

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

COMMISSIONER DARCIE L. HOUCK, in attendance
ADMINISTRATIVE LAW JUDGE ELAINE LAU, presiding



FILED
04/06/23
09:33 AM
R2211013

Order Instituting Rulemaking to Consider) PREHEARING
Distributed Energy Resource Program) CONFERENCE
Cost-Effectiveness Issues, Data Access)
and Use, and Equipment Performance)
Standards.)
)
) Rulemaking
) 22-11-013
)
)

REPORTERS' TRANSCRIPT
Virtual Proceeding
March 29, 2023
Pages 1 - 93
Volume 1

Reported by: Jason A. Stacey, CSR No. 14092
Tamara Dawson, CSR No. 11497

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

PARTY STATUS GRANTED	PAGE
Coalition of California Utility Employees	8
OhmConnect	10
Advanced Energy United	11
Olivine	12

1 VIRTUAL PROCEEDING

2 MARCH 29, 2023 - 1:34 P.M.

3 * * * * *

4 ADMINISTRATIVE LAW JUDGE LAU: On the record.
5 The Commission will come to order.

6 This is the prehearing conference for Order
7 Instituting Rulemaking R.22-11-013. This is the Order
8 Instituting Rulemaking or OIR to Consider Distributed
9 Energy Resources, DER, Program Cost-Effectiveness
10 Issues, Data Access and Use, and Equipment for
11 Performance Standards.

12 Good afternoon. I am Administrative Law Judge,
13 ALJ, Elaine Lau. I am the assigned ALJ in this
14 proceeding. Commissioner Darcie Houck is the assigned
15 commissioner. I believe Commissioner Houck has some
16 opening remarks for us.

17 COMMISSIONER HOUCK: Thank you, Judge Lau.

18 Good afternoon, everyone. I want to thank
19 Judge Lau for organizing and facilitating today's
20 hearing. Thank you to our court reporters and our IT
21 staff who provide support for the virtual hearings that
22 we're in today, and just recognize all of the work that
23 Energy Division staff have done to get the OIR to where
24 it is right now, as well as my advisor, Adam Buchholz,
25 and my former advisor, Kathleen Yip. Thank you to the

1 parties in the proceeding for joining us today for this
2 prehearing conference.

3 As the judge said, it's proceeding R.22-11-013,
4 and we'll be considering distributed energy resource
5 program cost-effectiveness issues, data access and use,
6 and equipment performance standards.

7 As the judge indicated, my name is Darcie Houck
8 and I'm the assigned commissioner for the proceeding.

9 We are proposing to conduct the initial phase
10 of the proceeding in two tracks. The first track will
11 address how to improve the accuracy and consistency of
12 Cost-Effectiveness assessments for DER programs. We
13 will consider the Societal Cost Test, and how best to
14 address and incorporate research results concerning air
15 quality impacts of decarbonization and DER programs in
16 California, and we will continue to update and improve
17 the Avoided Cost Calculator, a key component of which is
18 working to improve our estimates of DER impacts on
19 transmission and distribution buildout.

20 The second track will focus on improving data
21 accessibility to facilitate DER adoption, better
22 utilization, and grid integration. Our goal is to help
23 customers make informed decisions about DER adoption and
24 utilization while improving how these resources
25 integrate with the grid. To do this, we'll need to

1 think about customer privacy, data sharing barriers,
2 standardizing databases and data collection tools, which
3 could include how best to enhance data management best
4 practices. We will also propose the formation of a data
5 working group to facilitate a robust examination of how
6 to best improve data accessibility.

7 I'm interested to hear from the parties, your
8 comments, on what you see as the most important aspects
9 or factors that we should consider in creating the data
10 working group, how to ensure we have full representation
11 from a broad range of interests, including utilities,
12 governmental entities, state, local, and tribal industry
13 groups, ratepayer advocates, environmental groups,
14 environmental justice communities and tribal
15 communities, among other interests.

16 It will be important to ensure that we consider
17 equity as we address the issues for both tracks, and I
18 encourage parties to consider and provide your thoughts
19 on how we can adequately address equity concerns in DER
20 programs, particularly for those individuals living in
21 environmental and social justice communities and tribal
22 communities.

23 And so again, I want to thank Judge Lau for all
24 of her work on this proceeding, and look forward to
25 hearing from everyone today. And we'll turn the

1 proceeding back over to Judge Lau.

2 ALJ LAU: Thank you, Commissioner Houck.

3 So I just want to address that the main purpose
4 of today's prehearing conference is to discuss the
5 scope, schedule, need for hearings, and the category of
6 this proceeding. We will not make any determinations
7 regarding these issues. Commissioner Houck will make
8 these final determinations in the scoping memo issued
9 later.

10 So before we begin, I'd like to go over some
11 ground rules. There will be times when we ask for party
12 comments, and we will follow the established speaking
13 order. The established speaking order was projected on
14 the screen earlier and it was sent to the service list.
15 But there will be times when we call on parties, and
16 when we call on parties, we'll have parties raise their
17 virtual hand, and our proceeding analyst, Etchissa
18 Genesis, will be calling on parties. And if we call on
19 you, then please remember to lower your hand.

20 Regardless of whether we use the speaking order
21 or you use the virtual hand calling parties' method,
22 I'd like for parties to please introduce yourself and
23 the party you are representing before you speak, and
24 that helps our court reporter to identify who is
25 speaking, which is especially important given that we're

1 in a virtual setting and it's hard for court reporters
2 to identify who's speaking, who is not. And the third
3 -- and I see everyone's doing that, is to please mute if
4 you're not speaking.

5 So now the first item on the agenda is taking
6 appearances for parties. The first thing I'd like to do
7 is take motions for party status. And so when you make
8 a motion for party status, I'd like parties to remember
9 to first introduce yourself and the party you will be
10 representing and explain the interest your party has in
11 this proceeding; and lastly, describe how your party
12 intends on participating.

13 So for this portion I will actually just be
14 calling on the parties who have -- who I know is making
15 a motion for party -- intending to make a motion for
16 party status today.

17 So the first I'd like to hear from is Coalition
18 of California Utility Employees.

19 MS. KOSS: Good afternoon. This is Rachael
20 Koss requesting party status for the Coalition of
21 California Utility Employees or CUE.

22 CUE is a coalition of unions, whose
23 approximately 43,000 members work at nearly all of the
24 California electric utilities, both publicly and
25 privately owned. CUE has participated in proceedings

1 before the Public Utilities Commission since 1994,
2 including the preceding IDER proceeding, Rulemaking
3 14-10-003.

4 CUE provided input on the Cost-Effectiveness of
5 DERs and updates to the Avoided Cost Calculator in that
6 proceeding and seeks to do so again here. CUE intends
7 to actively participate in this proceeding by
8 participating in workshops and providing comments,
9 testimony, and briefs. Thank you.

10 ALJ LAU: Thank you, Ms. Koss.

11 Are there any objections to the oral motion for
12 party status from CUE?

13 (No response.)

14 ALJ LAU: All right. Hearing none, party
15 status is granted to Coalition of California Utility
16 Employees.

17 (Coalition of California Utility Employees
18 was granted Party Status.)

19 ALJ LAU: Next, I would like for OhmConnect --
20 counsel for OhmConnect, if you want to make a motion for
21 party status.

22 MS. BELENKY: Hi. Thank you, your Honor. My
23 name is Maria Belenky, and I am the market development
24 manager at OhmConnect, and I am seeking party status on
25 behalf of OhmConnect.

1 We are a third-party demand response aggregator
2 founded in 2013 and headquartered in Oakland,
3 California. Specifically, OhmConnect's free software
4 notifies households of impending energy saving events
5 and pays them for their energy reductions.

6 OhmConnect provides DR services to residential,
7 retail electric customers in California pursuant to
8 Electric Rule 24 and 32, and is registered to
9 participate as a DRP in the price of wholesale
10 electricity market.

11 As a DR provider and the largest residential
12 third-party DR aggregator in California, OhmConnect has
13 a unique and direct interest in this proceeding.
14 Several issue areas outlined in the draft scope,
15 especially for Track 2, for example, to modify or
16 improve data access and barriers to data sharing and
17 data access directly impacts our programs and
18 (indecipherable).

19 OhmConnect plans to actively participate in
20 this proceeding, and our participation will not
21 prejudice any other parties. Thank you.

22 ALJ LAU: Thank you.

23 Are there any objections to OhmConnect's
24 request?

25 (No response.)

1 ALJ LAU: All right. Hearing none, party
2 status is granted to OhmConnect.

3 (OhmConnect was granted Party Status.)

4 ALJ LAU: Next, we have Advanced Energy.

5 MR. TURNER: Hello, Commissioner Houck, Judge
6 Lau. My name is Brian Turner. I'm the regulatory
7 director for Advanced Energy United. We are formerly
8 Advanced Energy Economy, AEE, up until January of this
9 year when we changed our name.

10 Advanced Energy United represents over 100
11 advanced energy companies, including wide diversity in
12 the DER space from demand side management, demand
13 response, technologies and providers, distributed
14 generation, smart grid technologies, transportation
15 electrification, vehicles, and infrastructure, and
16 charging equipment, all of which may be impacted
17 directly by the issues at play in this proceeding.

18 I intend to represent United members in the
19 proceeding, participate in workshops, working groups,
20 provide comments and testimony, et cetera, and request
21 party status.]

22 ALJ LAU: All right. Thank you, Mr. Turner.

23 Any objections to Advanced Energy United's
24 request for party status?

25 (No response.)

1 ALJ LAU: All right. Hearing none, party
2 status granted to Advanced Energy United.

3 (Advanced Energy United was granted Party
4 Status.)

5 ALJ LAU: And we have Olivine next.

6 MR. DELEANU: Your Honor, this is Naor Deleanu.
7 I'm a policy specialist at Olivine. Olivine is an
8 industry DER and DER management and grid services
9 company with a long and proven track record at
10 integrating and managing DERs and DR for participation
11 in wholesale markets and retail customer programs.

12 We're a scheduling coordinator and demand
13 response provider as well as program administrator. And
14 we focus on integrating DRs -- DERs and DR to create
15 reliable and sustainable grid with equitable access for
16 all utility customers.

17 And we are an active participant in multiple --
18 we have been an active participant in previous
19 proceedings. We're currently active in the demand
20 flexibility proceeding now. And we are interested in
21 providing comments that pertains to data access and --
22 yes.

23 ALJ LAU: And Olivine is intending to actively
24 participate in this proceeding?

25 MR. DELEANU: Yes. We are intending to

1 actively submit comments and participate in this
2 proceeding.

3 ALJ LAU: Thank you.

4 Any objection to Olivine's request for party
5 status?

6 (No response.)

7 ALJ LAU: Hearing none, party status is granted
8 to Olivine.

9 (Olivine was granted Party Status.)

10 ALJ LAU: At this moment, I believe I took all
11 parties -- all parties who were intending to make
12 motions for party status. But I will give a minute or
13 so if I missed any parties an opportunity to now speak
14 up if you want to make an oral motion for party status.

15 (No response.)

16 ALJ LAU: All right. I think I got everyone.

17 So parties who requested party status today
18 must complete and submit an electronic copy of the
19 Commission's appearance form and email it to
20 process.office@cpuc.ca.gov.

21 I sent the link to the form in my email to the
22 service list that was titled "Guidance for Prehearing
23 Conference." Alternatively you may email Process Office
24 your full contact information and confirm with Process
25 Office if that information is sufficient.

1 Now we move on to taking appearances. I would
2 like to formally take appearances from all the parties
3 including the parties that were just granted party
4 status.

5 So after I call your party's name, party
6 representative please introduce yourself by stating your
7 full name and then the party and parties that you
8 represent. Now is also an opportunity for you, if you
9 so choose, that when you introduce yourself, you may
10 specify your pronouns that you'd like to be referred to.
11 That is not a requirement but an opportunity to make our
12 preferences known.

13 So we will again call the established speaking
14 order. But I will call on your parties first.

15 So Southern California Edison.

16 MR. SUNG: Good afternoon. Paul Sung counsel
17 for Southern California Edison Company.

18 ALJ LAU: Thank you.

19 Pacific Gas and Electric.

20 MR. SEZGEN: Good afternoon. Eric Sezgen
21 counsel for Pacific Gas and Electric Company. Pronouns
22 are he, him, his.

23 ALJ LAU: Thank you.

24 San Diego Gas & Electric Company.

25 MR. NEWLANDER: Good afternoon. Jonathan

1 Newlander for San Diego Gas & Electric Company.

2 ALJ LAU: Thank you.

3 Southern California Gas Company.

4 MR. HSU: Good afternoon. Edward Hsu for
5 Southern California Gas Company.

6 ALJ LAU: Public Advocates Office.

7 MR. DUTTA: Good afternoon. Gautam Dutta
8 appearing on behalf of Cal Advocates.

9 ALJ LAU: California Independent System
10 Operator Corporation.

11 MR. WEAVER: Good afternoon. This is Bill
12 Weaver for the CAISO.

13 ALJ LAU: And Small Business Utility Advocates.

14 MS. WEBERSKI: Good afternoon. Jennifer
15 Weberski on behalf Small Business Utility Advocates or
16 "SBUA."

17 ALJ LAU: Natural Resources Defense Council.

18 MR. CHHABRA: Good afternoon. This is Mohit
19 Chhabra with the NRDC.

20 ALJ LAU: TURN, The Utility Reform Network.

21 MR. CHENG: Hi. This is David Cheng
22 representing TURN. Thank you.

23 ALJ LAU: Utility Consumers Action Network.

24 MS. KRIKORIAN: Yes. This is Jane Krikorian
25 representing Utility Consumers Action Network or "UCAN."

1 ALJ LAU: Center for Biological Diversity.

2 MR. LIN: Good afternoon, your Honor. Roger
3 Lin. My pronouns are he, him. I'm with the Center for
4 Biological Diversity.

5 ALJ LAU: Coalition of California Utility
6 Employees.

7 MS. KOSS: Rachel Koss on behalf of the
8 Coalition of California Utility Employees.

9 ALJ LAU: Joint CCAs. Mr. Wiedman, you may --
10 you know, I just said Joint CCAs. You may tell the full
11 fleet.

12 MR. WIEDMAN: Sure. Thank you, your Honor.
13 Good afternoon, everyone. My name is Joseph Wiedman.
14 I'm here today on behalf of the Joint CCAs, which is
15 comprised of Sonoma Clean Power, Peninsula Clean Energy,
16 Marin Clean Energy, East Bay Clean Energy, and San Diego
17 Community Power. Thank you.

18 ALJ LAU: Thank you, Mr. Wiedman.

19 And Center for Energy Efficiency and Renewable
20 Technology as well as California Efficiency and Demand
21 Management Council.

22 MS. MYERS: Yes. Good afternoon, your Honor.
23 Megan Myers on behalf of the Center for Energy
24 Efficiency and Renewable Technologies also known as
25 "CERT." And the California Efficiency and Demand

1 Management Council also known as "The Council."

2 ALJ LAU: Okay. Thank you.

3 And Solar Energy Industries Association.

4 MR. BEACH: Thank you, your Honor. This is Tom
5 Beach consultant to SEIA. He, him.

6 ALJ LAU: Thank you.

7 And Protect Our Communities Foundation.

8 MS. DICKENSON: Yes, your Honor. Malinda
9 Dickenson on behalf of the Protect Our Communities
10 Foundation.

11 ALJ LAU: Western Riverside Council of
12 Governments.

13 MR. DRUYON: This is Benjamin Druyon for
14 Western Riverside Council of Governments on behalf of
15 the Inland Regional Energy Network.

16 ALJ LAU: And then we have California Large
17 Energy Consumers Association.

18 MR. HAFEZ: Good afternoon, your Honor. Samir
19 Hafez counsel for California Large Energy Consumers
20 Association or "CLECA."

21 ALJ LAU: Thank you.

22 GRID Alternatives.

23 MS. WYATT: Good afternoon. This is Andie
24 Wyatt appearing today on behalf of GRID Alternatives.

25 ALJ LAU: Thank you.

1 BayREN and C-REN -- 3C-REN. Sorry.

2 MS. KELLY: Thank you, your Honor. This is
3 Beth Kelly. My pronouns are she, her. I am
4 representing the Association of Bay Area Governments on
5 behalf of the Bay Area Regional Energy Network or
6 "BayREN" and County of Ventura on behalf of the
7 Tri-County Regional Energy Network or 3C-REN.

8 Thank you.

9 ALJ LAU: Thank you.

10 California Energy Storage Alliance.

11 MR. TAPIA: Good afternoon, your Honor. This
12 is Albert Tapia, policy analyst on behalf of California
13 Energy Storage Alliance also known as "CESA."

14 ALJ LAU: And ChargePoint.

15 (No response.)

16 ALJ LAU: I believe we're experiencing some
17 technical difficulties.

18 Go off the --

19 MS. HAUG: I'm sorry. I'm sorry, your Honor.

20 Lynn Haug appearing for ChargePoint.

21 ALJ LAU: Center for Accessible Technology.

22 MS. KASNITZ: Good afternoon. This is Melissa
23 Kasnitz with the Center for Accessible Technology
24 abbreviated CforAT. Thank you.

25 ALJ LAU: Thank you.

1 350 Bay Area.

2 MS. BROOME: Good afternoon. This is Claire
3 Broome representing 350 Bay Area. She, her.

4 ALJ LAU: Thank you.

5 OhmConnect.

6 MS. BELENKY: Hello. This is Maria Belenky.
7 I'm representing OhmConnect.

8 ALJ LAU: Thank you.

9 Advanced Energy United.

10 MR. TURNER: Good afternoon. Brian Turner for
11 Advanced Energy United. The association prefers to go
12 by "United."

13 ALJ LAU: Olivine.

14 MR. DELEANU: Naor Deleanu. I'm the specialist
15 with Olivine, Inc.

16 ALJ LAU: Thank you, Mr. Deleanu.

17 So I think that's all we have in terms of
18 appearances. So we move on to the next item of the
19 agenda.

20 As Commissioner Houck has said, the proceeding
21 has two phases. The first Phase looks at Track 1 and
22 Track 2 issues. In Track 1, we look at how to make
23 Cost-Effectiveness assessments more accurate and
24 consistent across the DER Program.

25 In Track 2, we look at how to improve data

1 access to facilitate DER adoption, improve DER
2 utilization, and improve DER integration with the grid.

3 The second phase looks at issues related to
4 performance of equipment and equipment standards. But
5 today we will primarily focus on Phase 1, Track 1 and 2.

6 As indicated in the agenda, we will first
7 discuss the items for Track 1. My intention is to
8 hopefully take a 5 to 10 minute break afterwards and
9 then move on to Track 2.

10 So let's move on to the first item under Track
11 1, which is categorization and need for hearings. The
12 Commission preliminarily categorized this as a
13 ratesetting proceeding. According to comments that
14 parties submitted to the OIR, parties generally agree
15 with this categorization. Particularly because the
16 issues are related to the Avoided Cost Calculator.

17 Now is an opportunity if parties want to make
18 any further comments on the categorization for Track 1.
19 If you wish to speak, please raise your virtual hand,
20 and our proceeding analyst, Etchissa Genesis, will call
21 on the parties.

22 (No response.)

23 ALJ LAU: Etchissa, did you get any hands
24 raised? I see that there are no hands raised.

25 MS. GENESIS: Your Honor, we did not get any

1 hands raised.

2 Thank you.

3 ALJ LAU: Great. This might be a smooth
4 sailing prehearing conference.

5 Next the need for hearings. Let's discuss the
6 need for hearings. It seems that there is consensus
7 among the parties that hearings may be needed because
8 the issues are related to the Avoided Cost Calculator.

9 Do parties have any further comment on the need
10 for hearing for Track 1?

11 (No response.)

12 ALJ LAU: Please raise your virtual hand if you
13 do have any comments.

14 (No response.)

15 ALJ LAU: Etchissa, can you confirm that
16 there's no virtual hands raised?

17 MS. GENESIS: Your Honor, I confirm there's no
18 hands raised.

19 ALJ LAU: Thank you.

20 Thank you, parties.

21 So the categorization as well as the need for
22 hearings for Track 1 will be confirmed in the scoping
23 memo.

24 Commissioner Houck, do you have any comments on
25 the items so far?

1 COMMISSIONER HOUCK: No, I don't. I think I
2 accidentally hit the hand raise.

3 ALJ LAU: Next item on the agenda is the scope
4 of issues. So last week I circulated an agenda with the
5 proposed set of scoping issues for Track 1.

