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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	Rulemaking 21-06-017

ASSIGNED COMMISSIONER'S AND ADMINISTRATIVE LAW JUDGES' RULING PROVIDING ALL-PARTY WORKSHOP INFORMATION AND SCHEDULE MODIFICATION

This ruling provides logistical information for the February 20, 2026 all-party workshop, modifies the schedule for Track 3 of this proceeding, identifies the topic areas for discussion at the workshop, and proposes taking official notice of relevant materials.

1. All-Party Workshop Logistics

This workshop will be held at the California Public Utilities Commission (CPUC) Headquarters in San Francisco with hybrid access online. The workshop will commence at 10:00 am and conclude at 5:00 pm.

Parties and interested members of the public may attend and participate in person at:

Auditorium

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA

Parties and interested members of the public may attend and participate remotely at:

Webinar Link:
https://cpuc.webex.com/cpuc/j.php?MTID=md3af8fe1e8ef2
5554d424637c1f9d432

Access Code: 248 295 83064

Password: 2026

Join by Phone:

- 855-282-6330 United States Toll Free
- 415-655-0002 United States Toll

As directed in the November 3, 2025 Ruling, any materials parties intend to present at the All-Party workshop shall be served to the proceeding service list and sent to Energy Division no later than February 13, 2026.

Energy Division staff will circulate a final workshop agenda to the service list of this Rulemaking by February 18, 2026. This workshop will be recorded and a link to the recording will be distributed to the service list. This ruling also directs Southern California Edison (SCE) to file and serve a Workshop Report by March 20, 2026. The Workshop Report shall contain a copy of the final agenda, a summary of discussions on the various agenda topics, and presenters' slides.

2. Modification of Schedule

This ruling amends the Track 3, Phase 1 schedule as follows:

Activity	Date
Assigned Commissioner and Assigned ALJ Ruling Issued	February 6, 2026
Party Presentation Materials served on service list	February 13, 2026
All-Party Workshop	February 20, 2026
Report on All-Party Workshop filed and served	March 20, 2026
Party Comment on Workshop Report	April 3, 2026

3. Areas of Focus for Discussion at February 20th Workshop/All Party Meeting

Based upon party comment to the November 3, 2025 ruling referenced above, we find the following areas are likely to provide value for the discussion on February 20, 2026. Areas of focus currently include the use of Distributed Energy Resource Management System (DERMS)/Advanced Distributed Management System (ADMS) to enable variable operating envelopes addressing primary infrastructure constraints, tools for characterizing low voltage networks and generating operating envelopes via Advanced Metering Infrastructure (AMI) data, aggregator mediated operating envelopes for shared secondary constraints, defining aggregators, communications protocols, dynamic rate alignment, and non-bridging solutions.

Parties should come to the All-Party workshop prepared to discuss these topics and whether implementation aligned with an item or combined items could proceed immediately or whether pilot program(s) should be considered prior to full implementation. All parties are invited to provide presentations on these topics.

For each topic area presentations should address: the primary use case(s) addressed by the solution (e.g. bridging solution, non-bridging solution); the distribution grid operational constraint being addressed or problem being solved; readiness to implement and scale the solution and approximate time frame; costs and benefits to the Distribution System Operator (DSO) operator, participating customer(s), and ratepayers.

4. Use of ADMS/DERMS for Provision of Variable Operating Envelopes on Appropriately Instrumented Feeders

An example of an offering capable of providing variable operating envelope for both load and generation is Pacific Gas and Electric (PG&E)'s Flex Connect pilot. PG&E notes that 37 feeders are currently modeled to support this ability within the pilot. PG&E has proposed expanding this to 350 feeders (100 of these would rely on forecasts that lack state estimation) in their 2027 General Rate Case (GRC). It is not clear how many sites can be supported with variable operating envelopes by the DERMS computation engine, and whether the number depends on whether the envelope is provided for both load and generation, or the timeline for the expansion to 350 feeders.

