

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



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

R.21-06-017
(Filed June 24, 2021)

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**COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK ON THE
JANUARY 22, 2025, RULING SEEKING COMMENT ON THE PROPOSED
MODIFICATIONS TO THE DUE DATES TO FILE THE FINAL ELECTRICIFICATION
IMPACT STUDY PART 2 REPORT**



February 3, 2025

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I. INTRODUCTION

The Utility Consumers’ Action Network (UCAN)¹ submits the following Comments pursuant to the January 22, 2025, *Assigned Commissioner’s and Assigned Administrative Law Judge’s Ruling Seeking Comment on Proposed Modifications to the Due Dates to File the Final Electrification Impact Study Part 2 Report* (Ruling). The Electrification Impact Study Part 2 (EIS Part 2) is the successor to the EIS Part 1, published in this proceeding May 9, 2023. The focus of EIS Part 2 is to assess potential costs of upgrading the primary and secondary distribution grid to meet electrification needs under multiple scenarios.² The intention of the EIS Part 2 is to “produce learnings that translate into improvements for each utility’s [Distribution Planning and Execution Process] DPEP.”³ These learning and improvements are meant to create cost savings and reduce risks for ratepayers as discussed throughout the final decision adopting improvements

¹ UCAN is a 501(c)(3) non-profit public benefit corporation dedicated to protecting and representing the interests of residential and small business customers in the San Diego Gas & Electric service territory. Approximately 98% of UCAN’s members are residential customers. UCAN has been active in Commission proceedings since 1983 and strives to meet the Commission’s goals for rates that are equitable and affordable for all ratepayers.

² D.24-10-030 at 97.

³ *Ibid.*

to the DPEP and ordering the EIS Part 2.⁴ The current ruling seeks modifications to the filing date for the EIS Part 2 to ensure its outcomes can be incorporated into the 2026-2027 Distribution Planning Process (DPP) cycle. UCAN offers the following observations and comments on the proposed modifications.

II. DISCUSSION

A. UCAN Observes Time for Stakeholder Comments on Final Study is Compressed

As noted in the Ruling, the EIS Part 2 findings were meant to inform the 2025-2026 DPP cycle.⁵ However, under the current schedule, the EIS Part 2 would not be ready before December 2025 and therefore its findings could not be used in the 2025-2026 DPP cycle.⁶ The Ruling clarified that the earliest the Utilities could incorporate the EIS Part 2 results would be the 2026-2027 DPP cycle.⁷ However, to ensure that the results can be used in the 2026-2027 DPP cycle, this Ruling proposes modifying the procedural schedule as set out in D.24-10-030.⁸

UCAN agrees that the EIS Part 2 findings could identify important cost savings and risk reductions for ratepayers. Therefore, UCAN also agrees that incorporating these findings into the DPP cycle as soon as possible is of the utmost importance for ratepayers struggling under extremely high electricity rates. However, UCAN notes that the proposed modifications compress the stakeholder comment timeline to two weeks after the Utilities file the Final Study. This compressed timeline does not allow enough time for expert evaluations of such a complex and important document, especially since these comments will be used by the Commission “to determine what outcomes will be included in the ongoing DPEP or other mechanisms.”⁹

⁴ D.24-10-030 at 47, 59, 66, 69, 74, 75, and 193 Ordering Paragraph 11.

⁵ Ruling at 2.

⁶ *Ibid.*

⁷ *Ibid.*

⁸ Ruling at 3.

⁹ *Ibid.*

Looking back at the docket card after the EIS Part 1 was published, multiple extensions were granted for comments on this study. UCAN's recommendation is to require the Utilities to file the Draft EIS Part 2 one month earlier and move the workshop and parties comments up the same amount of time. The Utilities could file the final study on 11/29/2025 thus allowing an extra 30 days for Comments on Study and Implementation. This is a more fair and reasonable time frame for expert evaluations and assessments of this important report.

B. UCAN Recommends Comments on EIS Part 2 be Formally Filed as Directed by D.14-10-030.

The Ruling makes an additional modification that differs from the final decision D.14-10-030. As noted in the Ruling, the final decision required comments on the Draft Study to be filed formally and thus added to the record of this proceeding.¹⁰ Yet the Ruling changes that directive and seeks to have parties only serve their comments on the draft study to the service list.¹¹ The Ruling offers no explanation or reasoning for this change. UCAN objects to this change and recommends that parties formally file comments on the Draft Study as directed in D.14-10-030.

Building a formal record is an important part of any proceeding and has previously been emphasized in this particular proceeding.¹² This Rulemaking already has multiple tracks and phases. There have been studies, workshops and Staff Proposals. More importantly, the scope of this proceeding includes examining “whether the current electric DPP is adequate for selecting and deploying both traditional distribution infrastructure and [distributed energy resources] solutions to meet grid requirements and minimize utility customer costs accurately.” Therefore, it is important that all comments examining utility spending and opportunities to minimize customer costs be formally recorded and easily accessible. “Service only” means that comments

¹⁰ D.24-10-030 at 99.

¹¹ Ruling at 3 and see fn. 7.

¹² See Administrative Law Judge's Ruling Directing Responses to Questions on Track 1 Phase 1, at 3.

will only be sent via email and not appear on the docket card. Therefore, these important comments will be easily lost and hard to find in the future.

UCAN agrees that building a formal record is essential to Commission proceedings and particularly in this proceeding due to its complexity and potential impacts for ratepayers. Therefore, UCAN recommends that the modification to serve rather than file comments on the Draft EIS Part 2 be removed and the original order to formally file comments be reinstated in the final adopted procedural schedule.

III. CONCLUSION

UCAN appreciates the opportunity to submit these comments.

Dated: February 3, 2025

Respectfully submitted,
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