

ALJ/KIHY/smt 5/19/2023



FILED

05/19/23

11:05 AM

R2106017

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

Rulemaking 21-06-017

**ADMINISTRATIVE LAW JUDGE'S RULING ON RECOMMENDED
REFORMS FOR THE 2023 DISTRIBUTION INVESTMENT
DEFERRAL FRAMEWORK PROCESS, THE
PARTNERSHIP PILOT AND THE STANDARD-
OFFER-CONTRACT PILOT**

This Ruling considers proposed reforms to three solicitation frameworks for the 2023 cycle: the Distribution Investment Deferral Framework (DIDF), the Partnership Pilot, and the Standard-Offer-Contract pilot. Reforms have been proposed by the Independent Professional Engineer, Independent Evaluators, and Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company (jointly, Utilities). As discussed herein, while this Ruling sets forth only four of the 31 recommendations, a majority of the remaining proposed reforms will either be considered in an upcoming decision in this proceeding looking at Track 1 Phase 1 issues, near-term actions on the Distribution Planning Process and Data Improvements, or will be considered in a later DIDF cycle, *i.e.*, 2024.

1. Background

This Ruling continues the annual practice of reviewing and adopting proposed reforms to three distributed energy resources procurement

frameworks including DIDF, the Standard-Offer-Contract pilot¹ and the Partnership Pilot.²

The November 15, 2021 *Assigned Commissioner's Scoping Memo and Ruling* set forth the scope of Rulemaking (R.) 21-06-017 and includes Track 1, Phase 1: Distribution Planning Process and Data Improvements Near-Term Actions and Phase 2: Distribution Planning Process Improvement, with subtopics such as implementation of the DIDF process (including its annual reform process) and continual implementation of two pilots from R.14-10-003: the Standard-Offer-Contract pilot and the Partnership Pilot. This Background section provides a description of the procedural background of the annual reform process and how the various elements from R.14-08-013 and R.14-10-003 come together in R.21-06-017.

In Decision (D.) 18-02-004 of R.14-08-013 (Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769), the Commission adopted the DIDF process, which built on the Competitive Solicitation Framework pilot previously adopted by the Commission in R.14-10-003 (Order Instituting Rulemaking to Create a Consistent Regulatory Framework for the Guidance, Planning and Evaluation of Integrated Distributed Energy Resources). The purpose of DIDF is to identify, review, and select opportunities for third-party owned distributed energy resources to defer or avoid traditional capital

¹ The Standard-Offer-Contract pilot is a three-year pilot, limited to in-front-of-the-meter distributed energy resources, that streamlines the existing DIDF Request for Offer procurement method.

² The Partnership Pilot is a five-year pilot for behind-the-meter distributed energy resources where an aggregator enrolls new and existing distributed energy resource customers to meet one or more grid needs.

investments foreseen by the three investor-owned utilities (Utilities)³ on their electric distribution systems. D.18-02-004 established DIDF as part of the annual utility distribution planning process. DIDF results in the identification of traditional distribution upgrades that may be deferrable through a competitive solicitation for distributed energy resources.

Also in D.18-02-004, the Commission concluded that “an open pathway for modifying various elements of the DIDF is needed.”⁴ This open pathway was established through the February 25, 2019 *Ruling Requesting Answers to Improve the Distribution Investment Deferral Framework Process*, which invited parties to comment on possible changes and improvements to the DIDF process.

The following rulings adopted previous DIDF reforms: the May 7, 2019 Ruling Modifying the Distribution Investment Deferral Framework Process; the April 13, 2020 Ruling Modifying the Distribution Investment Deferral Framework Process; the May 11, 2020 Ruling Modifying the Distribution Investment Deferral Framework-Filing and Process Requirements; and the June 21, 2021 Ruling on Recommended Reforms for the Distribution Investment Deferral Framework Process.

Related to the DIDF Reform process, in R.14-10-003, the Commission approved two pilots to expand the procurement of distributed energy resources: the Partnership Pilot and Standard-Offer-Contract pilot. D.21-02-006 directed that the evaluation of the two pilots occur during annual reviews and the filing

³ The three investor-owned utilities (Utilities) are Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE).

