

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA



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ADMINISTRATIVE LAW JUDGE DEBBIE CHIV, presiding

Order Instituting Rulemaking to                    ) PREHEARING  
Oversee the Resource Adequacy                    ) CONFERENCE  
Program, Consider Program Reforms            )  
and Refinements, and Establish                ) Rulemaking  
Forward Resource Adequacy                      ) 23-10-011  
Procurement Obligations.                        )

REPORTERS' TRANSCRIPT  
Virtual Proceeding  
November 21, 2023  
Pages 1 - 57  
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Reported by: Karly Powers, CSR No. 13991  
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VIRTUAL PROCEEDING

NOVEMBER 21, 2023 - 10:04 P.M.

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ADMINISTRATIVE LAW JUDGE CHIV: Okay. Let's go on the record.

The Commission will come to order. It's 10:05 on November 21st, 2023. And this is the prehearing conference for Rulemaking 23-10-011, the Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations.

I'm Administrative Law Judge Debbie Chiv. I'm the ALJ assigned to oversee this proceeding.

President Reynolds is the assigned commissioner. She could not attend today. But I will consult with her on the issues discussed at today's hearing.

The purpose of today's prehearing conference is to discuss the scope, schedule, need for hearings, and category of this proceeding. We will not make any determinations today regarding these issues. The assigned commissioner will make these determinations in a scoping ruling, which will be issued in the next few weeks. As such, for today's agenda, we will start with

1 party appearances, discuss categorization and need for  
2 hearing, and the scope of issues, then the procedural  
3 schedule, and any other remaining procedural matters.

4 I have reviewed all the written comments to the  
5 OIR. So, it is not necessary for individuals to repeat  
6 their written comments in detail. Speakers may offer a  
7 summary of key points they wish to emphasize.

8 We are conducting this prehearing conference  
9 remotely, using Webex. So I do want to go over some  
10 ground rules to help make this a successful prehearing  
11 conference.

12 So, number one, please do not speak unless you  
13 are called upon to speak;

14 Number two, please introduce yourself each time  
15 before you speak;

16 Number three, speak slowly and clearly for the  
17 benefit of the court reporter and for the benefit of a  
18 clear transcript;

19 Number four, please do not speak over one  
20 other;

21 Number five, mute your phone when you're not  
22 speaking;

23 Number six, keep your comments concise, on  
24 topic, and focused;

25 Number seven, no video or audio recordings or

1 screenshots of this prehearing conference are permitted;

2           And, number eight, parties are allowed to speak  
3 when making appearances and providing comments.

4           Yesterday, I sent out a speaking order for  
5 those who indicated they intend to participate in the  
6 PHC. Please have that speaking order available to you  
7 throughout this PHC. When we begin discussing a  
8 particular topic, parties can go ahead and proceed with  
9 comments according to that speaking order. If a party  
10 has no comment on the matter at hand, they should just  
11 introduce themselves and say, "No comment."

12           So, we will start with party appearances.  
13 First, I want to note the email communications from  
14 San Diego Community Power, East Bay Community Energy,  
15 and Peninsula Clean Energy regarding motions for party  
16 status. I will address those after appearances,  
17 although I already have added you to the end of the  
18 speaking order.

19           I see a hand raised from Doug Karpa.

20           You're on mute, Doug.

21           MR. KARPA: I may just be overly enthusiastic  
22 about putting in an appearance and moving for party  
23 status. So, if that's premature, we can go on.

24           ALJ CHIV: Yes. We will address party status  
25 after appearances.

1 MR. KARPA: Awesome. Thanks.

2 ALJ CHIV: Okay. According to the speaking  
3 order, please go ahead and make your appearance.

4 MR. KLATT: Good morning, your Honor.  
5 Gregory Klatt, for the Western Power Trading Forum.

6 MS. MEIERS-DE PASTINO: Hi, Judge.  
7 Rebecca Meiers-De Pastino.

8 MR. MILEY: Good morning, your Honor.  
9 Matt Miley for the Public Advocates Office.

10 ALJ CHIV: I'm not sure if Colin Smith is here.  
11 So, let's skip him.

12 MS. MYERS: Good morning, your Honor.  
13 Megan Myers for the Center for Energy Efficiency and  
14 Renewable Technologies. I'm also here for the  
15 California Efficiency and Demand Management Council.

16 I will also reach out to Colin and see if he's  
17 joining. And if he's not, I will appear for them as  
18 well.

19 Thank you.

20 MS. KARR: Good morning, your Honor. This is  
21 Lauren Karr for the California Community Choice  
22 Association.

23 ALJ CHIV: Who do we have next on the list?  
24 Megan Myers?

25 MS. MYERS: I believe I made my appearances for

1 the Council and for CEERT.

2 ALJ CHIV: Okay.

3 UNIDENTIFIED SPEAKER: I believe --

4 (Crosstalk.)

5 MS. NEAL: Is it my turn?

6 This is Mary Neal for the Alliance for Retail  
7 Energy Markets, or AREM.

8 MS. NAVA: Good morning, your Honor.

9 Marissa Nava for the California Independent System  
10 Operator.

11 MS. FITZSIMON: Good morning, your Honor.

12 Sara Fitzsimon for the Independent Energy Producers  
13 Association.

14 MS. MCMAHON: Good morning, your Honor.

15 Rachel McMahon for the California Energy Storage  
16 Alliance.

17 MR. BIERING: Good morning, your Honor.

18 Brian Biering for the American Clean Power Association  
19 of California.

20 MR. MARKER: Good morning, your Honor.

21 Doug Marker for the Bonneville Power Administrator.

22 MR. THEAKER: Good morning, your Honor.

23 Brian Theaker for Middle River Power.

24 MR. BARNES: Greg Barnes for San Diego Gas and  
25 Electric. I also want to note that Aimee Smith will be

1 the counsel of record in this proceeding. She wasn't  
2 available for the prehearing conference today.

3 MR. BALL: Good morning, your Honor. This is  
4 Andrew Ball on behalf of San Diego Community Power.

5 MR. HILTON: Good morning, your Honor.  
6 Seth Hilton on behalf of Shell Energy North America.

7 ALJ CHIV: I believe John Newton may be having  
8 issues. Let's skip him.

9 MR. NEWTON: Oh, your Honor, I'm sorry. I  
10 don't see the speaking order, so I was waiting for  
11 someone to call me out. This is John Newton with East  
12 Bay Community Energy.

13 ALJ CHIV: Okay. We can send you the speaking  
14 order.

15 MR. KARPA: Great.

16 And Doug Karpa for Peninsula Clean Energy.

17 ALJ CHIV: Great. That concludes the  
18 appearances from the speaker list.

19 Now, we will move to motions for party status.  
20 If there's anyone who would like to make an oral motion  
21 for party status, other than those who I mentioned who  
22 sent an email, please enter it into the chat. I also  
23 saw the request from Central Community -- Central Coast  
24 Community Energy.

25 So, I'll start with San Diego Community Power.



1 Are you making a motion for party status?

2 MR. BALL: Yes, your Honor. Thank you.

3 As I mentioned, my name is Andrew Ball. I'm  
4 with the Law Firm of Keyes and Fox LLP. And I would  
5 like to move for party status on behalf of SDCP.

6 As you may know, SDCP is a CCA that provides  
7 its customers in and around San Diego with clean energy  
8 for a healthier and more sustainable future. As a CCA,  
9 it is subject to the State's resource adequacy  
10 compliance requirements. And so, it is directly  
11 interested in the issues presented in this proceeding.

