract pilot. Opening comments were filed on April 4, 2022, by California Energy Storage Association (CESA), PG&E, Public Advocates Office, SDG&E, and SCE.<sup>5</sup> Reply comments were filed on April 18, 2022 by Joint Community Choice Aggregators<sup>6</sup> (Joint CCAs), PG&E, SDG&E, and SCE.

#### 2. 2022 Reforms to Be Implemented

Below are the reforms to be implemented in 2022. With each description of the reform is the reasoning for requiring the implementation of the reform.

#### 2.1. 2022 and 2023 DPAG and DIDF Schedule

The IE for PG&E recommends moving the due date for the Independent Evaluator's report from mid-February to mid-March to avoid the need for an

<sup>&</sup>lt;sup>5</sup> SCE filed two documents: SCE Comments on Possible Improvements to the 2022 DIDF Process and SCE IDER Pilot Reform Comments. (IDER is the acronym for the Integrated Distributed Energy Resources proceeding.)

<sup>&</sup>lt;sup>6</sup> Joint CCAs are Silicon Valley Clean Energy Authority, Peninsula Clean Energy Authority, Marin Clean Energy, San Jose Clean Energy, and Sonoma Clean Power Authority.

interim report. The PG&E IE contends the mid-February IE Report is of limited value because both the DIDF and Standard-Offer-Contract pilot have important activities to be considered in the mid-February IE Report, but these activities have deadlines close to or after the mid-February due date.<sup>7</sup> PG&E highlights that delaying the filing of the IE Report should avoid any continued need for an interim and final report, as occurred in 2022.<sup>8</sup> SCE supports this revision.<sup>9</sup>

Delaying the due date for the annual IE Report to mid-March is a reasonable modification and should be implemented. The final DPAG schedule for the 2022/2023 DIDF cycle with this revision and the changes established in Resolution E-5190 is included in this ruling as Attachment A. Further, this Ruling reiterates that Energy Division is authorized to maintain and modify the schedule, if necessary and with advance notice to the service list.

#### 2.2. Transparency of Interconnection Information

The IE for PG&E contends that including more information about the interconnection process in the Request For Offer materials may help participants develop more competitive offers. The IE submits that it is a reasonable expectation that participants should understand the interconnection process and timelines but that "the challenges and details of the interconnection process may deserve further emphasis."<sup>10</sup> Reiterating that it expects sellers to be familiar with the interconnection process, PG&E supports the inclusion of links in its Requests For Offers materials, "so the information is readily available to market

<sup>&</sup>lt;sup>7</sup> PG&E IE Report at 5.

<sup>&</sup>lt;sup>8</sup> PG&E Opening Comments, Attachment A at 5.

<sup>&</sup>lt;sup>9</sup> SCE Reply Comments at 12.

<sup>&</sup>lt;sup>10</sup> PG&E IE Recommendation #3. (See PG&E IE Report at 7.)

participants."<sup>11</sup> CESA offers support for this recommendation, contending interconnection is a barrier to submitting successful projects, given the highly localized nature of DIDF projects.<sup>12</sup>

Requiring thorough details on the interconnection process, including timelines, will improve transparency and may decrease the associated barrier to submitting successful projects, which may lead to more competitive offers. Accordingly, this recommendation should be implemented.

### 2.3. Solicitation Window for Standard-Offer-Contract Pilot

CESA recommends extending the solicitation window for the Standard-Offer-Contract pilot. CESA contends that extending the solicitation windows could allow for additional time to gain site control, leading to additional projects being developed. For the purposes of this Ruling, "solicitation window" is defined as the period between the solicitation launch date and the offer due date.

CESA points to the SCE IE Report which noted that site control seemed to be a major challenge.<sup>13</sup> CESA notes that each utility had a different solicitation window ranging from one month for SDG&E to over three and a half months for PG&E.<sup>14</sup>

PG&E supports longer solicitation windows.<sup>15</sup> SDG&E also supports longer solicitation windows of up to four months.<sup>16</sup> However, SCE opposes

<sup>&</sup>lt;sup>11</sup> PG&E Opening Comments, Attachment A at 6.

<sup>&</sup>lt;sup>12</sup> CESA Opening Comments at 9.

<sup>&</sup>lt;sup>13</sup> CESA Opening Comments at 8 citing SCE IE Report at 42.