⁴ D.18-02-004 at Conclusion of Law 15. *See also* Ordering Paragraph 2.gg. ordering the creation of an open pathway for modifying various elements of the DIDF and ordering the Utilities to propose modifications in the advice letters filed to request approval of distribution deferral projects.

of the Advice Letters regarding the evaluation criteria.⁵ D.21-02-006 also authorized Energy Division (in consultation with the Distribution Planning Advisory Group) to perform a midstream evaluation to determine whether to move forward with procurement for years four and five of the Partnership Pilot.⁶

On January 27, 2022, the Commission adopted Resolution E-5190, which approved, with modifications, evaluation criteria for the Partnership Pilot and Standard-Offer-Contract pilot pursuant to D.21-02-006. In Resolution E-5190, the Commission directed the pilot evaluation timeline to be aligned with the DIDF reform process and include an annual Administrative Law Judge Ruling in this proceeding (or its successor) to address reforms, pilot improvements, and off-ramp determinations.⁷ The Ruling also directed the Independent Evaluators (IEs) and Utilities to submit three reports as part of the pilot evaluation process: (1) IE DIDF Request for Offers/Standard-Offer-Contract Report; (2) Investor-Owned Utility and IE Annual Partnership Pilot Evaluation Report; and (3) Investor-Owned Utility and IE Midstream Partnership Pilot Evaluation Report.⁸ The adopted schedule in the Resolution indicates the Commission also approved off-ramps for both pilots.⁹ Relevant to this ruling, the schedule stated that in May 2023 the Administrative Law Judge Ruling would consider whether to launch the third year of the Standard-Offer-Contract.¹⁰

⁵ D.21-02-006 at Ordering Paragraph 6.

⁶ D.21-02-006 at Ordering Paragraph 6.

⁷ Resolution E-5190 at Ordering Paragraph 4.

⁸ Resolution E-5190 at Ordering Paragraph 5.

⁹ Resolution E-5190, Attachment B at 2.

¹⁰ Resolution E-5190, Attachment B at 2.

The 2023/2024 annual reform process began on March 24 , 2023, with the individual filing of final Independent Evaluator Interim Reports (IE Reports) on DIDF Request for Offers and the Standard-Offer-Contract pilot by Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) (together, Utilities). Pursuant to Resolution E-5190, the Independent Professional Engineer (IPE) submitted the *2023 Independent Professional Engineer Post DPAG Report* (IPE Report), dated March 29, 2023. Parties were invited to file comments on potential improvements to the Year 2 Standard-Offer-Contract pilot based on the IPE Report and annual reports from the utilities on the Standard-Offer-Contract pilot. Opening comments were filed on April 3, 2023, by PG&E, SDG&E, and SCE; no reply comments were filed.

2. DIDF Reforms

Utilities expressed general concerns about the DIDF Reform process. SCE contends that “given current concerns about the distribution deferral process...consideration of additional reforms to DIDF is not the best interest of ratepayers outcomes but time.”¹¹ SCE advocates for a comprehensive evaluation of the DIDF process in place of the annual reform cycle.¹² PG&E encourages the Commission to pause formal reform and expansion to the DIDF and instead focus on the Track 1 scoping issues.¹³ PG&E asserts that DIDF has shown that successful procurement of [distributed energy resources] to defer capacity investments in specific locations is already feasible.”¹⁴ However, PG&E contends

¹¹ SCE Comments at 2.

¹² SCE Comments at 2.

¹³ PG&E Comments at 1.

¹⁴ PG&E Comments at 1.

that expanding the deferral of capacity investments should not be a priority for PG&E or its customers and therefore DIDF reform should not be considered in Track 1, Phase 1.¹⁵ SDG&E submits “the ongoing efforts to improve the DIDF are not changing outcomes, but are consuming considerable resources.”¹⁶

These comments are taken into account when reviewing the recommendations of the IEs and IPE. It is reasonable to limit the number of reforms to be implemented for the 2023 DIDF cycle when considering the scope of this proceeding. Hence, below are a limited number of reforms to be implemented in 2023. The description of each proposed reform includes the reasoning for requiring the implementation of the reform. Following the discussion of the 2023 reforms is a list of reforms to be considered at a later date. Near the end of this ruling is a list of reforms that will not be considered.

