



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

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

R.21-06-017

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
COMMENTS ON DISTRIBUTION GRID ELECTRIFICATION
MODEL 2025 STUDY AND REPORT

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Dated: **February 5, 2026**

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Pursuant to the Administrative Law Judge’s Ruling soliciting comments on the Public Advocates Office’s Distribution Grid Electrification Model 2025 Study and Report, dated January 8, 2026, Southern California Edison Company hereby submits its comments on the Distribution Grid Electrification Model 2025 Study and Report.

Respectfully submitted,

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/s/ William Yu

By: William Yu

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Attachment

SCE's Comments on Distribution Grid Electrification

Model 2025 Study and Report

SCE Comments on Cal Advocates DGEM 2025 Study and Report

1. Introduction

Southern California Edison Company (SCE) appreciates this opportunity to offer comments on the Public Advocates Office at the California Public Utilities Commission's (Cal Advocates) Distribution Grid Electrification Model 2025 Study and Report (DGEM 2025 Study and Report). SCE commends Cal Advocates on a thorough and high quality report that adds significantly to the discourse in the High DER Futures Proceeding (R.21-06-017). With that said, SCE wishes to note that there is a fundamental difference between the DGEM 2025 Study and Report and SCE's recently filed Electrification Impacts Study, Part 2 (EIS 2). SCE believes that both offer important insights, however, differences in inputs and methodology make direct comparison of the results inappropriate.

2. A Difference in Variables: Electrification Futures vs. Responses to Electrification

The key observation SCE makes is that the DGEM 2025 Study and Report and EIS 2 are based on a different set of assumptions and methodology. In short, the DGEM 2025 Study and Report considers different electrification outcomes in terms of adoption of building electrification (BE) and electric vehicles (EVs). EIS 2, on the other hand, considers how the utility can manage the increasing load post adoption, therefore being more forward focused rather than contemplating adoption outcomes as in the DGEM.

a. DGEM 2025

The DGEM 2025 Study and Report is designed to explore uncertainty, offering directional sensitivity checks across nine scenarios that vary levels of BE and EV charging behavior. By structuring combinations of BE adoption (AAFS 2.5, 3, and 4) with EV charging load shapes

(High Peak, Moderate Peak, Managed), the DGEM 2025 Study and Report provides a wide analytical lens for understanding how different policy, technology, and customer-behavior pathways could shape grid needs over time. This scenario breadth is intended to illustrate the range of grid impacts rather than produce prescriptive utility planning forecasts.

b. EIS 2

By contrast, SCE's EIS 2 explores a different set of scenarios that does not consider varying levels of BE and EV adoption. EIS 2 evaluates four scenarios, each grounded in SCE's distribution system characteristics and its planning processes:

- Base Case
- Equity-Driven DER Dispersion Case
- Initial Demand Flexibility Case
- Alternate, Higher-Participation Demand Flexibility Case

These scenarios are structured to examine distribution system outcomes under different DER dispersion patterns and levels of demand flexibility, rather than different levels of BE/EV adoption. EIS 2 centers on how variations in equity-based DER adoption or customer participation in flexible load programs affect overloads and mitigation needs, providing results that can be benchmarked against the base planning case.

3. Conclusion

While the two studies are methodologically distinct, together they illustrate an important principle: electrification futures are multi-dimensional. The DGEM 2025 Study and Report tests uncertainty in scale of adoption, while EIS 2 tests uncertainty in the distribution and behavior of the adopted technologies. When viewed collectively, the studies highlight that California's electrification trajectory will evolve based on adoption volume, geographic distribution, and customer flexibility. While the DGEM 2025 Study and Report offers insights into potential grid needs and mitigation measures across a variety of sensitivities, the annual planning process remains the appropriate venue to develop a single, scenario-informed investment plan.