6 Did parties have any comments on the proposed
7 set of Track 1 issues? Please raise your virtual hand
8 and Etchissa Genesis, our proceeding analyst, will call
9 on the parties.

10 MS. GENESIS: Yes, your Honor. I see a couple
11 of hands. And I'm going to start calling the names.

12 ALJ LAU: Okay. Thank you.

13 MS. GENESIS: So the first one is Beth Kelly.

14 MS. KELLY: Thank you, your Honor. One brief
15 comment regarding DER Cost Effectiveness is in the
16 energy efficiency proceeding. There has been a
17 portfolio segmentation that has been a really useful way
18 of considering how Cost Effectiveness is implemented
19 breaking the portfolio into three primary segments.

20 One is resource acquisition, which basically
21 means, you know, cost effective programs and equity
22 segments that specifically target the support low-income
23 communities.

24 And then the market support segment, which is
25 workforce and training to help for the deployment of

1 energy efficiency resources. BayREN and 3C-REN would
2 like to see more alignment and convergence between
3 energy efficiency offerings and DR offerings and also
4 have the Cost Effectiveness considered consistently
5 across both of those.

6 Sorry, one moment.]

7 And so we believe that it would be helpful to
8 have this in scope, to have consistency across
9 proceedings be scoped. And eventually, it is BayREN and
10 3C-REN's hope that energy efficiency program
11 administrators, of which BayREN and 3C-REN are two of
12 those, the utilities are other administrators, we would
13 love to see RENs, in particular, be able to offer a
14 unified offering of energy efficiency and DER offerings
15 together.

16 So this, I understand, cannot be fully
17 accomplished within this proceeding, but that hopefully
18 provides the context for your Honor regarding our
19 interests here. Thank you.

20 ALJ LAU: Can you provide the proceeding for
21 the EE -- for the energy efficiency items?

22 MS. KELLY: Yes, your Honor. It is 13 -- hold
23 on one moment. I'm sorry.

24 ALJ LAU: Let's go off the record.

25 (Off the record.)

1 ALJ LAU: Go back on the record.

2 MS. KELLY: Your Honor, the energy efficiency
3 rulemaking is R.13-11-005, and currently there are
4 energy efficiency portfolio applications pending before
5 this Commission in A.22-02-005 and others. It's a
6 consolidated proceeding.

7 ALJ LAU: Okay.

8 Commissioner Houck, do you have any questions
9 for Ms. Kelly?

10 COMMISSIONER HOUCK: I don't think I have any
11 right now.

12 ALJ LAU: All right, thank you.

13 Etchissa, can you call on the next party?

14 MS. GENESIS: Next, I have Malinda Dickenson.

15 MS. DICKENSON: Thank you. Malinda Dickenson
16 on behalf of The Protect Our Communities Foundation.

17 We're on the scope of issues; correct?

18 ALJ LAU: Yes, correct.

19 MS. DICKENSON: For, I think it would be -- I
20 think this would fall under Issue 1 or Issue 2, but
21 Track 1 Question 4 of the OIR asked whether the
22 Commission should authorize the allocation of additional
23 ratepayer funds for consultant support to continue the
24 ACC work. And I think that would be appropriate under
25 Issue 1 or Issue 2; but if not, PCF would request

1 clarification and that the issue be included.

2 PCF's mission is that ratepayer funds spent on
3 consultants should be limited to consultants selected in
4 a transparent process with competitive bidding, and that
5 accounts for conflicts of interest and perceived
6 conflicts of interest so that we can ensure objectivity.
7 And we have concerns about some of the consultants that
8 have been used in the past, because they are also
9 employed by the utilities. And some of the implications
10 that should be considered when revising the ACC is
11 likely to have negative implications for the status quo
12 investor-owned utility business model.

13 And so to best represent the interest of
14 ratepayers, consultants should be objective and not have
15 perceived conflicts of interest. So we would just seek
16 clarification if that is not included in Issue 1 or 2.
17 But if it is, that's fine.

18 The other issue is with respect to the fourth
19 issue. We would request that the Commission not assume
20 the results should be applied and incorporated, but
21 could be open to additional analysis and criticism of
22 the findings in the research report. Thank you.

23 ALJ LAU: Thank you.

24 Commissioner Houck, if you don't have any
25 further questions, I'm going to call on the next person.

1 COMMISSIONER HOUCK: Go ahead and call on the
2 next person.

3 ALJ LAU: Etchissa?

4 MS. GENESIS: The next person is Roger Lin.

5 MR. LIN: Thank you, your Honor, for the time.
6 Roger Lin with Center for Biological Diversity.

7 Certainly concur with the comments from Protect
8 Our Communities Foundation just now. I also wanted to
9 go back to the comments from BayREN and the coordination
10 with other proceedings. Agree that it's important to
11 coordinate with energy efficiency proceedings, in
12 particular in regards to non-energy benefits that that
13 proceeding is considering, and this one also should,
14 given that energy efficiency is also a DER. And also,
15 coordination with other proceedings that are working on
16 other non-energy benefits factors such as the microgrid
17 incentive programs value of resiliency work.

18 And overall, just want to confirm -- I believe
19 this is encompassed in the Order Instituting Rulemaking,
20 but just to confirm that the Track 1 activities will go
21 further than the additional factors identified in the
22 Societal Cost Test evaluation.

23 ALJ LAU: Mr. Lin, do you have any proceedings
24 handy? You spoke about the microgrid incentive.

25 MR. LIN: Yes, I believe that one is Rulemaking

1 19-09-009. I'm not sure, but I believe the Value of
2 Resiliency Workshop also goes beyond just that
3 proceeding.

4 ALJ LAU: Okay, thank you.

5 MR. LIN: Thank you.

6 ALJ LAU: Etchissa, can you call on the next
7 person?

8 MS. GENESIS: The next person is Claire Broome.

9 MS. BROOME: Claire Broome representing 350 Bay
10 Area.

11 Your Honor, I would like to encourage the
12 proceeding's scope, particularly Track 1, to take a
13 holistic view of the DER. We all know that the
14 anticipated load growth for EVs and building
15 electrification is going to occur on the distribution
16 grid. Supplying and balancing that load within a
17 distribution grid using DER to the maximum extent
18 possible will be critical to controlling growth of
19 California's electricity rates.

20 And to 350 Bay Area, we recognize that as a
21 primary equity issue that if we don't control the growth
22 of rates, it's going to harm all ratepayers but
23 particularly those with a high energy burden.

24 The very specific points I wanted to make,
25 first of all to reinforce what the Center for Biological

1 Diversity urged, that the Avoided Cost Calculator, going
2 forward, needs to include all quantitatively defined
3 benefits of DERs that are currently not accounted for in
4 the previous versions of the ACC. That certainly
5 includes the unspecified transmission that is avoided
6 with the scope of DER. Over one half of all solar
7 installed in California in a recent five-year period was
8 on the distribution grid. That's the magnitude we're
9 talking about.

10 Furthermore, current data are unfortunately
11 behind. The CEC estimates that -- anticipates .2
12 gigawatts of behind-the-meter storage. However, DG
13 Stats already shows that we have 1 gigawatt of
14 behind-the-meter storage. So the CEC is anticipating
15 five-fold under what's already available. And, you
16 know, this makes it very important. We'll get to it in
17 the data use, Track 2. But even in Track 1, we really
18 need a holistic approach to the real value that DER can
19 bring to the grid.

20 And one specific point I'd like to make.
21 Currently, the OIR restricts consideration to
22 behind-the-meter customer DER. However, as I've
23 indicated with these facts and as was mentioned by the
24 energy efficiency issues and also with the microgrid,
25 some of those are behind the meter, but not all. And so

1 I would urge the proceedings to not artificially
2 constrain the value that DER can bring to the grid and
3 the opportunity to get fair compensation for that value.
4 Thank you.

5 ALJ LAU: Thank you.

6 Commissioner Houck, if you want to chime in,
7 just let me know.

8 COMMISSIONER HOUCK: Okay. Thanks, Judge.

9 ALJ LAU: Etchissa, can you call on the next
10 person?

11 MS. GENESIS: The next person is Brian Turner.

12 MR. TURNER: Hello again. I wanted to raise
13 the issue of the integration with IRP planning. That
14 was a significant feature in the OIR, and just did not
15 see it mentioned in the agenda for today. So wanted to
16 raise our support for including that either in Track 1
17 or Track 2. Looks like it probably needs to touch on
18 both. That's it. Just urge you to include how better
19 to consider and incorporate DERs as resources for
20 selection in the IRP process.

21 ALJ LAU: All right, thank you.

22 Etchissa, can you call on the next person?

23 MS. GENESIS: Mohit Chhabra.

24 MR. CHHABRA: Good afternoon, your Honor.

25 So as an add-on to the suggestion made by

1 counsel, Beth Kelly, part of the energy efficiency
2 proceeding, R.13-11-005, innovation was, along with
3 adopting a segmentation, which was done -- authored by
4 NRDC and me to better align DER objectives and policy
5 objectives by separating equity market transformation
6 and resource acquisition.

7 Part of that effort was also a proposal for a
8 metric that fully accounts for all the grid and climate
9 benefits of all DER and energy efficiency. The CPUC
10 adopted that for EE. One of the benefits of said metric
11 is that all DERs can be valued together on it; thereby,
12 it can help break silos across DERs and help offer DERs
13 together, and help program administrators offer the best
14 (indecipherable) DERs together.

15 For example, they don't have to offer a demand
16 response and an energy efficiency DER separately if
17 something like a temperature control or water heater can
18 do both. So it accounts for that and can compare
19 benefits across DERs. So that's the first suggestion.

20 The second suggestion has to do with an equity
21 consideration. I'm aware that that's also a topic for
22 discussion in your Word documents. I want to see if
23 this is the right time or will you call for it?

24 ALJ LAU: We will allow for it later.

25 MR. CHHABRA: Thank you.

1 ALJ LAU: Next person, Etchissa.

2 MS. GENESIS: Tom Beach.

3 MR. BEACH: Thank you, your Honor. Tom Beach
4 for SEIA.

5 With respect to the updates to the Avoided Cost
6 Calculator, those have assumed even greater importance
7 now that the Commission has issued its decision in
8 December on changes to net metering so that values
9 directly from the ACC will be used for ratemaking for
10 customers who adopt solar in the future.

11 And so it's really important that the ACC be as
12 accurate as possible, and the ACC product of a complex
13 set of models and it pulls in forecasts and models from
14 other agencies like the CEC IEPR process, which is just
15 getting started. It also relies heavily on the modeling
16 in the Commission's IRP process. And there is going to
17 be a new preferred system portfolio modeled this year.

18 So, you know, our concern is really that the
19 scope of the review of the ACC needs to make sure that
20 it incorporates the latest and best available
21 information from the sister agencies and from those very
22 closely related proceedings.

23 And we'll have -- I'll probably have some more
24 comments about this on the part of this prehearing
25 conference on schedule, but I think that I just wanted

1 to underline the importance of using new data from the
2 CEC IEPR proceeding. As well as at least the draft
3 modeling of the new preferred system portfolio from the
4 IRP, and hopefully we can incorporate both of those
5 things into the staff proposal that's one of the first
6 steps in the review of the ACC. Thank you.

7 ALJ LAU: Thank you, Mr. Beach.

8 Etchissa, do we still have other people?

9 MS. GENESIS: No, Your Honor.

10 ALJ LAU: All right. Then give me a moment.

11 Let's go off the record.

12 (Off the record.)

13 ALJ LAU: Let's go back on the record.

14 So the next item is the topic for discussion
15 that we talked about. So how should stakeholder
16 concerns about equity be incorporated into Track 1 scope
17 of issues?

18 This time instead of the virtual hand raise,
19 I'd actually like to hear from all the parties. So we
20 will go through the speaking order beginning with SCE,
21 Southern California Edison Company.

22 MR. SUNG: Paul Sung for SCE.

23 SCE believes that these equity issues could be
24 considered through an additional scoping issue. Because
25 equity concerns can be discovered and developed as this

1 track progresses, it's hard to give a definitive model
2 as to what that would look like, but we would recommend
3 that the scoping issue would be broad enough to capture
4 any potential issues that could arise. Thank you.

5 ALJ LAU: Thank you.

6 Next, we have PG&E.

7 MR. SEZGEN: Thank you, your Honor. Eric
8 Sezgen from PG&E.

9 So in the initial draft scoping OIR there was
10 the Track 3 for equity issues, and I believe Question 1
11 from that draft was incorporated into Track 2 in the OIR
12 for data issues. Questions 2 through 5, Question 2 is
13 particularly on point regarding DER Cost Effectiveness,
14 but 3 through 5 were about consolidation opportunities
15 and, just, programmatic overview.

16 PG&E believes that that would be a good
17 starting point if those questions could be folded into
18 Track 1. Or as SCE stated, reestablishing a separate
19 track for these issues. Thank you.

20 ALJ LAU: All right.

21 SDG&E.

22 MR. NEWLANDER: Thank you, your Honor.

23 I'll just echo the comments of Southern
24 California Edison and PG&E and also point to our
25 comments, which address data needs related to equity

1 issues. Thank you.

2 ALJ LAU: Thank you.

3 SoCalGas.

4 MR. HSU: Thank you, your Honor.

5 SoCalGas doesn't have any specific information
6 on this point. We did offer in opening and reply
7 comments some specificity especially as to the rate
8 impacts on customers and affordability that had been
9 discussed by other parties already. So we think that
10 that is an important focus, especially as we're
11 comparing DERs amongst other technology.

12 ALJ LAU: Okay, thank you.

13 MR. HSU: Thank you.

14 ALJ LAU: Cal Advocates.

15 MR. DUTTA: Thank you, your Honor. Gautam
16 Dutta appearing on behalf of Cal Advocates.

17 As we've set forth in our opening comments, we
18 have a -- we primarily have a couple of recommendations
19 on the issue of equity.

20 First, is we recommend that the Commission
21 continue regular updates to the ACC. Specifically, Cal
22 Advocates supports development of principles for future
23 ACC updates, including those related to improving
24 equity.

25 Secondly, the Commission should continue to

1 improve the DER Cost Effectiveness process. Because Cal
2 Advocates opposes disproportionately increasing the cost
3 burdens on low-income customers, the Commission must
4 investigate the development of a new ratepayer impact
5 measure test, that is a RIM test, to evaluate a given
6 program's impact on nonparticipating low-income
7 customers. The Commission should also develop
8 principles for load increasing and market transformation
9 programs. Thank you, your Honor.

10 ALJ LAU: Thank you.

11 CAISO.

12 MR. WEAVER: Thank you, your Honor.

13 The CAISO has every confidence the Commission
14 will address this issue properly. We have no specific
15 comments at this time. Thanks.

16 ALJ LAU: Thank you.

17 SBUA.

18 MS. WEBERSKI: My apologies. I was having
19 difficulty with the mute button.

20 SBUA would recommend, as mentioned by the
21 previous speakers from the IOUs, that the questions
22 themselves be folded into Track 1 and Track 2 rather
23 than have just a separate track to address the issue. I
24 think it would be more efficient for parties to be able
25 to address it within the confines of Track 1 and Track

1 2. Thank you, your Honor.

2 ALJ LAU: Thank you.

3 NRDC.

4 MR. CHHABRA: Good afternoon, your Honor.

5 Regarding equity issues for Track 1, we'd
6 recommend that the Commission, through this proceeding,
7 help develop a framework to understand the
8 distributional impacts. And by that I mean, who pays
9 and who gets the benefits of ratepayer funded DERs? The
10 issue with the traditional Cost Effectiveness tests
11 including the ratepayer impact measure test that the PAO
12 mentioned is that they only differentiate either between
13 participants and nonparticipants or all electric
14 ratepayers as a whole.

15 To better understand equitable impacts, a more
16 detailed distributional analysis needs to be conducted
17 to understand where these incentives are going, because
18 we know where they're coming from. We know everyone
19 pays for (indecipherable) rates, so those data, where
20 costs are coming from, are already available.

21 So we basically need, and it's easy enough to
22 develop a framework to require program implementers and
23 program administrators to consider the distributional
24 impacts of DER program funding whenever it's funded by
25 ratepayers.

1 Thank you. And we submitted this as part of
2 our comments, as well.

3 ALJ LAU: Thank you.

4 TURN.

5 MR. CHENG: Thank you, your Honor. Just a
6 couple quick comments.

7 First, we would strongly suggest that equity
8 not be concerned -- not be considered in a separate
9 track. We believe that that would tend to sort of lose
10 its meaning and just think of it as a nice to consider,
11 rather than be integrating solutions. So we believe
12 strongly that it should be integrated into the tracks.

13 Second of all, at the same time, we believe
14 that the equity issue should be broad enough -- should
15 be stated broad enough in the scoping memo so that
16 parties can be creative in terms of how they approach
17 this issue.

18 TURN, itself, is just learning more about
19 equity, and we not long ago established a separate
20 department just to look at the equity issue. And in the
21 Sempra GRC, we sort of pioneered an equity lens and
22 submitted a whole volume of testimony just focusing on
23 equity. So we believe there are a lot of different ways
24 to think about equity, so we don't think it should be
25 defined too narrowly so that parties cannot, sort of,

1 take their creativity in terms of how to look at it. So
2 basically we believe it should be integrated into the
3 tracks by the same time, phrased, you know, broadly
4 enough so that parties can exercise some creative
5 freedom. Thank you.

6 ALJ LAU: Thank you.

7 UCAN.

8 MS. KRIKORIAN: Yes, your Honor. Jane
9 Krikorian for UCAN.

10 And we would like to support Cal PA's comments
11 on identifying a ratepayer impact measure test that
12 really addresses affordability issues while at the same
13 time helping to identify a system benefits calculation
14 that somehow addresses where early adopters are actually
15 helping drive down system costs that benefit all
16 ratepayers, which is an equity issue. And we would like
17 to help explore that issue, so thank you.

18 ALJ LAU: Thank you.

19 Center for Biological Diversity.

20 MR. LIN: Thank you, your Honor. Apologies,
21 I'm suddenly in a very bright room over here.

22 Three quick things from me.

23 First, agree with the comments from TURN that
24 equity should be scoped broadly so that it can be
25 considered in every track and every phase of this

1 proceeding. The Cost Effectiveness tests were designed
2 prior to the Commission's efforts to really pursue
3 equity in its ESJ Action Plan and other efforts. So
4 equity -- first point, equity should be scoped broadly
5 so it can be covered in every phase and every track.

6 Second, the Societal Cost Test evaluation
7 identifies that consideration of societal costs could
8 increase affordability impacts, but there's a big caveat
9 that that finding is based on the lack of consideration
10 of subsidies out there.

11 So the proceedings should consider -- to avoid
12 making a false choice between affordability and public
13 health, the Commission should consider the full range of
14 subsidies available, including from the Inflation
15 Reduction Act and other incentives.

16 Related to that, the E3 UC Irvine Quantifying
17 the Air Quality Impacts of Decarbonization and DER
18 Programs in California report stops short of going to
19 extraction. It analyzes air quality benefits, stopping
20 at electricity generation, but does not consider the
21 full life cycle of impacts by going to extraction. We
22 all know where the majority of extraction wells are
23 located in the state, next to disadvantaged communities.
24 So there should be a full life cycle analysis when we
25 consider these social costs as well.

1 Related to that third point, last but not
2 least, the three -- SB 350 Barriers Study has
3 recommended since at least 2017, and the first iteration
4 of the Commission's ESJ Action Plan has recommended
5 since at least 2018 that the Commission consider
6 non-energy benefits in a streamlined way across
7 proceedings with standard definitions. And so it's a
8 critical factor to consider equity.

9 We have to have a robust and accurate
10 assessment of non-energy benefits or metrics, as well,
11 going back to NRDC's comments, but also how they can
12 inform Cost Effectiveness determinations.

13 ALJ LAU: Thank you.

14 CUE.

15 MS. KOSS: Rachael Koss for CUE. Thank you.

16 I'd like to echo others' comments that rate
17 impacts and affordability must be central to evaluating
18 Cost Effectiveness of DERs. CUE -- sorry, can you hear
19 me?

20 ALJ LAU: Yes.

21 MS. KOSS: Okay.

22 CUE agrees with NRDC that it is critical to
23 evaluate who pays and who gets the benefits of DERs, and
24 these issues should be integrated into Track 1. Thank
25 you.

1 ALJ LAU: Commissioner Houck, would you like to
2 make a comment or ask questions of the last few
3 speakers?

4 COMMISSIONER HOUCK: No. I apologize. The
5 very first thing that Ms. Koss said, I couldn't hear the
6 first part of it that it was cutting in and out on, but
7 I can check the transcript if the court reporter got it.
8 I just wanted to confirm that the court reporter was
9 able to get it.