12 It is required to procure resource capacity at  
13 regular intervals. And it interacts with others in the  
14 resource adequacy market. And so, its compliance  
15 obligations and the shape and nature of the RA market  
16 will be directly impacted by these proceedings. And  
17 thus, SDCP's interest here is clear.

18 SDCP intends to advance factual and legal  
19 contentions that will ensure that this resource adequacy  
20 program fulfills its core aim of grid reliability, while  
21 also ensuring that the resource adequacy requirements  
22 are just, reasonable, and cost-effective. I would also  
23 like to note that SDCP is a member of CalCCA; but SDCP  
24 will work diligently to ensure that it avoids  
25 duplicative or cumulative filings or other submissions.

1 SDCP also consents to email-only service. And I request  
2 that I am listed as SDCP's representatives as a party in  
3 this matter. So, for these reasons, your Honor, SDCP  
4 moves for party status under Rule 1.4 of the  
5 Commission's Rules of Practice and Procedure.

6 ALJ CHIV: Thank you.

7 Any objections from other parties?

8 (No response.)

9 ALJ CHIV: Okay. Hearing none, San Diego  
10 Community Power's motion for party status is granted.

11 MR. BALL: Thank you, your Honor.

12 (San Diego Community Power was granted Party  
13 Status.)

14 ALJ CHIV: You have already been added to the  
15 end of the speaker list.

16 MR. BALL: Great.

17 ALJ CHIV: Okay. Next, do we have a  
18 representative from East Bay Community Energy to make a  
19 motion for party status?

20 MR. NEWTON: Yes, your Honor. This is  
21 John Newton representing Easy Bay Community Energy. We  
22 are also a Community Choice Aggregation and load-serving  
23 entity, serving customers in Alameda and San Joaquin  
24 Counties.

25 As a California CCA and load-serving entity, we

1 are subject to the Commission's resource adequacy  
2 program. We intend to make contributions to the  
3 proceeding relative program enhancements that are within  
4 -- that are currently within the described scope.  
5 Similar to the proceeding party, we are a member of  
6 CalCCA, but we occasionally have differing views. So we  
7 intend to make those in the proceeding, as applicable.

8 Pursuant to Rule 1.4, we move for East Bay  
9 Community Energy to become a party to this proceeding.

10 ALJ CHIV: Thank you.

11 Any objections from other parties?

12 (No response.)

13 ALJ CHIV: Okay.

14 East Bay Community Energy's motion for party  
15 status is granted. And you are -- you have been added  
16 to the end of the speaker list.

17 (East Bay Community Energy was granted Party  
18 Status.)

19 MR. NEWTON: Sorry, your Honor. We also  
20 consent to email service.

21 ALJ CHIV: Thank you.

22 Is there a representative from Peninsula Clean  
23 Energy to make a motion for party status?

24 MR. KARPA: Yes, your Honor. Doug Karpa  
25 Peninsula Clean Energy.

1           We are also a CCA and, therefore, subject to RA  
2 requirements and have, therefore, a strong interest in  
3 the -- in the appropriate functioning of the program and  
4 the market. We have been strongly involved in the  
5 development of the slice-of-day proposal to date and,  
6 also, several auxiliary proposals around affordability.  
7 And we plan to make contributions to the development and  
8 feasibility and implementation of -- of that construct.

9           And like the other CCAs, we are also members of  
10 CalCCA and will avoid duplicative filings wherever  
11 possible. But we do, on occasion, have either differing  
12 views or more detail to add, more typically, in our  
13 filing. So, we'll try to keep that to a minimum.

14           We do consent to email-only service. And I  
15 would like to be the agent for service. So under  
16 Rule 1.4, I would like to move for party status for PCE.

17           ALJ CHIV: Thank you.

18           Any objections from other parties?

19           (No response.)

20           ALJ CHIV: Okay. Peninsula Clean Energy's  
21 motion for party status is granted. And you have been  
22 added to the speaker list already.

23           (Peninsula Clean Energy was granted Party  
24 Status.)

25           ALJ CHIV: Let's go to Central Coast

1 Community Energy.

2 MS. STRICKLAND: Hello. My name is  
3 Jerri Strickland, and I represent Central Coast  
4 Community Energy.

5 We are also a Community Choice Aggregator who  
6 serves electricity to Monterey, San Bonito,  
7 San Luis Obispo, Santa Cruz, and Santa Barbara Counties.  
8 As a CCA, we're subject so the state RA requirements.  
9 We have a strong interest in the market and promoting a  
10 grid that is safe, reliable, and also affordable.

11 We intend to aid in the proceeding by providing  
12 factual evidence that supports the betterment of the RA  
13 program. Like the other CCAs, we are a member of  
14 CalCCA, but may have differing opinions. And I consent  
15 to email-only service and would like to be a rep- -- an  
16 agent for that service.

17 So, with Rule 1.4 of the Commission's Rules of  
18 Practice and Procedures, I would like to request for  
19 party status.

20 ALJ CHIV: Thank you.

21 Any objections?

22 (No response.)

23 ALJ CHIV: Okay. Central Coast Community  
24 Energy's motion for party status is granted.

25 (Central Coast Community Energy was granted

1 Party Status.)

2 ALJ CHIV: And did you intend to participate in  
3 the PHC?

4 MS. STRICKLAND: Yes. Thank you.

5 ALJ CHIV: Okay. So, let's -- I believe you're  
6 not on the list. So let's add you to the end of the  
7 list behind Peninsula Clean Energy.

8 Next, Brian Turner, Advanced Energy United.

9 MR. TURNER: Good morning, Judge. My name is  
10 Brian Turner. I'm the regulatory policy director in the  
11 Western States for Advanced Energy United. Up until  
12 this year, we were known as "Advanced Energy Economy."

13 Advanced Energy United is a trade organization  
14 of over a hundred companies in the clean energy space,  
15 from large-scale renewables to distributed energy  
16 resources. We also represent large commercial buyers of  
17 clean electricity. And in that capacity, we -- our  
18 members have an interest in the resource adequacy  
19 proceeding, both from the qualifying capacity standpoint  
20 and evaluating of their resources, as well as from the  
21 large energy buyers' interest in the reliability of the  
22 state's electricity supply.

23 Advanced Energy United plans to actively  
24 participate in the proceedings with factual information  
25 to make better decisions. And according to Rule 1.4, we

1 would like to make a motion for party status, and would  
2 consent to email-only service.

3 Thank you.

4 ALJ CHIV: Thank you.

5 Any objections?

6 (No response.)

7 ALJ CHIV: Okay. Advanced Energy United's  
8 motion for party status is granted.

9 (Advanced Energy United was granted Party  
10 Status.)

11 ALJ CHIV: Do you intend to participate during  
12 the PHC?

13 MR. TURNER: Yes. Thank you.

14 ALJ CHIV: Okay. So, let's add you to the end  
15 of the speaker list behind Central Coast.

16 Do we have Ben Gustafson?

17 MR. GUSTAFSON: Good morning, your Honor. Can  
18 you hear me?

19 ALJ CHIV: Yes. I can hear you. You would  
20 like to make a motion?

21 MR. GUSTAFSON: Yes. Correct.

22 I represent Clean Power Alliance of Southern  
23 California. We are a community choice aggregator  
24 serving customers in Ventura and LA County.

