



(ATTACHMENT A)

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**Attachment A: Questions on the**  
*September 2025 Biannual Energization Report*  
*Review*

# Questions on the September 2025 Biannual Energization Report Review

## Reporting Questions

- 1) **Reporting Gaps:** The IOUs have stated their systems have **reporting gaps** and are not ready to report on the granular details required by the Decision accurately. A notable gap was distinguishing between IOU and Customer time across overlapping periods and customer complaints.
  - a) **Question for the IOUs:** What improvements are the IOUs making to improve internal systems (both IT systems, staff training, and process improvements) to enable tracking and reporting of granular details as required by D.24-09-020? When will this capability be available?
  - b) **Question:** There are other proceedings at the Commission that have been collecting data related to customers connecting to the distribution grid, for example Interconnection Rulemakings ([R.17-07-007](#) and [R.25-08-004](#)). What lessons learned from these proceedings or other proceedings regarding reporting and tracking can be incorporated into the energization data collection process? Alternatively, what are the challenges in collecting and reporting the data?
  - c) **Question:** How should the IOU's tracking methodology distinguish between the customer and utilities' steps in cases where there is an overlap of IOU and customer time?
- 2) **Energization Step Start End Dates:** The IOUs provided differing approaches to identifying start/end dates for steps with projects that lack a clear energization or meter set date.
  - a) **Question:** How do you recommend the CPUC make changes to the field definitions to ensure a uniform approach to identifying start/end dates for steps with projects that lack a clear energization or meter set date? What are the critical data points for the CPUC to use for determining the start/end dates for steps that lack a clear energization or meter set date? What are the critical data points for determining the start/end time for IOU/Customer controlled step?
- 3) **Tracking of Triggers for an Upstream Capacity Project:** Based on the most recent biannual energization reports, the IOUs either have not identified any distribution system upgrade triggers or have not defined the methodology to identify when a project triggers an upgrade. IOUs have expressed challenges with attributing distribution system upgrades to specific energization tariff project loads.
  - a) **Question for IOUs:** How do you identify and track when a tariff project, or group of projects, triggers an upstream capacity project? Are there any CPUC directed data reporting requirements that require tracking when an upstream capacity upgrade is linked to a tariff energization request?
  - b) **Question for IOUs:** What methodology do the IOUs currently use to determine that an upstream capacity upgrade is necessary, and to what (e.g., project characteristics, other trigger) does that methodology attribute the need? Are there any planned updates to IOUs capability to track this information? If so, when will they be complete?

- c) **Question for IOUs:** Are there specific updates necessary to IOUs methodology related to tracking a tariff project triggering an upstream capacity upgrade?
- 4) **Cost Data Availability Timing:** IOUs report on estimated project costs at the time of energization but actual costs are not recorded until approximately 6 to 12 months after energization date.
- a) **Question:** What refinements to the IOUs' existing efforts to collect energization project cost data are necessary to accurately track and report project costs as they incurred, rather than waiting multiple months for IOU reconciliation? If reconciliation is necessary, what is a reasonable methodology and timeframe for the IOUs to complete this process?
- 5) PG&E submitted its Section 935 staffing report as an attachment to its open GRC application and as an appendix to their September 2025 biannual energization report. December 2025, SCE and SDG&E filed their Section 935 staffing reports to the R. 24-01-018 service list.<sup>1</sup> March 31, 2026, SCE submitted an updated Annual 2025 Workforce Analysis Report.
- a) **Question:** Required Content of Section 935 Reports- What specific data fields should the CPUC require the large IOUs to include in their annual Section 935 workforce reports to comply with Section 935, which requires the IOUs to report on the following, at minimum:
- identification of relevant job classifications;
  - detailed analysis of current qualified staffing levels for each job classification; and,
  - detailed analysis of projected future qualified staffing needs by classification.
- b) **Question:** Historical and Forecasted Projections- What timeframe do parties recommend IOUs use when reporting historical workforce data and projecting future workforce numbers? In your response, please:
- Identify the specific year ranges recommended for both historical reporting and forward-looking projections, and explain the rationale for each, including how the proposed periods relate to relevant planning horizons, infrastructure investment cycles, or other operational or regulatory considerations.
  - Describe whether and why different projection periods may be appropriate for different categories of workforce data (e.g., staffing levels, contractor labor ratios,

