



ALJ/JR7/nd3 2/7/2025

FILED

02/07/25

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

04:41 PM

R2401018

Order Instituting Rulemaking to
Establish Energization Timelines.

Rulemaking 24-01-018

**ADMINISTRATIVE LAW JUDGE'S RULING
CLARIFYING NEXT STEPS FOR FLEXIBLE SERVICE CONNECTIONS,
MODIFYING PHASE 2 SCHEDULE, AND REQUESTING PARTY COMMENTS**

This ruling clarifies the next steps for the development of certain flexible service connection pathways, denies Enphase Energy, Inc.'s (Enphase) motion to amend Phase 2 scoped Issue 3, modifies the proceeding schedule for Issue 3 and Issue 4 of the quasi-legislative track's Phase 2, and requests party comments. Opening comments are due on February 27, 2025, and reply comments are due on March 6, 2025.

1. Background

The March 24, 2024 Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo) established a set of issues to be addressed in two Quasi-Legislative Phases of the Energization Rulemaking.

On September 11, 2024, Enphase filed a motion (Enphase Motion) to amend the scope of the Energization Rulemaking.

Decision 24-09-020 was issued September 17, 2024, addressing Energization Proceeding Phase 1 issues and clarifying that the Energization Proceeding remains open as a venue to address additional issues related to accelerating and improving energization timelines for utility customers.

The assigned Commissioner issued on October 18, 2024, an Amended Scoping Memo and Ruling (Amended Scoping Memo) establishing a ratesetting track within Phase 2 of the Energization Rulemaking, with reply briefing concluded by the end of January 2025.

An Assigned Administrative Law Judge Ruling issued on November 22, 2024 suspended the procedural schedule for Rulemaking (R.) 24-01-018 Phase 2 Quasi-legislative issues adopted in the Scoping Memo.

2. Definitions

For clarity, we use the following definitions in this ruling:

- **Flexible Service Connection (FSC)** is defined as the ability to expeditiously energize new load to a utility's distribution system with variable limits on the import of electricity at certain times. The implementation of FSC¹ may include tariffs, agreements, and schedules.
- **Flexible Energization Tariff** is the set of rules and requirements for expeditiously energizing new load to a utility's distribution system. It includes some or all of the rules governing the energization process including Rule 2, Rule 15, and Rule 16, as well as the Electric Vehicle Rule 29 and Rule 45.
- **Flexible Service Connection Agreement (FSCA)** means a contract between a Distribution System Operator and a customer connecting load to the distribution system; this agreement articulates limits on the amount of electricity imported from the distribution system at specific times.
- **Limited Load Profile (LLP)** means a profile, or schedule, to be attached to service agreements governing energization of loads. It contains information on the maximum power that can be imported from the grid by the customer at any given time.

¹ Flexible Energization Connection is an equivalent term.

- **Firm Capacity** is capacity that remains unchanged as long as the FSCA remains in place.
- **Non-Firm Capacity** is capacity that can change in response to provisions articulated in the FSCA.
- **A Static LLP** is an LLP that provides firm capacity. It is established and agreed upon at the time the FSCA is established and remains in place from year to year.
- **Flexible Service**² means the ability to provide service or import power at varying levels through time. It can incorporate non-firm capacity with dynamic LLPs.
- **Power Control System (PCS)** is a system that monitors the output of power sources and regulates or limits current or power within predefined limits.
- **Uniform Load Integration Capacity Analysis (Load ICA)** are grid modeling results that represent the maximum uniform power available to serve load at the point of interconnection without violating the thermal, voltage variation, and steady state voltage criteria. These results take the form of a set of power values that represent capacity available during different periods of time.

3. **Next Steps for Flexible Service Connections**

Multiple parties supported FSCs using LLPs in their comments on both the Scoping Memo and on the Enphase Motion, arguing that FSCs can aid customers with exceptionally long energization timelines. A potential key benefit of FSCs is offering energization applicants the option to energize sooner by operating below their maximum requested load on a temporary basis while investor-owned utilities (IOU) build additional upstream capacity needed to meet the full load; this process is informally called a “bridge to wires.”

² This has also been referred to as Flexible Imports.

FSCs are currently being offered to some energization customers on a case-by-case basis through form-based processes and in other cases through IOU pilots. Under these FSCs, limits on power import are removed and the energized customer may operate at their requested full load capacity once the upstream capacity is built. This proceeding will consider static and pre-programmed LLPs that can be implemented in the near-term as bridging solutions when distribution capacity is temporarily insufficient to serve the full load of an energization request.

Specifically, this effort will focus on how to standardize FSC in simple terms that can be implemented in the very near term to avoid energization delays triggered by upstream capacity needs on the distribution system. This may enable allowing more rapid connections of customer loads, while still maintaining grid safety and reliability.