25 We have -- we are subject to the Commission's

1 RA program. And, as such, we are impacted throughout  
2 the RA proceedings. We have been a party to the  
3 predecessor RA proceeding. We intend to mit- -- provide  
4 non-duplicative ideas and proposals, as a member of  
5 CalCCA. We also are aligned with much of what they say  
6 and advocate on behalf for.

7 We -- I consent to email-only notifications.  
8 And I will not be needing to participate in the PHC or  
9 have any further comments beyond making my motion  
10 pursuant to Rule 1.4 for party status.

11 ALJ CHIV: Thank you.

12 Any objections?

13 (No response.)

14 ALJ CHIV: Okay. Clean Power Alliance's motion  
15 for party status is granted.

16 (Clean Power Alliance was granted Party  
17 Status.)

18 ALJ CHIV: Are there any other motions for  
19 party status that I missed?

20 MS. MYERS: Your Honor, this is Megan Myers.  
21 I'm not here on behalf of them today, but I know that  
22 yesterday the Large Scale Solar Association submitted a  
23 motion for party status. And I wanted to see if that  
24 had been granted. I know that they are not able to  
25 attend today and would not be speaking at the prehearing



1 conference. But I just wanted to check on that motion.

2 ALJ CHIV: Thank you.

3 The motion will be granted. But I believe, if  
4 it was filed yesterday, it has not been added to the  
5 docket card. So that would need to happen first, but I  
6 expect that that motion will be granted.

7 MS. MYERS: Thank you.

8 ALJ CHIV: Okay. Hearing no further motions,  
9 that concludes appearances.

10 Next, we will turn to categorization and the  
11 need for hearings. The OIR categorized this rulemaking  
12 as ratesetting and preliminarily determined that  
13 hearings were not necessary.

14 Parties may comment on the categorization and  
15 need for hearings in speaking order at this time.

16 MR. KLATT: Thank you, your Honor.

17 Gregory Klatt for the Western Power Trading Forum.

18 We support or agree with the categorization as  
19 ratesetting. Originally, I thought that I may have some  
20 remarks about the need for hearings. Upon further  
21 consideration, I don't really have comments on need for  
22 hearing, but rather, would like to refine WPTF's  
23 proposal with respect to the process for developing the  
24 planning reserve margin for slice of day. I'm not sure  
25 whether that would be taken up in the schedule

1 discussion or the other procedural matters; but I just  
2 wanted to flag that to make sure, one, that you knew  
3 that I plan to make comments on that topic; and, two,  
4 make sure everyone knows when we should have that  
5 discussion. ]

6 ALJ CHIV: Okay. Hearing no further motions,  
7 that concludes appearances.

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9 need for hearings. The OIR categorized this rulemaking  
10 as ratesetting and preliminarily determined that  
11 hearings were not necessary. Parties may comment on the  
12 categorization and need for hearings in speaking order  
13 at this time.

14 MR. KLATT: Thank you, your Honor. Gregory  
15 Klatt for Western Power Trading Forum.

16 We support or agree with the categorization as  
17 ratesetting. Originally, I thought I may have some  
18 remarks about the need for hearings. Upon further  
19 consideration, I don't really have comments on need for  
20 hearing but rather would like to refine WPTF's proposal  
21 with respect to the process for developing the planning  
22 reserve margin for slice of day. I'm not sure whether  
23 that would be taken up in the schedule discussion or the  
24 other procedural matters, but I just wanted to flag that  
25 to make sure, one, that you knew about our plan to make

1 comments on that topic and to make sure everyone knows  
2 we should have that discussion.

3 ALJ CHIV: Thank you. Why don't you raise that  
4 in your comments to either the scope or the schedule I  
5 guess depending on what you're planning to say there.

6 MR. KLATT: Thank you.

7 MS. MEIERS-DE PASTINO: Rebecca Meiers-De  
8 Pastino for Southern California Edison.

9 I agree with the preliminary categorization and  
10 the conclusions regarding the need for hearings.

11 I have no further comments.

12 MR. MILEY: Your Honor, Matt Miley for the  
13 Public Advocates office.

14 No further comments beyond our comments on the  
15 OIR in regards to categorization and need for hearings.

16 Thank you.

17 (Crosstalk.)

18 MR. SMITH: Hi. This is Collin Smith from  
19 LEAP. I just wanted to speak up and say we are here  
20 present at the PHC, and there are no further comments  
21 outside of our comments on the OIR.

22 MS. MYERS: Megan Myers.

23 No comment at the PHC on this issue for CEERT  
24 or the council. Thank you.

25 MS. CARR: Lauren Carr from the California

1 Community Choice Association.

2           Depending on how the proceeding evolves, we  
3 believe that there could be a need for hearings within  
4 this case. Many parties including CalCCA have raised  
5 concerns about ability for the available RA supply to  
6 meet demands and the procurement challenges and pricing  
7 impacts resulting from an apparent supply insufficiency.  
8 The level at which the planning reserve margin is set  
9 and how it is set considering Slice of Day and affective  
10 PRM can impact LEC's abilities to comply with their  
11 obligations. Whether the RA portfolio is sufficient to  
12 meet the RA requirement is a factual matter and must be  
13 considered in establishing the PRM. Hearings could be  
14 necessary to put forth studies such as CalCCA's Stack  
15 Analysis or an analysis by Energy Division if one is  
16 available so that parties can evaluate the merits of  
17 such analyses and determine how they may inform the  
18 setting of RA requirements for other decisions made in  
19 this proceeding. For these reasons, the Commission  
20 should retain the option to hold hearings if it  
21 determines that they are necessary.

22           That concludes my comments. Thank you.

23           MS. NEAL: Hello. This is Mary Neal for the  
24 Alliance For Retail Energy Markets.

25           Regarding the need for hearings, AReM does have

1 a concern. The issues of material fact may arise on IRP  
2 RA coordination. This has been a controversial topic.  
3 So AReM recommends the schedule include a date by which  
4 parties may offer a motion for evidentiary hearings.  
5 Given the uncertainty around the topic because we do not  
6 yet have the expected ruling on the Reliable & Clean  
7 Power Procurement Program in the IRP proceedings, AReM  
8 can't say for certain it would request hearings, but it  
9 would like to keep the option open. It also does not  
10 oppose any other party being allowed to make a request  
11 for hearings on any other topics.

12 Thank you.

13 ALJ CHIV: I have East Bay Community Energy  
14 next.

15 MR. NEWTON: Thank you, your Honor.

16 East Bay supports preliminary categorization.  
17 We -- like others we'd like the proceeding retain the  
18 option to allow hearings if deemed necessary, but we  
19 have no objections at this time to either course.

20 Thanks.

21 MR. KARPA: Hi. Doug Karpa, Peninsula Clean  
22 Energy.

23 We support what CalCCA said. No further  
24 comment. Thank you.

25 MS. STRICKLAND: Jerri Strickland, Central

1 Coast Community Energy.

2 We also support the preliminary categorization  
3 and the position of CalCCA. And we have no further  
4 comments for this PHC. Thank you.

5 MR. TURNER: Brian Turner, Advanced Energy  
6 United.

7 Support the categorization and also the option  
8 for hearings. Like AReM, we have made comments and made  
9 motions regarding alignment of the -- some of the issues  
10 within the IRP proceeding and the former RA proceeding.  
11 And as that develops including the release of the  
12 procurement framework in the IRP proceeding, we'd like  
13 to retain the option for hearings in the RA proceeding.