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<sup>1</sup> Public Utilities Code Section 935 requires each large IOU, as part of its annual reporting, to include a detailed analysis of its current qualified staffing level and future required qualified staffing level, by job classification, necessary to achieve the policies and requirements of Article 14.5 (Sections 930-940), including timely energization of customer projects.

In addition, Section 935(b) directs the CPUC to require each IOU to maintain adequate qualified staffing, and Section 935(c) requires the maintenance of sufficient apprentice pipelines for job classifications with apprentice training requirements.

apprenticeship and training pipelines), and identify any data categories for which a longer or shorter horizon is warranted.

- Address what criteria the Commission should weigh in determining an appropriate and consistent projection period across IOUs, including considerations of data reliability, comparability, and the ability to identify meaningful workforce trends over time.

c) **Question:** Level of Standardization

- Should the CPUC require standardized reporting formats, definitions, or metrics to allow comparison across utilities and over time? If so, please provide examples of the formatting, definitions, or metrics the CPUC can consider? If not, explain why a standardized process is not reasonable.

d) **Question:** Linkage between staffing and energization obligations

- How should Section 935 staffing reports demonstrate the relationship between staffing levels and the IOUs' ability to meet energization targets, timelines, and customer engagement obligations adopted pursuant to Sections 934 and 935?
- How should adequate staffing be determined? Should any consideration be given to potential ebbs and flows in the volume of energization projects?

e) **Question:** Apprenticeship and Workforce Pipeline Requirements

- For job classifications subject to apprentice training requirements, what information should be included to demonstrate compliance with Section 935(c), including:
  - Apprentice pipeline capacity;
  - Expected graduation or qualification timelines; and
  - Alignment between apprentice programs and projected future staffing needs?
- **Customer Engagement and Communication Plan Implementation and Ongoing Oversight:** D.24-09-020 requires the large IOUs to develop and stand up customer engagement and communication plans to improve transparency around energization timelines, clarify utility and customer responsibilities, and provide customers with clearer pathways to obtain information and report delays. D.26-02-025 requires PG&E and SCE to formalize preliminary capacity assessments to be provided ahead of a customer's application submission.

a) **Question:** Annual Status Reporting- Should the CPUC require the large IOUs to include, as part of their future Biannual Energization Narrative Reports, a status update describing the implementation and performance of their customer engagement and communication plans? If so, what specific information beyond the information suggested below should the CPUC require the IOUs to report?

- The current status of implementation of customer-facing communication tools (e.g., web portals, landing pages, customer tracking tools, or other outreach mechanisms);

- Any enhancements or modifications made since the prior reporting period, including the hyperlinks to any publicly facing resources;
- Metrics or indicies used by the IOUs to assess the effectiveness of these engagement efforts.

The most common types of guidance and support the advisors are providing customers in the energization process.