<sup>&</sup>lt;sup>14</sup> CESA Opening Comments at 7.

<sup>&</sup>lt;sup>15</sup> PG&E Reply Comments, Attachment A at 1.

<sup>&</sup>lt;sup>16</sup> SDG&E Reply Comments at 2.

CESA's recommendation for longer solicitation windows contending there is no evidence it will lead to improved participation.<sup>17</sup> SCE argues that longer solicitation windows conflict with the objective to streamline the solicitation process.

Given the SCE IE Report concern about site control, it is reasonable to establish a longer solicitation window for Utilities. A minimum 75-day window balances the need for more robust participation with ensuring a streamlined procurement process. A procurement window of a minimum of 75 days should be implemented for the Standard-Offer-Contract, extending from September 15<sup>th</sup> to at least November 30<sup>th</sup>. If a second round Standard-Offer-Contract solicitation launches, the same 75-day minimum solicitation window should apply. Utilities may use a longer solicitation window.

#### 2.4. Excess Partnership Pilot Funds Between Tranches

CESA recommends rolling over any and all excess funds to subsequent tranches of the Partnership Pilot in order to provide utilities flexibility in setting budgets.<sup>18</sup> CESA contends that while ratepayer savings is a guiding principle of this pilot, it is also important that the Partnership Pilot is successful, which will result in a 15 percent cost savings to ratepayers. CESA asserts that permitting the rolling of excess funds to subsequent tranches, will lead to "additional ability to incentivize enrollment and achieve a successful deferral."<sup>19</sup>

<sup>&</sup>lt;sup>17</sup> SCE Reply Comments at 13.

<sup>&</sup>lt;sup>18</sup> CESA Opening Comments at 5.

<sup>&</sup>lt;sup>19</sup> CESA Opening Comments at 6.

SCE and SDG&E oppose CESA's recommendation, contending it conflicts with the guiding principle of reducing overall energy system costs.<sup>20</sup> SCE proposes the Commission allow a roll over of up to 100 percent of the cost cap of the specific deferral year of that planned investment to ensure cost-effectiveness. SCE asserts the total compensation for a specific year of the deferral would always be 100 percent or below, thus ensuring cost effectiveness. Currently, the budget for each tranche equates to 85 percent of the cost cap, hence, a roll over under SCE's proposal could increase a tranche budget by up to 15 percent.

CESA's proposal to roll over the full amount of unused funds from a tranche is reasonable given the overall cost cap (i.e., the total of all tranche budgets for a deferral opportunity) would not be exceeded. Furthermore, a 15 percent cost savings to ratepayers is already embedded. The purpose of this pilot is to test behind-the-meter distributed energy resources technologies in a DIDF procurement as well as tranche design. The rolling over of funds will improve deferral opportunities allowing for a significant evaluation process. The pilot will be fully evaluated for cost effectiveness pursuant to D.21-02-006 and Resolution E-5190.

Accordingly, funds not spent in any Partnership Pilot project tranche should be rolled over to the subsequent tranche. Excess funds that may remain after the full deferral period (i.e., there are no future tranches to receive the roll over) shall be returned to ratepayers. In addition, funds should be rolled over to the next tranche while maintaining the deployment (20 percent), reservation (30 percent), and performance (50 percent) payment structure. Tranche design will be reviewed in the annual DIDF reform process as pilot data becomes available.

<sup>&</sup>lt;sup>20</sup> SCE Reply Comments at 12 and SDG&E Reply Comments at 2-3.

## 2.5. Improvement of Selection Scoring Method for Standard-Offer-Contract and Partnership Pilots

The IPE stated its observation that Utilities used different approaches when selecting the projects to participate in the first cycle of the Standard-Offer-Contract pilot and Partnership Pilot: PG&E chose more than the minimum number of projects and evaluated different variations; SDG&E used a simple method to select which of the two candidate deferral opportunities would be used for the two pilots; SCE used a numerical score to rank projects for each of the two pilots. The IPE recommends the Commission require a scoring approach similar to that used by SCE so that the Commission has better insight into the process when evaluating the process.<sup>21</sup> The IPE also recommends some qualitative measures could be used to difference projects on secondary factors, which is similar to PG&E's approach.<sup>22</sup> PG&E asserts it is premature to make any required revisions to the selection approach.<sup>23</sup>

The hybrid approach recommended by the IPE is a balance of the approaches taken by PG&E and SCE. A quantitative scoring method like that used by SCE is consistent with the general DIDF reform approach of seeking to quantify ranking and metrics whenever possible. However, allowing for the use of qualitative scoring, as used by PG&E, is equally useful. Further, some consistency across Utilities will allow for improved insight during evaluations. It is reasonable to require the implementation of this modification.