10 ALJ LAU: Ms. Koss, can you just repeat your
11 first few comments.

12 MS. KOSS: Yes. I believe I said that I wanted
13 to echo others' comments that rate impacts and
14 affordability should be central to evaluating the Cost
15 Effectiveness of DERs.

16 ALJ LAU: All right. Thank you.

17 I think it's Joint CCAs.

18 MR. WIEDMAN: Thank you, your Honor. This is
19 Joseph Wiedman.

20 The Joint CCAs support and echo the comments
21 other parties have raised about having equity broadly
22 scoped in each track versus being in its own track.

23 As part of that discussion, we do think it's
24 important to develop a consistent framework to assess
25 and incorporate non-energy benefits into Cost

1 Effectiveness methodologies.

2 As some other parties have mentioned, it's been
3 talked about for quite some time, but we haven't made it
4 across the finish line, and we think that discussion of
5 non-energy benefits is important to assessing equity and
6 providing a way to measure it and discuss it amongst,
7 you know, the stakeholders. That's all for me.

8 Thank you.]

9 ALJ LAU: Thank you.

10 CERT and The Council.

11 MS. MYERS: Good afternoon. On behalf of CERT,
12 we largely support the inclusion of equity in this
13 proceeding and to both tracks.

14 And as to the California Efficiency and Demand
15 Management Council, we recommended in our opening
16 comments on this OIR the Commission should collect data
17 on disadvantaged communities to assess the success and
18 participation of customers in disadvantaged or ESJ
19 communities and inform potential course corrections and
20 marketing program design and that that should be an
21 emphasis in this proceeding.

22 Thank you.

23 ALJ LAU: Thank you.

24 SEIA.

25 MR. BEACH: This is Tom Beach for SEIA. We

1 also support a broad scope for the consideration of
2 equity in this proceeding and included equity
3 considerations in both of the tracks rather than in a
4 separate track.

5 We think that there's an equity dimension of
6 the Societal Cost Test that the Commission should
7 consider. Many of some of the important new benefits
8 that will be brought into the Cost Effectiveness by
9 adopting the Societal Cost Test such as the health
10 benefits of reducing air pollution have strong equity
11 dimensions to them that we think the Commission should
12 consider carefully.

13 We also think that there's an equity dimension
14 to issues that -- like looking at the full life cycle of
15 some of the energy sources that California uses. For
16 example the current ACC does not consider methane
17 leakage from natural gas that's produced outside the
18 state of California but then imported into the state and
19 consumed here.

20 And we think that there are, sort of,
21 generational equity issues involved in ignoring those
22 submissions and also in using a 100-year global warming
23 potential for methane leakage rather than a 20-year
24 global warming potential that corresponds to a period
25 over which the DERs are going to be assessed by the ACC

1 will have useful lives.

2 So those are some additional ways that we think
3 equity could be brought into this proceeding.

4 ALJ LAU: Thank you.

5 PCF.

6 MS. DICKENSON: Thank you, your Honor. PCF
7 agrees and reiterates the comments made by Center for
8 Biological Diversity. Equity cannot be achieved without
9 an accurate Avoided Cost Calculator and informed
10 decisionmaking. An accurate Avoided Cost Calculator
11 will likely result in changes to the status quo. And so
12 it will also be important for the Commission to avoid
13 reliance on any findings that assume the Societal Cost
14 Test or other changes that can cause electric rates to
15 increase. With a fair Avoided Cost Calculator and
16 incorporation of the Societal Cost Test, the incentives
17 for the utilities and the kind of projects that are
18 developed or deployed are likely to change, but that
19 does not mean that rates will need to increase. To the
20 contrary, more distributed generation to request battery
21 storage projects will result in reduced rates.

22 Thank you.

23 ALJ LAU: Thank you.

24 I-REN and Western Riverside Council of
25 Governments.

1 MR. DRUYON: Thank you, your Honor. Western
2 Riverside Council of Governments is the administrative
3 lead agency for the Inland Regional Energy Network, or
4 I-REN.

5 We would like to also agree that equity should
6 be scoped broadly and considered across all phases and
7 tracks. And we also agree with comments made by Beth
8 Kelly and the other RENs.

9 Regarding Phase 1 Track 1 at the preliminarily
10 scoping memo, I-REN is generally supportive of exploring
11 the Societal Cost Test at least on an informational
12 basis as a possible way to better quantify and implement
13 nonenergy benefits.

14 Of particular importance to I-REN are
15 non-energy benefits such as family health and safety and
16 comfort given the disproportionate impacts of climate
17 change on I-REN territory.

18 We are reviewing the staff report and preparing
19 to respond to the ALJ ruling next month with additional
20 thoughts and comments on this topic.

21 Regarding Phase 1, Track 2, I-REN is
22 generally --

23 ALJ LAU: We will get --

24 MR. DRUYON: Sorry. Okay. Thank you.

25 ALJ LAU: Thank you.

1 GRID Alternatives.

2 MS. WYATT: Hi. Thank you, your Honor. Equity
3 is obviously at the center of our policy outlook noted
4 in our initial comments. We support the goals of the
5 ESJ Action Plan and the integration of equity
6 throughout.

7 We echo comments of NRDC and others on the need
8 for a framework on consideration of distributional
9 impacts and the equity is benefitted by a broad and
10 holistic view that's led by what (indecipherable) and
11 includes nonenergy benefits and is also situated within
12 the broader policy context including federal subsidies
13 as well as state and national decarbonization
14 commitments, which themselves are of course crucial for
15 equity.

16 And I'll just refer everything else to our
17 initial comments. Thank you.

18 ALJ LAU: Thank you.

19 Bay REN and 3C-REN.

20 MS. KELLY: Thank you, your Honor. I don't
21 think I need to add much more to my prior comments since
22 they really did focus on portfolio segmentation and the
23 equity as one key pillar of that. But I did want to
24 provide your Honor with the specific citation to the
25 segmentation decision, which is D.21-05-031.

1 And the key part that I just want to highlight
2 there is, you know, resource acquisition for energy
3 efficiency generally is the --the objective is for it to
4 be cost effective. However, what the Commission has
5 acknowledged in that proceeding is that often deployment
6 for equity communities is not cost effective. But even
7 things that are cost effective does not mean it's not
8 critically important in critical past issues.

9 So as the Commission considers how to consider
10 Cost Effectiveness for equity communities, it is going
11 to be a critical decision to at least consider in terms
12 of DER Cost Effectiveness.

13 Thank you.

14 ALJ LAU: Thank you.

15 California Energy Storage Alliance.

16 MR. TAPIA: Thank you, your Honor. Albert
17 Tapia with the California Energy Storage Alliance, CESA.
18 And we do not have any further comments on equity at
19 this time.

20 Thank you, your Honor.

21 ALJ LAU: Thank you.

22 ChargePoint.

23 MS. HAUG: Thank you, your Honor. Lynn Haug
24 for ChargePoint. We support incorporating equity issues
25 into both phase -- Track 1 and Track 2.

1 Thank you.

2 ALJ LAU: Thank you.

3 CforAT.

4 MS. KASNITZ: Thank you, your Honor. Melissa
5 Kasnitz with CforAT. We also support the broad
6 integration of equity into the scope. At the same time,
7 I would recommend that the Commission be alert to the
8 fact that some parties who are prioritizing the equity
9 issue may not be able to be as actively engaged
10 (inaudible) with the much more technical elements of the
11 proceeding.

12 So for example when issuing questions for party
13 comment, it may be useful to have equity-focused
14 questions, and not just say, "In addition to your
15 technical comments, explain how equity is impacted," to
16 allow that parties who have equity as their primary
17 focus to really engage with all opportunities to provide
18 input in the proceeding.

19 Beyond that, I agree with other parties who are
20 addressing the importance of non-energy benefits for my
21 constituency of people with disabilities, chronic health
22 conditions and such, the public health benefits, among
23 others are vitally important to consider.

24 At the same time, there is likely to be tension
25 between the short-term financial costs of improving DERs

1 and the long-term and indirect benefits of
2 (indecipherable) energy benefits. And I think that the
3 Commission needs to be mindful of that tension. And in
4 particular echoing the input of other parties be mindful
5 of all opportunities to fund these types of developments
6 with non-ratepayer funding sources. Whether that's
7 federal money, state money, philanthropy, or whatever
8 else might be available that does not heap all of the
9 direct financial costs onto ratepayers.

10 And finally consistent with that, I'd like to
11 again echo other parties about the importance of looking
12 directly at affordability impacts and rate impacts. And
13 I would also flag that impacts directly on customer risk
14 of disconnection should also be taken into consideration
15 in the Commission's disconnections proceeding. There
16 has been -- there have been decisions that direct the
17 IOUs to look at the impact of various activities on
18 disconnections, and I think that should be part of the
19 process here.

20 And if you'll give me a moment, I'll just pull
21 that proceeding number, which is R.18-07-005 also before
22 Commissioner Houck. And that is another element of the
23 impact on ratepayers that should be taken into
24 consideration.

25 Thank you.

1 ALJ LAU: Thank you.

2 350 Bay Area.

3 MS. BROOME: Claire Broome 350 Bay Area. Your
4 Honor, we are strongly centering equity in our efforts
5 and in our filings. We believe that equity starts with
6 constraining the rapid growth of electricity rates in
7 California well before you start talking about how those
8 are distributed.

9 This is not hypothetical. I hope this
10 proceeding will really recognize the full potential of
11 DERs. In fact we know California rates are high, but
12 our bills are not that high because of energy
13 efficiency, a DER. CAISO canceled \$2.6 billion of
14 transmission in 2017 due to energy efficiency and DER.

15 So these -- if we can -- and the PUC itself has
16 shown that the projected increases are going up most
17 rapidly with transmission and infrastructure. So equity
18 starts with recognizing the full potential of DER to
19 limit the growth in cost.

20 We also strongly disagree with prioritizing the
21 RIM. In the Cost Effectiveness part of this proceeding,
22 we concur with previous CPUC decisions, which have
23 emphasized the total resource cost and we hope now the
24 Societal Cost Test with non-energy benefits as a much
25 more accurate reflection of benefits to the public, to

1 all ratepayers as well as to low and middle-income
2 ratepayers.

3 It is -- Enshrining the RIM is basically a vote
4 for the status quo that the investor-owned utilities
5 must retain the same income that they've always gotten
6 from customers. But that makes no sense. The eight
7 gigawatts of distribution grid solar, if those weren't
8 there, don't you think the rates would have -- the
9 infrastructure constructed would have had to support
10 those? The potential that has been shown for modeling
11 for California to save literally billions of dollars.

12 I really hope the Commission will keep that
13 front and center and have a result from this proceeding,
14 which moves us into the future not mires us in the past.

15 Thank you.

16 ALJ LAU: Thank you.

17 OhmConnect.

18 MS. BELENKY: Thank you. Similar to other
19 parties we agree that this issue should be broadly
20 scoped into the track rather than having the track
21 itself. Other than that, we have no further comments.

22 Thank you.

23 ALJ LAU: Thank you.

24 Advanced Energy United.

25 MR. TURNER: We support the broad inclusion of

1 equity throughout the proceeding and have no comments
2 beyond that.

3 Thank you.

4 ALJ LAU: Thank you.

5 Olivine.

6 MR. DELEANU: We have no further comments on
7 this topic at this time.

8 Thank you, your Honor.

9 ALJ LAU: Thank you.

10 Now we can move on to the next item on the
11 agenda, which is the proposed proceeding schedule. The
12 agenda includes the proposed proceeding schedule. Now
13 would be an opportunity for parties to raise any
14 comments on the proceeding schedule. If you have any
15 comments, please raise your virtual hand and our
16 proceeding analyst, Etchissa, will call on the parties.

17 I want to remind parties that even though she
18 calls on you, please introduce yourself and your party
19 before you speak.

20 Etchissa, I see several hands.

21 MS. GENESIS: Yes, your Honor, and I will start
22 now.

23 I have Samir Hafez.

24 MR. HAFEZ: This is Samir Hafez on behalf of
25 CLECA. I apologize, your Honor. It seems that I was

1 skipped over for the last item.

2 ALJ LAU: Oh, I am so sorry.

3 MR. HAFEZ: No worries. So if I can just
4 provide some -- CLECA's response to that as well.

5 ALJ LAU: Yes.

6 MR. HAFEZ: CLECA has no specific
7 recommendations on the equity topic at this time but
8 does generally support other party comments and other
9 party proposals calling for the consideration of
10 affordability and rate impacts on all customer classes
11 across both tracks of this proceeding.

12 And as for the schedule, CLECA generally
13 supports the Phase 1, Track 1 schedule. And just
14 requests that parties be afforded the time review the
15 material staff proposals adjust that and conduct
16 discovery as needed.

17 Thank you.

18 ALJ LAU: What do you mean? Do you have any
19 proposal as to what you'd like for efficient time for
20 parties to review staff proposals?

21 MR. HAFEZ: So as CLECA laid out in our
22 comments -- in our reply comments in the OIR, the
23 schedule is sufficient. However, it weeds out certain
24 of the detailed requirements that were set forth in the
25 D.22-05-002.

1 So to the extent that the schedule's revised to
2 include those provisions, CLECA requests that parties --
3 that the (indecipherable) does not result in reduced
4 time for parties' considerations of update and staff
5 proposal.

6 ALJ LAU: Thank you.

7 MR. HAFEZ: Thank you, your Honor.

8 ALJ LAU: Etchissa, can you call on the next
9 party?

10 MS. GENESIS: Tom beach.

11 MR. BEACH: Thank you, your Honor. Tom Beach
12 for SEIA. Our concern with the schedule is as I
13 emphasized in my prior comments. We think it's
14 extremely important that the staff proposal that is
15 supposed to be, kind of, the first step of the update to
16 the ACC, we think it's very important that that use at
17 least the draft modeling from the new preferred system
18 portfolio that's being developed in the IRP proceeding.

19 Our understanding of the schedule for the IRP
20 proceeding is that that draft PSP modeling is supposed
21 to be completed in the third quarter of this year. The
22 staff proposal under the schedule for this proceeding
23 would be issued in July, which is obviously the first
24 month of the third quarter.

25 So, you know, it is our strong recommendation

1 that that those be coordinated so that the staff
2 proposal can use the modeling from the draft PSP
3 especially for any changes or significant updates in the
4 ACC. In order to understand the impact of those on the
5 numbers in the ACC, we have to have at least a draft of
6 the modeling that's going to be used for the next round
7 of the ACC.

8 So we think it's really important that -- that
9 the staff proposal on updates to the ACC use at least
10 the draft modeling for the PSP. As you know, the -- one
11 of the most important inputs into the ACC is the new IRP
12 resource plan that's been modeled and resolved. So
13 that's really our, kind of, number one concern about the
14 schedule.

15 Thank you.

16 ALJ LAU: Thank you. We'll take that into
17 consideration, but we need to coordinate across
18 proceedings and staff. So Commissioner Houck will --
19 and I will talk about it with all the staff.

20 Etchissa, can you call on the next person?

21 MS. GENESIS: Eric Sezgen.

22 MR. SEZGEN: Thank you, your Honor. Eric
23 Sezgen for PG&E. One thing from schedule that we were
24 somewhat unclear on was the transmission and
25 distribution avoided cost study and whether that would

1 be incorporated into the July staff proposal or what the
2 timing is around that. So if it's possible to get any
3 more clarity, that would be much appreciated.

4 Thank you.

5 ALJ LAU: I don't believe that we can
6 incorporate the results of any study for the
7 transmission and distribution avoided cost into the
8 current cycle. But I would like to start the study in
9 the Track 1.

10 MR. SEZGEN: Okay. Thank you.

11 ALJ LAU: Etchissa, can you call on the next
12 party?

13 MS. GENESIS: Malinda Dickenson.

14 MS. DICKENSON: Thank you. Two issues on the
15 proposed schedule. First, it's PCF's position there
16 should not be a need for parties to bring a motion for
17 evidentiary hearing. Hearings have already been
18 requested. The existence of disputed facts are evident
19 from comments on the OIR, and the Commission has already
20 (indecipherable) concluded that hearings should be held.

21 In the unlikely event that the parties are able
22 to enter into stipulations on all the disputed issues,
23 the hearings can be taken off calendar. That would be
24 an easy way to do it and would avoid having the burden
25 fall on intervenors to have to file motions that are

1 already evidently necessary.

2 And the second issue is we would just seek
3 clarification about the relationship between Phase 1 and
4 the proposed decision after the April 22 comments on the
5 Societal Cost Test and air quality research.

6 One of the issues for Phase 1 is whether the
7 Commission should adopt the Societal Cost Test. And if
8 so, how the results should be considered in the DER Cost
9 Effectiveness framework. PCF's position is that all
10 issues in Phase 1 should be subject to testing in the
11 evidentiary hearing process. And that it would not be
12 appropriate for earlier issued decisions to predetermine
13 issues that have yet to be tested in that process. So
14 we would just seek clarification about what that
15 proposed decision is to decide and how can we -- and
16 perhaps align it more closely with the evidentiary
17 hearing and the ultimate decision in Phase 1.

18 ALJ LAU: So, Ms. Dickenson, I want to ask a
19 clarifying question which is: So you do desire that
20 during evidentiary hearing, which currently as drafted
21 is for January 2024, to include party comments to the
22 Societal Cost Testing air research quality -- air
23 quality research?

24 MS. DICKENSON: Yes. And I guess maybe I'm
25 reading the proposed schedule inaccurately. The

1 proposed decision after the Societal Cost Test and air
2 quality research submission of the matter. Do you mean
3 submission of what matter? The comments? Or the matter
4 meaning the matter in Phase 1? The Phase 1 --

5 ALJ LAU: So as currently drafted, we have a
6 Track 1 but a series of different things going on not
7 concurrently. And the Avoided Cost Calculator has a
8 schedule which is the first table. And the evidentiary
9 hearing is regarding the ACC calculator, which includes,
10 you know, comments from parties on the staff proposals.
11 And as you all may be well aware, our staff will not be
12 on the witness stand. So it would just be, you know,
13 parties' comments on staff proposals.

14 MS. DICKENSON: Still parties should be
15 afforded the opportunity to submit alternatives to the
16 analysis and to test the (indecipherable) otherwise.

17 ALJ LAU: Right.

18 MS. DICKENSON: And so we would -- we would --
19 we would object to any, I guess, separating out of
20 issues in Phase 1 from the evidentiary hearing process.

21 ALJ LAU: Okay. So you would like to include
22 the Societal Cost Test comments into the ACC schedule so
23 that the evidentiary hearing can include, you know,
24 party comments on Societal Cost Test and air quality
25 research?

1 MS. DICKENSON: And also the next -- now that I
2 think I understand more. Also the next subject is
3 transmission and distribution avoided cost should also
4 be included in that as well.

5 ALJ LAU: Okay. However, I don't know -- you
6 know, I don't know if the study of transmission and
7 distribution of what it costs would be timely enough for
8 an evidentiary hearing. That's my concern.

9 MS. DICKENSON: Our overall concern is
10 accuracy. So we would be -- it would be difficult to
11 get to that accuracy -- to the accuracy that we think is
12 required without making sure we consider all the issues.

13 ALJ LAU: Yeah, I think what we're thinking of
14 is to have the ACC include all -- you know, not include
15 the study of transmission distribution of what it costs.
16 At least not the results of it. Because we need the ACC
17 updated every two years. And that study may require,
18 you know, more than what is necessary to have, you know,
19 that be updated.

20 So I agree with you in a way that: Yes, we
21 should try to get it more accurate. But we also need to
22 be updating it such that we don't let one thing hold up,
23 you know having the ACC calculator be updated.

24 MS. DICKENSON: But one of the main problems
25 that has been evident to date is the miscalculation on

1 the avoided transmission cost that is available and that
2 is definitely a live issue that needs to be corrected as
3 quickly as possible.

4 ALJ LAU: Commissioner Houck seems like --

5 COMMISSIONER HOUCK: I think that, you know,
6 we're going to be going back and talking with Energy
7 Division staff. This is something that's definitely
8 going to be a subject of discussion in the proceeding
9 and we'll be looking to most likely put some questions
10 out and address that further.

11 I think we're still in the discussion phase
12 about how it's going to be addressed. We understand
13 that we have to be looking at certain costs within the
14 ACC.

15 But what I'm hearing is that you would like to
16 see both the Societal Cost Test and to whatever extent
17 we are -- to -- as to whatever information we do have
18 available to account for those distribution and
19 transmission costs for the ACC to also be included when
20 we're looking at evidentiary hearings and potentially
21 briefing.