14 Thank you.

15 ALJ CHIV: Thank you.

16 Was there anyone else that we missed?

17 (No response.)

18 ALJ CHIV: Okay. I will discuss with President  
19 Reynolds and a determination of the category and the  
20 need for hearing will be set in the scoping memo.

21 Next we will turn to the proposed scope of  
22 issues for this proceeding. The preliminary scope was  
23 laid out in the OIR. I note that one topic that was  
24 inadvertently left off the initial scope of issues is  
25 the evaluation of the Central Procurement Entity or the

1 CPE framework. This will be included in the scope of  
2 issues in the forthcoming scoping memo, but we will  
3 address the timing of the CPE topics when we get to the  
4 schedule.

5           Again, just a reminder that we have read all  
6 the written comments to the OIR so it's not necessary to  
7 repeat those in detail. Parties may comment on the  
8 proposed scope of issues at this time in speaking order.

9           MR. KLATT: Thank you, your Honor. Gregory  
10 Klatt for the Western Power Trading Forum.

11           Just wanted to touch upon two of the topics,  
12 the first being the development of the planning reserve  
13 margin and the second being the reforms or refinements  
14 to the Central Procurement Entity framework. I'll start  
15 first with PRM.

16           I think it will be helpful if we could have it  
17 clarified in the scoping ruling whether the Commission's  
18 intent is to keep the 17 percent PRM that was adopted in  
19 the June decision, to keep that for 2025 or if the  
20 Commission is going to entertain a staff proposal for a  
21 PRM that's developed using the conversion tool for 2025.  
22 The reason I bring that up is that if it's the former,  
23 if we're going to stick with the 17 percent PRM for  
24 2025, I think we can safely just focus on tool  
25 development and working out the kinks as it were with

1 respect to that conversion tool during 2025 and then  
2 focus on the PRM calculation for 2025 in -- I'm sorry.  
3 For -- if it's the former, it would be -- wouldn't be  
4 developing a Slice of Day specific PRM until for the  
5 2026 compliance year. In that case, we can focus on  
6 tool development in 2024, the actual PRM calculation  
7 exercise that's informed by the LOLE study in 2-1 of  
8 2025.

9           If it's the latter, if the Commission is going  
10 to consider a staff proposal for a 2025 Slice of Day to  
11 think PRM, then we need to resolve both tool development  
12 and PRM calculations by early August at the latest so  
13 that the LECs have their full and accurate RA  
14 requirements in time at the same time as they get their  
15 allocations.

16           Either way, WPTF's deal is we really needed a  
17 more transport and a more record-based process. This  
18 isn't a critique of staff at all. We know they've been  
19 working very diligently on this, but it is complicated.  
20 Brings to mind something that the American poet and  
21 novelist Steven Dobbins once wrote. He said "I can't  
22 believe there is a poet who hasn't eagerly put down a  
23 word one day only to erase it the next day deciding it  
24 was sheer lunacy. It's part of the process of  
25 selection." And the same applies to computer models and



1 modeling results.

2           So I think that at this point we'd like to  
3 refine a recommendation instead of from just kind of a  
4 workshop and comment process to have more of a  
5 working-group process at least on the front end where we  
6 have more regular meetings with staff. The benefit of  
7 the working group process is that those parties and  
8 representatives who really want to get down into the  
9 details of how the modeling is being done can do so.  
10 Not everyone wants to be a part of that discussion.  
11 It's going to make their eyes glaze over at some point  
12 like it did for me back in the day when I was first  
13 introduced to PRM. But it has a benefit of having a  
14 more fulsome discussion kind of on the front end so that  
15 we're not kind of left guessing how things were done or  
16 have questions about the results that we're not able to  
17 get answered in a timely manner.

18           And then as we kind of get towards the end of  
19 that working progress wrapping it up, everyone is  
20 comfortable that they understand how the conversion tool  
21 works, what the assumptions are, understand how the  
22 results that are at that point the active results, how  
23 those were arrived at. And at that point I would  
24 suggest that we have a working group report and then  
25 kind of a final opportunity for formal comments that are

1 part of the record making both the working group report  
2 and the formal comments a party of the record because  
3 this is such an important piece of the puzzle. So  
4 that's WPTF's recommendation on PRM development and the  
5 scope of in the process.

6           On the CPE framework, WPTF doesn't necessarily  
7 disagree with PG&E that consideration of proposals for  
8 major structural changes may need to be deferred until  
9 after the June decision, but WPTF believes that proposed  
10 refinements to the extent possible should be considered  
11 for the June decision. And the idea there is that some  
12 key refinements that could be made could then be  
13 incorporated into the -- the CPE's procurement efforts  
14 for 2025, 2026, and 2027 again recognizing that kind of  
15 proposals for major structural changes may want to put  
16 those off. We may not have time to consider them before  
17 the June decision. And obviously, if they were a major  
18 changes that could disrupt what the CPEs have been  
19 trying to do for the next procurement cycle, it  
20 wouldn't -- probably doesn't make sense to try to  
21 interject that into the mix kind of after that process  
22 is already well underway.

23           So those are WPTF's remarks on scope and to a  
24 lesser degree process.

25           ALJ CHIV: Thank you for those comments.

1 I was going to address the CPE kind of the  
2 timing of where that fits in when we get to the  
3 schedule, but you did raise it. And that is something I  
4 would, you know, want parties to comment on. References  
5 to PG&E is proposing that CPE issues be addressed in a  
6 separate track with a final decision around December  
7 2024. And PG&E is stating that even if the CPE issues  
8 were addressed in the June decision, it would be too  
9 late to implement those changes for the 2025 to 2027 CPE  
10 local procurement cycle.

11 So putting the CPE issues in a separate track,  
12 according to PG&E, would avoid overloading the current  
13 schedule and prioritize Slice of Day refinements and  
14 also give parties more time to develop the CPE  
15 proposals.

16 So I just want to give that background, but  
17 hearing, Mr. Klatt, you're suggesting addressing some of  
18 the CPE refinements in the June decision and the larger  
19 structural changes in the -- in a later decision?

20 MR. KLATT: Correct, your Honor.

21 ALJ CHIV: Okay. Thank you.

22 Parties are free to comment on this as well.

23 MS. MEIERS-DE PASTINO: Rebecca Meiers-De  
24 Pastino for Southern California Edison.

25 SCE does not have comments beyond what we

1 already included in our written comments on my opening  
2 reply and I have no comments on Western Power's position  
3 at this time.

4 MR. MILEY: Hi, your Honor. Matt Miley for the  
5 Public Advocates Office.

6 Cal Advocates recommend that the following  
7 three issues related to refinements of the RA program be  
8 included within the scope of this proceeding. First, RA  
9 affordability; second, an evaluation of the Commission's  
10 current test year accedence methodology for wind and  
11 solar resources; and third, an evaluation of the  
12 Commission's RA import requirements.

13 And I'll just touch on each of those briefly.  
14 Starting with RA affordability of the Commission's 2021  
15 RA report notes an increase of 158 percent in the  
16 weighted average price of August system RA between 2017  
17 and 2021. The market price benchmark system RA Adder  
18 has been increased from \$8.11 per kilowatt month for  
19 2022, \$14.37 per kilowatt month for 2023. In addition,  
20 the CAISO recently launched an RA focus date called  
21 their initiative that includes identifying what has lead  
22 to high system -- excuse me -- to high RA prices and  
23 options to make RA more affordable.