<sup>&</sup>lt;sup>21</sup> IPE Report at 56.

<sup>&</sup>lt;sup>22</sup> IPE Report at 56.

<sup>&</sup>lt;sup>23</sup> PG&E Opening Comments at 3-4.

Accordingly, each utility shall develop, document, and implement a quantitative ranking method for the Standard-Offer-Contract pilot and Partnership Pilot project selection in their 2022 Grid Needs Assessment/ Distribution Deferral Opportunity Report (GNA/DDOR) filings, which shall be the primary factor used for the selection of projects to pilot. Qualitative measures may also be applied by Utilities as a secondary factor but must be fully documented and described in the GNA/DDOR filing.

## 2.6. Improvement of Known Load Project Tracking and Reporting

The IPE discusses the treatment of known load or known load projects, which are defined as forecasts of load growth that are based upon the requests for service from residential, commercial, and industrial customers received by the utility. Based on its observations, the IPE recommends Utilities use the approach currently used by SCE where the sum of the embedded annual known load projects and economic loads do not exceed the annual Integrated Energy Policy Report (IEPR) forecast.<sup>24</sup> The IPE also recommends Utilities: (i) report data sufficient for someone to track whether specific known load projects materialize and (ii) include a detailed review of Utilities' use of embedded and incremental known loads in the GNA/DDOR filings. Lastly, the IPE recommends Utilities collaborate with the California Energy Commission (CEC) on improving the IEPR forecasts by exchanging information on modelling and assumptions.<sup>25</sup>

Joint CCAs contend the differing approaches currently used by Utilities lead to lost opportunities for candidate deferral opportunities and assert the IPE

<sup>&</sup>lt;sup>24</sup> IPE Report at 33.

<sup>&</sup>lt;sup>25</sup> IPE Report at 33.

recommendations for standardizing the approach "will ease review and…help ensure the maximum opportunities are presented…"<sup>26</sup>

PG&E states these recommendations will be reviewed during the joint utility Distribution Forecast Working Group and will be considered for implementation for future DIDF cycles (2023 and beyond.)<sup>27</sup>

It is reasonable to facilitate tracking of known loads year after year to determine if they materialize. It is important to begin such tracking in the 2022 GNA/DDOR filing, with additional improvements in future years. Accordingly, as recommended by the IPE, Utilities shall include a spreadsheet listing of all Known Load Projects with their 2022 GNA/DDOR filing. Unlocked Excel spreadsheets shall be provided to the service list in R.21-06-017. If confidential information is included, a public version shall be provided (also in unlocked Excel files). Further, Utilities shall report data sufficient to track, over time, whether specific known load projects materialize.

The data shall include a unique project identifier, impacted circuit, initial service request date, load amount, current expected in-service date or indication if service request was cancelled, if appropriate, and type/category of load and, if appropriate, the actual date service was initially provided and the amount. For SCE, the spreadsheet shall indicate whether each project was classified as an incremental or embedded known load project as defined by SCE.

The data to track shall be selected by Utilities as appropriate to facilitate an annual review of CEC demand forecast accuracy and planning improvements for the next forecast. The tracked data will be reviewed during the 2022 DPAG and

<sup>&</sup>lt;sup>26</sup> Joint CCAs Reply Comments at 3.

<sup>&</sup>lt;sup>27</sup> PG&E Opening Comments, Attachment A at 2.

by Energy Division. Stakeholder comments on the data selected for tracking are requested for consideration in the 2023 reform process.

Utilities shall include a detailed review of known load projects in their GNA/DDOR filings, including but not limited to, types of loads, number, amounts, and timing. A summary shall also be included similar to the evaluation provided in Section 3 of the March 17, 2022 IPE Report.