**2.1. Reforms to Be Implemented
in 2023 DIDF Cycle**

**2.2. IE and IPE Reports Shall Be
Filed in Future Years**

Over the past reform cycles (including the 2023 cycle) the IE and IPE reports have been served to the parties and parties have had an opportunity to comment on these reports. However, these reports have not been part of the proceeding record. In order to ensure transparency of the annual reform DIDF process, the IE and IPE Reports should be in the record. Copies of the IE reports are attached to this ruling for the record (*see* Attachment B). A prior ruling in this proceeding entered the IPE reports into the record. In future years, Utilities shall

¹⁵ PG&E Comments at 2.

¹⁶ SDG&E Comments at 1.

be responsible for filing the reports with the Commission and serving the reports to the service list.

2.3. Standard Offer Contract Midstream Evaluation

As previously described, Resolution E-5190 directed that a midstream evaluation for the Standard-Offer-Contract be conducted in 2023 prior to the launch of a proposed third and final year of the pilot. The IE Reports and Utilities disagree on whether to implement the third year. As described below, in order to ensure the protection of ratepayer funds, the Standard-Offer-Contract pilot should be discontinued going forward. The lone project in process should continue.

SCE's IE stated that in both years of the Standard-Offer-Contract pilot, SCE received bids that were able to meet the project needs.¹⁷ However, the SCE IE Report acknowledges that the 2021 solicitation resulted in the proposed technology not commercially proven and the project not coming to fruition. For the 2022 solicitation, SCE increased the original need, and the revised bid was not economic relative to the traditional solution. Recommending the continuance of the Standard-Offer-Contract, the SCE IE Report highlights that in the case of the Partnership Pilot, "it has been more of a challenge for aggregators of behind-the-meter projects to meet the entire project need," while the In-Front-Of-the-Meter projects (the focus of the Standard-Offer-Contract pilot) have had more success.¹⁸ The SCE IE Report contends that the overall minimal competition in

¹⁷ SCE IE Report at 53.

¹⁸ SCE IE Report at 53.

the Standard-Offer-Contract pilot “should be generally expected and is not necessarily a sign of a failing pilot program.”¹⁹

In support of continuing the Standard-Offer-Contract, SCE notes that while the first two years of the pilot supplied bids that “had potential to meet the respective deferral needs,” the site-constraints of the solicitation make it “subject to changes to the deferral needs.” SCE concedes that it is generally expected that “it is difficult to contract successful projects for this pilot.” However, SCE cautions that “with limited availability of data to better define program shortfalls, and lack of successful projects to track, it is difficult to predict the outcome and potential success” of this pilot.²⁰ SCE recommends moving forward with the third year and if there are no successful deferral projects, the Commission should evaluate the shortfalls as well as the need to implement the pilot as a full program.²¹

PG&E’s IE recommends that the Standard-Offer-Contract be “off-ramped and not launched for Year [Three].”²² The PG&E IE Report indicates that, while there was at least one bid received in 2021, a distributed energy resources solution was determined to be impractical, and the need was removed. The procurement process is still ongoing for the grid need identified in 2022, which is currently found to be cost-effective compared to the traditional investment. The PG&E IE Report was unable to provide evaluation outcomes due to the project being stopped in 2021 and ongoing project procurement in 2022. The PG&E IE Report concludes that the pilot has resulted in a low participation rate and does

¹⁹ SCE IE Report at 53.

²⁰ SCE Comments at 10.

²¹ SCE Comments at 10.

²² PG&E IE Report at 28.

not appear to be an improvement over the traditional DIDF RFO.²³ PG&E supports this recommendation, underscoring the low participation rate.²⁴

SDG&E did not conduct a Standard-Offer-Contract solicitation.

The Commission stated in D.22-02-006 that “we should provide a guardrail or off-ramp, as recommended by SDG&E and Public Advocates Office, to ensure protection of ratepayer funds.”²⁵ We agree with the SCE IE Report that is difficult to predict the outcome and potential success of the pilot given the limited availability of data and lack of successful projects. While it would be valuable to evaluate the ongoing PG&E project, it is unknown whether that project will come to fruition given the prior experience of other projects. Further, it is difficult to determine how valuable the data from a single project would be in comparison with the costs to administer the evaluation of the project. The Commission has stated that the purpose of the guardrail or off-ramp is to determine whether the pilot should be modified or terminated and also to ensure protection of ratepayer funds. Hence, we find that to ensure protection of ratepayer funds, the Standard-Offer-Contract pilot should not be continued, and no further solicitations should occur. However, it is reasonable to allow the current project in process to move forward.

