



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

**FILED**

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Order Instituting Rulemaking to  
Establish Energization Timelines.

Rulemaking 24-01-018

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON  
THE PROPOSED DECISION OF COMMISSIONER ALICE REYNOLDS  
ESTABLISHING A STANDARD OFFER FOR FLEXIBLE SERVICE CONNECTIONS**

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## **I. INTRODUCTION**

Southern California Edison Company (“SCE”) respectfully submits its reply comments to parties’ opening comments on the *Proposed Decision Establishing a Standard Offer for Flexible Service Connections* (“PD”).<sup>1</sup>

SCE takes this opportunity to reply to a number of stakeholder comments that suggest that the CPUC impose additional maximum timelines or requirements on activity that is out of scope for this decision, either having been more appropriate for consideration within a prior decision in this proceeding, D.24-09-020, or being out of scope for this proceeding generally. SCE also notes that certain criteria raised by stakeholders, including secondary system upgrades and behind-the-meter solar or storage, do not factor into flexible service connection offerings in the way suggested in certain comments, and these misunderstandings are clarified below.

## **II. DISCUSSION**

### **A. Stakeholders Suggest a Number of Requirements That Are Out of Scope for This Decision**

#### **1. A New Requirement Setting a 10-Day Maximum Timeline for a Load Limit Conversation is Not Feasible and Not Appropriate for this Decision**

Both CALSTART and IREC recommend establishing a maximum time for IOUs to have a load limit conversation with a customer. CALSTART points to PG&E’s 3-day average and notes that SCE has an average of 10 days.<sup>2</sup> CALSTART then offers 10 days as a reasonable maximum. Alternatively, IREC suggests that the Commission should establish a 30-day timeline between the customer application being deemed complete and the initial customer load limit conversation.<sup>3</sup>

Input on compliance timelines for flexible service connections (“FSCs”) were not added to the scope of the proceeding. The ALJ questions did not request, and SCE therefore did not provide relevant facts necessary to establish the feasibility and reasonableness of various options. Additionally, SCE recommends that all compliance timeline discussions occur within a single phase of the proceeding (e.g., when timelines are revisited in a future phase of this proceeding), not

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<sup>1</sup> PD Opening Comments of: Advanced Energy United (AEU), CALSTART, Enphase, and Interstate Renewable Energy Council (IREC), Jan. 16, 2026.

<sup>2</sup> CALSTART PD Comments at 6.

<sup>3</sup> IREC PD Comments at 14.

addressed piecemeal. Already the complexity of tracking timelines to the existing eight steps has proven challenging for utilities to implement and for stakeholders to understand. IREC’s 30-day suggestion is more achievable, and SCE is already attempting to streamline processes to expedite its timing, but it would still take time (and potentially additional costs) to achieve this timeline. For the reasons described above, a timeline for FSC should not be adopted at this time. With that said, this is not the right venue to establish this requirement. A record would need to be established regarding what is or is not a feasible timeline.

**2. More Granular Climate-Based Schedules Should Not Be Mandatory, but Flexibility to Offer Them Is Warranted**

The PD patterns its requirements for seasonal periods on SCE’s Load Control Management Systems (LCMS) approach, which used a 3-season framework, with a peak and non-peak for each season, or 6 settings in total. The PD allows each utility to set different dates based on their seasons, but CALSTART voices concern that even within a single utility service area, climates and seasons differ, and thus utilities should be required to customize the offerings based on customer location.<sup>4</sup> SCE acknowledges climate zone variation within its territory, and in fact, SCE tailors the scheduled limits for each individual customer, based on forecasted values for their particular location, which already incorporate climate at such location and thus meet the suggestions from CALSTART. SCE instead recommends the approach suggested by IREC: “give the utilities flexibility to define the seasons based upon a customer’s location, rather than requiring each utility to have a single seasonal calendar” (IREC at 13). SCE takes that to mean that the seasonal shift may come on a different date depending on location, which would buttress SCE’s existing practice without making it significantly more complicated.

**3. Emergency Capacity Ratings Being Deemed “Too Conservative” is Out of Scope for FSCs**

Several stakeholders (CALSTART, IREC) suggest that the utilities must make available information on their emergency ratings in order to determine how much overall capacity is available. CALSTART suggests that “If the utilities’ emergency ratings are inconsistent or too conservative, it will be necessary to develop another metric for ensuring that load stays within reasonable bounds.”<sup>5</sup> SCE believes this is out of scope. The determination of ratings and planning practices belong with

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<sup>4</sup> CALSTART PD Comments at 10-11.

<sup>5</sup> *Id.* at 10.

general rate case review of utility practices and should not be unique to any specific tariff, rule, or individual customer.

**4. Coordination of Upstream Capacity Work and Rule 15/16 Work Is Out of Scope for FSCs**

CALSTART asks the Commission to require that if a pause is warranted based on needed upstream capacity work, downstream work should resume in parallel to align with the expected completion of the upstream upgrade, rather than sequentially.<sup>6</sup> SCE notes that while it is always its goal to coordinate these disparate projects, the upstream capacity project and R15/16 work both involve a large number of discrete processes, which may occur concurrently or sequentially, and which involve key milestones outside of the control of SCE. Therefore, whether certain work can continue is likely based on the specific circumstances of the project and would need to take into account how close SCE is to completion of the upgrade at the time of energization request.