Utilities shall each evaluate in their 2022 GNA/DDOR filings SCE's approach to tracking known load projects that identifies embedded and incremental loads and compare it to the PG&E and SDG&E approaches with the goal of proposing a standardized approach in the IOUs' 2023 DIDF reform comments.

Utilities shall collaborate with the CEC and Energy Division staff on improving the IEPR demand forecast by exchanging information on modelling and assumptions used in the utility and CEC load forecasting processes.

#### 2.7. Line Section Data Extension

PG&E requests that the requirement to include line section data in GNA/DDOR filings be removed. PG&E explains that, in the 2021-2022 DIDF cycle, they filed the required line section data on October 15 instead of August 15. PG&E anticipates the need to request an extension in 2022.<sup>28</sup> Supporting PG&E's request, SCE asserts this data is unlikely to identify new candidate deferral offers, requires significant utility resources to produce, and does not benefit the DIDF process."<sup>29</sup> SDG&E also agrees, contending the data "creates confusion and unnecessary and unhelpful churn among stakeholders."<sup>30</sup> While

<sup>&</sup>lt;sup>28</sup> PG&E Opening Comments, Attachment A at 1-2.

<sup>&</sup>lt;sup>29</sup> SCE Reply Comments at 7.

<sup>&</sup>lt;sup>30</sup> SDG&E Reply Comments at 5.

the IPE agreed with PG&E in the IPE DPAG Report specific to PG&E's 2021 GNA/DDOR filing,<sup>31</sup> the IPE did not highlight line segments for a reform in the IPE Post-DPAG Report.<sup>32</sup>

This ruling continues the requirement to include line section data in the GNA/DDOR filing. Stakeholders are asked to consider the continued need for this data and provide comment on this matter in the 2022/2023 DIDF cycle. Given the experience of the 2021-2022 DIDF cycle, it is reasonable to grant an extension to file the required line section data. Accordingly, if necessary, Utilities may supplement their GNA/DDOR filings with line section data and the associated analyses no later than October 15, 2022.

## 3. Clarification Needed for Proposed Reforms

Clarification is necessary to address two proposed reforms. As a result of the clarification provided below, the associated proposed reforms are unnecessary.

## 3.1. Application of 90 Percent Acceptance Trigger

The IE for PG&E recommends changing the Standard-Offer-Contract pilot trigger from 90 percent to 100 percent. This Ruling clarifies that the acceptance trigger only applies to the Partnership Pilot. The acceptance trigger is defined as the point at which 90 percent of deferral needs are subscribed. However, the Standard-Offer-Contract pilot does not involve a series of bids as occurs in the Partnership Pilot. Rather, a simple pricing sheet is submitted at the time of offering requiring a single round simplified bidding process. Because the

<sup>&</sup>lt;sup>31</sup> IPE PG&E 2021 DPAG Report, November 15, 2021, at 10.

<sup>&</sup>lt;sup>32</sup> IPE Report.

acceptance trigger is not applicable to the Standard-Offer-Contract, there is no need to consider its modification.

## 3.2. Clarification of the Alignment of General Rate Case and GNA/DDOR Filings

SCE discusses the alignment of general rate case testimony and the most recent GNA/DDOR filing.<sup>33</sup> SCE asserts that the recently adopted timing of the general rate case filings leads to a filing that pre-dates the annual DDOR submission and could lead to missed deferral opportunities.<sup>34</sup> SCE asks the Commission to specify that the GNA/DDOR rely on the most recent distribution planning process year.

In D.18-02-004, Ordering Paragraph 1h, the Commission ordered that a utility's general rate case testimony should be consistent with the most recent GNA/DDOR filing. As such, if a general rate case is filed in May, it should be consistent with the GNA/DDOR from the previous August. As noted by SDG&E, this same ordering paragraph also allows Utilities to explain discrepancies between, for example, the 2022 GNA/DDOR filing and the May 2023 general rate case testimony.<sup>35</sup> Accordingly, no revision or reform to the DIDF process is necessary. Further, SCE is correct in its presumption that a GNA/DDOR filing should be based on the recent distribution planning process, as the Commission did not intend that a GNA/DDOR would be filed twice.

### 4. Additional Work for Future Consideration

Below is a proposed reform for future consideration that requires additional work by the utilities.

<sup>&</sup>lt;sup>33</sup> SCE Opening Comments at 1 and SDG&E Reply Comments at 6.