2.4. Known Loads Tracking Data

The 2022 DIDF Reform Ruling adopted the IPE recommendation to require Utilities to begin the tracking of known loads in the 2022 GNA/DDOR filing.²⁶

²³ PG&E IE Report at 28.

²⁴ PG&E Comments at A-16.

²⁵ D.22-02-006 at 61.

²⁶ *Administrative Law Judge’s Ruling On Recommended Reforms For The Distribution Investment Deferral Framework Process, The Partnership Pilot And The Standard-Offer-Contract Pilot*, June 16, 2022 at 11.

Known load or known load projects are defined as forecasts of load growth that are based upon the requests for service from residential, commercial, and industrial customers received by the utility. The ruling provided instructions to Utilities to ensure consistency of reporting between Utilities. As described below, this ruling directs Utilities to provide additional data in order to determine whether the loads materialize and the types of customer requests that lead to known loads, which will improve alignment between distribution planning and forecasting, including the IEPR forecasts datasets.

In the 2023 IPE Report, the IPE explains that the purpose for requesting the data is to track if known loads used in the DPP forecasting process materialize. IPE contends that tracking whether a known load materializes requires the tracking of known loads “from its initial use in the DPP until (1) the known load is implemented (requested service is provided to the customer); or (2) the request for service is terminated by the customer; or (3) the customer requests a change in the amount or timing of the service.”²⁷

The IPE Report submits that all the necessary statistics for such tracking can be calculated for all three utilities except for metrics that break out the data by category and type, this is because “the utilities interpreted the requirement to report category and type differently.”²⁸ This, the IPE contends, prevents analysis to determine if some categories of new loads are less certain to materialize than others and prohibits the metrics to reflect how customer requests change over time from the initial customer request to subsequent years.”²⁹ To correct for this, the IPE Report recommends that Utilities report “type of customer (residential,

²⁷ IPE Report at 30.

²⁸ IPE Report at 31.

²⁹ IPE Report at 32.

commercial, and industrial), as well as the category of the customer load (Agricultural Water Pump, Mega Tract Homes, Cultivation, Medium/Heavy Duty Commercial EV Charger, etc.)” The IPE Report recommends that Utilities use “the same list of potential categories.”³⁰

Additionally, the IPE Report observes that PG&E did not provide the actual load amount and the actual in-service date. However, the IPE Report submits that based on discussions with PG&E, the utility will “try to provide this day in future cycles.”³¹ Further, the IPE Report observes that SCE provided the five-year total amount of service being requested while PG&E and SDG&E provided annual values. The IPE Report contends that annual values are needed to calculate the metrics discussed earlier in this section.³²

SCE agrees that terms related to load growth, as referenced in the 2022 Reform Ruling, should be clearly defined but the reform process “should consider [Utilities’] current and planned tool capabilities.”³³ PG&E asserts it is still in the process of developing the known load tracking data set and does not yet have the granular level of customer type and customer load categories as recommended by the IPE. PG&E states that it can include data on customer load categories as it becomes feasible but recommends the reform process not require the same customer categories.³⁴ SDG&E contends the “ongoing efforts to improve the DIDF are not changing outcomes but are consuming considerable

³⁰ IPE Report at 32.

³¹ IPE Report at 33.

³² IPE Report at 33.

³³ SCE Comments at 3.

³⁴ PG&E Comments at A-4.

Energy division, consultants, utility and stakeholder resources.”³⁵ SDG&E recommends that proposed DIDF refinements that require a material amount of utility resources and time to implement should not be adopted and acted on.”³⁶

This Ruling finds that sufficient data to track known loads year over year is needed to understand whether the known loads materialize and why types of customer requests lead to known loads. To accomplish this, the initial in-service date initially requested by the customer, actual load amount,³⁷ and actual service date as defined in Appendices A to C in the IPE Report are important to track, as well as the annual amounts of service requested. Utilities shall jointly develop a uniform list of type of customer and customer load categories in preparation for their August 2023 GNA/DDOR filings as described above and include the data in the report.

