

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**



**FILED**  
01/09/24  
04:59 PM  
R2211013

Order Instituting Rulemaking to Consider  
Distributed Energy Resource Program  
Cost-Effectiveness Issues, Data Access and  
Use, and Equipment Performance Standards.

R.22-11-013

**MEET AND CONFER REPORT**

JANET S. COMBS  
PAUL I. SUNG

Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Telephone: (626) 302-2985  
Email: Paul.Sung@sce.com

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

Dated: **January 9, 2024**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider  
Distributed Energy Resource Program  
Cost-Effectiveness Issues, Data Access and  
Use, and Equipment Performance Standards.

R.22-11-013

**MEET AND CONFER REPORT**

Pursuant to the Assigned Commissioner’s Scoping Memo and Ruling (Scoping Memo), California Public Utilities Commission’s (Commission or CPUC) Rule of Practice and Procedure (Rule) 13.9, and the *Administrative Law Judge’s Email Ruling Granting Extension Request on Meet and Confer Deadline* (Ruling) dated November 28, 2023, Southern California Edison Company (SCE) respectfully submits this *Meet and Confer Report* on behalf of the Parties.<sup>1</sup>

**I.**

**BACKGROUND**

Pursuant to the Scoping Memo and Rule 13.9, the parties were required to meet and confer no later than November 30, 2023, or 10 calendar days after the submission of rebuttal testimony. On November 28, 2023, SCE, Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E), Southern California Gas Company (SoCalGas) (collectively, the Joint Utilities), requested an extension of the meet and confer deadline from November 30, 2023 to December 22, 2023. On November 28, 2023, the Assigned Administrative Law Judge granted the extension request for good cause shown via email Ruling.

---

<sup>1</sup> Pursuant to Rule 1.8(d), the Parties have each authorized SCE to file this Meet and Confer Report on their behalf. A list of the Parties that participated in the meet and confer is included in Section I below.

On December 15, 2023, the meet and confer was held via Microsoft Teams at 11:15 a.m. The parties that participated in the meet and confer include 350 Bay Area, Association of Bay Area Governments for the San Francisco Bay Area Regional Area Network (BayREN), and County of Ventura for the Tri-County Regional Energy Network (3C-REN), California Efficiency + Demand Management Council, California Large Energy Consumers Association (CLECA), Center for Biological Diversity (CBD), Center for Energy Efficiency and Renewable Technologies (CEERT), Clean Coalition, Coalition of California Utility Employees (CUE), Grid Alternatives, Leapfrog Power, Inc., Natural Resources Defense Council (NRDC), PG&E, Public Advocates Office, SDG&E, Small Business Utility Advocates (SBUA), Solar Energy Industries Association (SEIA), SCE, SoCalGas, The County of Los Angeles, on behalf of The Southern California Regional Energy Network (SoCalREN), The Protect Our Communities Foundation (PCF), The Utility Reform Network (TURN), (collectively, the Parties).

On December 20, 2023, pursuant to Rule 13.9(b), SCE provided notice to the service list of Rulemaking (R.) 22-11-013 that the meet and confer was held on December 15, 2023.

## **II.**

### **NEED FOR EVIDENTIARY HEARING**

During the meet and confer, the Parties discussed whether, pursuant to Rule 13.8(c), the parties stipulate to the receipt of prepared testimony into evidence without direct or cross examination or whether an evidentiary hearing is still needed. The Joint Utilities opened by submitting that evidentiary hearings should not be necessary in this proceeding. SEIA submitted that though many issues could be addressed through briefing, hearings would be necessary for certain transmission and distribution-related topics. PCF submitted that hearings would be necessary, and that all issues should be potentially addressable during hearings. CBD agreed with PCF's position.

### III.

#### LIST OF DISPUTED OR STIPULATED ISSUES

In advance of the meet and confer, the Parties identified and compiled a list of all the issues in this proceeding. During the meet and confer, the Parties went through each issue on this list, item-by-item, to determine whether each issue could be stipulated or were in dispute. Though the Parties in good faith attempted to identify issues that were uncontested and may be the subject of stipulation, the large number of parties with varying positions and the complexity of the issues themselves made it difficult to do so. Ultimately, the Parties agreed that each issue in this proceeding was disputed. A list of the disputed issues is included below:

**What updates are appropriate for the Avoided Cost Calculator (ACC), in accordance with Decision (D.) 22-05-002? What modifications, if any, to the biennial update process are appropriate?**

- Staff Proposal
  - Shifting from No New DER to the Latest IRP PSP
    - Load flexibility considerations for new DERs
    - Calculation of the No New DER scenario
  - Integrated Calculation of Generation Capacity and GHG Avoided Costs
    - Resources to include
    - Optimization constraint to recover financing
    - Levelization Approach for GHG Adder
    - Bounds on generation capacity and GHG
    - Calculation of certain transmission costs in the IRP/PSP
  - Allocation of Generation Capacity Value
  - Calibrating and Benchmarking SERVM Prices
  - Refrigerant Calculator
    - Consider RACC in R.13-11-005 (EE proceeding)
    - Natural gas GHG adder vs. electric GHG adder
  - Gas GHG Adder
  - Gas Transportation Marginal Costs
  - Avoided Transmission and Distribution Cost Issues
    - Use current T&D avoided costs for 2024 cycle and update for 2026 ACC following completion of T&D avoided cost study
      - a. Calculation of certain transmission costs
      - b. ACC inclusion of alternatives to transmission/hardening
      - c. Coincident and non-coincident Distribution Costs/Secondary Distribution Costs
      - d. Planned v. unplanned transmission costs

- Other issues related to the ACC update not included in the Staff Proposal
  - Demand Response outputs related to Resource Adequacy
  - Methane leakage adder
  - Portfolio rebalancing
  - Inclusion of Non-Energy Benefits and Social Costs in the ACC
  - Use of sensitivity analyses
- Process and timing considerations for the Avoided Cost Calculator Update
  - Access to modeling data/more consistent visibility into inputs and outputs
  - Additional comment period after running the models post-availability in the IRP
  - Identifying and mitigating fluctuations in ACC values across updates

**Should the Commission adopt guiding principles for the ACC, including principles that ensure alignment with R.20-05-003 (Integrated Resource Planning OIR) and other DER-related proceedings?**

- Parties generally agree that there should be guiding principles but differ on what those principles should be.

**Should the Commission adopt a Societal Cost Test? If so, how should the results of the Societal Cost Test be considered in the DER cost-effectiveness framework? If appropriate, how should the Societal Cost Test consider equity issues, such as affordability and public health inequalities?**

- Parties dispute the role of a Societal Cost Test in evaluating DERs.

**How should equity issues be considered in evaluating DER cost effectiveness?**

- Parties differ on how equity issues should be considered in evaluating DERs.

Respectfully submitted on behalf of the Parties,

JANET S. COMBS  
PAUL I. SUNG

*/s/ Paul I. Sung*

---

By: Paul I. Sung

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2985  
E-mail: Paul.Sung@sce.com

**Date: January 9, 2024**