22 MS. DICKENSON: Yes. Thank you.

23 ALJ LAU: Okay. Thank you.

24 Etchissa, do we have more hands raised?

25 MS. GENESIS: Yes. We have one more, your

1 Honor. It's Beth Kelly.

2 MS. KELLY: Thank you, your Honor. My
3 apologies for being out of order and being pulled
4 between motherhood, daughter hood, and work. So I do
5 have to leave this prehearing conference early.

6 I believe that our comments regarding the next
7 set of questions has already been covered, and we have
8 no further comments on that -- on the schedule.

9 Thank you so much for your attention during
10 this prehearing conference.

11 ALJ LAU: Do you have to leave the prehearing
12 conference? Is there anything -- any comments you want
13 to make for Track 2 before we --

14 MS. KELLY: No, your Honor. I believe my
15 comments have been adequately covered, and I do
16 sincerely apologize for not being able to attend the
17 entire prehearing conference.

18 ALJ LAU: All right. Thank you, Ms. Kelly.

19 MS. KELLY: Thank you very much.

20 ALJ LAU: All right. Let's move on to the next
21 item on the agenda. I want to take this opportunity to
22 talk about the Commission's Alternative Dispute
23 Resolution Program, ADR. We offer mediation and
24 facilitation services using ALJs trained as neutrals.

25 We encourage ADR resolution or other settlement

1 on some or all the issues. Parties may request ADR by
2 contacting me, the assigned ALJ, or the ADR coordinator
3 who is ALJ Charles Ferguson.

4 In addition to ADR, parties are welcome to
5 pursue outside settlement talks using whatever methods
6 you wish. We remind parties to consult with Rule 12 in
7 considering settlement options. We will consider
8 motions for settlement at any time but remind parties
9 that settlements before evidentiary hearing are most
10 useful.

11 So we are coming to the conclusion of Track 1
12 items. Do parties have any more questions or comments
13 regarding Track 1 before we move on?

14 Please raise your virtual hand.]

15 (No response.)

16 ALJ LAU: All right, hearing none.

17 Commissioner Houck, do you have any comments or
18 questions before we conclude Track 1?

19 COMMISSIONER HOUCK: Just that I very much
20 appreciate the parties' comments, and we are going to
21 carefully consider and look at particularly the comments
22 on the equity issues and how that can be addressed
23 across the track. So just thank you for the thoughtful
24 comments on that.

25 ALJ LAU: Okay, let's take a quick break.

1 Let's come back at 3:10, and then we'll move on to Track
2 2 and the discussion. Let's go off the record.

3 (Recess taken.)

4 ALJ LAU: Back on the record.

5 Before the break, we finished discussing Track
6 1 items. We now move to Track 2 items.

7 The objective of Track 2 is to improve data
8 access to facilitate DER adoption, improve DER
9 utilization, and improve DER integration with the grid.
10 The first item under Track 2 is the categorization and
11 whether hearings are needed.

12 So the Commission preliminarily categorized
13 this proceeding as a ratesetting proceeding, but that
14 was because parties generally agreed that this
15 categorization is appropriate for issues related to the
16 Avoided Cost Calculator.

17 However, in Track 2 we are focused on
18 developing rules and policies on improving data access
19 and use. Therefore, we want to hear from parties
20 whether they believe Track 2 is more appropriately
21 categorized as ratesetting or quasi-legislative.

22 We will again establish -- let's do the hand
23 raise. If you do -- if parties have comments, please
24 raise your virtual hand and Etchissa will call on you.

25 Etchissa, would you like to call on parties?

1 MS. GENESIS: Yes, your Honor.

2 Eric Sezgen.

3 MR. SEZGEN: Thank you, your Honor. Eric
4 Sezgen for PG&E.

5 PG&E believes that this should be potentially
6 categorized as ratesetting, due to the fact that given
7 the scope of the data access track there could be
8 subsequent applications for hosting large amounts of
9 data, processing data, and the cost and benefits of that
10 could affect rates essentially. So thank you.

11 ALJ LAU: Thank you.

12 I actually think I would -- I think I'm going
13 to go through the scope with the parties and go through
14 the speaking order. I just want to hear from other
15 parties more than just PG&E.

16 So let's go with SoCal Edison.

17 MR. SUNG: Thank you, your Honor. Paul Sung
18 for Edison.

19 SCE believes that the quasi-legislative
20 categorization could be appropriate for Track 2, but the
21 ratesetting categorization could also be appropriate if
22 ultimately customer rates are impacted or increase as a
23 result of over the course of performing the activities
24 in the track.

25 It's a bit difficult to tell at the onset of

1 this proceeding if rates ultimately would be affected,
2 so we don't have a strong position on which category it
3 would fall under, but I do see the potential for
4 customer programs and applications potentially being --
5 that are funded by ratepayer funds to be potentially
6 impacted from the activities and the results of this
7 track.

8 ALJ LAU: All right, thank you.

9 SDG&E.

10 MR. NEWLANDER: Thank you, your Honor.

11 I concur entirely with what counsel for Edison
12 just stated.

13 ALJ LAU: Okay.

14 Counsel for SoCalGas.

15 MR. HSU: Thank you, your Honor. I apologize,
16 I had to come off double mute.

17 We are supportive of a similar position of the
18 utilities before us. We think that, generally speaking,
19 it does look like it could be quasi-leg, but at the same
20 time, to the extent we believe there might be the
21 possibility of rate impacts, then we should consider
22 whether or not it should be ratemaking.

23 ALJ LAU: Cal Advocates.

24 MR. DUTTA: Thank you, your Honor. I apologize
25 for the delay. I was trying to get on.

1 Similarly, Cal Advocates does not take -- have
2 a strong position on this matter. This matter could be
3 -- you know, this matter has various aspects that could
4 alternatively be viewed as quasi-legislative or
5 ratesetting, and for that reason we do not have -- we do
6 not take a position on this matter at this time.

7 ALJ LAU: Thank you.

8 CAISO.

9 MR. WEAVER: Thank you, your Honor.

10 The CAISO adds ditto to the list of what the
11 utilities just said.

12 ALJ LAU: Can you repeat that just for the
13 benefit of the court reporter. I think -- I didn't hear
14 you that clearly, so --

15 MR. WEAVER: The CAISO agrees with what the
16 IOUs said.

17 ALJ LAU: Thank you.

18 Small Business Utility Advocates.

19 MS. WEBERSKI: Thank you, your Honor. Jennifer
20 Weberski for SBUA.

21 We also concur with the comments that were
22 previously spoken; specifically, the Public Advocates
23 Office. We don't really take a position. I do think
24 that at this time the designation could really go either
25 way, as articulated by the IOUs. Thank you, your Honor.

1 ALJ LAU: NRDC.

2 MR. CHHABRA: NRDC has no comment on this
3 specific issue, your Honor. Thank you.

4 ALJ LAU: Thank you.

5 TURN.

6 MR. CHENG: Thank you, your Honor.

7 We also agree that it could go either way. But
8 given that, we would suggest it might be easier to just
9 make it ratemaking. It's easier to make it ratemaking,
10 everyone follow the ratemaking rules, rather than make
11 it quasi and then figure out how to make it ratemaking
12 down the road. Thank you.

13 ALJ LAU: Ratesetting.

14 MR. CHENG: Ratesetting. I'm sorry.

15 ALJ LAU: UCAN.

16 MS. KRIKORIAN: Thank you, your Honor. Jane
17 Krikorian for UCAN.

18 We don't have a position at this time.

19 ALJ LAU: Center for Biological Diversity.

20 MR. LIN: Thank you, your Honor. Roger Lin,
21 Center for Biological Diversity.

22 We recommend quasi-leg, and then switching to
23 ratesetting if needed.

24 ALJ LAU: Thank you.

25 CUE.

1 MS. KOSS: This is Rachael Koss for CUE.

2 We agree with TURN that because it could go
3 either way, it makes sense to just have it set now as
4 ratesetting. That way, we don't have to flip-flop
5 later. Thank you.

6 ALJ LAU: Thank you.

7 Joint CCAs.

8 MR. WIEDMAN: This is Joseph Wiedman for the
9 Joint CCAs.

10 We agree with the position of TURN. Thank you.

11 ALJ LAU: Thank you.

12 Council and CERT.

13 MS. MYERS: Megan Myers on behalf of CERT and
14 the Council.

15 We do not have a position on this matter.

16 ALJ LAU: Thank you.

17 SEIA.

18 MR. BEACH: Tom Beach for SEIA.

19 We don't have a position on this. Thank you.

20 ALJ LAU: PCF.

21 MS. DICKENSON: We agree with TURN on this
22 issue.

23 ALJ LAU: Thank you.

24 I-REN.

25 MR. DRUYON: I-REN doesn't have a position on

1 this.

2 ALJ LAU: Thank you.

3 CLECA.

4 MR. HAFEZ: Samir Hafez for CLECA.

5 We have no position on this.

6 ALJ LAU: GRID Alternatives.

7 MS. WYATT: Andie Wyatt for GRID Alternatives.

8 We have no comment on this item.

9 ALJ LAU: And I believe Beth Kelly has left.

10 And the California Energy Storage Alliance.

11 MR. TAPIA: Albert Tapia with CESA.

12 We have no comment on this question. Thanks.

13 ALJ LAU: Thank you.

14 ChargePoint.

15 MS. HAUG: Thank you, your Honor. Lynn Haug

16 for ChargePoint.

17 We haven't taken a position on this. But to
18 the extent that it's relevant in discussing the scope of
19 issues, we were going to recommend that the allocation
20 of costs be added as an issue within the scope of Track
21 2; specifically, the allocation of costs for data
22 preparation, storage, et cetera. It is an issue that
23 has come up, and will continue to come up, and so should
24 be discussed within the scope of this track.

25 ALJ LAU: Okay, can you raise that during the

1 scope of issues?

2 MS. HAUG: Yes.

3 ALJ LAU: Okay, thank you.

4 CforAT.

5 MS. KASNITZ: Melissa Kasnitz with CforAT.

6 We agree with TURN. Thank you.

7 ALJ LAU: 350 Bay Area.

8 MS. BROOME: Claire Broome, 350 Bay Area.

9 No position on this.

10 ALJ LAU: Thank you.

11 OhmConnect.

12 MS. BELENKY: This is Maria Belenky for

13 OhmConnect.

14 We also have no position on this issue. Thank
15 you.

16 ALJ LAU: Advanced Energy United.

17 MR. TURNER: Brian Turner for Advanced Energy

18 United.

19 Slight preference for quasi-legislative
20 actually, because the lower formality procedural
21 requirements perhaps support greater involvement of our
22 members and broader research community, other data
23 users, into the proceedings. So until necessary to
24 categorize as ratesetting, we have a preference for
25 quasi-leg. Thank you.

1 ALJ LAU: Olivine.

2 MR. DELEANU: We have no position on this, your
3 Honor.

4 ALJ LAU: Thank you.

5 Next, I'd like to move to the next item, which
6 is the need for hearings. Commissioner Houck and I do
7 not believe that hearings are needed, that there may not
8 be any material disputed facts requiring hearings, given
9 the issues and objective of Track 2, you know, but we're
10 ready -- now is an opportunity for parties to opine on
11 this.

12 So if you have any opinions right now -- the
13 proceedings schedule did not have any evidentiary
14 hearings scheduled. If you have any opinions, please
15 raise your virtual hand.

16 Etchissa, can you call on the parties?

17 MS. GENESIS: Malinda Dickenson.

18 MS. DICKENSON: Thank you.

19 Our position on evidentiary hearings was set
20 forth in our comments on the OIR, and that's on page 10.
21 And we -- our position is that evidentiary hearings are
22 required for both phases.

23 The Public Utilities Code requires evidentiary
24 hearings in the context of proceedings in which the
25 Commission considers establishing policies and rules

1 affecting a class of utilities. And we have the cites
2 there. And so we do think that evidentiary hearings
3 should be required for this phase as well.

4 ALJ LAU: Then when we talk about the scope of
5 issues later, you can also identify it for us, which
6 issue do you think would require hearings. That would
7 be helpful.

8 MS. DICKENSON: Okay.

9 ALJ LAU: Okay.

10 Etchissa, can you call on the next party?

11 MS. GENESIS: Eric Sezgen.

12 MR. SEZGEN: Thank you, your Honor. Eric
13 Sezgen for PG&E.

14 Similarly too, I think the ratesetting
15 categorization, it's possible that the data working
16 group process and decision that comes out of that might
17 leave -- there might be issues still outstanding,
18 because it is a broad scope with a lot of different cost
19 issues potentially.

20 So to the extent that maybe in a later phase it
21 requires a more formal evidentiary process with
22 testimony and potentially hearings, I think PG&E would
23 just like to flag that if the data working group --
24 depending on what that decision is and the scope of that
25 decision, that the hearings before the data working

1 group's report and the comments on that we don't believe
2 it going to be necessary, but might be necessary further
3 down the line. Thank you.

4 ALJ LAU: Thank you.

5 How about let's move on to the scope of issues,
6 which right now the agenda includes our proposed scope
7 of issues. If the parties have any comments on these,
8 please raise your virtual hand and our proceeding
9 analyst, Etchissa Genesis, will call on the parties.

10 I do want PCF to opine on which issues they
11 believe would require evidentiary hearings, so if PCF
12 can raise your hand and also opine on that.

13 MS. DICKENSON: Sure. Go ahead now?

14 ALJ LAU: Yeah, sure.

15 MS. DICKENSON: Okay. I think it would
16 probably be more Issues 1 and 3 than 2. It could be a
17 situation where, unlike the Phase 1 need for a motion,
18 it might be more appropriate to require a motion in
19 this, in this context, in the context of in this phase
20 or this track. Because it could be that there would not
21 be one needed, but it also could be that there is.

22 So if there are disputed issues, we would
23 submit that evidentiary hearings are required. But
24 certainly in the Phase 1, Track 1 issues, we do already
25 know there are disputed issues, so therefore it's a

1 different analysis depending on the track we're talking
2 about. Thank you.

3 ALJ LAU: Thank you.

4 Etchissa, can you call on the parties?

5 MS. GENESIS: Megan Myers.

6 MS. MYERS: I had trouble finding the mute
7 button, or unmute, I guess, as it were. Megan Myers on
8 behalf of the California Efficiency and Demand
9 Management Council.

10 One of the Track 2 issues we addressed in our
11 opening comments were data working groups, and we set
12 forth several additional items that we think should be
13 critical to the working groups. If you want me to
14 repeat them here, I can, or I can just refer back to the
15 opening comments on the OIR.

16 ALJ LAU: How do you think that the data
17 working group should affect the scope of issues? I
18 think their working group is a vehicle to go through and
19 figure out how to address the scope of issues rather --

20 MS. MYERS: Yes, yes, I definitely think they
21 should be included. I got a little ahead of myself
22 there, but yes. We think that the data working group
23 should be included, and we provided some additional
24 information that the working group should consider.

25 ALJ LAU: Okay. Can you -- maybe you can just

1 give us a high level.

2 MS. MYERS: Sure. So each of these issues we
3 set forth generally revolve around improving access to
4 accurate customer meter data, which is critical to
5 operating a modern grid and enabling DER participation
6 in the CAISO market. So that's the very high level of
7 this.

8 We think they should address expansion of
9 Electric Rule 2432 to other types of DER providers,
10 update rules for sharing customer meter data to allow
11 for the aggregated use of customer data, that there
12 should be standardized metrics for advanced meter
13 infrastructure performance, and there should be
14 standards for the customer authorization performance,
15 which I know are being addressed in Application
16 18-11-015. So there would need to be coordination with
17 that proceeding, that there should be potential
18 improvements to the Share My Data performance standards.
19 And lastly, the creation of a universal -- of universal
20 group controls for CAISO market settlement DR DER
21 qualifying capacity evaluation and Cost Effectiveness
22 calculations.

23 ALJ LAU: Okay, thank you.

24 MS. MYERS: Thank you.

25 ALJ LAU: Is that all the comments?

1 MS. MYERS: Yes. And all of those comments are
2 on behalf of the California Efficiency and Demand
3 Management Council. CERT has no comment at this time.
4 Thank you.

5 ALJ LAU: Thank you.

6 Etchissa, can you call on the next party?

7 MS. GENESIS: Lynn Haug.

8 MS. HAUG: Thank you, your Honor. Lynn Haug
9 for ChargePoint.

10 In general, it appears that Issue 2 is broadly
11 framed and does address most of the issues addressed in
12 our comments, and we appreciate that.

13 A couple small changes or additions. As I
14 mentioned a minute ago in discussing as it may relate to
15 categorization, ChargePoint believes that cost
16 allocation should be identified as an issue; and also,
17 perhaps as part of 2a, confidentiality should be added
18 as an issue. It obviously overlaps with customer
19 privacy, but it's a broader issue than customer privacy
20 to the extent that the Commission has historically
21 respected and protected proprietary or competitively
22 sensitive information in considering data collection,
23 and it should continue to do so and is something that we
24 need to discuss within the working group process.

25 ALJ LAU: Can I ask you --

1 MS. HAUG: Yes.

2 ALJ LAU: Can I ask you how so do you think
3 cost allocation should be included in the scope of
4 issues?

5 MS. HAUG: So this is discussed in our
6 comments, I think pages 5 to 6. In summary, there are
7 costs associated with collecting data, with preparing
8 the data and formatting it, storing it, et cetera and,
9 you know, in some contexts costs are not, you know,
10 controversial or at issue.

11 There's some Commission programs that already
12 require stakeholders, vendors, to provide data as a
13 condition of participation in the program. But since
14 the scope of this discussion is broader than that, the
15 issue of cost recovery and cost allocation I think will
16 come up, because there are significant costs at times
17 associated with those functions, and they're going to
18 vary depending on the application of the program.

19 ALJ LAU: Thank you.

20 Etchissa, can you call on the next party?

21 MS. GENESIS: Jane Krikorian.

22 MS. KRIKORIAN: Yes, your Honor. Thank you.
23 Jane Krikorian for UCAN.

24 We would just like to draw attention to 1c,
25 Track 2 1c, where it talks about aligning with other

1 DER-related Commission proceedings.

2 UCAN believes that data access is key to
3 developing advanced rate designs, as is the goal of
4 R.22-07-005, the Demand Flexible OIR, and that the lack
5 of data access is preventing all non-IOU load serving
6 entities from fully participating in dynamic pricing
7 such as realtime pricing programs. And this is
8 happening in SDG&E's realtime pricing program
9 application, which is A.21-12-006, where the CCAs have
10 put in testimony that they can't participate in realtime
11 pricing due to lack of data access.

12 So resolving the data access issue will allow
13 all LSEs to participate in dynamic pricing, which will
14 promote demand flexibility for all customers. So we
15 would just like to see, if possible, the scope
16 acknowledge the connection between data access and
17 advanced rate design, if that's possible.

18 ALJ LAU: Okay, thank you.

19 Etchissa, can you call on the next party?

20 MS. GENESIS: Joseph Wiedman.

21 MR. WIEDMAN: Good afternoon. This is Joseph
22 Wiedman for Joint CCAs.

23 In general, we're comfortable with the scope of
24 the issues but did want to, you know, clarify and
25 amplify a certain aspect of our comments which is, you

1 know, as load serving entities, CCAs need data for a
2 variety of purposes and our use of data, if we had
3 better access to data, would also be broader than what
4 we currently look at just as load serving entities as
5 far as developing and designing programs for our
6 customers to either accelerate or support their adoption
7 of distributed energy resources. Our opening comments
8 touch upon those issues.

9 And I would note, you know, there was really
10 sort of two aspects to data access and the type of data
11 that we're talking about. One is billing quality hourly
12 interval data at the end of each billing cycle, which is
13 necessary for general billing purposes but also for
14 being able to access and utilize dynamic rates. That
15 issue is teed up a little bit in the Demand Flexibility
16 OIR, but it would be good to have a clear home for the
17 issue, right, just so we know which docket we need to be
18 in to talk about that issue.

19 The other aspect of data access is low latency,
20 which we call within 48 hours. So low latency interval
21 data which we can use for short-term load forecasting
22 and load shifting in development of programs around load
23 shifting. It touches upon DERs and the types of issues
24 we're talking about in this docket, but it's somewhat
25 broader. Even as a load serving entity, we currently do

1 not have access to sufficient data to be able to do
2 short-term load forecasting which can, as we have seen
3 during the heat storms, impact overall potentially
4 system reliability and other things. It just becomes
5 much harder for us to help there.