2.5. Known Loads Reporting

D.18-02-004 established the DIDF and the Distribution Planning Advisory Group to include the Independent Professional Engineer (IPE). The Commission described the role of the IPE as “primarily concerned with providing neutral expertise on distribution planning activities and the selection of candidate deferral opportunities.”³⁸ Additionally, D.18-02-004 described the annual IPE Report as an “evaluation of the DPAG review process, plus any stakeholder feedback regarding candidate projects that the [investor-owned utilities] did not

³⁵ SDG&E Comments at 1.

³⁶ SDG&E Comments at 1.

³⁷ [The IPE clarified that the actual load amount is not the meter read, but an entry is made if the customer-requested amount is changed from the previously requested amount of service by the customer in the year service is provided/service actually commences. IPE Report, Appendix A, at A-3\).](#)

³⁸ D.18-02-004 at 63.

propose for solicitation.” Given the role of the IPE as evaluator, this ruling determines it reasonable to require Utilities to provide a narrative summary report that includes metrics they calculate based upon their Known Load Tracking Data (discussed in subsection 3.3) and the implications of those metrics. As described below, this information should be provided earlier in the process to allow the IPE, Energy Division and other stakeholders to be able to perform their own metric analysis, as recommended by the IPE.³⁹

The IPE Report recommends that “given the complexity of the tracking data submittals and the fact that all three companies will report the data differently because of differences in their business processes and IT systems,” Utilities should also provide a narrative summary report that includes metrics calculated by Utilities based upon utility tracking data and the implications of those metrics; this would be in addition to the tracking data.⁴⁰ Again, the purpose of this narrative and metrics is to help answer the question: Did known loads incorporated in the DPP materialize, and if not, how many were deferred, cancelled, or modified?

This ruling finds this recommendation to be valuable in reaching the objective of tracking known loads discussed in the previous subsection. Utilities are directed to provide both the metrics and the narrative as described in pages 9 to 20 and 31 to 32 of the IPE Report. Further, the information will increase in value if provided earlier in the DIDF process so that members of the DPAG can review the narrative and associated metrics. Hence, Utilities shall provide this information in their August 2023 GNA/DDOR filings.

³⁹ IPE Report at 33.

⁴⁰ IPE Report at 33.

2.6. Separate Reporting of Utility Procurement and/or Projects Identified for Utility Ownership

Pursuant to the May 11, 2020 *Ruling Modifying the Distribution Investment Deferral Framework-Filing and Process Requirements*, in the annual DDOR spreadsheet of planned investments, Utilities are required to “identify all [distributed energy resources] solutions planned for [investor-owned utility] ownership or otherwise planned for procurement but not prioritized as deferral opportunities.” Additionally, Utilities are required to include an “indicator that the project is excluded from prioritization.”⁴¹ As discussed below, this ruling requires an additional spreadsheet that removes projects otherwise planned for procurement or identified for utility ownership. The identification of these projects, which are not likely to be recommended for deferral, will improve the Candidate Deferral Opportunity prioritization.

In its November 14, 2022 IPE 2022 DPAG Report, the IPE describes the prioritization process used where the Candidate Deferral Opportunity metrics are normalized and ranked relative to each other. Including the projects that are not likely candidates to be recommended for deferral decreases the chances for the other listed projects to be selected.⁴² The IPE recommends that Utilities “provide a prioritization with all projects included as they do now and to also provide a second one with such projects removed.” I find this to be a reasonable solution to this concern. SCE stated they are “neutral on this recommendation.”⁴³

⁴¹ May 11, 2020 *Ruling Modifying the Distribution Investment Deferral Framework-Filing and Process Requirements*, Attachment 1 at 1. (See Reform #2.)

⁴² IPE 2022 November Report at 30.

⁴³ SCE Comments at 4.

Hence, Reform 2 is revised to include a second spreadsheet that excludes projects that are not likely candidates to be recommended for deferral.

2.7. Updated Schedule for 2023-2024 Cycle

The updated Distribution Planning Advisory Group schedule for the 2023-2024 DIDF Cycle, attached to this Ruling as Attachment A, is hereby adopted.