## Data Template Questions

- 3) **Data Submission Template Feedback and Refinements:** The Data Submission Template includes over 90 data points for tariff data and 20 for MPU data. IOUs reported challenges with reporting data points included in the template. Although the IOUs provided the full template in their submission, the fields were not fully completed; for example, certain fields lack well-defined or valid inputs. Moreover, the IOUs are not reporting at sufficient granularity to determine the “Business Class” or cause of delays.
- a) **Question:** Attached to this report is an updated Data Submission Template including a data dictionary. Should the CPUC adopt the attached data dictionary? Should the CPUC make any modifications to the template? Please discuss:
- Whether there is agreement on the definitions provided in the data dictionary.
  - Whether any additional terms need to be included in the data dictionary.
- a) **Question:** Should the CPUC modify the Data Submission Template in the following ways:
- Expand the valid inputs for the index “Business Class (Requested End User)” to align with Appendix B of the Decision, e.g., include “Electric Vehicle charging” and “Single-family residential” as inputs for the “Business Class (Requested End User)”.
  - Disaggregate the “Community Type” index to be three separate columns, one for each ESJ Community, e.g., Disadvantaged Community, Underserved Area, Tribal Community. Require IOUs to input “Yes” or “No” in each of the three columns to indicate whether the project is located in that specific community type
  - Replace the input “< 1MW” in the Capacity Request Category index with “<.2MW,” “.2MW to.5MW,” “.5MW to 1MW,” “1MW to 2MW,” and “>2MW” to better categorize projects by capacity
  - Require a description of specific causes of delays, e.g., “Permitting Challenges”, as inputs for the index “Energization Reasoning about why exceeded average/maximum Energization Target”.
- b) **Question:** What data fields should the CPUC consider adding, consolidating, or removing from the existing energization data template? For fields to consolidate or remove, identify the specific reporting field and explain why the field(s) should be consolidated or removed. The following are some examples identified for this study:

- IOUs have no field to indicate the actual site capacity once energization is completed, only fields that identify what the site capacity was before the energization request and the customer-requested capacity. Add “Actual, Utility Determined Total Site Capacity Needed” column to facilitate IOUs identifying the amount of capacity associated with a site once it has been electrified
  - Eliminate duplicative columns:
    - Remove “Total additional kW capacity installed for the necessary future upgrade as listed on customer’s application” as it provides the same data as the index “Additional Capacity (kW) installed for future electric load deployment.”
    - Remove “Customer elected to install additional capacity to anticipate associated future load growth as indicated on customer application” as it provides the same data as the index “Did customer install additional capacity to support future load growth.”
  - Add the index “Actual Costs of Project” for IOUs to indicate the cost of the project as it is reconciled over time
  - Add “Reconciled Cost” column to facilitate IOUs identifying which projects have been financially reconciled and which have not
  - IOUs do not consistently provide insights into which specific projects were identified as outliers. Add “Outlier” column that indicates which energization projects were identified as outliers based on the definition from Question 6) in Section **Error! Reference source not found.**, using the following inputs:
    - **Timeline-SD** for outliers that exceed two standard deviations above average for that step, tariff type, and IOU
    - **Timeline** for outliers that a) have “Start” or “End Dates” for Steps 1 through 7 occur after Step 8 “End Date” (without explanation) or b) have a “Start” or “End Dates” occur outside of the period between January 31, 2023, and the submission data for the current report (without explanation)
    - **Negative** for outliers that have negative data points
  - Remove all columns in the Tariff Data Submission Template that request Business Days
- c) **Question:** IOUs did not conform to a single set of indices in the template, with IOUs including indices unique to their own Data Submission. Furthermore, the document format of the template offers room for varying interpretations by each IOU of definitions, valid inputs, and units of measurement reported. Please identify in the proposed Template Data Dictionary any additional terms that should be defined and any revisions to consider in the current Data Dictionary. Include the term, definition and set of potential indices for recommended data fields.