SCE does not specify what its ability to "manage" up to 5 million Distributed Energy Resource (DERs) is comprised of. Specifically, there is no discussion of whether this management can provide variable operating envelopes for load and generation, and whether this capability, as with PG&E's DERMS, depends on feeder instrumentation. This capability is currently on track for rollout in the 2027-2028 timeframe. SCE states that it has already scoped out the plans for this rollout but does not specify where that plan is memorialized.[1]

SDG&E has utilized DMS/ADMS capabilities for grid operations and has planned a DERMS program. Current production ADMS tools don't support day ahead forecasting, relying on long-term planning information suitable for seasonal or multiyear studies. It is also targeting development of ADMS capabilities that calculate dynamic charging limits for Wholesale Distribution Access Tariff (WDAT) storage resources.

[1] SCE Opening Comments on November 3, 2025 ACR, Appendix at 4.

Discussion on this topic should clarify the number of sites that will be supported by each Investor Owned Utility (IOU)s' DERMS systems, the timeframe upon which each IOU can scale this support, the effect that providing generation variable operating envelopes may have on the total number of sites supported, the level of feeder instrumentation required for the DERMS solution to be viable, and the rationale for needing this level of instrumentation.

5. Exploration of Existing AMI based Low Voltage System Modeling to Provide Operating Envelopes for Feeders not Served by ADMS/DERMS Solutions

Successful characterization of low voltage portions of the grid from AMI data has been performed using real world data by the United Power Corporation. Given the abundance of historical AMI data and the lack of available power flow models[2] for the single-phase network[3], this approach may be useful for providing operating envelopes for these customers. Discussion on this topic should address whether the Sandia Labs developed methodology/tool should be explored for portions of the grid that aren't currently modeled, and whether additional methodologies[4] are appropriate.

6. Exploration of Operating Envelopes' Use in Addressing Shared Secondary Constraints

Existing solutions (e.g., LLL, Standard Offer, Flex Connect, LGP, existing aggregator-based solutions[5]) are focused on addressing constraints for either

[2] IOU responses to the November 3, 2025 ACR confirmed that this portion of the grid lacks significant modeling.

[3] PG&E notes plans to augment DERMS in the next 1-2 years to forecast at a secondary transformer level, but this record is underdeveloped and may not encompass the network between the secondary transformer and the customer.

[4] A distinct methodology addressing voltage modeling has been developed by the University of Melbourne.

[5] IOUs currently have programs with Octopus, Sunrun, Tesla, and SPAN.

dedicated secondary or primary infrastructure. While valuable, these solutions do not enable more rapid interconnection/energization of customers who are limited by the capacity of shared secondary equipment (e.g., service transformer, networked secondary). Aggregator mediated load and generation control (i.e. through smart inverter, smart panel, meter collar, or existing aggregator gateway imposed limits) on individual sites could be used to enable safe operation of increased load or generation over exiting assets without the need to wait for upgrades. Discussion should address current platforms that are technically capable of this control and articulate the considerations, including aggregator charges for accessing the site equipment, that should be weighed as the Commission contemplates whether such controls can provide timely capacity over existing infrastructure and be integrated into the distribution planning process.

7. Appropriateness of Requiring Extended Volt/VAR and Volt/Watt Curves for Generating Assets Using Operating Envelopes on Shared Secondary Equipment

Tariff Rule 21 specifies a set of default volt/VAR and volt/watt curves for generating assets, and allows exception to these curves by mutual agreement between IOU and customer. IEEE 1547 specifies a wider range of operation than is enabled by the default curves. Discussion should focus on whether and when it may be appropriate to require generation customers to utilize the full set of IEEE 1547 capabilities for these functions, and whether any additional functions (e.g., rate of change of frequency, etc.) would be appropriate.