3. Proposed Reforms to Be Considered in the Future

Below is a list of reforms to be considered in the future:

- SDG&E recommends permitting Utilities to revise cost caps downward.
- Kevala recommends Utilities provide equity data in GNA/DDOR reports.
- Kevala recommends adding more data to the GNA/DDOR reports.
- Kevala recommends flagging planned upgrades that are at risk of becoming stranded assets in GNA/DDOR reports if Known Loads do not materialize.
- Kevala recommends implementing consistent methods across Utilities.
- Kevala recommends flagging facilities at risk for violating reliability criteria in GNA/DDOR reports.
- Kevala recommends adding an explicit category for Photo Voltaics and generation hosting capacity in the GNA.
- Kevala recommends peak load reduction, voltage and resiliency constraints management in the DIDF.
- SCE recommends removing legacy layers from the data portals.
- Kevala recommends performing case studies of capacity-constrained distribution grid areas.

- IPE Report recommends resolving inconsistencies in the level of Certainty Questionnaire.
- PG&E and SDG&E recommend off-ramping the Partnership Pilot.
- Kevala recommends a DPP Planning Horizon.
- SCE and PG&E recommend exempting from DIDF any projects requiring Commission permitting, *i.e.*, General Order 131-D.
- Utilities recommend modifying D.16-12036 “Resiliency (Microgrids)” definition as a grid service applicable to DIDF.
- Kevala recommends considering services other than microgrids that might provide resiliency.
- Kevala recommends modifying the timing screen to identify Candidate Deferral Opportunities earlier than Year 4 of the DPP Planning Horizon.
- Kevala recommends that GNA/DDOR reports include the cost of high-voltage bus work in calculating deferral values.
- Kevala recommends addressing climate change in the demand forecast with weather adjustments.
- Kevala recommends more transparency in the DIDF analysis to allow replication by third parties.

4. Proposed Reforms Denied

Below is a list of recommended reforms that are not planned to be considered:

- SDG&E recommends to cease the redundant review of the DIDF by IPE, IE, and Kevala.
- All three Utilities question the validity of the DIDF Reform and recommend (to varying degrees) stopping or pausing the annual DIDF reform process.

Attachment A

**Revised Distribution Planning Advisory Group (DPAG) Schedule for
2023/2024 Distribution Investment Deferral Framework (DIDF) Cycle**

Activity	Date
Pre-DPAG 2023	
<ul style="list-style-type: none"> • Joint Utility proposal on IEPR scenarios to apply to the 2024 Grid Needs Assessment/Distribution Deferral Opportunity Report (GNA/DDOR) filings (due 5/12/2023) • DIDF Reform Ruling 	May 2023
<ul style="list-style-type: none"> • Distribution Forecasting Working Group workshop (final workshop date to be determined in coordination with the Energy Division) • Draft Independent Professional Engineer (IPE) Plan 	Week of May 22, 2023
Utilities submit DIDF Procurement Status Report to Energy Division, IPE, and Independent Evaluators (IEs) (every 6 months)	May 15, 2023
Stakeholder comments on Joint Utility proposal for IEPR scenarios to apply to the 2024 GNA/DDOR filings	June 24, 2023
Prescreening period for Partnership Pilot ⁴⁴	July 15, 2023 to August 15, 2023
<ul style="list-style-type: none"> • Energy Division approval or modification of Joint Utility proposal for IEPR scenarios to apply to the 2024 GNA/DDOR filings • IE Post-Procurement Utility Comparison Report (comparing Utility procurement approaches and reporting on all procurement outcomes to date) 	August 1, 2023

⁴⁴ Prescreening Application and other information regarding the Partnership Pilot can be found at: (1) PG&E website, here: https://www.pge.com/en_US/residential/save-energy-money/savings-programs/savings-programs-overview/partnership-pilot.page; (2) SCE’s website, here: <https://www.sce.com/business/savings-incentives/integrated-distributed-energy-resources-partnership-pilot>; and (3) SDG&E’s website, here: <https://www.sdge.com/partnership-pilot#apply>.