4. The Enphase Motion

The areas enumerated in the Enphase Motion can be addressed within currently scoped issues. Further, the California Public Utilities Commission (Commission) has discretion to establish the appropriate procedural process to build a sufficient record. Accordingly, while Enphase's motion reflects some issues under consideration in this proceeding, it is not necessary to rule on the motion.

5. Modifying the Procedural Schedule for Quasi-Legislative Track

This ruling establishes a modified schedule for the quasi-legislative track of Phase 2 of this proceeding for the purpose of addressing the following Phase 2 Scoping Memo issues: (3) Should additional actions beyond compliance with Senate Bill 410 and Assembly Bill 50 be implemented to improve energization timelines, processes, or tariffs in Phase 2 of this proceeding; and (4) What actions

can expedite energization projects, including when upstream upgrades are necessary.

This ruling amends the Quasi-Legislative Track Phase 2 schedule as follows:

EVENT	DATE (with workshop)	DATE (without workshop)
Opening comments to this ruling	February 27, 2025	February 27, 2025
Reply comments to this ruling	March 10, 2025	March 10, 2025
Ruling directing the filing of draft FSCA and/or tariff language, supporting information	March 19, 2025	March 19, 2025
Party filing of sample FSCA and/or tariff language, supporting information	Late March 2025	Late March 2025
Opening comment on sample language	20 days after language filing	20 days after language filing
Reply comment on sample language	10 days after opening comment	10 days after opening comment
Workshop	Mid-May 2025	-
Proposed decision on FSC-related issues	Q3 2025	Q3 2025

6. Request for Comments on Firm Flexible Service Connections

In order to further develop the record of this proceeding, parties are encouraged to file and serve responses to the following questions by February 27, 2025:

Pilot and Process Learnings

1. What learnings from past and ongoing large IOU FSC pilots and processes can inform the design of LLP?

2. Are there FSC processes in other jurisdictions whose learnings should be considered? If so, what are those jurisdictions and the associated learnings?
3. What is an appropriate temporal granularity for LLP schedules? For example, will the simple monthly or seasonal import-limit granularity utilized within Limited Generation Profiles (LGP) be sufficient for LLP schedules? If not, why not?
4. What elements of LGP adopted in R.17-07-007 and LGP Resolutions³ should be adapted for development of LLPs? In what ways can implementation of LLP employ approaches from the LGP process? In what ways should LLP design and implementation differ from LGP?
5. How can Load ICA results and data inform and enable LLPs? Is there another existing means to inform and enable LLP other than Load ICA?

Equipment Requirements and Certification

6. To implement static LLPs what device(s) are required for customers to install to control load and prevent power consumption (*i.e.*, imports) from exceeding the scheduled LLP? Is PCS sufficient for this task?
7. Is a PCS certified to UL 3141 Issue 2,⁴ sufficient to operationalize static LLPs? If no, why not, and are there

³ Resolution (Res.) E-5296, Res. E-5230, and Res. E-5211.

⁴ https://www.shopulstandards.com/ProductDetail.aspx?productId=UL3141_2_O_20241009, accessed January 30, 2025:

These requirements cover Power Control Systems (PCS) used in Distributed Energy Resource (DER) systems which include one or more power sources in addition to the primary power source, typically the utility grid. PCS-LC (load control only applications) may consist of only the utility source, or a combination of the utility source and DER sources not controlled by the PCS-LC. The PCS electronically limits or controls current or power to stay within defined limits and may consist of a single device or multiple devices operating together as a system. The PCS may be designed for autonomous operation or may respond to external commands or schedules provided by authorized third parties.

alternative existing standards or equipment the Commission should consider for LLP participation?

8. When do stakeholders expect UL 3141 Issue 2 certified equipment to be readily available to support LLP?
9. Is there a size threshold (*e.g.*, absolute [MW] or relative [percent of total feeder rating] site capacity) that necessitates equipment commissioning or telemetry? If so, what is that threshold and what need does it raise?

Energization Queue and Circumstances for LLP

10. Under what circumstances should a customer be eligible for FSCAs? What type or class of customer should be eligible for FSCAs and why? Should FSCAs be reserved for when a circuit is constrained? Should customers be able to elect to engage in an FSCAs on an unconstrained circuit to aid in creating circuit capacity for additional customers?
11. How should the Utilities address multiple requests for FSCAs on the same circuit?

Tariffs, Rules, Agreements, and Forms

12. What are the applicable tariffs, rules, agreements, and forms that may need modification? What should those modifications be? Is there a need for differences between different IOUs' versions of these documents? If so, what is this need based upon?
13. Are there any unique considerations that must be included in modifications to rules, agreements, and/or forms (*e.g.*, such as for onsite generation, electric vehicles, or emergency conditions)?
14. Are there other steps needed to implement FSCs? If so, what are these steps?