## Data Evaluation Methodology Questions

- 4) **Data Categories:** Data included in the template is required per Appendix B of the Decision and necessary to identify trends and gaps for energization projects. However, not all data points are needed to directly assess an IOU's performance against the Decision's Target Timelines.
- a) **Question:** Should the CPUC adopt the following types of categories for data points defined below:
- **Compliance Data Point:** A data point included in the IOUs' Data Submission that is required to assess an IOU's performance against Decision Targets, specifically a data point related to tariff type, IOU-controlled steps, aggregate IOU-controlled, and End-to-End timelines.
  - **Contextual Data Point:** A data point included in the IOUs' Data Submission that provides contextual information on a given energization project, e.g., requested capacity, project costs, trigger for upstream capacity need, concurrent timeline, and reasons for exceeding Decision Targets.
- b) **Question:** The data dictionary includes an index that identifies whether a data point included in the IOUs' Data Submission is categorized as a Compliance Data Point or a Contextual Data Point. Is there agreement on how the data included in the IOUs' Data Submission is categorized?
- 5) **Data Sufficiency Thresholds:** The variances in IOU data **availability** and **reliability** provides significant uncertainty about whether analyses of the data will satisfy the requirements of the Decision.
- a) **Question:** Are the proposed data sufficiency threshold definitions listed below reasonable for determining the IOUs compliance with the data reporting requirements and meeting of the adopted targets while the IOUs' data quality improves. If no, propose alternative data sufficiency threshold definitions. What additional guidance for the IOUs is necessary to clarify how the CPUC should determine their data sufficiency, availability, and/or reliability? Does the reliability threshold need more boundaries and quantitative descriptors?
- **Sufficient:**
    - **Available**, defined as 1)  $\geq 95\%$  of data points reported for Compliance Data Points<sup>2</sup> and 2)  $\geq 75\%$  of data points reported for Contextual Data Points
    - **Reliable**, defined as minimal threats to validity<sup>3</sup> of data sets

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<sup>2</sup> Data availability threshold for Compliance Data Points based on Section 40 CFR §127.23 under the Environmental Protection Agency's National Pollutant Discharge Elimination System.

<sup>3</sup> Data validity refers to the extent to which data accurately represent the real-world entities, events, or measurements they are intended to describe, per "Experimental and Quasi-Experimental Designs for Research," Campbell, Donald T., Stanley, Julian. (1963).

- **Insufficient:**
    - **Not available**, defined as 1) < 95% of data points reported for Compliance Data Points and 2) < 75% data points reported for Contextual Data Points
    - and/or **not reliable**, defined as posing a threat to the validity of data sets
- b) **Question:** In order for the CPUC to monitor an IOU's energization backlog, should the CPUC require utilities that are unable to meet the data sufficiency thresholds of  $\geq 95\%$  for Compliance Data Points and  $\geq 75\%$  for Contextual Data Points in their biannual energization report to file additional reporting? If yes, what additional reporting requirements should the CPUC direct the IOUs to provide to demonstrate their efforts to eliminate or reduce their energization backlogs?
- 6) **Outlier Definition:** IOUs used inconsistent criteria for identifying outliers in their Data Submission.
- a) **Question:** Are the following criteria reasonable for the CPUC to adopt as criteria for consistently identifying outliers, specifically projects where any one of their IOU-controlled steps (Steps 2, 4, 6, 7, and 8):
- Exceed two standard deviations above average for that step, tariff type, and IOU.
  - Have a "Start" or "End Dates" occurring after Step 8 "End Date" (without explanation).
  - Have a "Start" or "End Dates" occur outside of the period between January 31, 2023, and the submission data for the current report, e.g., September 30, 2025, for the September 2025 Biannual Energization Report (without explanation).
  - Have negative data points, i.e., "End Dates" occurring before "Start Dates" for a given step or negative values for "Calendar Days" or "Business Days" (without explanation).
- 7) **Outlier Inclusion in Data Submission and Aggregate Calculations:** IOUs used inconsistent approaches in reporting outliers in their Data Submission. Projects identified as outliers based on data irregularities for a specific step which do not impact the accuracy of the overall IOU-controlled and End-to-End cycle timelines may still be viable data points in assessing IOU performance against Decision Targets.
- a) **Question:** Should the CPUC require the IOUs to include all projects in their Data Submissions regardless of whether they are considered outliers based on the CPUC-defined outlier criteria? Why or why not?
- b) **Question:** Are the following classifications of outliers reasonable and cover all spectrums of potential outliers? If not, what are the gaps and how should they be defined?
- **Data Outlier** is defined as projects identified as outliers where the erroneous step data does not impact the overall IOU-controlled or End-to-End Cycle timelines