The topic of this coordination is beyond the scope of the FSC phase/issues identified for this phase; there is no record in the proceeding to consider the challenges and opportunities of coordinating these two complex processes. Therefore, specific policies should not be adopted at this juncture. Such coordination should be dealt with in the broader proceeding because it affects all projects that necessitate capacity upgrades, regardless of whether they participate in FSC.

**B. The Commission and Stakeholders Suggest Several Criteria that Do Not Impact FSCs and Should Not Be Considered in a Standard Offer**

**1. Modifications or Upgrades to Secondary Infrastructure are Covered Under Rules 15 and 16 and Are Not Relevant to FSCs**

Enphase suggests that defining upstream capacity as not including the single-phase secondary distribution system “would effectively exclude residential customers from FSCA eligibility, in as much as residential customers receive single-phase service.”<sup>7</sup> Advanced Energy United makes the same comment.<sup>8</sup> This contention contains multiple factual errors. First, the secondary network does not cause the substantial delays that FSCs are designed to address. Second, upgrades to the secondaries are clearly part of Rule 15 and 16 scope, and are subject to the timelines adopted in this proceeding (e.g. 125 day average). Conversely, the upstream capacity upgrades relevant for FSCs

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<sup>6</sup> *Id.* at 11.

<sup>7</sup> Enphase PD Comments at 4.

<sup>8</sup> AEU PD Comments at 4.

may take years to construct. In any case, understanding of “upstream capacity” as referring to grid capacity upgrades that go beyond the scope of Rules 15 and 16 is well established and should not be changed.

**2. On-Site Generation and Storage Do Not and Should Not Factor Into the FSC; Generation-Related Issues Are Outside Proceeding Scope**

SCE wishes to clarify how behind-the-meter (BTM) generation and storage do and do not impact an engineering FSC evaluation. The PD found it reasonable that “the Standard Offer process consider on site generation as part of the utility engineering evaluation, whether it be existing or planned, non-exporting or exporting.”<sup>9</sup> It also “direct[ed] PG&E and SCE to incorporate the output of photovoltaics for customers without on-site storage into their engineering evaluation and to continue working toward offering a single, streamlined process to customers requesting both load and generation.”<sup>10</sup> Enphase notes that this should be re-worded to include on-site storage, whether or not paired with photovoltaic.<sup>11</sup> IREC asserts that the PD does not go far enough in setting up parameters for considering photovoltaics, suggesting that “utilities should be required to outline the necessary process changes in their Implementation Advice Letters.”<sup>12</sup>

First, SCE notes that BTM on-site generation/storage is ***not*** part of the Phase 2 scope of the Energization Timelines proceeding, as modified by the *Administrative Law Judge’s Ruling Clarifying Next Steps for Flexible Service Connections, Modifying Phase 2 Schedule, and Requesting Party Comments*, dated February 7, 2025 (FSC Ruling). Neither “on-site generation” nor “storage” is mentioned in the FSC Ruling that defined the issues/questions to be addressed during the FSC track of the proceeding, or the Scoping Memo for Phase 2 of this proceeding. The FSC Ruling makes clear that the focus should be on “***the import*** of electricity” from the grid to serve customer load.<sup>13</sup>

Second, what ultimately matters for purposes of FSC programs and the FSC track of the Energization Timelines proceeding is the amount of electrical power that can be imported from the grid – not what an individual customer may or may not separately generate on-site. SCE’s FSC power

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<sup>9</sup> PD, p. 27.

<sup>10</sup> *Id.*

<sup>11</sup> Enphase PD Comments at 8.

<sup>12</sup> IREC PD Comments at 14.

<sup>13</sup> *See, e.g.*, FSC Ruling, p. 2 (referring to “limits on the import of electricity,” “electricity imported from the distribution system at specific times,” “power that can be imported from the grid”); see also *id.* p. 3 (defining “flexible service” as the ability “to ***import power*** at varying levels through time”).

import schedules should be based only on grid capacity assessments and power imported from the grid to serve the FSC customer's load.

If for example a customer requests 5MW of power, installs 2MW of generation, and the circuit can support 3MW, the FSC power import limit via the PCS would be set to not exceed 3MW of power import from the grid, regardless of the customer's generation because that is what the circuit can support. Because SCE does not have control of the customer's generation, SCE cannot guarantee its availability. The customer could operate 5MW of load based on the 3MW of available grid capacity and customer's own control of its generation as to prevent risk of grid overloads.

While SCE encourages customers to add additional BTM resources to supplement the FSC power import limits to meet the desired capacity, these generation resources must be interconnected and operated in accordance with applicable interconnection rules (such as Rule 21). As such, the Commission should reject recommendations by IREC and Enphase to include on-site storage or to set up parameters to consider photovoltaics in the Standard Offer FSC Tariff. For similar reasons, SCE disagrees with the PD's proposed incorporation of generation-related issues into the Energization Timelines proceeding, the utilities' engineering analysis, or the biannual energization reporting.

### **III. CONCLUSION**

SCE appreciates the opportunity to file these reply comments and respectfully requests that the Commission adopt SCE's recommendations.

Respectfully submitted,

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