ADMINISTRATIVE LAW JUDGE’S RULING REQUESTING COMMENT ON THE JOINT INVESTOR-OWNED UTILITIES DATA ASSESSMENTS PURSUANT TO DECISION 22-11-040

Summary

This ruling seeks comment from interested parties on the Joint Investor-Owned Utilities Data Assessments pursuant to Decision 22-11-040. The Joint Investor-Owned Utilities’ Data Assessments are attached to this ruling, entitled as “Attachment 1” and “Attachment 2.” Parties who wish to provide formal comments in response to this ruling must file and serve them on February 2, 2024. Reply comments must be filed and served on February 16, 2024.

1. Background

On November 21, 2022, the Commission adopted Decision (D.) 22-11-040. This decision establishes a transportation electrification policy framework that includes a third-party administered statewide transportation electrification infrastructure rebate program. D.22-11-040 also directs the California electrical corporations – Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service Inc., and PacifiCorp d/b/a Pacific Power (collectively, “Joint IOUs”) – to jointly fund the program and associated
activities.\(^1\) D.22-11-040 also adopts a Data Assessment structure\(^2\) to capture all Joint IOU transportation electrification data.\(^3\) The Commission determined that the objective for the Data Assessment is to streamline existing reporting requirements, minimize unnecessary or duplicative reports, and inform Funding Cycle 1\(^4\) program reporting requirements.\(^5\)

As part of the Data Assessment structure, D.22-11-040 adopted parameters by which the Joint IOUs were ordered to submit information to inform Funding Cycle 1. D.22-11-040 directed the Joint IOUs to submit an inventory of all transportation electrification data they are required to report across the Commission’s transportation electrification reporting requirements.\(^6\) D.22-11-040 directed the Joint IOUs to submit this information to the Commission’s Energy Division.

On July 31, 2023, the Joint IOUs submitted a draft Data Assessment Analysis to Energy Division. On November 22, 2023, with initial feedback from Energy Division, the Joint IOUs updated their analysis and submitted a revised draft to Energy Division. The Joint IOUs’ Data Assessment Analysis is attached

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1 D.22-11-040 at 2.
2 Id. at 194.
3 Id.
4 Funding Cycle 1 refers to the period of time, beginning in 2025 through the end of 2029, that covers a statewide rebate program for behind-the-meter make-readies and electric vehicle supply equipment, as well as marketing, education, and outreach and technical assistance programs.
5 D.22-11-040 at 194.
6 Id. at Appendix B.
to this ruling as Attachment 1. Additionally, the Joint IOUs also prepared a streamlining and consolidation proposal, attached to this ruling as Attachment 2.

2. Request for Formal Comments

To guide parties’ and the Commissions’ review of stakeholders’ responses, this ruling directs parties to discuss their positions to Attachment 1 and Attachment 2 in response to the questions below.

2.1. Questions

Again, parties are directed to respond to the specific questions below. Parties shall organize and submit their comments in the same order in which the issues and questions are presented, here:

1) Reports
   a) Joint IOU Proposal
      i) Do you support or oppose the Joint IOUs’ streamlining and consolidation proposal? Discuss your reasoning.
      ii) Should any reports be added or removed from the Joint IOUs’ proposal? Discuss your reasoning.

   b) Eliminating Requirements
      i) Do you support or oppose the Joint IOUs’ proposal to eliminate the stocktake reporting requirement? Discuss your reasoning.
      ii) Do you support or oppose the Joint IOUs’ proposal to simplify the Vehicle to Grid Integration Report, as directed in Ordering Paragraph 1 of D.20-12-029? Discuss your reasoning.

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7 A spreadsheet version of the IOUs’ Data Assessment Analysis is available on the CPUC website here: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/transportation-electrification/data_assessment_joint_iou.xlsx
iii) Are there other reporting requirements or reports that should be eliminated? Discuss your reasoning.

c) Changing Requirements
i) Do you support or oppose the Joint IOUs’ proposal to submit the Electric Vehicle Load and Cost Report to “energydivisioncentralfiles@cpuc.ca.gov” as well as to the service list of this proceeding? Discuss your reasoning.

ii) Do you support or oppose the Joint IOUs’ proposal to consolidate the Transportation Electrification Funding Annual Reporting and Roundtable Report within the March 31 Joint IOU Electric Vehicle Cost and Load Report or the June 30 Annual Transportation Electrification Programs and Initiatives Compliance Report? Discuss your reasoning.

iii) Are there other reporting requirements or reports that should be changed? If so, please state them and explain your reasoning.

d) Reporting Frequency
i) Do you support or oppose the Joint IOUs’ proposal to reduce the Vehicle to Grid reporting to once a year from twice a year? Discuss your reasoning.

ii) How often should the other IOU reports be filed (i.e., are some reports filed too frequently, not frequently enough, or is end-of-program reporting appropriate)? If you would like to see any changes, please: (a) list the report; (b) state the desired change; and (c) discuss your reasoning.
e) Standardization
   i) Which reports should be standardized across the IOUs that are not already standardized? Discuss your reasoning.

f) Miscellaneous
   i) Please discuss any additional concerns pertaining to the Joint IOU’s Transportation Electrification reports. Discuss the relevancy of your concern and provide a solution.

2) Terms
   a) For comments on any term utilized in the IOU’s joint analysis, please provide your comment in the following format:

<table>
<thead>
<tr>
<th>Master ID</th>
<th>Overlap Metric</th>
<th>Data Field</th>
<th>Comment</th>
</tr>
</thead>
</table>

   i) Note: if multiple Master IDs apply and an Overlap Metric is provided for them, choosing one sample is sufficient.

b) Definitions
   i) Are there any definitions – either existing or proposed – that should be revised because they may be overly broad, or vague, or narrow, or inaccurate? If so, please list the term(s), explain your concern, and provide an alternative definition.

c) Redundancy
   i) In addition to those identified by the Joint IOUs, are there any additional overlapping data fields? If so, please state the term(s) and explain the overlap.

   ii) Given that the analysis counted 2,775 total data fields (with 983 overlapping data fields), do stakeholders find any data fields unnecessary? If so, please list the term(s) and explain your reasoning.
d) Over consolidation
   i) Of those identified by the Joint IOUs, are there any misidentified overlapping data that should not be considered overlapping? If so, please state the term(s) and explain why they do not overlap.

e) Missing Terms
   i) Are there any terms or categories of data (i.e., cost, performance metrics, equity, locational) that may be missing? If so, please list the term(s), the need for the missing term, and provide a definition for the proposed term.

f) Miscellaneous
   i) Please discuss any other concerns stakeholders have about the Joint IOU’s transportation electrification terminology.

3) General Comment
   a) Provide additional comments, feedback, and proposals that otherwise do not fit into the questions provided above.
      i) Only provide responses that fulfill the stated goal of the Data Assessment in D.22-11-040.8

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8 D.22-11-040 states that the goal of the Data Assessment is streamline existing reporting requirements, minimize unnecessary or duplicative reporting, and inform the Fundy Cycle 1 program reporting requirements as well as help identify where there are gaps in data reporting..., and improve transparency. See D.22-11-040 at 194.
IT IS RULED that:

1. Parties who wish to file opening comments in response to this Ruling, and its attachments, must file and serve them on February 2, 2024. Reply comments must be filed and served on February 16, 2024.

Dated December 27, 2023, at San Francisco, California.

/s/ COLIN RIZZO
Colin Rizzo
Administrative Law Judge