6 And so in 1c, you know, aligning with these DER
7 proceedings, I think that is important, but I think it's
8 also important, you know, coming out of my understanding
9 of the workshop last week in the Demand Flexibility
10 Rulemaking where the same issue was discussed, and then
11 there was some discussion, as I understood it, about
12 where these issues should lie.

13 And so in addition to sort of alignment, we
14 would like some clarity on where we should talk about
15 these issues so that, you know, we're being able to
16 participate effectively and not try to participate
17 across three dockets on the same issue. Thank you.

18 ALJ LAU: Can I ask a clarifying question? Are
19 you asking, you know, in terms of the scope of issues
20 what data is involved in looking at data access? Is it
21 including billing data and load latency interval data?
22 Is that --

23 MR. WIEDMAN: Yes. Sorry. Thank you, your
24 Honor. Yes, it's both. I think as part of the data
25 working group, you know, our position of course

1 expressed in opening comments is we look forward to
2 participating in that working group, and I think that is
3 the appropriate forum to start hashing out these issues.
4 But what I'm really sort of requesting too is clarity
5 that that is going to be within the issues, because they
6 are -- ours are a little more nuanced than just
7 effectuating DERs and things like that we're discussing
8 in this docket, you know.

9 Because again, we're sort of cutting across
10 being a load serving entity and also wanting to develop
11 programs that can unlock these values or participate in
12 dynamic rates. And so it kind of gets siloed over in
13 one docket, but then it's not quite right there, it kind
14 of gets siloed over in another docket.

15 And again, coming out of the discussion last
16 week in the Demand Flexibility Rulemaking Workshop,
17 folks were thinking this may be the appropriate docket.
18 And so we've been sort of hunting around on the topic,
19 and we just really would like some clarity. I hope
20 that's helpful.

21 ALJ LAU: I think let's go down the list and
22 then maybe Commissioner Houck can opine, or not, on some
23 of these things. These are things that we were
24 considering.

25 Etchissa, can you call on the next party?

1 MS. GENESIS: Claire Broome.

2 MS. BROOME: Thank you. Claire Broome for 350
3 Bay Area.

4 I really appreciate separating out the issue of
5 data. And I concur with the points made by the Joint
6 CCAs and also by the Energy Efficiency Council.

7 Good policy really starts with good data. And
8 as I cited earlier, this is a field that's moving really
9 fast. It's really challenging to keep up with and to
10 cooperate across the different agencies, across the
11 different proceedings but it's, I think, really
12 essential that that happens.

13 The one thing I would like to add to what was
14 said by my colleagues is, as became evident in the
15 workshop for the Demand Flexibility proceedings last
16 week, this is not a new issue. It's been unresolved. I
17 think we heard since at least 2012 particularly in terms
18 of the CCAs having information about their LSE about
19 their customers. So -- and this is something really for
20 the CPUC to consider, and it may not be appropriate for
21 the working group. But I think some degree of oversight
22 by the Energy Division and the CPUC and timelines is
23 essential and isn't currently. You know, timelines for
24 data availability should be considered in the scope.
25 Thank you.

1 ALJ LAU: Thank you.

2 Etchissa, can you call on the next party?

3 MS. GENESIS: Melissa Kasnitz.

4 MS. KASNITZ: Thank you. Melissa Kasnitz for
5 Center for Accessible Technology.

6 I believe these issues already fit within the
7 scoped identification of customer privacy as a concern,
8 but I do want to urge the Commission to be mindful and
9 cautious about the release of customer usage data that's
10 not necessary for effective grid functioning. In
11 particular for low-income customers, the Commission
12 should be wary about mandating customers give up their
13 data privacy in order to participate in any particular
14 program. So this is a balance that needs to be
15 maintained in terms of who gets the data that really can
16 be used to do substantial analytics about a customer's
17 behavior.

18 ALJ LAU: Thank you.

19 I believe there are no more hands.

20 Commission Houck, did you want to respond to
21 what we -- what the Joint CCAs talked about in regards
22 to data, definition of the data, or any other things
23 that other parties have raised?]

24 COMMISSIONER HOUCK: Just to comment that, you
25 know, I think the intent here with this proceeding and

1 this track in particular with the data working group is
2 to be brought consistent with the DER Action Plan. And
3 I think a number of the items that were discussed by the
4 parties in their comments here and why we looked at load
5 flexibility proceeding and I-DER is they're all a part
6 of the DER Action Plan.

7 So I think we wanted to try and fit as much in
8 one place and give people a broad forum to try and work
9 through some of these issues because we do know they've
10 been out there for quite a long time.

11 So we'll have additional questions and be
12 working through what the working group looks like and
13 how these efforts are going to coordinate among the
14 proceeding. But the idea is to try and come up with a
15 working model that's going to be able to be utilized in
16 a way that's useful and hopefully as efficient as
17 possible.

18 ALJ LAU: Yeah. And I also want to emphasize
19 that our intent was to have data defined very broadly.
20 We did discuss about how should we define data. And
21 thought about having that discussion at the PHC, but
22 then we thought that's going to be two hours long.

23 We may -- you know, Commissioner Houck and I
24 will consider whether we should issue a ruling or have
25 that hashed out in a data working group. But our intent

1 is to have data be broadly defined, which includes
2 billing interval data.

3 Next if there are no other comments, I'd like
4 to move on to the next item, which is the proceeding
5 schedule. The proceeding schedule is very broadly
6 defined right now. As we all said, there is a lot of,
7 you know, things that we need to work through and that
8 may change the proceeding schedule and that's why, you
9 know, it is pretty broad.

10 We may need hearings if costs are involved, or
11 we may not. But the first item we think that we want to
12 do is issue a ruling rather than in this forum
13 requesting party comments on the formation of a data
14 working group, you know, in terms of who should be part
15 of the data working group, how should we collect a
16 coordinator. You know, once, you know, we have better
17 -- we took all the comments that were submitted in the
18 OIR, and we're still hashing out how we'd like to do
19 this.

20 And once we have a better idea, we would issue
21 a ruling asking parties like, "This is our idea. This
22 is what the Commission is thinking of. Parties, do you
23 have any further comments as opposing or supporting what
24 the Commission will do informing the data working
25 group."

1 That is the clear thing. The clear next step
2 we have so far. And so, you know, we have April 20,
3 2023 issuing that ruling and allowing party comments in
4 response to that ruling.

5 Depending on the cost of the facilitator, it
6 may have to be a proposed decision to create the data
7 working group because particularly if the cost of the
8 facilitator has to come from a ratepayer fund. So after
9 the data working group is established, then we would
10 have a series of workshops, recommendations from the
11 data working group, and then from then out, it's pretty,
12 you know, pretty vague as to what we should do. But at
13 least for the first few steps, that's what we envisioned
14 for Track 2. And if parties have any comments on that,
15 please raise your virtual hand, and Etchissa will call
16 on you.

17 I'm seeing people are -- Oh, okay. I see a
18 hand.

19 Etchissa, would you like to call on people?

20 MS. GENESIS: Yes, your Honor.

21 I have Gautam Dutta.

22 MR. DUTTA: Thank you, your Honor. Actually, I
23 didn't raise my hand. We don't have any comments at
24 this time.

25 ALJ LAU: I thought you had some great idea on

1 the proceeding schedule.

2 Okay. Great.

3 Commissioner Houck, do you have any questions
4 or comments on Track 2 items so far?

5 COMMISSIONER HOUCK: No. No questions so far.

6 ALJ LAU: Thank you.

7 Next let's move on to the next topic for
8 discussion, which is regarding intervenor compensation
9 for Track 2. So in comments that our OIR parties
10 inquired about whether intervenor compensation is
11 available for participation in the Track 2 working
12 groups, data working groups. And I'm going to first try
13 to address the issue and then allow parties to ask
14 further questions about it.

15 So we have determined that parties'
16 participation in the Track 2 data working group are
17 eligible for intervenor compensation subject to the
18 guidelines set forth in Public Utilities Code
19 Section 1801 to 1812.

20 In accordance with Public Utilities Code
21 Section 1801.3, intervenors are eligible for
22 compensation when they make a substantial contribution
23 to a proceeding specifically if their contribution helps
24 the Commission deliberate on issues resulting in a
25 decision or an order.

1 Intervenors should try to avoid unproductive or
2 unnecessary participation that duplicates the
3 participation of similar interests represented in the
4 proceeding.

5 While we recognize that there may be some
6 overlap of the interests represented, intervenors should
7 demonstrate reasonable effort to collaborate with other
8 parties to minimize duplication of effort.

9 When submitting your claim for intervenor
10 compensation, please be sure to distinguish your
11 contribution from those of other parties and demonstrate
12 how your contribution materially supplements,
13 compliments, or contributes to the presentation of other
14 parties in accordance with Public Utilities Code
15 Section 1802.5.

16 If you have further questions about intervenor
17 compensation, please raise your virtual hand and
18 Etchissa, our proceeding analyst, will call on you.

19 Etchissa, I see some virtual hands raised.

20 MS. GENESIS: Yes, your Honor.

21 Jennifer Weberski.

22 MS. WEBERSKI: Yes. Jennifer Weberski from
23 SBUA. So I just want to clarify, your Honor. You were
24 talking with respect to the working group. I just want
25 to make sure that if there's multiple parties who

1 represent, say, a representative on the working group
2 that that's not going to be deemed duplicative.

3 Because it sounds like you're going to want
4 representatives of the working group some who represent
5 residential customers, we would respectfully say small
6 business customers, large customers. But there's not
7 going to be a concern that because it's all customer
8 representation that that's duplicative. Because that's
9 small intervenors such as ourselves and I --

10 (Crosstalk.)

11 ALJ LAU: Yeah. And I think it is, you know,
12 just trying to demonstrate that there is coordination
13 with other parties to minimize that duplication. Like
14 even though, you know, maybe -- I don't know, like,
15 advocates represent also small business customers and
16 you do too, but where are the interests?

17 You know, maybe their interest of representing
18 small business customers are different from how, you
19 know, SBUA represent. Like even though they're small
20 business customers maybe the interests are different.

21 So does that answer your question?

22 MS. WEBERSKI: It does. I'm not so much -- I'm
23 not absolutely sure it allays our concern then with
24 regard to being on the working group. But I guess that
25 would have to be an internal discussion.

1 It just -- generally, you know, particularly
2 for small intervenors to spend the time and the effort
3 on the working groups to participate, there's not a
4 concern at the end with regard to intervenor comp that
5 now it sounds like there is an extra -- there's that
6 caveat. So I'm a little concerned about that. But I
7 think we'll have to discuss that internally.

8 COMMISSIONER HOUCK: Judge Lau, is it accurate
9 to say we're going to be looking at the working group
10 the same way we would look at party participation in a
11 proceeding?

12 So to the extent that you're actively engaged
13 in providing contributions that aren't duplicative of
14 other people the same way you wouldn't in a proceeding
15 in the working group that would be the same evaluation.
16 And I don't know if that alleviates some of your
17 concerns.

18 It's going to be the same way we would be
19 looking at it is your involvement as a party.

20 MS. WEBERSKI: Okay.

21 ALJ LAU: Right. That is correct.

22 MS. WEBERSKI: Okay. Thank you.

23 ALJ LAU: Okay. Any other questions?

24 (No response.)

25 COMMISSIONER HOUCK: I think someone from TURN

1 -- David Cheng has his hand up.

2 ALJ LAU: Mr. Cheng, I'm sorry.

3 MR. CHENG: Thank you, your Honor. Just a
4 quick comment about the intervenor comp working group.
5 Obviously this is not the first working group the
6 Commission has had. And there's been plenty of
7 intervenor compensation working groups.

8 What I do want to say about working groups in
9 general is unless there are, sort of, disputed issues
10 and that parties cannot come to an agreement, generally
11 the working group report does not lay out the different
12 positions of the various parties. Because the purpose
13 of working groups generally is to try to reach a
14 consensus.

15 And so it is not easy to tease out who has what
16 unique contribution in the working group report unless
17 there's, like, heavily contested issues where parties
18 are laying out their different positions. So I do want
19 to present that.

20 But at the same time, there's been plenty of
21 Commission decisions previously about working group
22 I-Comp. I don't think we're in new territory. I just
23 want to throw that out there about the unique nature of
24 working groups.

25 ALJ LAU: Right. Thank you.

1 I think we're going to evaluate it similar to,
2 you know, parties' involvement in other data working
3 groups like in the energy efficiency proceedings or the
4 other DER proceedings. If that allays any concerns.

5 Okay. All right. I think I believe we've hit
6 every item that's on the agenda. So we are coming to
7 the conclusion of the prehearing conference.

8 So before we conclude, I'd like to allow
9 parties to raise any matters that we have not addressed
10 either for Track 1 or Track 2.

11 If you wish to speak, please raise your virtual
12 hand.

13 Etchissa, I just want to confirm with you I
14 didn't miss anyone, right?

15 MS. GENESIS: No, you did not. I do not see
16 any hands at this point. Thank you.

17 ALJ LAU: All right. Seeing that no one has
18 any matters to raise, this prehearing conference is
19 concluded. Thank you all for your participation.

20 Off the record.

21 (At the hour of 3:52 P.M. this matter having
22 been concluded, the Commission then
23 adjourned.)

24
25

* * * * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, JASON STACEY, CERTIFIED SHORTHAND REPORTER
NO. 14092, IN AND FOR THE STATE OF CALIFORNIA DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 29, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS APRIL 06, 2023.




JASON A. STACEY
CSR NO. 14092

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING
I, TAMARA DAWSON, CERTIFIED SHORTHAND REPORTER
NO. 11497, IN AND FOR THE STATE OF CALIFORNIA, DO
HEREBY CERTIFY THAT THE PAGES OF THIS TRANSCRIPT
PREPARED BY ME COMPRISE A FULL, TRUE, AND CORRECT
TRANSCRIPT OF THE TESTIMONY AND PROCEEDINGS HELD IN
THIS MATTER ON MARCH 29, 2023.

I FURTHER CERTIFY THAT I HAVE NO INTEREST IN THE
EVENTS OF THE MATTER OR THE OUTCOME OF THE PROCEEDING.
EXECUTED THIS APRIL 06, 2023.


TAMARA DAWSON
CSR NO. 11497

<hr/> \$ <hr/>	85:14 86:4,9,11,16 91:10	<hr/> A <hr/>	actively 8:7 9:19 11:23 12:1 47:9 89:12
\$2.6 49:13	20 85:2	A.21-12-006 77:9	activities 25:20 48:17 63:23 64:6
<hr/> -	20-year 42:23	A.22-02-005 23:5	Adam 3:24
--the 46:3	2012 81:17	abbreviated 17:24	add 45:21 81:13
<hr/> 1 <hr/>	2013 9:2	absolutely 88:23	add-on 28:25
1 18:21,22 19:5,7,11,18 20:10,22 21:5,7 23:20, 21,25 24:16 25:20 26:12 27:13,17 28:16 31:16 32:10,18 34:22, 25 35:5 39:24 44:9,21 46:25 52:13 55:9 56:3, 6,10,17 57:4,6,20 61:11,13,18 62:6 72:16, 17,24 91:10	2017 39:3 49:14	ACC 23:24 24:10 27:4 30:9,11,12,19 31:6 33:21,23 42:16,25 53:16 54:4,5,7,9,11 57:9,22 58:14,16,23 59:14,19	added 68:20 75:17
10 19:8 70:20	2018 39:5	accelerate 78:6	addition 47:14 61:4 79:13
100 10:10	2023 3:2 85:3	access 3:10 4:5 9:16, 17 11:15,21 19:1 62:8, 18 63:7 74:3 77:2,5,11, 12,16 78:3,10,14,19 79:1,20	additional 23:22 24:21 25:21 31:24 43:2 44:19 73:12,23 83:11
100-year 42:22	2024 56:21	accessibility 4:21 5:6	additions 75:13
12 61:6	22 56:4	Accessible 17:21,23 82:5	address 4:11,14 5:17, 19 6:3 32:25 34:14,23, 25 59:10 73:19 74:8 75:11 86:13
13 22:22	24 9:8	accidentally 21:2	addresses 37:12,14
14-10-003 8:3	2432 74:9	accomplished 22:17	addressing 47:20
18-11-015 74:16	29 3:2	accordance 86:20 87:14	adds 65:10
1801 86:19	2a 75:17	account 59:18	adequately 5:19 60:15
1801.3 86:21	<hr/> 3 <hr/>	accounted 27:3	adjourned 91:23
1802.5 87:15	3 32:10,14 72:16	accounts 24:5 29:8,18	adjust 52:15
1812 86:19	32 9:8	accuracy 4:11 58:10, 11	administrative 3:4,12 44:2
19-09-009 26:1	350 18:1,3 26:9,20 39:2 49:2,3 69:7,8 81:2	accurate 18:23 30:12 39:9 43:9,10 49:25 58:21 74:4 89:8	administrator 11:13
1994 8:1	3:10 62:1	achieved 43:8	administrators 22:11, 12 29:13 35:23
1:34 3:2	3:52 91:21	acknowledge 77:16	adopt 30:10 56:7
1c 76:24,25 79:6	3C-REN 17:1,7 22:1,11 45:19	acknowledged 46:5	adopted 29:10
<hr/> 2 <hr/>	3c-ren's 22:10	acquisition 21:20 29:6 46:2	adopters 37:14
2 9:15 18:22,25 19:5,9 23:20,25 24:16 27:11, 17 28:17 32:11,12 34:22 35:1 44:21 46:25 60:13 62:2,6,7,10,17,20 63:20 68:21 70:9 72:16 73:10 75:10 76:25	<hr/> 4 <hr/>	Act 38:15	adopting 29:3 42:9
	4 23:21	Action 14:23,25 38:3 39:4 45:5 83:2,6	adoption 4:21,23 19:1 62:8 78:6
	43,000 7:23	active 11:17,18,19	ADR 60:23,25 61:1,2,4
	48 78:20		advanced 10:4,7,8,10, 11,23 11:2,3 18:9,11 50:24 69:16,17 74:12 77:3,17
	<hr/> 5 <hr/>		
	5 19:8 32:12,14 76:6		
	<hr/> 6 <hr/>		
	6 76:6		

beach 16:4,5 30:2,3 31:7 41:25 53:10,11 67:18	Brian 10:6 18:10 28:11 69:17	21,24 8:15,17 9:3,7,12 13:15,17 14:3,5,9 15:5, 8,20,25 16:16,19 17:10, 12 27:7 31:21 32:24 38:18 41:14 42:15,18 46:15,17 49:7,11 50:11 68:10 73:8 75:2	CESA 17:13 46:17 68:11
begin 6:10	briefing 59:21	California's 26:19	cetera 10:20 68:22 76:8
beginning 31:20	briefs 8:9	call 6:15,16,18 13:5,13, 14 19:20 21:8 23:13 24:25 25:1 26:6 28:9,22 29:23 51:16 53:8 54:20 55:11 62:24,25 70:16 71:10 72:9 73:4 75:6 76:20 77:19 78:20 80:25 82:2 85:15,19 87:18	Cforat 17:24 47:3,5 69:4,5
behalf 8:25 14:8,15 15:7,14,23 16:9,14,24 17:5,6,12 23:16 33:16 41:11 51:24 67:13 73:8 75:2	bright 37:21	calling 6:18,21 7:14 21:11 52:9	challenging 81:9
behavior 82:17	bring 27:19 28:2 55:16	calls 51:18	change 43:18 44:17 84:8
behind-the-meter 27:12,14,22	broad 5:11 32:3 36:14, 15 42:1 45:9 47:5 50:25 71:18 83:8 84:9	canceled 49:13	changed 10:9
Belenky 8:22,23 18:6 50:18 69:12	broader 45:12 69:22 75:19 76:14 78:3,25	capacity 74:21	Chargepoint 17:14,20 46:22,24 68:14,16 75:9, 15
believes 31:23 32:16 63:5,19 75:15 77:2	broadly 37:3,24 38:4 40:21 44:6 50:19 75:10 83:19 84:1,5	capture 32:3	charging 10:16
benefit 37:15 65:13	Broome 18:2,3 26:8,9 49:3 69:8 81:1,2	carefully 42:12 61:21	Charles 61:3
benefits 25:12,16 27:3 29:9,10,19 35:9 37:13 38:19 39:6,10,23 40:25 41:5 42:7,10 44:13,15 45:11 47:20,22 48:1,2 49:24,25 63:9	brought 42:8 43:3 83:2	categorization 19:11, 15,18 20:21 62:10,15 63:20,21 71:15 75:15	check 40:7
benefitted 45:9	Buchholz 3:24	category 6:5 64:2	Cheng 14:21 36:5 66:6, 14 90:1,2,3
Benjamin 16:13	building 26:14	cautious 82:9	Chhabra 14:18,19 28:23,24 29:25 35:4 66:2
Beth 17:3 21:13 29:1 44:7 60:1 68:9	buildout 4:19	caveat 38:8 89:6	chime 28:6
bidding 24:4	burden 26:23 55:24	CCAS 15:9,10,14 40:17,20 67:7,9 77:9,22 78:1 81:6,18 82:21	choice 38:12
big 38:8	burdens 34:3	CEC 27:11,14 30:14 31:2	choose 13:9
Bill 14:11	business 14:13,15 24:12 65:18 88:6,15,18, 20	center 15:1,3,19,23 17:21,23 25:6 26:25 37:19 43:7 45:3 50:13 66:19,21 82:5	chronic 47:21
billing 78:11,12,13 79:21 84:2	button 34:19 73:7	centering 49:4	circulated 21:4
billion 49:13	<hr/> C <hr/>	central 39:17 40:14	citation 45:24
billions 50:11	C-REN 17:1	CERT 15:25 41:10,11 67:12,13 75:3	cited 81:8
bills 49:12	CAISO 14:12 34:11,13 49:13 65:8,10,15 74:6, 20		cites 71:1
Biological 15:1,4 25:6 26:25 37:19 43:8 66:19, 21	Cal 14:8 33:14,16,21 34:1 37:10 64:23 65:1		claim 87:9
bit 63:25 78:15	calculation 37:13		Claire 18:2 26:8,9 49:3 69:8 81:1,2
break 19:8 29:12 61:25 62:5	calculations 74:22		clarification 24:1,16 56:3,14
breaking 21:19	calculator 4:17 8:5 19:16 20:8 27:1 30:6 43:9,10,15 57:7,9 58:23 62:16		clarify 77:24 87:23
	calendar 55:23		clarifying 56:19 79:18
	California 4:16 7:18,		clarity 55:3 79:14 80:4, 19