<sup>&</sup>lt;sup>34</sup> SCE Opening Comments at 1-2.

<sup>&</sup>lt;sup>35</sup> SDG&E Reply Comments at 7.

### 4.1. Joint Prioritization Metrics Updates

The IPE recommends, for the purpose of developing metrics for the prioritization process, that days of need be estimated that reflect the expected number of days of operation, and not the number of days that a dispatch might occur in a month.<sup>36</sup> PG&E proposes that no major changes to the joint prioritization metrics template be made for the 2022 DIDF cycle, as PG&E contends there is not sufficient time to implement the changes. Instead, PG&E proposes to work with the DPAG on joint prioritization metrics updates and submit them to Energy Division by March 1, 2023.<sup>37</sup> In reply comments, PG&E offers a simplified process whereby Utilities would work with the IPE to make revisions to the joint utility prioritization metrics for the 2023 DIDF cycle and submit a report by mid-November 2022 for consideration in the 2022 Staff Proposal.

Given the timing of this ruling, I agree that it would be difficult if not impossible to implement changes to the prioritization metrics. Hence, it is reasonable to require Utilities to work with the IPE to develop a proposal for revisions to the joint prioritization metrics. The final joint proposal shall be filed in this proceeding by a representative of one of the three utilities, no later than November 15, 2022.

<sup>&</sup>lt;sup>36</sup> IPE Report at 68.

<sup>&</sup>lt;sup>37</sup> PG&E Opening Comments, Attachment A at 2-3.

## 5. Proposed Reforms Not Considered at This Time

Below is a list of recommended reforms that are not considered at this

time. These proposed reforms should be considered either in this rulemaking by

the full Commission or delayed for consideration in the 2023 reform process.

- Future Changes to Joint Prioritization Metrics
- Forecast Certainty Metric
- Absolute Ranking Approach
- Application of LNBA
- Flagging Process Consistency
- Available Land Identified for Solicitations
- Fairness of Cost Allocation Process
- Post-Deferral Contingency Costs Tracking and Cost Recovery
- Pricing Sheets and the Standard-Offer-Contract Pilot
- Duplicative Data
- Cost-effectiveness Cap Changes

## IT IS RULED that:

1. The amendments to the 2022-2023 Distribution Deferral Framework cycle, Partnership Pilot, and Standard-Offer-Contract pilot set forth in Section 2 of the Ruling are adopted.

2. The updated Distribution Planning Advisory Group schedule for the 2022-2023 Distribution Deferral Framework cycle, attached as Attachment A, is adopted.

3. Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall work with the Independent Professional Engineer to develop a proposal for revisions to the joint prioritization metrics, as described in Section 4 above. The final joint proposal

shall be filed in this proceeding by a representative of one of the three utilities, no later than November 15, 2022.

Dated June 16, 2022, at San Francisco, California.

/s/ KELLY A. HYMES

Kelly A. Hymes Administrative Law Judge

## Attachment A

Activity	Date*
Pre-DPAG 2022	
<ul> <li>Pre-DPAG meetings and workshops, including Joint Utility proposal on 5/6/22 for IEPR scenarios to apply to the 2023 GNA/DDOR filings</li> <li>DIDF Reform Ruling</li> </ul>	May 2022
<ul> <li>Distribution Forecasting Working Group workshop</li> <li>Draft IPE Plan</li> </ul>	Week of May 15, 2022
Utilities submit DIDF Procurement Status Report to Energy Division, IPE, and IEs (every 6 months)	May 15, 2022
Stakeholder comments on Joint Utility proposal for IEPR scenarios to apply to the 2023 GNA/DDOR filings	June 24, 2022
Prescreening period for Partnership Pilot <sup>38</sup>	July 15, 2022 to August 15, 2022

Prescreening Application and other information regarding the Partnership Pilot can be found at: (1) PG&E website, here: <u>https://www.pge.com/en\_US/residential/save-energy-money/savings-programs/savings-programs-overview/partnership-pilot.page;</u> (2) SCE's website, here: <u>https://www.sce.com/business/savings-incentives/integrated-distributed-energy-resources-partnership-pilot;</u> and (3) SDG&E's website, here: <u>https://www.sdge.com/partnership-pilot#apply</u>.