- **Project Outlier** is defined as projects identified as outliers where the erroneous step data does impact the overall IOU-controlled or End-to-End Cycle timelines
- c) **ESJ Community Type Definition:** IOUs used varying definitions and resources to identify whether a project is located in an ESJ Community. Accurate, consistent inputs in the “Community Type” field are essential to assessing the timelines for projects in ESJ Communities for verifying equitable treatment of all utility customers.
  - d) **Question:** Are the definitions of ESJ Communities adopted in the CPUC’s ESJ Action Plan Version 2.0<sup>4</sup> reasonable for the IOUs to use when tracking if an energization request is located within an ESJ Community? If no, what other definitions should the CPUC consider using to track the IOUs’ efforts to energize customers located in Underserved Communities, Disadvantaged Communities, and Tribal Communities?

## Data Collection Methodology Questions

- 8) **Cost Data Collection Standardization:** IOUs report on project costs at the time of energization, but note that these costs may not be reconciled, a process that can take 6 to 12 months after the energization date. The IOU-provided methodology is part of Question 4) in Section **Error! Reference source not found.**
  - a) **Question:** How can these efforts be standardized across IOUs? What should be incorporated into the standardized cost collection efforts to address the reporting challenges associated with cost reconciliation?
  - b) **Question:** Should the IOUs record and report energization cost data as it is incurred, or should cost data be recorded and reported after a project is completed?
- 9) **Complete Project Initiated Prior to the Decision:** The majority of completed projects to date in the existing dataset were initiated prior to the Decision establishing the 8 Energy Steps and are not subject to the Decision’s target timelines.
  - a) **Question:** Is there a number or percentage of complete projects initiated after the Decision that would represent sufficient data to discontinue analysis on pre-decision projects?
  - b) **Question:** Should the CPUC continue to require the IOUs to submit data from projects that were started before the Decision established energization targets? If not, why should this information not be reported?
  - c) **Question:** Under what conditions, e.g., data sufficiency or sample size, should the CPUC analyze IOU performance against target values? How should the CPUC measure the IOUs performance meeting the targets absent of full and sufficient data collection and reporting?
- 10) **In-Progress Projects Exceeding Target Timelines:** IOUs currently only include completed projects in their aggregate calculations on holistic and individual step timelines and the percent of projects meeting targets, omitting in-progress projects that may have exceeded

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<sup>4</sup> See the CPUC’s ESJ Action Plan Version 2.0 released April 7, 2022 <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-action-plan-v2jw.pdf>

the target timelines pursuant to D.24-09-020. Omitting these in-progress projects may lead to the appearance of worse performance over time as the in-progress projects with extended timelines become completed projects.

- a) **Question:** Should the IOUs include in-progress projects that have exceeded the target timelines pursuant to D.24-09-020 in future data reporting efforts? If yes, how should the IOUs identify the project is still in progress?

11) **IOU Treatment of Concurrent Steps:** IOUs identified overlapping and concurrent steps as a key challenge in accurately reporting individual step timelines. PG&E included in their Narrative Report<sup>5</sup> a description of their approach to accounting for concurrent and overlapping steps, specifically:

- For overlapping IOU and Customer steps, PG&E assigned time to the Customer
- For concurrent IOU phases, PG&E aggregated those days as a single day within the total IOU time count
- For agency/permitting time, PG&E excluded overlapping time from the IOU-controlled time

- a) **Question:** Is PG&E's current process for accounting for overlapping steps between IOU and customer responsibility reasonable? If yes, should SCE and SDG&E be directed to follow similar processes for tracking overlapping steps? If no, what guidance is necessary to ensure the IOUs accurately track the time to complete overlapping steps?

**(END ATTACHMENT A)**

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<sup>5</sup> [PG&E Biannual Energization Report](#), September 2025; page 11