8. Appropriate Role and Definition of Aggregator for the Purposes of Operating Envelopes

Parties note several delineations around aggregators; Community Choice Aggregator (CCA) vs. IOU, cloud service providers vs. customer program

providers. Further, parties suggest that the Commission provide a definition for an aggregator, and raise concerns that the access fees levied by equipment manufacturers or aggregation providers will make their use cost prohibitive. Parties should be prepared to discuss definition(s) for the aggregator term and provide context for the identified delineations.

9. Potential Modifications to the 2030.5 Communications/CSIP

While the majority of deployed and all new inverters must be capable of communications over IEEE 2030.5/Common Smart Inverter Profile (CSIP) and IOUs have demonstrated their capacity to provide control signals over this architecture, parties have noted the installed base of resources that communicate over OpenADR.[6] Further, many deployed DERs utilize other architectures to communicate. While there may need to be intermediate translation (e.g., through an aggregator's software layers or an onsite gateway's programming) from the IOUs' 2030.5 signaling to the resources' receipt of the information, it may be possible to use a single communications headend to relay DERMS information. Discussion should inform whether CSIP can currently support commands that are used by other architectures and whether it is appropriate to standardize on a single architecture for communicating the DERMS information.

10. Alignment of Dynamic Rates with Variable Operating Envelopes

Parties have been clear that customers with variable operating envelopes should retain the ability to choose their rate. Discussion should include whether these customers should be opted into dynamic rates (with the option to choose a non-dynamic rate), whether those customers should retain the right to return to

[6] CalCCA Opening Comments on Assigned Commissioners Ruling Seeking Additional Information on Der Enabled Near Term Flexible Connections at 4.

their previous rate (e.g., NEM), and whether shadow billing and ratepayer protections should be provided to these customers.

11. Non-Bridging Solutions

The Energization proceeding (R.24-01-018) has directed a Standard Offer static operational envelope to be offered to customers as a bridging solution. This proceeding will explore the development of variable operational envelope options in addition to PG&E's Flex Connect pilot. Discussion should include whether customers should have the choice to adopt an operational envelope as a non-bridging solution, and if so, whether it is appropriate for the customer to utilize the envelope as a bridging solution for a set amount of time (e.g., peak demand season, one year, etc.) prior to electing to have it as a non-bridging solution.

12. Taking Official Notice

There are several resources discussed by parties, served to this proceeding, or filed within other proceeding(s) that are not part of the record of this proceeding that are relevant to the issues presented in Track 3. Accordingly, this ruling takes official notice of the following resources:

- UL 3141 Second Edition Standard
- IEEE 1547-2018
- SCE AL 5711-E
- PG&E AL 7784-E
- SDG&E AL 4774-E
- IOU Operational Flexibility Reports submitted pursuant to Resolution E-5260
- *Unlocking the Value of Smart Panels*, Energy & Environmental Economics, available at https://www.ethree.com/wp-

content/uploads/2025/08/E3_Unlocking-the-Value-of-Smart-Panels_August-2025.pdf

- Party Comments on D.26-02-025
- Model-Free Hosting Capacity Analysis (MoHCA) The National Rural Electric Cooperative Association (NRECA) final report, available at: https://www.cooperative.com/programs-services/bts/Documents/Reports/del0.3_-_MOHCA_NRECA_Final_Report.pdf
- Final Report: Model-Free Operating Envelopes, available at: https://www.researchgate.net/publication/374002627_Final_Report_Model-Free_Operating_Envelopes
- A.25-05-009 Testimony Exhibit PG&E-4

Grounds exist for taking official notice of the above pursuant to Rule 13.9 of the Commission's Rules of Practice and Procedure and California Evidence Code Section 452. If a party objects to the taking of official notice of this information, the party shall file and serve a motion to object within 10 days of the issuance of this ruling.

IT IS SO RULED.

Dated February 6, 2026 at San Francisco, California.

/s/ DARCIE L.HOUCK
Darcie L. Houck
Assigned Commissioner

/s/ JUSTIN REGNIER
Justin Regnier
Administrative Law Judge

/s/ JACK CHANG
Jack Chang
Administrative Law Judge