clear 78:16 85:1	Commission's 12:19 30:16 38:2 39:4 48:15 60:22	conclusion 61:11 91:7	consultant 16:5 23:23
CLECA 16:20 51:25 52:6,12,21 53:2 68:3,4	commissioner 3:14, 15,17 4:8 6:2,7 10:5 18:20 20:24 21:1 23:8, 10 24:24 25:1 28:6,8 40:1,4 48:22 54:18 59:4,5 61:17,19 70:6 80:22 82:24 83:23 86:3, 5 89:8,25	concur 25:7 49:22 64:11 65:21 81:5	consultants 24:3,7,14
CLECA's 52:4		concurrently 57:7	consumed 42:19
climate 29:8 44:16		condition 76:13	Consumers 14:23,25 16:17,19
closely 30:22 56:16		conditions 47:22	contact 12:24
coalition 7:17,20,22 8:15,17 15:5,8		conduct 4:9 52:15	contacting 61:2
Code 70:23 86:18,20 87:14	commitments 45:14	conducted 35:16	contested 90:17
collaborate 87:7	communities 5:14,15, 21,22 16:7,9 21:23 23:16 25:8 38:23 41:17, 19 46:6,10	conference 3:6 4:2 6:4 12:23 20:4 30:25 60:5, 10,12,17 91:7,18	context 22:18 45:12 70:24 72:19
colleagues 81:14		confidence 34:13	contexts 76:9
collect 41:16 84:15	community 15:17 69:22	confidentiality 75:17	continue 4:16 23:23 33:21,25 68:23 75:23
collecting 76:7	comp 89:4 90:4	confines 34:25	contrary 43:20
collection 5:2 75:22	companies 10:11	confirm 12:24 20:15,17 25:18,20 40:8 91:13	contributes 87:13
comfort 44:16	company 11:9 13:17, 21,24 14:1,3,5 31:21	confirmed 20:22	contribution 86:22,23 87:11,12 90:16
comfortable 77:23	compare 29:18	conflicts 24:5,6,15	contributions 89:13
comment 20:9 21:15 40:2 47:13 66:2 68:8,12 75:3 82:24 90:4	comparing 33:11	connection 77:16	control 26:21 29:17
comments 5:8 6:12 8:8 10:20 11:21 12:1 19:13,18 20:13,24 21:6 25:7,9 30:24 32:23,25 33:7,17 34:15 36:2,6 37:10,23 39:11,16 40:11,13,20 41:16 43:7 44:7,20 45:4,7,17,21 46:18 47:15 50:21 51:1, 6,14,15 52:8,22 53:13 55:19 56:4,21 57:3,10, 13,22,24 60:6,8,12,15 61:12,17,20,21,24 62:23 65:21 70:20 72:1, 7 73:11,15 74:25 75:1, 12 76:6 77:25 78:7 80:1 83:4 84:3,13,17,23 85:3,14,23 86:4,9	compensation 28:3 86:8,10,17,22 87:10,17 90:7	consensus 20:6 90:14	controlling 26:18
Commission 3:5 8:1 19:12 23:5,22 24:19 30:7 33:20,25 34:3,7,13 35:6 38:13 39:5 41:16 42:6,11 43:12 46:4,9 47:7 48:3 50:12 55:19 56:7 62:12 70:25 75:20 76:11 77:1 82:8,11,20 84:22,24 86:24 90:6,21 91:22	competitive 24:4	consideration 27:21 29:21 38:7,9 42:1 45:8 48:14,24 52:9 54:17	controls 74:20
	competitively 75:21	considerations 42:3 53:4	controversial 76:10
	complete 12:18	considered 22:4 24:10 31:24 36:8 37:25 44:6 56:8 81:24	convergence 22:2
	completed 53:21	considers 46:9 70:25	cooperate 81:10
	complex 30:12	consistency 4:11 22:8	coordinate 25:11 54:17 83:13
	compliments 87:13	consistent 18:24 40:24 48:10 83:2	coordinated 54:1
	component 4:17	consistently 22:4	coordination 25:9,15 74:16 88:12
	comprised 15:15	consolidated 23:6	coordinator 11:12 61:2 84:16
	concern 30:18 53:12 54:13 58:8,9 82:7 88:7, 23 89:4	consolidation 32:14	copy 12:18
	concerned 36:8 89:6	constituency 47:21	Corporation 14:10
	concerns 5:19 24:7 31:16,25 89:17 91:4	constrain 28:2	correct 23:17,18 89:21
	conclude 61:18 91:8	constraining 49:6	corrected 59:2
	concluded 55:20 91:19,22	constructed 50:9	corrections 41:19
		consult 61:6	corresponds 42:24
			cost 4:13,17 8:5 19:16 20:8 21:15,18,21 22:4 25:22 27:1 30:5 32:13

34:1,2 35:10 38:1,6 39:12,18 40:14,25 42:6, 8,9 43:9,10,13,15,16 44:11 46:4,6,7,10,12 49:19,21,23,24 54:25 55:7 56:5,7,8,22 57:1,7, 22,24 58:3 59:1,16 62:16 63:9 71:18 74:21 75:15 76:3,15 85:5,7	customer 5:1 11:11 27:22 48:13 52:10 63:22 64:4 74:4,10,11, 14 75:18,19 82:7,9 88:7	decisions 4:23 48:16 49:22 56:12 90:21	design 41:20 77:17
cost-effectiveness 3:9 4:5,12 8:4 18:23	customer's 82:16	deemed 88:2	designation 65:24
costs 35:20 37:15 38:7, 25 47:25 48:9 58:7,15 59:13,19 68:20,21 76:7, 9,16 84:10	customers 4:23 9:7 11:16 30:10 33:8 34:3,7 41:18 50:6 77:14 78:6 81:19 82:11,12 88:5,6, 15,18,20	Defense 14:17	designed 38:1
Council 14:17 15:21 16:1,11,14 41:10,15 43:24 44:2 67:12,14 73:9 75:3 81:6	cutting 40:6 80:9	define 83:20	designing 78:5
counsel 8:20 13:16,21 16:19 29:1 64:11,14	cycle 38:21,24 42:14 55:8 78:12	defined 27:2 36:25 83:19 84:1,6	designs 77:3
County 17:6	<hr/> D <hr/>	definition 82:22	desire 56:19
couple 21:10 33:18 36:6 75:13	D.21-05-031. 45:25	definitions 39:7	detailed 35:16 52:24
court 3:20 6:24 7:1 40:7,8 65:13	D.22-05-002. 52:25	definitive 32:1	determinations 6:6,8 39:12
covered 38:5 60:7,15	Darcie 3:14 4:7	degree 81:21	determined 86:15
CPUC 29:9 49:22 81:20,22	data 3:10 4:5,20 5:1,2, 3,4,6,9 9:16,17 11:21 18:25 27:10,17 31:1 32:12,25 35:19 41:16 62:7,18 63:7,9 68:21 69:22 71:15,23,25 73:11,16,22 74:4,10,11, 18 75:22 76:7,8,12 77:2,5,11,12,16 78:1,2, 3,10,12,19,21 79:1,20, 21,24 81:5,7,24 82:9, 13,15,22 83:1,19,20,25 84:1,2,13,15,24 85:6,9, 11 86:12,16 91:2	delay 64:25	develop 34:7 35:7,22 40:24 80:10
create 11:14 85:6	databases 5:2	Deleanu 11:6,25 18:14, 16 51:6 70:2	developed 31:25 43:18 53:18
creating 5:9	date 58:25	deliberate 86:24	developing 62:18 77:3 78:5
creation 74:19	daughter 60:4	demand 9:1 10:12 11:12,19 15:20,25 29:15 41:14 73:8 75:2 77:4,14 78:15 79:9 80:16 81:15	development 8:23 33:22 34:4 78:22
creative 36:16 37:4	David 14:21 90:1	demonstrate 87:7,11 88:12	developments 48:5
creativity 37:1	decarbonization 4:15 38:17 45:13	department 36:20	DG 27:12
critical 26:18 39:8,22 46:8,11 73:13 74:4	December 30:8	depending 71:24 73:1 76:18 85:5	Dickenson 16:8,9 23:14,15,19 43:6 55:13, 14 56:18,24 57:14,18 58:1,9,24 59:22 67:21 70:17,18 71:8 72:13,15
critically 46:8	decide 56:15	deployed 43:18	Diego 13:24 14:1 15:16
criticism 24:21	decision 30:7 45:25 46:11 56:4,15,17 57:1 71:16,24,25 85:6 86:25	deployment 21:25 46:5	differentiate 35:12
Crosstalk 88:10	decisionmaking 43:10	DER 3:9 4:12,15,18,21, 23 5:19 10:12 11:8 18:24 19:1,2 21:15 22:14 25:14 26:13,17 27:6,18,22 28:2 29:4,9, 16 32:13 34:1 35:24 38:17 46:12 49:13,14, 18 56:8 62:8,9 74:5,9, 20 79:6 83:2,6 91:4	difficult 58:10 63:25
crucial 45:14		DER-RELATED 77:1	difficulties 17:17
CUE 7:21,22,25 8:4,6, 12 39:14,15,18,22 66:25 67:1		DERS 8:5 11:10,14 27:3 28:19 29:11,12,14, 19 33:11 35:9 39:18,23 40:15 42:25 47:25 49:11 78:23 80:7	difficulty 34:19
current 27:10 42:16 55:8		describe 7:11	dimension 42:5,13
			dimensions 42:11
			direct 9:13 48:9,16
			directly 9:17 10:17 30:9 48:12,13
			director 10:7
			disabilities 47:21
			disadvantaged 38:23 41:17,18
			disagree 49:20

disconnection 48:14	draft 9:14 31:2 32:9,11 53:17,20 54:2,5,10	12 49:21 56:9 74:21	14 26:23 27:24 29:1,9, 16 42:15 44:3 46:2,15, 17 48:2 49:12,14 50:24 59:6 68:10 69:16,17 78:7 81:6,22 91:3
disconnections 48:15,18	drafted 56:20 57:5	effectuating 80:7	
discovered 31:25	draw 76:24	efficiency 15:19,20,24, 25 21:16 22:1,3,10,14, 21 23:2,4 25:11,14 27:24 29:1,9,16 41:14 46:3 49:13,14 73:8 75:2 81:6 91:3	engage 47:17
discovery 52:16	drive 37:15	efficient 34:24 52:19 83:16	engaged 47:9 89:12
discuss 6:4 19:7 20:5 41:6 75:24 83:20 89:7	DRP 9:9	effort 29:7 87:7,8 89:2	enhance 5:3
discussed 33:9 68:24 76:5 79:10 83:3	DRS 11:14	efforts 38:2,3 49:4 83:13	Enshrining 50:3
discussing 62:5 68:18 75:14 80:7	Druyon 16:13 44:1,24 67:25	Elaine 3:13	ensure 5:10,16 24:6
discussion 29:22 31:14 40:23 41:4 59:8, 11 62:2 76:14 79:11 80:15 83:21 86:8 88:25	due 49:14 63:6 77:11	electric 7:24 9:7,8 13:19,21,24 14:1 35:13 43:14 74:9	enter 55:22
disproportionate 44:16	duplicate 87:2	electricity 9:10 26:19 38:20 49:6	entire 60:17
disproportionately 34:2	duplicative 88:2,8 89:13	electrification 10:15 26:15	entities 5:12 77:6 78:1, 4
Dispute 60:22	Dutta 14:7 33:15,16 64:24 85:21,22	entity 78:25 80:10	environmental 5:13, 14,21
disputed 55:18,22 70:8 72:22,25 90:9	dynamic 77:6,13 78:14 80:12	envisioned 85:13	equipment 3:10 4:6 10:16 19:4
distinguish 87:10	<hr/> E <hr/>	equitable 11:15 35:15	equity 5:17,19 21:21 26:21 29:5,20 31:16,23, 25 32:10,25 33:19,24 35:5 36:7,14,19,20,21, 23,24 37:16,24 38:3,4 39:8 40:21 41:5,12 42:2,5,10,13,21 43:3,8 44:5 45:2,5,9,15,23 46:6,10,18,24 47:6,8, 15,16 49:4,5,17 51:1 52:7 61:22
distributed 3:8 4:4 10:13 43:20 49:8 78:7	E3 38:16	equity-focused 47:13	Eric 13:20 32:7 54:21, 22 63:2,3 71:11,12
distribution 4:19 26:15,17 27:8 50:7 54:25 55:7 58:3,7,15 59:18	earlier 6:14 56:12 81:8	ESJ 38:3 39:4 41:18 45:5	essential 81:12,23
distributional 35:8,16, 23 45:8	early 37:14 60:5	essentially 63:10	establish 62:22
ditto 65:10	easier 66:8,9	established 6:12,13 13:13 36:19 85:9	establishing 70:25
diversity 10:11 15:1,4 25:6 27:1 37:19 43:8 66:19,21	East 15:16	estimates 4:18 27:11	
Division 3:23 59:7 81:22	easy 35:21 55:24 90:15		
docket 78:17,24 80:8, 13,14,17	echo 32:23 39:16 40:13,20 45:7 48:11		
dockets 79:17	echoing 48:4		
documents 29:22	Economy 10:8		
dollars 50:11	Edison 13:15,17 31:21 32:24 63:16,18 64:11		
double 64:16	Edward 14:4		
	EE 22:21 29:10		
	effective 21:21 46:4,6, 7 82:10		
	effectively 79:16		
	Effectiveness 21:15, 18 22:4 32:13 34:1 35:10 38:1 39:12,18 40:15 41:1 42:8 46:10, 12 49:21 56:9 74:21		
		employed 24:9	
		Employees 7:18,21 8:16,17 15:6,8	
		enabling 74:5	
		encompassed 25:19	
		encourage 5:18 26:11 60:25	
		end 78:12 89:4	
		energy 3:9,23 4:4 9:4,5 10:4,7,8,10,11,23 11:2, 3 15:15,16,19,23 16:3, 15,17,19 17:5,7,10,13 18:9,11 21:16 22:1,3, 10,14,21 23:2,4 25:11, 14 26:23 27:24 29:1,9, 16 42:15 44:3 46:2,15, 17 48:2 49:12,14 50:24 59:6 68:10 69:16,17 78:7 81:6,22 91:3	

Etchissa 6:17 19:20,23 20:15 21:8 23:13 25:3 26:6 28:9,22 30:1 31:8 51:16,20 53:8 54:20 55:11 59:24 62:24,25 70:16 71:10 72:9 73:4 75:6 76:20 77:19 80:25 82:2 85:15,19 87:18,19 91:13		83:5	funding 35:24 48:6
evaluate 34:5 39:23 91:1		Flexible 77:4	funds 23:23 24:2 64:5
evaluating 39:17 40:14		flip-flop 67:4	future 30:10 33:22 50:14
evaluation 25:22 38:6 74:21 89:15	F	focus 4:20 11:14 19:5 33:10 45:22 47:17	
event 55:21	facilitate 4:21 5:5 19:1 62:8	focused 62:17	G
events 9:4	facilitating 3:19	focusing 36:22	gas 13:19,21,24 14:1,3, 5 42:17
eventually 22:9	facilitation 60:24	folded 32:17 34:22	Gautam 14:7 33:15 85:21
everyone's 7:3	facilitator 85:5,8	folks 80:17	general 75:10 77:23 78:13 90:9
evident 55:18 58:25 81:14	fact 47:8 49:11 63:6	follow 6:12 66:10	generally 19:14 44:10, 22 46:3 52:8,12 62:14 64:18 74:3 89:1 90:10, 13
evidentiary 55:17 56:11,16,20 57:8,20,23 58:8 59:20 61:9 70:13, 19,21,23 71:2,21 72:11, 23	factor 39:8	forecasting 78:21 79:2	generation 10:14 38:20 43:20
evidently 56:1	factors 5:9 25:16,21	forecasts 30:13	generational 42:21
EVS 26:14	facts 27:23 55:18 70:8	form 12:19,21	Genesis 6:18 19:20,25 20:17 21:8,10,13 23:14 25:4 26:8 28:11,23 30:2 31:9 51:21 53:10 54:21 55:13 59:25 63:1 70:17 71:11 72:9 73:5 75:7 76:21 77:20 81:1 82:3 85:20 87:20 91:15
examination 5:5	fair 28:3 43:15	formal 71:21	gigawatt 27:13
exercise 37:4	fall 23:20 55:25 64:3	formality 69:20	gigawatts 27:12 50:7
existence 55:18	false 38:12	formally 13:2	give 12:12 31:10 32:1 48:20 74:1 82:12 83:8
expansion 74:8	family 44:15	formation 5:4 84:13	global 42:22,24
experiencing 17:16	fast 81:9	formatting 76:8	goal 4:22 77:3
explain 7:10 47:15	feature 28:14	forum 80:3 83:8 84:12	goals 45:4
explore 37:17	federal 45:12 48:7	forward 5:24 27:2 80:1	good 3:12,18 7:19 13:16,20,25 14:4,7,11, 14,18 15:2,13,22 16:18, 23 17:11,22 18:2,10 28:24 32:16 35:4 41:11 77:21 78:16 81:7
exploring 44:10	Ferguson 61:3	Foundation 16:7,10 23:16 25:8	governmental 5:12
expressed 80:1	field 81:8	founded 9:2	Governments 16:12, 14 17:4 43:25 44:2
extent 26:17 53:1 59:16 64:20 68:18 71:20 75:20 89:12	figure 66:11 73:19	fourth 24:18	granted 8:15,18 10:2,3 11:2,3 12:7,9 13:3
extra 89:5	files 55:25	framed 75:11	
extraction 38:19,21,22	filings 49:5	framework 35:7,22 40:24 45:8 56:9	
extremely 53:14	final 6:8	free 9:3	
	finally 48:10	freedom 37:5	
	financial 47:25 48:9	front 50:13	
	finding 38:9 73:6	full 5:10 12:24 13:7 15:10 38:13,21,24 42:14 49:10,18	
	findings 24:22 43:13	fully 22:16 29:8 77:6	
	fine 24:17	functioning 82:10	
	finish 41:4	functions 76:17	
	finished 62:5	fund 48:5 85:8	
	fit 82:6 83:7	funded 35:9,24 64:5	
	five-fold 27:15		
	five-year 27:7		
	flag 48:13 71:23		
	fleet 15:11		
	flexibility 11:20 77:14 78:15 79:9 80:16 81:15		

