

ALJ/ML2/KHY/fzs 8/30/2022



FILED

08/30/22

2:14 PM

R2106017

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

Rulemaking 21-06-017

**ADMINISTRATIVE LAW JUDGES' RULING APPROVING PACIFIC GAS
AND ELECTRIC COMPANY'S MOTION FOR AN EXTENSION TO FILE
KNOWN LOAD PROJECT TRACKING DATA AND PARTLY APPROVING
SOUTHERN CALIFORNIA EDISON COMPANY'S MOTION FOR
EXTENSION OF TIME TO FILE 2022 GRID NEEDS
ASSESSMENT/DISTRIBUTION DEFERRAL
OPPORTUNITIES REPORT**

This Ruling approves Pacific Gas and Electric Company's (PG&E's) motion for an extension to file a report on the Known Load Project Tracking on October 15, 2022.

This Ruling partly approves Southern California Edison Company's (SCE's) motion for an extension to file its 2022 Grid Needs Assessment/ Distribution Deferral Opportunity Report (GNA/DDOR). SCE shall file its partial report on the GNA/DDOR information by September 2, 2022, and a complete report by January 13, 2023. SCE shall submit its second Advice Letter seeking approval not to launch a Request for Offer, Standard Offer Contract, or Partnership Pilots for any remaining planned investments or candidate deferral opportunities by January 13, 2023.

**1. 2022 Grid Needs Assessment/ Distribution Deferral
Opportunity Reporting Requirements**

On June 16, 2022, an Administrative Law Judge (ALJ) ruling adopted reforms for the Distribution Investment Deferral Framework Process (DIDF), the

Partnership Pilot, and the Standard-Offer-Contract Pilot (Ruling). With the reforms, the Ruling set reporting requirements and due dates for the 2022 GNA/DDOR filings and a 2022-2023 DIDF and Distribution Planning Advisory Group (DPAG) schedule.¹

The Ruling requires each utility to 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. Additionally, the Ruling required each utility to 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.

The Ruling set August 15, 2022, as the due date for GNA/DDOR filings.

2. PG&E's Motion for an Extension

Pursuant to Rule 11.6 of the Commission's Rules of Practice and Procedure, PG&E filed a motion on July 7, 2022, seeking an extension to file the requirements of Section 2.6 of the Ruling on October 15, 2022, instead of August 15, 2022 (PG&E Motion).

PG&E states that Known Load Project Tracking and Reporting data is not readily available to file a report by August 15, 2022. PG&E contends that the Known Load Project Tracking and Reporting are irrelevant to the imminent Request for Offer (RFO), pilot launch dates, and associated DPAG meetings. PG&E argues that an extension will enable it to focus on completing the tasks necessary to launch the RFO and pilot programs on September 15, 2022 and

¹ ALJ Ruling Adopting Reforms for the Distribution Investment Deferral Framework Process (DIDF), the Partnership Pilot and the Standard-Offer-Contract Pilot, Attachment A.

prepare for the DPAG meetings. PG&E states that it has confirmation from the Independent Professional Engineer (IPE) that publishing the Known Load Project Tracking and Reporting on October 15, 2022, is acceptable and would still allow them to evaluate the data in the IPE Report. The PG&E Motion further states that stakeholders will still be provided the complete GNA and DDOR by August 15, 2022, with the supplemental Known Load Project Tracking and Reporting by October 15, 2022.

No comments were filed in response to the PG&E Motion.

Good cause is shown, and the PG&E Motion for the proposed extension of the due date to file Known Load Project Tracking and Reporting data from August 15, 2022, to on or before October 15, 2022, is granted. All other dates on the DPAG schedule remain the same for PG&E filings.

3. SCE's Motion for Extension

On July 29, 2022, pursuant to Rule 11.6 of the Commission Rules of Practice and Procedure, SCE filed a motion seeking an extension of the August 15, 2022, deadline to file GNA/ DDOR Reports. SCE is seeking to file a partial DDOR update on September 2, 2022, and an extension to February 3, 2023, for a complete GNA/DDOR update.