Activity	Date*
<ul> <li>Energy Division approval or modification of Joint Utility proposal for IEPR scenarios to apply to the 2023 GNA/DDOR filings</li> <li>IE Post-Procurement Utility Comparison Report (comparing Utility procurement approaches and reporting on all procurement outcomes to date)</li> </ul>	August 1, 2022
DPAG 2022	
<ul><li>Utility GNA/DDOR filings</li><li>Final IPE Plans circulated</li></ul>	August 15, 2022
Utilities update DRP Data Portals with GNA/DDOR data	August 30, 2022
IPE Preliminary Analysis of GNA/DDOR data adequacy circulated	September 5, 2022
<ul> <li>Utilities launch RFOs and SOC pilot (SOC bids due no sooner than 75 days after launch or November 30, 2022)</li> <li>Utilities update Participation Pilot website with prescreened aggregator contact information</li> </ul>	September 15, 2022

Activity	Date*
Participants provide questions and comments to Utilities and IPE	September 25, 2022
DPAG meetings with each Utility	Mid to Late September 2022
Utility responses to questions	October 5, 2022
<ul> <li>Follow-up Utility meetings via webinar</li> <li>Optional due date for line section data supplement to GNA/DDOR (October 15, 2022)</li> </ul>	Week of October 15, 2022
IPE DPAG Reports	October 25, 2022
<ul> <li>Tier 2 Advice Letters:</li> <li>(1) Approval to launch subscription periods for Partnership Pilot. If applicable, also to seek approval to launch RFOs or SOCs for planned investments elevated to Tier One candidate deferral opportunities during the DPAG</li> <li>(2) Approval not to launch RFOs, SOCs, or Partnership Pilots for any remaining planned investments or candidate deferral opportunities identified in the GNA/DDOR filings, by DPAG stakeholders, by or Energy Division Procurement Status:</li> <li>Utilities submit DIDF Procurement Status Report to Energy Division, IPE, and IEs (every 6 months)</li> </ul>	November 15, 2022
Post-DPAG 2022 and 2023	

Activity	Date*
Utilities provide draft second-round RFO or SOC launch materials to Energy Division for approval in consultation with IPE and IE (if second round needed)	December 10, 2022
<ul> <li>Utilities launch second round of RFOs or SOCs for DERs (if needed pursuant to the DIDF Advice Letter outcomes)</li> <li>IOUs launch Partnership Pilot subscription periods</li> </ul>	January 15, 2023 (or within 30 days of DIDF Advice Letter approval if approval is after December 15, 2022)
Utility Presentation to Procurement Review Group of Project Shortlist for first-round RFO and SOC If second round (2022) RFO occurs, Procurement Review Group presentation occurs within 5 months of approval to launch the second RFO	January 2023
Information-Only submittal notification of executed contracts for first round (2022) RFO and SOC solicitations Note: If second round (2023) RFO or SOC occurs, Information-Only submittals are due within 6 months of approval to launch RFO or SOC	February 15, 2023
Partnership Pilot websites updated advertising subscription period launch, and notices availability of procurement tranches	February 15, 2023 (or within 30 days of subscription period launch)

# DPAG Schedule for 2022/2023 DIDF Cycle

Activity	Date*
<ul> <li>Utility Annual Partnership Pilot Evaluation Reports</li> <li>IE DIDF RFO/SOC Reports</li> <li>IPE Post-DPAG Report (covering all three IOUs)</li> <li>Note: If second round (2023) RFO or SOC occurs, IE</li> <li>DIDF RFO/SOC Report is due within 60 days of RFO contract execution or RFO completion without contracts</li> </ul>	March 15, 2023
IE Annual Partnership Pilot Evaluation Reports	March 25, 2023
Annual DIDF and Pilot reform comments (also on SOC Midstream Evaluation)	April 1, 2023
Annual DIDF and Pilot reform reply comments (also on SOC Midstream Evaluation)	April 15, 2023
DIDF and Pilots Reform Ruling (also on SOC Midstream Evaluation)	May 2023
<u>Notes</u> : *Where dates fall on a weekend or holiday, the activity is intended to occur/be due on the following business day. With advance notice to the service list, activities and dates may be altered by Energy Division based on comments received during DPAG activities or as needed. This schedule is intended to cover most DPAG dates and activities, especially those expected to recur each DIDF cycle.	

(END OF ATTACHMENT A)