GRC 36:21	harm 26:22	11,19 19:25 20:17	identifying 37:11
great 20:3 85:25 86:2	hashed 83:25	21:10,14 22:18,22 23:2	IDER 8:2
greater 30:6 69:21	hashing 80:3 84:18	25:5 26:11 28:24 30:3	IEPR 30:14 31:2
grid 4:22,25 10:14 11:8, 15 16:22,24 19:2 26:16, 17 27:8,19 28:2 29:8 45:1 50:7 62:9 68:6,7 74:5 82:10	Haug 17:19,20 46:23 68:15 69:2 75:7,8 76:1, 5	31:9 32:7,22 33:4,15 34:9,12 35:1,4 36:5 37:8,20 40:18 43:6 44:1 45:2,20,24 46:16,20,23 47:4 49:4 51:8,21,25 53:7,11 54:22 60:1,2,14 63:1,3,17 64:10,15,24 65:9,19,25 66:3,6,16,20 68:15 70:3 71:12 75:8 76:22 79:24 85:20,22 87:20,23 90:3	ignoring 42:21
ground 6:11	headquartered 9:2	hood 60:4	impact 34:4,6 35:11 37:11 48:17,23 54:4 79:3
group 5:5,10 71:16,23 73:17,18,22,24 74:20 75:24 79:25 80:2 81:21 83:1,12,25 84:14,15,25 85:7,9,11 86:16 87:24 88:1,4,24 89:9,15 90:4, 5,11,16,21	health 38:13 42:9 44:15 47:21,22	hope 22:10 49:9,23 50:12 80:19	impacted 10:16 47:15 63:22 64:6
group's 72:1	heap 48:8	hosting 63:8	impacts 4:15,18 9:17 33:8 35:8,15,24 38:8, 17,21 39:17 40:13 44:16 45:9 48:12,13 52:10 64:21
groups 5:13 10:19 73:11,13 86:12 89:3 90:7,8,13,24 91:3	hear 5:7 7:17 31:19 39:18 40:5 62:19 63:14 65:13	Houck 3:14,15,17 4:7 6:2,7 10:5 18:20 20:24 21:1 23:8,10 24:24 25:1 28:6,8 40:1,4 48:22 54:18 59:4,5 61:17,19 70:6 80:22 82:20,24 83:23 86:3,5 89:8,25	impending 9:4
growth 26:14,18,21 49:6,19	heard 81:17	hour 91:21	implement 44:12
guess 56:24 57:19 73:7 88:24	hearing 3:20 5:25 8:14 10:1 11:1 12:7 20:10 55:17 56:11,17,20 57:9, 20,23 58:8 59:15 61:9, 16	hourly 78:11	implemented 21:18
Guidance 12:22	hearings 3:21 6:5 19:11 20:5,6,7,22 55:17,20,23 59:20 62:11 70:6,7,8,14,19, 21,24 71:2,6,22,25 72:11,23 84:10	hours 78:20 83:22	implementers 35:22
guidelines 86:18	heat 79:3	households 9:4	implications 24:9,11
<hr/> H <hr/>	heater 29:17	Hsu 14:4 33:4,13 64:15	importance 30:6 31:1 44:14 47:20 48:11
Hafez 16:18,19 51:23, 24 52:3,6,21 53:7 68:4	heavily 30:15 90:17	hour 91:21	important 5:8,16 6:25 25:10 27:16 30:11 33:10 40:24 41:5 42:7 43:12 46:8 47:23 53:14, 16 54:8,11 79:7,8
half 27:6	held 55:20	hourly 78:11	imported 42:18
hand 6:17,19,21 19:19 20:12 21:2,7 31:18 51:15 61:14 62:22,24 70:15 72:8,12 85:15,18, 23 87:17 90:1 91:12	helpful 22:7 71:7 80:20	hours 78:20 83:22	improve 4:11,16,18 5:6 9:16 18:25 19:1,2 34:1 62:7,8,9
hands 19:23,24 20:1, 16,18 21:11 51:20 59:24 82:19 87:19 91:16	helping 37:13,15	households 9:4	improvements 74:18
handy 25:24	helps 6:24 86:23	hypothetical 49:9	improving 4:20,24 33:23 47:25 62:18 74:3
happening 77:8	high 26:23 49:11,12 74:1,6	<hr/> I <hr/>	inaccurately 56:25
hard 7:1 32:1	highlight 46:1	I-COMP 90:22	inaudible 47:10
harder 79:5	historically 75:20	I-DER 83:5	incentive 25:17,24
	hit 21:2 91:5	I-REN 43:24 44:4,10,14, 17,21 67:24,25	incentives 35:17 38:15 43:16
	hold 22:22 58:22	idea 83:14 84:20,21 85:25	include 5:3 27:2 28:18 53:2 56:21 57:21,23 58:14
	holistic 26:13 27:18 45:10	identification 82:7	included 24:1,16 42:2 58:4 59:19 73:21,23 76:3
	home 78:16	identified 25:21 75:16	
	Honor 8:22 11:6 15:2, 12,22 16:4,8,18 17:2,	identifies 38:7	
		identify 6:24 7:2 37:13 71:5	

includes 27:5 45:11 51:12 57:9 72:6 84:1	inputs 54:11	IRP 28:13,20 30:16 31:4 53:18,19 54:11	Joint 15:9,10,14 40:17, 20 67:7,9 77:22 81:5 82:21
including 5:11 8:2 10:11 13:3 28:16 33:23 35:11 38:14 45:12 79:21	inquired 86:10	Irvine 38:16	Jonathan 13:25
inclusion 41:12 50:25	installed 27:7	issue 9:14 23:20,25 24:1,16,18,19 26:21 28:13 31:24 32:3 33:19 34:14,23 35:10 36:14, 17,20 37:16,17 47:9 50:19 56:2 59:2 66:3 67:22 68:20,22 69:14 71:6 75:10,16,18,19 76:10,15 77:12 78:15, 17,18 79:10,17 81:4,16 83:24 84:12,20 86:13	Joseph 15:13 40:19 67:8 77:20,21
income 50:5	Instituting 3:7,8 25:19	issued 6:8 30:7 53:23 56:12	judge 3:4,12,17,19 4:3, 7 5:23 6:1 10:5 28:8 89:8
incorporate 4:14 28:19 31:4 40:25 55:6	integrate 4:25	issues 3:10 4:5 5:17 6:7 10:17 18:22 19:3,16 20:8 21:4,5,7 23:17 27:24 31:17,23 32:4,10, 12,19 33:1 35:5 37:12 39:24 42:14,21 46:8,24 55:14,22 56:6,10,13 57:20 58:12 61:1,22 62:15 68:19 69:1 70:9 71:5,17,19 72:5,7,10, 16,22,24,25 73:10,17, 19 74:2 75:11 76:4 77:24 78:8,23 79:12,15, 19 80:3,5 82:6 83:9 86:24 90:9,17	July 53:23 55:1
incorporated 24:20 31:16 32:11 55:1	integrated 36:12 37:2 39:24	issuing 47:12 85:3	justice 5:14,21
incorporates 30:20	integrating 11:10,14 36:11	item 7:5 18:18 19:10 21:3 31:14 51:10 52:1 60:21 62:10 68:8 70:5 84:4,11 91:6	<hr/> K <hr/>
incorporating 46:24	integration 4:22 19:2 28:13 45:5 47:6 62:9	items 19:7 20:25 22:21 61:12 62:6 73:12 83:3 86:4	Kasnitz 17:22,23 47:4, 5 69:5 82:3,4
incorporation 43:16	intend 10:18	iteration 39:3	Kathleen 3:25
increase 38:8 43:15,19 63:22	intending 7:15 11:23, 25 12:11	<hr/> J <hr/>	Kelly 17:2,3 21:13,14 22:22 23:2,9 29:1 44:8 45:20 60:1,2,14,18,19 68:9
increases 49:16	intends 7:12 8:6	Jane 14:24 37:8 66:16 76:21,23	key 4:17 45:23 46:1 77:2
increasing 34:2,8	intent 82:25 83:19,25	January 10:8 56:21	kind 43:17 53:15 54:13 80:12,13
indecipherable 9:18 29:14 35:19 45:10 48:2 53:3 55:20 57:16	intention 19:7	Jennifer 14:14 65:19 87:21,22	Koss 7:19,20 8:10 15:7 39:15,21 40:5,10,12 67:1
Independent 14:9	interest 7:10 9:13 24:5, 6,13,15 88:17	joining 4:1	Krikorian 14:24 37:8,9 66:16,17 76:21,22,23
indirect 48:1	interested 5:7 11:20		<hr/> L <hr/>
individuals 5:20	interests 5:11,15 22:19 87:3,6 88:16,20		lack 38:9 77:4,11
Industries 16:3	interests 5:11,15 22:19 87:3,6 88:16,20		laid 52:21
industry 5:12 11:8	internal 88:25		large 16:16,19 63:8 88:6
Inflation 38:14	internally 89:7		largely 41:12
inform 39:12 41:19	interval 78:12,20 79:21 84:2		largest 9:11
information 12:24,25 30:21 33:5 59:17 73:24 75:22 81:18	intervenor 86:8,10,17 87:9,16 89:4 90:4,7		lastly 7:11 74:19
informational 44:11	intervenor 86:8,10,17 87:9,16 89:4 90:4,7		latency 78:19,20 79:21
informed 4:23 43:9	intervenor 55:25 86:21 87:1,6 88:9 89:2		latest 30:20
informing 84:24	introduce 6:22 7:9 13:6,9 51:18		Lau 3:4,13,17,19 5:23 6:1,2 8:10,14,19 9:22 10:1,4,6,22 11:1,5,23
infrastructure 10:15 49:17 50:9 74:13	investigate 34:4		
initial 4:9 32:9 45:4,17	investor-owned 24:12 50:4		
Inland 16:15 44:3	involved 42:21 79:20 84:10		
innovation 29:2	involvement 69:21 89:19 91:2		
input 8:4 47:18 48:4	IOUS 34:21 48:17 65:16,25		

12:3,7,10,16 13:18,23 14:2,6,9,13,17,20,23 15:1,5,9,18 16:2,6,11, 16,21,25 17:9,14,16,21, 25 18:4,8,13,16 19:23 20:3,12,15,19 21:3,12 22:20,24 23:1,7,12,18 24:23 25:3,23 26:4,6 28:5,9,21 29:24 30:1 31:7,10,13 32:5,20 33:2,12,14 34:10,16 35:2 36:3 37:6,18 39:13,20 40:1,10,16 41:9,23 43:4,23 44:23, 25 45:18 46:14,21 47:2 49:1 50:16,23 51:4,9 52:2,5,18 53:6,8 54:16 55:5,11 56:18 57:5,17, 21 58:5,13 59:4,23 60:11,18,20 61:16,25 62:4 63:11 64:8,13,23 65:7,12,17 66:1,4,13, 15,19,24 67:6,11,16,20, 23 68:2,6,9,13,25 69:3, 7,10,16 70:1,4 71:4,9 72:4,14 73:3,16,25 74:23,25 75:5,25 76:2, 19 77:18 79:18 80:21 82:1,18 83:18 85:25 86:6 88:11 89:8,21,23 90:2,25 91:17	link 12:21 list 6:14 12:22 65:10 80:21 literately 50:11 live 59:2 lives 43:1 living 5:20 load 26:14,16 34:8 77:5 78:1,4,21,22,25 79:2,21 80:10 83:4 local 5:12 located 38:23 long 11:9 36:19 83:10, 22 long-term 48:1 looked 83:4 lose 36:9 lot 36:23 71:18 84:6 love 22:13 low 50:1 78:19,20 low-income 21:22 34:3,6 82:11 lower 6:19 69:20 LSE 81:18 LSES 77:13 Lynn 17:20 46:23 68:15 75:7,8	makes 27:16 50:6 67:3 making 7:14 38:12 58:12 Malinda 16:8 23:14,15 55:13 70:17 management 5:3 10:12 11:8 15:21 16:1 41:15 73:9 75:3 manager 8:24 managing 11:10 mandating 82:12 MARCH 3:2 Maria 8:23 18:6 69:12 Marin 15:16 market 8:23 9:10 21:24 29:5 34:8 74:6,20 marketing 41:20 markets 11:11 material 52:15 70:8 materially 87:12 matter 57:2,3,4 65:2,3, 6 67:15 91:21 matters 91:9,18 maximum 26:17 meaning 36:10 57:4 means 21:21 measure 34:5 35:11 37:11 41:6 mediation 60:23 Megan 15:23 67:13 73:5,7 Melissa 17:22 47:4 69:5 82:3,4 members 7:23 10:18 69:22 memo 6:8 20:23 36:15 44:10 mentioned 27:23 28:15 34:20 35:12 41:2 75:14 meter 27:25 74:4,10,12	metering 30:8 methane 42:16,23 method 6:21 methodologies 41:1 methods 61:5 metric 29:8,10 metrics 39:10 74:12 microgrid 25:16,24 27:24 middle-income 50:1 mindful 48:3,4 82:8 minimize 87:8 88:13 minute 12:12 19:8 75:14 mires 50:14 miscalculation 58:25 missed 12:13 mission 24:2 model 24:12 32:1 83:15 modeled 30:17 54:12 modeling 30:15 31:3 50:10 53:17,20 54:2,6, 10 models 30:13 modern 74:5 modify 9:15 Mohit 14:18 28:23 moment 12:10 22:6,23 31:10 48:20 money 48:7 month 44:19 53:24 motherhood 60:4 motion 7:8,15 8:11,20 12:14 55:16 72:17,18 motions 7:7 12:12 55:25 61:8 move 13:1 18:18 19:9, 10 51:10 60:20 61:13 62:1,6 70:5 72:5 84:4 86:7
Law 3:4,12 lay 90:11 laying 90:18 lead 44:3 leakage 42:17,23 learning 36:18 leave 60:5,11 71:17 led 45:10 left 68:9 lens 36:21 level 74:1,6 lie 79:12 life 38:21,24 42:14 limit 49:19 limited 24:3 Lin 15:2,3 25:4,5,6,23, 25 26:5 37:20 66:20	made 28:25 41:3 43:7 44:7 81:5 magnitude 27:8 main 6:3 58:24 maintained 82:15 majority 38:22 make 4:23 6:6,7 7:7,15 8:20 12:11,14 13:11 18:22 19:17 26:24 27:20 30:19 40:2 60:13 66:9,10,11 86:22 87:25	<hr/> M <hr/> Maria 8:23 18:6 69:12 Marin 15:16 market 8:23 9:10 21:24 29:5 34:8 74:6,20 marketing 41:20 markets 11:11 material 52:15 70:8 materially 87:12 matter 57:2,3,4 65:2,3, 6 67:15 91:21 matters 91:9,18 maximum 26:17 meaning 36:10 57:4 means 21:21 measure 34:5 35:11 37:11 41:6 mediation 60:23 Megan 15:23 67:13 73:5,7 Melissa 17:22 47:4 69:5 82:3,4 members 7:23 10:18 69:22 memo 6:8 20:23 36:15 44:10 mentioned 27:23 28:15 34:20 35:12 41:2 75:14 meter 27:25 74:4,10,12	

moves 50:14	NRDC's 39:11	Operator 14:10	participate 8:7 9:9,19 10:19 11:24 12:1 77:10, 13 79:16 80:11 82:13 89:3
moving 81:8	nuanced 80:6	opine 70:10 72:10,12 80:22	participated 7:25
multiple 11:17 87:25	number 48:21 54:13 83:3	opinions 70:12,14	participating 7:12 8:8 77:6 80:2
mute 7:3 34:19 64:16 73:6	numbers 54:5	opportunities 32:14 47:17 48:5	participation 9:20 11:10 41:18 74:5 76:13 86:11,16 87:2,3 89:10 91:19
Myers 15:22,23 41:11 67:13 73:5,6,7,20 74:2, 24 75:1	O	opportunity 12:13 13:8,11 19:17 28:3 51:13 57:15 60:21 70:10	parties 4:1 5:7,18 6:15, 16,18,22 7:6,8,14 9:21 12:11,13,17 13:2,3,7,14 19:14,17,21 20:7,9,20 21:6,9 31:19 33:9 34:24 36:16,25 37:4 40:21 41:2 47:8,16,19 48:4,11 50:19 51:13,16,17 52:14,20 53:2 55:16,21 57:10,14 61:1,4,6,8,12 62:14,19,23,25 63:13, 15 70:10,16 72:7,9 73:4 82:23 83:4 84:21,22 85:14 86:9,13 87:8,11, 14,25 88:13 90:10,12, 17 91:9
N	Oakland 9:2	opposes 34:2	parties' 6:21 53:4 57:13 61:20 86:15 91:2
names 21:11	object 57:19	opposing 84:23	party 6:11,23 7:7,8,9, 10,11,15,16,20 8:12,14, 18,21,24 10:1,3,21,24 11:1,3 12:4,7,9,12,14, 17 13:3,5,7 23:13 47:12 51:18 52:8,9 53:9 55:12 56:21 57:24 71:10 75:6 76:20 77:19 80:25 82:2 84:13 85:3 89:10,19
Naor 11:6 18:14	objection 12:4	options 61:7	party's 13:5
narrowly 36:25	objections 8:11 9:23 10:23	oral 8:11 12:14	past 24:8 46:8 50:14
national 45:13	objective 24:14 46:3 62:7 70:9	order 3:5,6,7 6:13,20 13:14 25:19 31:20 54:4 60:3 63:14 82:13 86:25	Paul 13:16 31:22 63:17
natural 14:17 42:17	objectives 29:4,5	organizing 3:19	pays 9:5 35:8,19 39:23
nature 90:23	objectivity 24:6	others' 39:16 40:13	PCF 23:25 43:5,6 67:20 72:10,11
needed 20:7 52:16 62:11 66:23 70:7 72:21	occur 26:15	outlined 9:14	PCF's 24:2 55:15 56:9
negative 24:11	offer 22:13 29:12,13,15 33:6 60:23	outlook 45:3	pending 23:4
net 30:8	offering 22:14	outstanding 71:17	Peninsula 15:15
Network 14:20,23,25 16:15 17:5,7 44:3	offerings 22:3,14	overlap 87:6	people 31:8 47:21 83:8
neutrals 60:24	Office 12:23,25 14:6 65:23	overlaps 75:18	
Newlander 13:25 14:1 32:22 64:10	ohmconnect 8:19,20, 24,25 9:6,12,19 10:2,3 18:5,7 50:17 69:11,13	oversight 81:21	
nice 36:10	Ohmconnect's 9:3,23	overview 32:15	
non-energy 25:12,16 39:6,10 40:25 41:5 44:15 47:20 49:24	OIR 3:8,23 19:14 23:21 27:21 28:14 32:9,11 41:16 52:22 55:19 70:20 73:15 77:4 78:16 84:18 86:9	owned 7:25	
non-iou 77:5	olivine 11:5,7,23 12:8,9 18:13,15 51:5 70:1	P	
non-ratepayer 48:6	Olivine's 12:4	P.M. 3:2 91:21	
nonenergy 44:13 45:11	onset 63:25	PA's 37:10	
nonparticipants 35:13	open 24:21	Pacific 13:19,21	
nonparticipating 34:6	opening 3:16 33:6,17 41:15 73:11,15 78:7 80:1	pages 76:6	
note 78:9	operating 74:5	PAO 35:11	
noted 45:3		part 29:1,7 30:24 36:1 40:6,23 46:1 48:18 49:21 75:17 79:24 83:5 84:14	
notifies 9:4		participant 11:17,18	
NRDC 14:19 29:4 35:3 39:22 45:7 66:1,2		participants 35:13	