24 Your Honor, Cal Advocates recommend that the  
25 Commission include the general issue of RA affordability

1 in the scope of this proceeding with the focus on  
2 minimizing ratepayer costs while maintaining reliability  
3 of the grid and compliance with the Commission's RA  
4 program rules.

5           The second topic is evaluation of the  
6 Commission's current test year exceedance methodology  
7 for wind and solar resources. Cal Advocates notes that  
8 the Energy Division's most recently published exceedance  
9 in analysis there's little resemblance to the PG&E  
10 five-day methodology selected by the Commission in  
11 Decision 23-04-010. Many of the key aspects of Energy  
12 Division's current exceedance approach were introduced  
13 by Energy Division after that decision selected an  
14 exceedance methodology proposal.

15           Cal Advocates recommends that the scope of this  
16 proceeding include stakeholder evaluation of Energy  
17 Division's current exceedance analysis. And Energy  
18 Division held a workshop to explain the methodology used  
19 in its exceedance study with an opportunity for  
20 stakeholder feedback at the workshop or through formal  
21 comments.

22           Consistent with either of the schedules  
23 proposed for the OIR, this workshop should occur during  
24 February of 2024 with comments due on whichever date the  
25 Commission establishes for opening comments on party

1 proposals filed January 19.

2           And lastly, your Honor, an evaluation of the  
3 Commission's RA import rules in Decision 20-06-028 the  
4 Commission adopted RA import requirements intended to  
5 address speculative supply and double-counting issues by  
6 defining how resource specific and non-resource specific  
7 import contracts can count toward meeting RA  
8 requirements. The decision also directed Energy  
9 Division staff to review data on self-schedules and bids  
10 associated with RA import resources and submit a summary  
11 report of any issues that arise. As outlined in Cal  
12 Advocates' comments on the OIR, significant challenges  
13 have arisen regarding RA import availability and  
14 increased market competition for imports since the  
15 Commission implemented the existing RA import rules over  
16 two years ago. For example, increased peak loads and  
17 the adoption of renewable policies amongst western  
18 states that created higher needs for RA resources  
19 including imports.

20           Cal Advocates recommends that the Commission  
21 include an evaluation of RA requirements implemented in  
22 Decision 20-06-028 to the scope of issues in this  
23 proceeding in order to determine if the rules create  
24 unnecessary challenges in today's more competitive  
25 import market. In addition, Cal Advocates recommends

1 that the final scoping memo requests that Energy  
2 Division submit a report on import rules as was called  
3 for in Decision 20-06-028. In addition to detailing any  
4 issues with the existing rules, the report should  
5 include consideration of the rule's potential or actual  
6 impact on successful import procurement and pricing in  
7 the more competitive environment of RA procurement  
8 consistent with either of the schedules proposed for the  
9 OIR. Energy Division should submit the report no later  
10 than January 5th, 2024, in order to inform stakeholder  
11 proposals.

12           And, your Honor, I would note that both  
13 proposed schedules propose a date of January 19, 2024,  
14 for party proposals.

15           Thank you, your Honor. ]

16           MS. MYERS: This is Megan Myers. I've nothing  
17 to add outside of what counsel submitted in opening  
18 comments. Thank you.

19           MS. CARR: This is Lauren Carr for the  
20 California Community Choice Association. CalCCA filed  
21 opening comments on November 8 outlining our position on  
22 the scope of this proceeding. We maintain the position  
23 taken in those comments regarding the scoped items to  
24 prioritize and add to this proceeding. CalCCA also does  
25 not object to any of the items recommended to be put in

1 scope by other parties.

2 Thank you, your Honor.

3 MS. NEAL: Hi. This is Mary Neal on behalf of  
4 AReM. Regarding the scope of issues, AReM would just  
5 like to emphasize the need for greater alignment between  
6 the CAISO and CPUC RA processes. Our members were  
7 assessed cost responsibility for the CAISO Capacity  
8 Procurement Mechanism event in August 2023 despite being  
9 compliant with CPUC RA requirements.

10 AReM does not want this to happen again. AReM  
11 is actively participating in the CAISO RA Modeling and  
12 Program Design Working Group, where it hopes to resolve  
13 this issue. In the event the working group reveals  
14 actions that would need to be taken by the CPUC to fully  
15 resolve the matter, AReM recommends the final scope of  
16 this proceeding explicitly include refinements to the RA  
17 program to address consistency between CPUC and CAISO  
18 resource allocation for determining RA compliance.

19 Thank you. That's all I wanted to discuss at  
20 this time.

21 MS. NAVA: Good morning, your Honor. This is  
22 Marissa Nava with the California Independent System  
23 Operator also known as CAISO.

24 The CAISO generally supports the preliminary  
25 scope of issues outlined in the OIR. We recommend the



1 Commission add the following four issues to the scope of  
2 this proceeding: First, the Commission should make  
3 coordination between RA and IRP a priority in this  
4 proceeding. Specifically, the Commission should  
5 coordinate the evaluation of slice of day with the  
6 development of the multi-year procurement framework in  
7 IRP as the schedule in both proceedings will run in  
8 parallel.

9           Second, the scope should include a transparent  
10 process to establish the PRM under slice of day based on  
11 an LOLE study that meets at least a zero-point-one LOLE.

12           Third, the CAISO supports consideration of a  
13 UCAP methodology. The CAISO is currently re-examining  
14 its own RA rules and performance incentives in working  
15 groups. We urge the Commission to coordinate closely  
16 with the CAISO on UCAP in those working groups.

17           Finally, the scope should include a  
18 reevaluation of the Commission's RA. Thank you for your  
19 consideration.

20           MS. FITZSIMON: Your Honor, Sara Fitzsimon for  
21 the Independent Energy Producers Association. We have  
22 no further comment outside those submitted on  
23 November 8. Thank you.

24           MS. McMAHON: Good morning, your Honor. Rachel  
25 McMahon with the California Energy Storage Alliance. We

1 submitted comments on November 8 and reply comments  
2 yesterday and will not repeat those comments here, but  
3 will continue to stand by those positions. We're  
4 generally supportive of the scope with the additions  
5 that we recommend and have not opposed any aspects of  
6 the scope nor have we seen any recommendations from  
7 parties that we oppose.

8 I also do want to say that we generally are  
9 supportive of the approach to revisiting PRM that was  
10 recommended by the Western Power Trading Forum earlier  
11 in the PHC.

12 MR. BIERING: Your Honor, this is Brian Biering  
13 for the American Clean Power Association of California.  
14 I won't repeat all of our comments that we submitted on  
15 November 8.

16 I would like to stress that the slice-of-day  
17 framework is a fundamental shift in how the resource  
18 counting rules and the resource adequacy program will  
19 work. Slice-of-day framework removes the effective  
20 load-carrying capacity methodology and also created a  
21 new requirement for storage resources to match energy  
22 for charging sufficiency within the LSE's portfolios.

23 We are concerned that some of these changes  
24 will affect the marketability of the resources and may  
25 not be totally reflective of the actual liability

1 contributions of those resources and would specifically  
2 recommend that the scope be broadened to not just  
3 consider potential modifications to qualifying capacity  
4 methodologies for DR resources, but be more specifically  
5 inclusive of other resources, specifically solar, wind  
6 and storage.