**Revised Distribution Planning Advisory Group (DPAG) Schedule for
2023/2024 Distribution Investment Deferral Framework (DIDF) Cycle**

Activity	Date
DPAG 2023	
<ul style="list-style-type: none"> • Utility GNA/DDOR filings • Final IPE Plans circulated 	August 15, 2023
Utilities update DRP Data Portals with GNA/DDOR data	August 30, 2023
IPE Preliminary Analysis of GNA/DDOR data adequacy circulated	September 5, 2023
<ul style="list-style-type: none"> • Utilities launch Request for Offer (RFO) and Standard Offer Contract (SOC) pilot (SOC bids due no sooner than 75 days after launch or November 30, 2023) • Utilities update Participation Pilot website with prescreened aggregator contact information 	September 15, 2023
DPAG meetings with each Utility Note: Utilities to provide workshop participation details and complete agendas for each meeting to the Service List at least 10 days in advance of the first meeting.	Mid to Late September 2023
Participants provide questions and comments to Utilities and IPE	September 25, 2023
Utility responses to questions	October 5, 2023
<ul style="list-style-type: none"> • Follow-up utility meetings via webinar (optional)⁴⁵ • Optional due date for line section data supplement to GNA/DDOR (October 15, 2023) 	Week of October 15, 2023
IPE DPAG Reports	November 8, 2023

⁴⁵ The utilities will coordinate with the Energy Division on the potential need for follow-up webinars.

**Revised Distribution Planning Advisory Group (DPAG) Schedule for
2023/2024 Distribution Investment Deferral Framework (DIDF) Cycle**

Activity	Date
<p>Tier 2 Advice Letters:</p> <ul style="list-style-type: none"> • (1) “First” Advice Letter for approval to launch subscription periods for Partnership Pilot. If applicable, also to seek approval to launch RFOs or SOCs for planned investments elevated to Tier One candidate deferral opportunities during the DPAG • (2) “Second” Advice Letter for approval not to launch RFOs, SOCs, or Partnership Pilots for any remaining planned investments or candidate deferral opportunities identified in the GNA/DDOR filings, by DPAG stakeholders, or by Energy Division (i.e., any not included in the “First” Advice Letter) <p>Procurement Status:</p> <ul style="list-style-type: none"> • Utilities submit DIDF Procurement Status Report to Energy Division, IPE, and IEs (every 6 months) 	November 15, 2023
Post-DPAG 2023	
Utilities provide draft second-round RFO or SOC launch materials to Energy Division for approval in consultation with IPE and IE (if second round needed)	December 10, 2023
<ul style="list-style-type: none"> • Utilities launch second round of RFOs or SOCs for DERs (if needed pursuant to the DIDF Advice Letter outcomes) • Utilities launch Partnership Pilot subscription periods 	January 15, 2024 (or within 30 days of DIDF Advice Letter approval if approval is after December 15, 2023)

**Revised Distribution Planning Advisory Group (DPAG) Schedule for
2023/2024 Distribution Investment Deferral Framework (DIDF) Cycle**

Activity	Date
<ul style="list-style-type: none"> Utility Presentation to Procurement Review Group of Project Shortlist for first-round (2023) RFO and SOC <p>Note: If second round RFO occurs, Procurement Review Group presentation occurs within 5 months of approval to launch the second RFO.</p>	January 2024
<ul style="list-style-type: none"> Information-Only submittal notification of executed contracts for first round (2023) RFO and SOC solicitations <p>Note: If second round RFO or SOC occurs, Information-Only submittals are due within 6 months of approval to launch RFO or SOC.</p>	February 15, 2024
Partnership Pilot websites updated advertising subscription period launch, and notices availability of procurement tranches	February 15, 2024 (or within 30 days of subscription period launch)
<ul style="list-style-type: none"> Utility Annual Partnership Pilot Evaluation Reports IE DIDF RFO/SOC Reports IPE Post-DPAG Report (covering all three Utilities) <p>Note: If second round RFO or SOC occurs, IE DIDF RFO/SOC Report is due within 60 days of RFO contract execution or RFO completion without contracts</p>	March 15, 2024
IE Annual Partnership Pilot Evaluation Reports	March 25, 2024
Annual DIDF and Pilot reform comments (also on SOC Midstream Evaluation)	April 1, 2024
Annual DIDF and Pilot reform reply comments (also on SOC Midstream Evaluation)	April 15, 2024
DIDF and Pilots Reform Ruling (also on SOC Midstream Evaluation)	May 2024

End of Attachment A

Attachment B