85:17,19 89:14	portion 7:13	primary 21:19 26:21 47:16	programatic 32:15
perceived 24:5,15	position 55:15 56:9 64:2,17 65:2,6,23 66:18 67:10,15,19,25 68:5,17 69:9,14 70:2,19,21 79:25	principles 33:22 34:8	programs 4:12,15 5:20 9:17 11:11 21:21 25:17 34:9 38:18 64:4 76:11 77:7 78:5,22 80:11
performance 3:11 4:6 19:4 74:13,14,18	positions 90:12,18	prior 38:2 45:21 53:13	progresses 32:1
performing 63:23	possibility 64:21	prioritizing 47:8 49:20	projected 6:13 49:16
period 27:7 42:24	potential 32:4 41:19 42:23,24 49:10,18 50:10 64:3 74:17	privacy 5:1 75:19 82:7, 13	projects 43:17,21
person 24:25 25:2,4 26:7,8 28:10,11,22 30:1 54:20	potentially 59:20 63:5 64:4,5 71:19,22 79:3	privately 7:25	promote 77:14
pertains 11:21	Power 15:15,17	problems 58:24	pronouns 13:10,21 15:3 17:3
PG&E 32:6,8,16,24 54:23 63:4,5,15 71:13, 22	practices 5:4	procedural 69:20	properly 34:14
phase 4:9 18:21 19:3,5 37:25 38:5 44:9,21 46:25 52:13 56:3,6,10, 17 57:4,20 59:11 71:3, 20 72:17,19,24	preceding 8:2	proceeding 3:1,14 4:1, 3,8,10 5:24 6:1,6,17 7:11 8:2,6,7 9:13,20 10:17,19 11:20,24 12:2 18:20 19:13,20 21:8,16 22:17,20 23:6 25:13 26:3 29:2 31:2 35:6 38:1 41:13,21 42:2 43:3 46:5 47:11,18 48:15,21 49:10,21 50:13 51:1,11, 12,14,16 52:11 53:18, 20,22 59:8 62:13 64:1 72:8 74:17 82:25 83:5, 14 84:4,5,8 86:1,23 87:4,18 89:11,14	proposal 29:7 31:5 52:19 53:5,14,22 54:2,9 55:1
phases 18:21 44:6 70:22	predetermine 56:12	proceeding's 26:12	proposals 52:9,15,20 57:10,13
PHC 83:21	preference 69:19,24	proceedings 7:25 11:19 22:9 25:10,11,15, 23 28:1 30:22 38:11 39:7 54:18 69:23 70:13, 24 77:1 79:7 81:11,15 91:3,4	propose 5:4
philanthropy 48:7	preferences 13:12	process 12:23,24 24:4 28:20 30:14,16 34:1 48:19 56:11,13 57:20 71:16,21 75:24	proposed 21:5,6 51:11,12 55:15 56:4,15, 25 57:1 72:6 85:6
phrased 37:3	preferred 30:17 31:3 53:17	process.office@ cpuc.ca.gov. 12:20	proposing 4:9
pillar 45:23	prefers 18:11	processing 63:9	proprietary 75:21
pioneered 36:21	prehearing 3:6 4:2 6:4 12:22 20:4 30:24 60:5, 10,11,17 91:7,18	produced 42:17	Protect 16:7,9 23:16 25:7
place 83:8	prejudice 9:21	product 30:12	protected 75:21
plan 38:3 39:4 45:5 54:12 83:2,6	preliminarily 19:12 44:9 62:12	program 3:9 4:5 11:13 18:24 22:10 29:13 35:22,23,24 41:20 60:23 76:13,18 77:8 82:14	proven 11:9
planning 28:13	preparation 68:22	program's 34:6	provide 3:21 5:18 10:20 22:20 45:24 47:17 52:4 76:12
plans 9:19	preparing 44:18 76:7		provided 8:4 73:23
play 10:17	present 90:19		provider 9:11 11:13
plenty 90:6,20	presentation 87:13		providers 10:13 74:9
point 27:20 32:13,17,24 33:6 38:4 39:1 91:16	pretty 84:9 85:11,12		providing 8:8 11:21 41:6 89:13
points 26:24 81:5	preventing 77:5		provisions 53:2
policies 62:18 70:25	previous 11:18 27:4 34:21 49:22		PSP 53:20 54:2,10
policy 11:7 17:12 29:4 45:3,12 81:7	previously 65:22 90:21		public 8:1 14:6 38:12 47:22 49:25 65:22 70:23 86:18,20 87:14
pollution 42:10	price 9:9		publicly 7:24
portfolio 21:17,19 23:4 30:17 31:3 45:22 53:18	pricing 77:6,7,8,11,13		PUC 49:15
	primarily 19:5 33:18		

pull 48:20	R.22-11-013 4:3	recess 62:3	relevant 68:18
pulled 60:3	R.22-11-013. 3:7	recognize 3:22 26:20 49:10 87:5	reliability 79:4
pulls 30:13	Rachael 7:19 39:15 67:1	recognizing 49:18	reliable 11:15
purpose 6:3 90:12	Rachel 15:7	recommend 32:2 33:20 34:20 35:6 47:7 66:22 68:19	reliance 43:13
purposes 78:2,13	raise 6:16 19:19 20:12 21:2,7 28:12,16 31:18 51:13,15 61:14 62:23, 24 68:25 70:15 72:8,12 85:15,23 87:17 91:9,11, 18	recommendation 53:25	relies 30:15
pursuant 9:7	raised 19:24 20:1,16,18 40:21 59:24 82:23 87:19	recommendations 33:18 52:7 85:10	remarks 3:16
pursue 38:2 61:5	range 5:11 38:13	recommended 39:3,4 41:15	remember 6:19 7:8
put 59:9 77:10	rapid 49:6	record 3:4 11:9 22:24, 25 23:1 31:11,12,13 62:2,4 91:20	remind 51:17 61:6,8
<hr/> Q <hr/>	rapidly 49:17	recovery 76:15	REN 45:19
qualifying 74:21	rate 33:7 39:16 40:13 48:12 52:10 64:21 77:3, 17	reduced 43:21 53:3	Renewable 15:19,24
quality 4:15 38:17,19 56:5,22,23 57:2,24 78:11	ratemaking 30:9 64:22 66:9,10,11	reducing 42:10	RENS 22:13 44:8
quantify 44:12	ratepayer 5:13 23:23 24:2 34:4 35:9,11 37:11 64:5 85:8	Reduction 38:15	repeat 40:10 65:12 73:14
Quantifying 38:16	ratepayers 24:14 26:22 35:14,25 37:16 48:9,23 50:1,2	reductions 9:5	reply 33:6 52:22
quantitatively 27:2	rates 26:19,22 35:19 43:14,19,21 49:6,11 50:8 63:10,22 64:1 78:14 80:12	reestablishing 32:18	report 24:22 38:18 44:18 72:1 90:11,16
quarter 53:21,24	ratesetting 19:13 62:13,21 63:6,21 65:5 66:13,14,23 67:4 69:24 71:14	refer 45:16 73:14	reporter 6:24 40:7,8 65:13
quasi 66:11	reach 90:13	referred 13:10	reporters 3:20 7:1
quasi-leg 64:19 66:22 69:25	reading 56:25	reflection 49:25	represent 10:18 13:8 24:13 88:1,4,15,19
quasi-legislative 62:21 63:19 65:4 69:19	ready 70:10	Reform 14:20	representation 5:10 88:8
question 23:21 32:10, 12 56:19 68:12 79:18 88:21	real 27:18	regard 88:24 89:4	representative 13:6 88:1
questions 23:8 24:25 32:12,17 34:21 40:2 47:12,14 59:9 60:7 61:12,18 83:11 86:3,5, 14 87:16 89:23	realtime 77:7,8,10	Regional 16:15 17:5,7 44:3	representatives 88:4
quick 36:6 37:22 61:25 90:4	reason 65:5	registered 9:8	represented 87:3,6
quickly 59:3	reasonable 87:7	regular 33:21	representing 6:23 7:10 14:22,25 17:4 18:3,7 26:9 88:17
quo 24:11 43:11 50:4	recent 27:7	regulatory 10:6	represents 10:10
<hr/> R <hr/>		reinforce 26:25	request 9:24 10:20,24 12:4 23:25 24:19 43:20 61:1
R.13-11-005 23:3 29:2		reiterates 43:7	requested 12:17 55:18
R.18-07-005 48:21		relate 75:14	requesting 7:20 80:4 84:13
R.22-07-005 77:4		related 19:3,16 20:8 30:22 32:25 33:23 38:16 39:1 62:15	requests 52:14 53:2
		relationship 56:3	require 35:22 58:17 71:6 72:11,18 76:12
		release 82:9	required 58:12 70:22

71:3 72:23	revolve 74:3	scope 6:5 9:14 21:3 22:8 23:17 26:12 27:6 30:19 31:16 42:1 47:6 63:7,13 68:18,20,24 69:1 71:4,18,24 72:5,6 73:17,19 76:3,14 77:15, 23 79:19 81:24	set 21:5,7 30:13 33:17 52:24 60:7 67:3 70:19 73:11 74:3 86:18
requirement 13:11	RIM 34:5 49:21 50:3	scoped 22:9 37:24 38:4 40:22 44:6 50:20 82:7	setting 7:1
requirements 52:24 69:21	risk 48:13	scoping 6:8 20:22 21:5 31:24 32:3,9 36:15 44:10	settlement 60:25 61:5, 7,8 74:20
requires 70:23 71:21	Riverside 16:11,14 43:24 44:2	screen 6:14	settlements 61:9
requiring 70:8	road 66:12	SDG&E 32:21 64:9	Sezgen 13:20 32:7,8 54:21,22,23 55:10 63:2, 3,4 71:11,12,13
research 4:14 24:22 56:5,22,23 57:2,25 69:22	robust 5:5 39:9	SDG&E's 77:8	Share 74:18
residential 9:6,11 88:5	Roger 15:2 25:4,6 66:20	Section 86:19,21 87:15	sharing 5:1 9:16 74:10
resiliency 25:17 26:2	room 37:21	seek 24:15 56:2,14	shifting 78:22,23
resolution 60:23,25	round 54:6	seeking 8:24	short 38:18
resolved 54:12	Rule 9:8 61:6 74:9	seeks 8:6	short-term 47:25 78:21 79:2
resolving 77:12	rulemaking 3:7,8 8:2 23:3 25:19,25 79:10 80:16	segment 21:24	shown 49:16 50:10
resource 4:4 21:20 29:6 46:2 49:23 54:12	rules 6:11 62:18 66:10 70:25 74:10	segmentation 21:17 29:3 45:22,25	shows 27:13
resources 3:9 4:24 14:17 22:1 28:19 78:7	ruling 44:19 83:24 84:12,21 85:3,4	segments 21:19,22	side 10:12
respect 24:18 30:5 87:24		SEIA 16:5 30:4 41:24, 25 53:12 67:17,18	significant 28:14 54:3 76:16
respected 75:21	S	selected 24:3	silod 80:12,14
respectfully 88:5	safety 44:15	selection 28:20	silos 29:12
respond 44:19 82:20	sailing 20:4	Sempra 36:21	similar 50:18 64:17 87:3 91:1
response 8:13 9:1,25 10:13,25 11:13 12:6,15 17:15 19:22 20:11,14 29:16 52:4 61:15 85:4 89:24	Samir 16:18 51:23,24 68:4	sense 50:6 67:3	Similarly 65:1 71:14
restricts 27:21	San 13:24 14:1 15:16	sensitive 75:22	sincerely 60:16
result 43:11,21 50:13 53:3 63:23	save 50:11	separate 32:18 34:23 36:8,19 42:4	sister 30:21
resulting 86:24	saving 9:4	separately 29:16	situated 45:11
results 4:14 24:20 55:6 56:8 58:16 64:6	SB 39:2	separating 29:5 57:19 81:4	situation 72:17
retail 9:7 11:11	SBUA 14:16 34:17,20 65:20 87:23 88:19	series 57:6 85:10	skipped 52:1
retain 50:5	SCE 31:20,22,23 32:18 63:19	service 6:14 12:22	Slight 69:19
review 30:19 31:6 52:14,20	schedule 6:5 30:25 51:11,12,14 52:12,13, 23 53:12,19,22 54:14, 23 55:15 56:25 57:8,22 60:8 70:13 84:5,8 86:1	services 9:6 11:8 60:24	small 14:13,15 65:18 75:13 88:5,9,15,18,19 89:2
reviewing 44:18	schedule's 53:1	serving 77:5 78:1,4,25 80:10	smart 10:14
revised 53:1	scheduled 70:14		smooth 20:3
revising 24:10	scheduling 11:12		Socal 63:16
			Socalgas 33:3,5 64:14
			social 5:21 38:25

societal 4:13 25:22 38:6,7 42:6,9 43:13,16 44:11 49:24 56:5,7,22 57:1,22,24 59:16	standard 39:7	submissions 42:22	talk 54:19 60:22 71:4 78:18 79:14
software 9:3	standardized 74:12	submit 12:1,18 57:15 72:23	talked 31:15 41:3 82:21
solar 16:3 27:6 30:10 50:7	standardizing 5:2	submitted 19:14 36:1, 22 84:17	talking 27:9 49:7 59:6 73:1 78:11,24 87:24
solutions 36:11	standards 3:11 4:6 19:4 74:14,18	submitting 87:9	talks 61:5 76:25
Sonoma 15:15	start 21:11 49:7 51:21 55:8 80:3	subsequent 63:8	Tapia 17:11,12 46:16, 17 68:11
sort 36:9,21,25 42:20 78:10 79:13 80:4,9,18 90:9	started 30:15	subsidies 38:10,14 45:12	target 21:22
sounds 88:3 89:5	starting 32:17	substantial 82:16 86:22	tease 90:15
sources 42:15 48:6	starts 49:5,18 81:7	success 41:17	technical 17:17 47:10, 15
Southern 13:15,17 14:3,5 31:21 32:23	state 5:12 38:23 42:18 45:13 48:7	suddenly 37:21	technologies 10:13,14 15:24
space 10:12	stated 32:18 36:15 64:12	sufficient 12:25 52:23 79:1	technology 15:20 17:21,23 33:11 82:5
speak 6:23 12:13 19:19 51:19 91:11	stating 13:6	suggest 36:7 66:8	teed 78:15
speakers 34:21 40:3	Stats 27:13	suggestion 28:25 29:19,20	temperature 29:17
speaking 6:12,13,20, 25 7:2,4 13:13 31:20 63:14 64:18	status 7:7,8,16,20 8:12, 15,18,21,24 10:2,3,21, 24 11:2,4 12:5,7,9,12, 14,17 13:4 24:11 43:11 50:4	summary 76:6	tend 36:9
specialist 11:7 18:14	step 53:15 85:1	Sung 13:16 31:22 63:17	tension 47:24 48:3
specific 26:24 27:20 33:5 34:14 45:24 52:6 66:3	steps 31:6 85:13	supplements 87:12	terms 18:17 36:16 37:1 46:11 79:19 81:17 82:15 84:14
specifically 9:3 21:22 33:21 65:22 68:21 86:23	stipulations 55:22	Supplying 26:16	territory 44:17 90:22
specificity 33:7	stopping 38:19	support 3:21 21:22,24 23:23 28:16 37:10 40:20 41:12 42:1 45:4 46:24 47:5 50:9,25 52:8 69:21 78:6	test 4:13 25:22 34:5 35:11 37:11 38:6 42:6,9 43:14,16 44:11 49:24 56:5,7 57:1,16,22,24 59:16
spend 89:2	stops 38:18	supporting 84:23	tested 56:13
spent 24:2	storage 17:10,13 27:12,14 43:21 46:15, 17 68:10,22	supportive 44:10 64:17	testimony 8:9 10:20 36:22 71:22 77:10
spoke 25:24	storing 76:8	supports 33:22 52:13	testing 56:10,22
spoken 65:22	storms 79:3	supposed 53:15,20	tests 35:10 38:1
staff 3:21,23 31:5 44:18 52:15,20 53:4,14,22 54:1,9,18,19 55:1 57:10,11,13 59:7	streamlined 39:6	sustainable 11:15	thing 7:6 40:5 54:23 58:22 81:13 85:1
stakeholder 31:15	strong 42:10 53:25 64:2 65:2	switching 66:22	things 31:5 37:22 46:7 57:6 79:4 80:7,23 82:22 84:7
stakeholders 41:7 76:12	strongly 36:7,12 49:4, 20	system 14:9 30:17 31:3 37:13,15 53:17 79:4	thinking 58:13 80:17 84:22
stand 57:12	study 39:2 54:25 55:6,8 58:6,15,17	<hr/> T <hr/>	third-party 9:1,12
	subject 56:10 58:2 59:8 86:17	table 57:8	thought 83:21,22 85:25
	submission 57:2,3	taking 7:5 13:1	

thoughtful 61:23	traditional 35:10	69:16,18	vehicles 10:15
thoughts 5:18 44:20	trained 60:24	United's 10:23	vendors 76:12
throw 90:23	training 21:25	universal 74:19	Ventura 17:6
time 25:5 29:23 31:18 34:15 36:13 37:3,13 41:3 46:19 47:6,24 51:7 52:7,14,19 53:4 61:8 64:20 65:6,24 66:18 75:3 83:10 85:24 89:2 90:20	transcript 40:7	unlike 72:17	versions 27:4
timelines 81:22,23	transformation 29:5 34:8	unlock 80:11	versus 40:22
timely 58:7	transmission 4:19 27:5 49:14,17 54:24 55:7 58:3,6,15 59:1,19	unmute 73:7	view 26:13 45:10
times 6:11,15 76:16	transparent 24:4	unnecessary 87:2	viewed 65:4
timing 55:2	transportation 10:14	unproductive 87:1	virtual 3:1,21 6:17,21 7:1 19:19 20:12,16 21:7 31:18 51:15 61:14 62:24 70:15 72:8 85:15 87:17,19 91:11
titled 12:22	Tri-county 17:7	unresolved 81:16	vitality 47:23
today 3:22 4:1 5:25 7:16 12:17 15:14 16:24 19:5 28:15	tribal 5:12,14,21	update 4:16 53:4,15 74:10	volume 36:22
today's 3:19 6:4	trouble 73:6	updated 58:17,19,23	vote 50:3
Tom 16:4 30:2,3 41:25 53:10,11 67:18	turn 5:25 14:20,22 36:4, 18 37:23 66:5 67:2,10, 21 69:6 89:25	updates 8:5 30:5 33:21,23 54:3,9	<hr/> W <hr/>
tools 5:2	Turner 10:5,6,22 18:10 28:11,12 50:25 69:17	updating 58:22	wanted 25:8 26:24 28:12,15 30:25 40:8,12 83:7
topic 29:21 31:14 44:20 51:7 52:7 80:18 86:7	type 78:10	urge 28:1,18 82:8	wanting 80:10
total 49:23	types 48:5 74:9 78:23	urged 27:1	warming 42:22,24
touch 28:17 78:8	<hr/> U <hr/>	usage 82:9	wary 82:12
touches 78:23	UC 38:16	users 69:23	water 29:17
track 4:10,20 9:15 11:9 18:21,22,25 19:5,7,9, 10,18 20:10,22 21:5,7 23:21 25:20 26:12 27:17 28:16,17 31:16 32:1,10,11,18,19 34:22, 23,25 35:5 36:9 37:25 38:5 39:24 40:22 42:4 44:9,21 46:25 50:20 52:13 55:9 57:6 60:13 61:11,13,18,23 62:1,5, 6,7,10,17,20 63:7,20,24 64:7 68:20,24 70:9 72:20,24 73:1,10 76:25 83:1 85:14 86:4,9,11,16 91:10	UCAN 14:25 37:7,9 66:15,17 76:23 77:2	utilities 5:11 7:24 8:1 22:12 24:9 43:17 50:4 64:18 65:11 70:23 71:1 86:18,20 87:14	ways 36:23 43:2
tracks 4:10 5:17 36:12 37:3 41:13 42:3 44:7 52:11	ultimate 56:17	utility 7:18,21 8:15,17 11:16 14:13,15,20,23, 25 15:5,8 24:12 65:18	Weaver 14:11,12 34:12 65:9,15
	ultimately 63:22 64:1	utilization 4:22,24 19:2 62:9	Weberski 14:14,15 34:18 65:19,20 87:21, 22 88:22 89:20,22
	unclear 54:24	utilize 78:14	weeds 52:23
	underline 31:1	utilized 83:15	week 21:4 79:9 80:16 81:16
	understand 22:16 35:7,15,17 54:4 58:2 59:12	<hr/> V <hr/>	wells 38:22
	understanding 53:19 79:8	vague 85:12	Western 16:11,14 43:24 44:1
	understood 79:11	valued 29:11	wholesale 9:9 11:11
	unified 22:14	values 30:8 80:11	wide 10:11
	unions 7:22	variety 78:2	Wiedman 15:9,12,13, 18 40:18,19 67:8 77:20, 21,22 79:23
	unique 9:13 90:16,23	vary 76:18	
	United 10:7,10,18 11:2, 3 18:9,11,12 50:24	vehicle 73:18	

Word 29:22

work 3:22 5:24 7:23
23:24 25:17 60:4 83:8
84:7

workforce 21:25

working 4:18 5:5,10
10:19 25:15 71:15,23,
25 73:11,13,17,18,22,
24 75:24 79:25 80:2
81:21 83:1,12,15,25
84:14,15,24 85:7,9,11
86:11,12,16 87:24 88:1,
4,24 89:3,9,15 90:4,5,7,
8,11,13,16,21,24 91:2

workshop 26:2 79:9
80:16 81:15

workshops 8:8 10:19
85:10

worries 52:3

Wyatt 16:23,24 45:2
68:7

Y

year 10:9 30:17 53:21

years 58:17

Yip 3:25