7 I'll defer the rest of our comments to what we  
8 submitted on November 8th. Thank you.

9 MR. MARKER: Good morning, your Honor. I'm  
10 Doug Marker, Bonneville Power Administration.

11 Bonneville Power Administration offers resource  
12 adequacy products to California Load Serving Entities  
13 and our offers come from surplus electricity generation  
14 of the Federal Columbia River Power System, the output  
15 of 31 federal hydroelectric dams and one nuclear power  
16 plant in the Pacific Northwest. We filed comments to  
17 the Commission urging the Commission to consider its  
18 requirements for offering resource adequacy imports for  
19 out-of-state marketers who offer generation from  
20 coordinated systems.

21 Our comments respond to the Commission's  
22 invitation to propose revisions to a program design that  
23 could extend more supply. By not allowing out-of-state  
24 integrated resource suppliers to economically bid  
25 must-offer RA, this requirement unfairly deprives those

1 suppliers from obtaining fair value for the energy  
2 provided with the RA capacity they would offer  
3 California Load Serving Entities. The ability to  
4 economically bid would incent more Pacific Northwest  
5 surplus hydrogeneration to participate in the California  
6 RA market.

7 Thank you for this opportunity to comment.

8 MR. THEAKER: Your Honor, Brian Theaker with  
9 Middle River Power. The only thing that I would add to  
10 our comments already submitted is to express support for  
11 WPTF's proposal for a robust process to set the  
12 slice-of-day PRM for 2025 and for the opportunity to  
13 make refinements to the CPE structure end-of-June  
14 proposed decision. Thank you.

15 MR. HILTON: Good morning, your Honor. Seth  
16 Hilton on behalf Shell Energy North America. Shell  
17 Energy submitted reply comments yesterday outlining its  
18 position with regard to the scope, and I won't repeat  
19 those comments here.

20 However, two quick additional comments: One, I  
21 want to note our agreement with the position that  
22 Cal Advocates outlined with regard to the importance of  
23 reevaluating import RA rules and the potential impacts  
24 those might have on the importation of RA capacity into  
25 California.

1           The other comment I wanted to make relates to  
2 the Central Procurement Entity schedule. While Shell  
3 Energy indicated in their reply comments they wanted  
4 additional time to evaluate significant structural  
5 changes to the CPE framework, Shell Energy does have a  
6 concern about the way the Central Procurement Entity is  
7 currently operating, including, more specifically,  
8 regarding when there's a CPE shortfall and the impact  
9 that that has on other LSEs in terms of meeting their RA  
10 compliance obligations, and that particular timing  
11 issue, which I think AReM has raised in the past, CalCCA  
12 has raised in the past in the prior RA proceeding.

13           It would be better to address that issue  
14 expeditiously so that resolution could be in place by  
15 next year.

16           MR. NEWTON: John Newton for East Bay Community  
17 Energy. I believe I'm not speaking out of order.  
18 Apologies if I am. Here, we would like to emphasize the  
19 importance of getting the slice-of-day framework  
20 transition right. It is identified already in the  
21 preliminary scoping memo.

22           We think that it is critical for the  
23 refinements to that transition to be prioritized as a  
24 core of this proceeding. We don't object to any other  
25 topics that other parties raised in opening or reply

1 comments, but we do see this as the overarching  
2 objective.

3           If I might comment briefly upon the schedule  
4 with regard to some of these items, particularly related  
5 to slice-of-day framework, we note that the current,  
6 revised schedule suggests that party proposals would be  
7 due January 19, but the Energy Division --

8           ALJ CHIV: Hold on just one second. We will  
9 get to the proposed schedule once we finish the scope.  
10 If you want to hold for that?

11           MR. NEWTON: Very good. I'll comment on the  
12 schedule at that point.

13           With regard to the CPE topic, we do recognize  
14 that is an important element of the RA program, but at  
15 this time we agree with PG&E's filed comments that,  
16 perhaps, it is a lower priority relative to other --  
17 other topics. Thank you.

18           MR. KARPA: Doug Karpa, Peninsula Clean Energy.  
19 We want to emphasize actually the same thing that  
20 others -- CalCA, CalCCA, and PCA, among others -- have  
21 also raised around affordability and expressly  
22 addressing that in scope, and in particular  
23 expressing -- taking a look at mechanisms that can be  
24 used for cost containment and to bring cost down, also  
25 including review of the CPE.

1           And I would also raise the hourly -- hourly  
2 obligation trading proposal that PCE and San Jose  
3 Community Energy and CESA proposed in the last -- the  
4 last round. And a large part of concern here -- some of  
5 it is around ratepayer cost, of course, but as others  
6 have noted, RA costs have really sky-rocketed, and are,  
7 basically, consuming large quantities of money that get  
8 transferred to existing generators.

9           And I wanted to emphasize that this dynamic  
10 really runs the risk of underlying reliability and it  
11 would be a little bit ironic if the RA program were to  
12 undermine reliability in part because at the end of the  
13 day what matters for keeping the lights on and ensuring  
14 reliability and having enough generation is having the  
15 steel in the ground.

16           And I think what we've learned from the  
17 Integrated Resources Planning proceeding, of course, is  
18 CCAs are very much leading the way in new resource  
19 procurement, procuring over 500 megawatts of the LCC  
20 value above CPUC goals because we have our own internal  
21 requirements that are frequently more stringent than  
22 CPUC targets, which has lead us into a situation where  
23 California is really relying on CCA procurements to  
24 maintain reliability and decarbonization.

25           And because of the nature of that effort, every

1 increase we see in RA cost is directly eating into the  
2 financial ability or -- you know, we have to leave some  
3 sort of head room for uncertain cost rises when planning  
4 future procurement. And at the moment, I wouldn't  
5 necessary hazard a guess to say that those costs are  
6 currently undermining reliability, but the prospects of  
7 a failure to contain costs definitely could.

8           And so, particularly, since high RA cost falls  
9 on CCAs I think in part because how the existing  
10 portfolio works under the PCIA proceeding, we really  
11 don't, I think, collectively want to run the risk that  
12 the LSEs that are really being most aggressive in  
13 procurement run into issues when we're trying to  
14 actually get new resources brought online.

15           And I know the Commission is well-aware of this  
16 and has worked with us intensively to get resources  
17 online and is definitely appreciative of the work the  
18 Commission has -- you know, the collaboration we've had  
19 around those issues, but I definitely wanted to put a  
20 little more gloss on why affordability is actually  
21 fundamentally important for reliability going forward.  
22 Thank you.

23           ALJ CHIV: Are there any further comments from  
24 those who were added to the speaker list today?

25           MR. TURNER: Brian Turner, Advanced Energy



1 United. I wanted to highlight the coordination of the  
2 RA and IRP programs and associate ourselves with the --  
3 as other parties have, with CAISO, AReM, Independent  
4 Energy Producers Association and Microsoft in their  
5 written comments, and highlight four categories  
6 specifically within coordination with RA and IRP; that  
7 is, PRM methodologies, modeling procedures, accounting  
8 rules, and the requirements across both programs.

9 And then, very specifically, within the  
10 modeling and accounting rules, the coordination between  
11 the programs, and in particular long-duration energy  
12 storage or other resources that can address multi-day  
13 reliability events. So in the modeling procedures,  
14 multi-day reliability events. In the accounting rules,  
15 evaluation of long-duration energy storage. Thank you.

16 ALJ CHIV: Would anyone like to respond to any  
17 of the comments that were made?

18 (No response.)

19 ALJ CHIV: No. Okay. In that case, thank you  
20 for those comments. We will consider them when we  
21 finalize the scope of issues in the scoping memo.