SCE states that recent software updates resulted in an incorrect correlation of weather station data to SCE distribution circuits and substations. It states that while it has corrected the software error, the affected GNA and DDOR data and the entire distribution planning process must be rerun. SCE states that the original August 15, 2022, deadline can no longer be met because the distribution planning process must be re-analyzed by engineers. SCE is requesting to stagger the information for its 2022 GNA/DDOR filing into two steps. It requests to provide a partial DDOR filing with the first filing on September 2, 2022, that

would include (1) updated needs and projects for candidate deferrals only based on the corrected data, to inform distributed energy resource solution and solicitation processes, and (2) known load growth projects. SCE proposes to submit a second filing on February 3, 2023, that would include (1) complete GNA/DDOR information with need and project information for all candidate deferral and planned investment projects based on the updated forecast and (2) a complete set of planning assumptions which displays demand and DER growth information for all distribution circuits and substations. SCE contends that if no new candidate deferral opportunities are identified after completing the complete refresh of the system planning inputs into the GNA/DDOR, then SCE can likely file a full GNA/DDOR update by January 13, 2023.

In its proposed modification to the schedule, SCE indicates that it will update DRP Data Portals with GNA/DDOR data by September 16, 2022, instead of August 30, 2022. SCE further seeks approval for a reduced comment period between the DDOR update and the DPAG presentation. SCE contends that the remaining DPAG schedule will remain unchanged and will file its Tier 2 Advice Letters on November 15, 2022, per the schedule established by the Ruling.

SCE states that on July 26, 2022, it emailed the service list for this proceeding, requesting feedback from the parties by noon (Pacific Time) on July 28, 2022. SCE further states that it incorporated feedback from two parties and did not receive any responses indicating opposition to its request.

We find it reasonable to allow SCE to use corrected information and stagger its 2022 GNA/DDOR filing into two steps. However, the annual DPAG schedule is already set with multiple filings. Given the time needed to review the complex GNA/DDOR data across the three investor-owned utilities (IOUs), we

do not find it reasonable to extend the second step of SCE's filing dates through February 3, 2023.

Per the DPAG schedule, each IOU is required to file two Advice Letters on November 15, 2022.² The second Advice Letter aims to determine if projects other than what the IOU proposed to defer in the first Advice Letter should be deferred. For the Commission to review the second Advice Letter, we will need a complete set of GNA/DDOR data to support SCE's proposal not to launch RFOs, Standard Offer Contracts, or Partnership Pilots for planned investments or candidate deferral opportunities identified in the GNA/DDOR filings by DPAG stakeholders or by Energy Division.

SCE states that a January 13, 2023 deadline for the staggered filing of its GNA/DDOR report can be met if no additional candidate deferral opportunities are identified with the full update. We find that reviewing the second Advice Letter without a complete GNA/DDPR report is not an efficient use of our resource time. Therefore, it is reasonable for SCE to submit its second Advice Letter and file the complete GNA/DDOR filing at the same time by January 13, 2023. A revised DPAG schedule for SCE for 2022/2023 DIFD Cycle is adopted in Attachment A.

IT IS RULED that:

1. Pacific Gas and Electric Company shall file its Known Load Project Tracking and Reporting data by October 15, 2022.

²“First” Advice Letter for 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 and “Second” Advice Letter for 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, or by Energy Division (*i.e.*, any not included in the “First” Advice Letter)

2. Southern California Edison Company shall file its 2022 Grid Needs Assessment/ Distribution Deferral Opportunity Report in two steps. The first partial report shall be filed by September 2, 2022, and a complete report shall be filed by January 13, 2023.

3. Southern California Edison Company shall submit its second Advice Letter seeking approval not to launch a Request for Offer, Standard Offer Contract, or Partnership Pilots for any remaining planned investments or candidate deferral opportunities by January 13, 2023.

4. A revised Distribution Planning Advisory Group Schedule for the 2022/2023 Distribution Investment Deferral Framework Cycle for Southern California Edison Company is adopted in Attachment A of this ruling.

Dated August 30, 2022, at San Francisco, California.

/s/ MANISHA LAKHANPAL
Manisha Lakhanpal
Administrative Law Judge

/s/ KELLY A. HYMES
Kelly A. Hymes
Administrative Law Judge

Attachment A