22 Next, we will turn to the proceeding schedule.  
23 On Friday I circulated an agenda with two revised  
24 schedules to the service list of the proceeding. First,  
25 I want to explain the reasoning behind these revised

1 schedules if it wasn't apparent.

2           The first is, as I mentioned, Energy Division's  
3 report on the CPE framework was inadvertently left out  
4 of the schedule. The CPE report is due in the first  
5 quarter of 2024. So, since we don't have specific  
6 deadline in which it will come in, the revised  
7 schedules, A & B, included dates that would tee-off the  
8 submission of the report.

9           We recognize that that's a tight schedule, but  
10 it was proposed in that manner to allow the Commission  
11 to consider the proposal -- the CPE proposal, that is,  
12 in time for the June decision. As I mentioned earlier,  
13 there is now a third option, which is to use any  
14 proposal to address CPE issues in a separate track, with  
15 a final decision around December 2024. And Western  
16 Power rates, a variation of that schedule, with  
17 structural issues -- structural CPE issues being  
18 addressed in a later track, but CPE refinement topics  
19 possibly addressed in the June decision.

20           The second reason for the revised schedule  
21 relates to Energy Division's slice-of-day report. A few  
22 parties commented they would like more time for  
23 proposals following the release of the slice-of-day  
24 report, so we are taking that into consideration.

25           I just want to note that the decision

1 authorizing Energy Division's report, which was the  
2 23-04-010, directed Energy Division to solicit informal  
3 feedback from parties after certain milestones during  
4 the 2024 Test Year. And the report would, quote,  
5 "summarize the comments and feedback after the  
6 year-ahead test showing," end quote.

7           So just keep in mind that the slice-of-day  
8 report is intended to summarize parties' informal  
9 feedback after the test year showing. Parties in this  
10 proceeding should have access to that informal feedback  
11 without waiting for that February 1st report; however,  
12 to ensure that all parties have access to that informal  
13 feedback, we can also have Energy Division compile the  
14 informal feedback and put it on the Commission's website  
15 if that's helpful to parties.

16           All of that said, the two revised schedules  
17 allow parties to revise their slice-of-day proposals  
18 after Energy Division releases its report.

19           Again, we recognize this is a tight schedule,  
20 but it was done in this manner so we have sufficient  
21 time to address these topics to get a proposed decision  
22 out in late May.

23           So that's my summary of the revisions for the  
24 proceeding schedule. Parties may comment on either of  
25 the revised schedules or having separate CPE tracks in

1 speaking order.

2 MR. KLATT: Thank you, your Honor. Greg Klatt  
3 for the Western Power Trading Forum.

4 First, I just want to acknowledge and voice  
5 appreciation for the Commission first specifying a date  
6 for the slice-of-day test year report, and also for the  
7 prior decision specifying that the CPE framework  
8 efficiency or effectiveness report should come out in  
9 the first quarter of 2024. I believe those were -- it's  
10 important to set those dates. I think folks who are  
11 concerned, you know, maybe PG&E, and, of course, you, as  
12 the ALJ, have concerns about how much we can fit into  
13 the schedule that's aimed at the June decision on LCRs  
14 and SCRs, et cetera.

15 I think that rather than have -- I do think  
16 that we probably would be well-served by having a  
17 separate track on CPE structural reforms, while  
18 retaining what you have in your proposed -- your Honor,  
19 in your proposed schedules for CPE framework or program  
20 refinements because I think -- I think, again, some of  
21 those -- to the extent possible some of those  
22 refinements could be considered if approved, and then  
23 incorporated into the CPE's procurement efforts for the  
24 2025 through 2027 procurement cycle.

25 So if WPTF had its druthers, we'd like to keep,

1 kind of, CPE framework -- or CPE refinements in this  
2 schedule for Q1 and Q2 of 2024, and then have a separate  
3 track that looks at potentially at CPE structural  
4 reforms that may be kind of more -- more like a major  
5 overhaul, have that addressed -- provide for that to be  
6 addressed in its own track. ]

7           On slice-of-day framework, again, you know,  
8 probably not able to get into really, kind of, major  
9 structural changes to the slice-of-day framework in the  
10 process leading up to the June decision. But I do  
11 appreciate that we're going to have an opportunity in  
12 the proposed schedules to comment on the -- comment on  
13 the report, specifically, and -- yeah...

14           I think, kind of, the major focus for WPTF is  
15 still the planning and reserve margin, getting that  
16 right, in terms of making sure the conversion tool is  
17 doing what we want it to do and having sufficient time  
18 -- kind of face time with staff, upfront through the  
19 working group process, cumulate -- cumulate, resulting  
20 in a working group report. But then we could have, kind  
21 of, a broader workshop where staff goes over the report  
22 and its contents, and there are formal comments on the  
23 workshop -- or working group report. So, I think that's  
24 pretty much what I wanted to cover.

25           Thank you, your Honor.

1 MS. MEIERS-DE PASTINO: Rebecca  
2 Meiers-De Pastino for Southern California Edison.

3 I think that Edison is fairly neutral on  
4 whatever schedule the Commission settles upon. I think  
5 that there may be some issues with structural changes to  
6 CPE being possible for 2025, because that process starts  
7 in July. But, again, we defer to the Commission and are  
8 neutral on the schedule that you select.

9 Thank you.

10 MR. MILEY: Your Honor, Matt Miley for the  
11 Public Advocates Office.

12 Public Advocates Office prefers Schedule A,  
13 with modifications. Schedule A provides for submission  
14 of Energy Division's report on the slice-of-day  
15 framework on February 1st of 2024. And that provides  
16 sufficient time for parties to develop revised  
17 slice-of-day proposals for filing on March 1st, 2024.

18 However, Schedule A does not provide an  
19 explicit opportunity for formal comments on parties'  
20 revised slice-of-day proposals. Cal Advocates  
21 recommends that the Commission adopt Schedule A with  
22 modifications to include opening and reply comments on  
23 parties' revised slice-of-day proposals. Specifically,  
24 opening comments would be due on March 15, which is two  
25 weeks after the revised proposals are filed. And reply

1 comments would be due on March 25th, which is two weeks  
2 after opening comments are filed.

3 Thank you.

4 MS. KARR: Your Honor, this is Lauren Karr from  
5 the California Community Choice Association.

6 Either of the proposed revised schedules is  
7 preferable to the original schedule put forth in the  
8 OIR. The revised schedule allows for Energy Division's  
9 report of slice of day to be issued before parties  
10 submit their final slice-of-day proposals. And it  
11 includes dates for Central Procurement Entity's  
12 effectiveness report.

13 Thank you.

14 MS. NEAL: Hello. This is Mary Neal for AREM.

15 On the topic of the schedule, AREM has some  
16 comments in addition to what it filed on November 8th.  
17 It is concerned about the consistency between the CAISO  
18 RA working group schedule and the schedule in this  
19 proceeding. Based on the current CAISO working group  
20 schedule, which was just delayed, it is unlikely for  
21 parties to have a chance to adequately discuss the issue  
22 of CAISO-CPUC alignment by the January 19th date for  
23 party proposals. The March dates for opening comments  
24 on the current proposed schedules would be a more  
25 realistic forum to present such proposals. But,

1 ultimately, AREM recommends flexibility in the schedule  
2 to accommodate this issue, given the dual ongoing  
3 proceedings.

4           On the IRP RA coordination issue and the need  
5 for a deadline for motion for evidentiary hearings,  
6 given the uncertainty in the IRP schedule, it is  
7 difficult to determine the best date for that. The IRP  
8 schedule should be better known once the next ruling on  
9 the reliable and clean power procurement program is  
10 issued. And the most practical thing is to revisit the  
11 date at that time.

12           And that's all I have. Thank you.

13           MS. NAVA: Your Honor, Marissa Nava for the  
14 California Independent System Operator, or CAISO.

15           The CAISO prefers proposed revised Schedule A.  
16 This schedule gives parties sufficient time to review  
17 Energy Division's slice-of-day report and develop  
18 revised proposals. The CAISO believes Schedule B would  
19 be very compressed.

20           Regarding CPE, the CAISO supports establishing  
21 a separate track from this proceeding to consider CPE  
22 issues.

23           Thank you.

24           MS. FITZSIMON: Your Honor, Sara Fitzsimon for  
25 the Independent Energy Producers Association. We have



1 no comment on this issue at this time.

2 Thank you.

3 MS. MCMAHON: Good morning, your Honor.

4 Rachel McMahon with the California Energy Storage  
5 Alliance.

6 The only scheduling issue that we commented on  
7 was specific to the timing of the release of the  
8 slice-of-day report and party proposals. So, we very  
9 much appreciate the revised schedules. We are --  
10 support either, but are -- generally prefer Schedule A,  
11 for the reasons stated by the CAISO. It gives the  
12 parties more opportunity to provide -- to develop  
13 proposals.

14 And then, at the -- your Honor had mentioned in  
15 this prehearing conference that the informal results  
16 from the Energy Division's examination should be  
17 available to parties and suggested posting on the PUC  
18 website. CESA definitely supports requiring  
19 Energy Division to post those results on the PUC website  
20 to ensure they are available to all parties.

21 Thank you.

22 ALJ CHIV: Thank you, Ms. McMahon.

23 Just to clarify, my understanding is that the  
24 Energy Division's report will be based on informal  
25 feedback from the parties. So, that's what I was

1 suggesting for -- to ensure that all parties have access  
2 to that feedback, in case it's not served on the service  
3 list, is to compile that on the Commission's website.

4 MS. MCMAHON: Thank you. That's how I  
5 understood it.

6 Thank you.

7 ALJ CHIV: Okay. Great.

8 (No response.)

9 ALJ CHIV: I believe --

10 (Crosstalk.)

11 ALJ CHIV: Oh, is it -- okay.

12 MR. NEWTON: This is John Newton with East Bay  
13 Community Energy. Again, I think I'm skipping over  
14 several folks, but -- after a pause.

15 Our comments regarding the schedule. We, like  
16 many others, appreciate the proposed revised Schedules A  
17 and B. Between the two, revised Schedule A -- sorry. I  
18 think (inaudible) -- shall I wait until he's spoken?

19 ALJ CHIV: Go ahead and finish.

20 MR. NEWTON: Okay. Thank you.

21 Between Schedule A and B, we noticed that there  
22 is potentially more time to consider the report in  
23 Schedule A, the slice-of-day framework report,  
24 particularly. But the timing of that consideration  
25 seems to be a little bit later with Schedule B. Again,

1 since East Bay considers slice-of-day framework to be  
2 the most critical element of the proceeding and getting  
3 it right, we appreciate that there's represented greater  
4 flexibility for parties to consider the informal  
5 feedback and the Energy Division's report coming out in  
6 early February. We're concerned that the substance of  
7 the informal feedback and the report may not be  
8 sufficient to really provide the information that we may  
9 need to make the slice-of-day framework really  
10 effective.

11           So, you know, between the two schedules, we  
12 appreciate, again, a little more time between the two.  
13 I suppose that we would prefer Schedule A. But that is,  
14 the schedule and timing of the consideration of the  
15 slice-of-day framework report is of concern to us.

16           Thank you.

17           MR. THEAKER: Your Honor, Brian Theaker for  
18 Middle River Power.

19           Sorry for missing my opportunity. Perhaps I  
20 misunderstood your instruction that parties in the  
21 speaking order, even if they had no additional comment,  
22 were supposed to queue up and say they had no comment.  
23 But I do have a couple of comments on schedule.

24           We support revised -- proposed revised  
25 Schedule A; but we agree with Cal Advocates. It should

1 be amended to provide for an explicit comment  
2 opportunity on revised slice-of-day proposals.

3           With regard to CPE issues, we understand that  
4 larger issues may require deferring to a separate, later  
5 track. However, given that we have not seen the CPE  
6 evaluation report, we still hold out hope that if there  
7 are significant -- even significant changes needed, and  
8 can be undertaken before the summer for the 2025  
9 compliance year, that we should not roll those out. So,  
10 those are our comments on schedule.

11           Thank you.

12           MR. HILTON: Your Honor, Seth Hilton on behalf  
13 of Shell Energy North American. Just two quick  
14 comments.

15           One, with regard to your suggestion about  
16 posting informal feedback on slice of day or having the  
17 Energy Division do that, we would certainly support that  
18 and appreciate that.

19           And then, the second comment has to do with the  
20 CPE review schedule. Shell supports WPTF's suggestion  
21 that we have a separate track for major structural  
22 reform, but that we consider some modifications to the  
23 existing framework to potentially implement some changes  
24 in the June decision that would be applicable for this  
25 -- the 2025, 2027 procurement.

1 MR. KARPA: Yeah. Doug Karpa, Peninsula Clean  
2 Energy.

3 Largely echo the comments of CalCCA and, also,  
4 actually, of East Bay, as well, somewhat of a preference  
5 for Schedule A. I do think, also, in whatever forum it  
6 takes, turning attention to the CPE and CPE reform is  
7 warranted. The past performance has had pretty  
8 significant consequences. And, again, around  
9 affordability issues that I think are worth paying close  
10 attention to.

11 So, thank you.

12 ALJ CHIV: Are there any other --

13 MR. TURNER: Brain Turner, Advanced Energy  
14 United. No comment on this issue.

15 I guess we lost Central Coast.

16 MS. STRICKLAND: No. Central Coast Community  
17 Energy. No comment. And no further comment with the  
18 PHC.

19 Thank you.

20 ALJ CHIV: Okay. Great. Thank you.

21 Thank you for all these comments. We will  
22 consider them as we prepare the scoping memo.

23 As our last item on the agenda, I request  
24 parties bring up any remaining procedural matters now.

25 So, please respond in speaking order.

1 MR. KLATT: Thank you, your Honor. Greg Klatt  
2 for the Western Power Trading Forum. I don't think I  
3 have any additional remarks at this time.

4 MS. MEIERS-DE PASTINO: Rebecca Meiers-De  
5 Pastino for Southern California Edison. I also have no  
6 further remarks.

7 MR. BALL: And this is Andrew Ball on behalf of  
8 San Diego Community Power. I also do not have any  
9 further remarks. Thank you, your Honor.

10 MR. MILEY: Matt Miley for the Public Advocates  
11 Office. No further comments.

12 Thank you.

13 ALJ CHIV: Okay. Thank you.

14 Is there any other speaker that wanted to chime  
15 in?

16 (No response.)

17 ALJ CHIV: Okay. That concludes the speaking  
18 order and our agenda for today. Thank you for your  
19 participation at today's prehearing conference. The  
20 prehearing conference is concluded. We are adjourned.  
21 Off the record.

22 (At the hour of 11:20 a.m., this matter  
23 having been concluded, the Commission then  
24 adjourned.) ]

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