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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

COMMENTS OF WEAVE GRID, INC. ON ASSIGNED COMMISSIONER'S AND ADMINISTRATIVE LAW JUDGE'S RULING ISSUING QUESTIONS ON THE DISTRIBUTED ENERGY RESOURCES ORCHESTRATION WORKSHOP REPORTS

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), Weave Grid, Inc. ("WeaveGrid") hereby submits these comments on the *Assigned Commissioner's and Administrative Law Judge's Ruling Issuing Questions on the Distributed Energy Resources Orchestration Workshop Reports* ("Ruling"), issued on July 9, 2026.

I. OPENING COMMENTS

Responsive to the questions posed by the Ruling, WeaveGrid offers the following comments:

3. **Given the time required to prepare and decide on potential Investor-owned Utility ("IOU") distributed energy resource ("DER") Orchestration applications and the related IOU pilots currently underway, how can IOUs:**
    a. **Ensure DER orchestration strategies and implementation stages proposed in future applications incorporate lessons learned, relevant data, and any other benefits generated from the currently ongoing pilots and the information set forth in the record of this proceeding?**
    b. **Coordinate the pilots with the formal DER orchestration application proceeding?**

Pilot and program evaluations should assess DER orchestration benefits at the level of the distribution system where those benefits are realized. Grid constraints often emerge first on secondary distribution infrastructure, including service transformers, before becoming apparent at the feeder or substation level. Accordingly, where pilot and program data can be paired with utility planning and asset information, evaluations should measure how orchestration improves utilization of existing distribution assets, reduces loading during asset-specific peak periods, and defers or avoids capital investments.

This type of locational analysis is not dependent on the development of a novel orchestration model. Utilities in California and other jurisdictions are already implementing managed charging and DER orchestration programs using commercially available technologies.[1][2][3] The relevant question for evaluation is therefore not whether DER orchestration can influence customer load, but how effectively, reliably, and persistently it can address identified distribution-system needs.

Future IOU applications should explain how results from existing pilots and programs will inform the selection of use cases, target locations, technology architecture, implementation stages, and scale of deployment.

10. How should the Commission coordinate DER orchestration implementation for IOUs in different stages of technical readiness with regards to telemetry, DER management systems, and other DER orchestration aspects?

The Commission should accommodate differences in IOU technical readiness through a gradual, phased approach to implementation rather than requiring uniform deployment of specific

[1] *See* Maryland Public Service Commission, Case No. 9478, *In the Matter of the Petition of the Electric Vehicle Work Group for Implementation of a Statewide Electric Vehicle Portfolio*

[2] *See* PG&E's *Epic Program Investment Charge 2025 Annual Report*. Accessible at https://www.pge.com/assets/pge/docs/about/corporate-responsibility-and-sustainability/2025-annual-report-epic.pdf. "EPIC 4.04 Home Charging, Distribution – Managed Charging" demonstrated significant technical progress in 2025, enrolling by December 2025 6,240 vehicles and deployed grid-aware orchestration across more than 4,500 transformers. (p. 42)

[3] *Ibid.* "EPIC 4.09B Aggregated Customers on Distribution Circuits" which provided funding for PG&E's Seasonal Aggregation of Versatile Energy ("SAVE") which estimated saving $130M per year when fully scaled. (p. 37). Lessons learned from SAVE are actively being deployed such as with PG&E's PanelBoost program which will deploy new SPAN Edge devices coupled with next-generation metering infrastructure designed to reduce upgrade costs for customers adopting EVs, heat pumps, induction cooking, and other high efficiency electric technologies.

technologies or capabilities on the same timeline. Each IOU should be permitted to build from existing systems, pilots, and demonstrated capabilities while progressing toward common functional outcomes necessary for scalable DER orchestration.

As implementation scales, those outcomes should include sufficient visibility into and the ability to coordinate behind-the-meter DER load at the locational and temporal granularity needed to support identified distribution use cases. The Commission should focus on the capabilities and outcomes necessary to deliver measurable grid and ratepayer benefits, while allowing IOUs flexibility to determine the appropriate combination of DERMS, telemetry, integrations, and other technologies based on their existing systems and stage of readiness.

In particular, implementation of targeted orchestration use cases need not await completion of a comprehensive enterprise DERMS deployment. Utilities can procure Grid Edge DER management and orchestration platforms that integrate with participating customer DERs, receive utility-defined grid objectives or operating constraints, coordinate device operation, and provide the utility with visibility into performance. These platforms can complement utility enterprise DERMS, advanced distribution management systems, planning tools, and other operational systems.

The Commission should allow each IOU to establish an architecture appropriate to its technical readiness while encouraging each IOU to identify: (1) the distribution use case(s) to be addressed; (2) the utility system(s) or process(es) that identifies the grid need; (3) the means by which that need is communicated to the Grid Edge DER management or orchestration platform; (4) the DERs and customer groups capable of responding; and (5) the metrics that will determine whether the use case is ready to scale.

This phased approach would permit an IOU to begin with a targeted managed charging, battery, or other DER use case while broader enterprise systems continue to develop. It would also preserve utility requirements, including grid objectives, operating envelopes, cybersecurity, and performance standards while allowing utilities to procure specialized capabilities where doing so can accelerate implementation or reduce cost.

17. The IOUs have previously made statements regarding opportunities for lowering costs. Please provide explicit examples of these opportunities including how these opportunities may shift between initial implementation and further scaling.

WeaveGrid agrees with the perspectives expressed by Pacific Gas & Electric Company ("PG&E") and Southern California Edison Company ("SCE") at the May 21, 2026 DER Orchestration Workshop that DER orchestration can lower ratepayer costs by improving utilization of existing grid infrastructure, accelerating energization, and deferring or avoiding capital investments. Over time cost-effectiveness should guide implementation, however IOUs should retain the flexibility necessary to integrate lessons learned from near-term implementation.

For example, an IOU may identify service transformers, feeder segments, or other distribution assets expected to exceed applicable planning or operating limits during a relatively limited number of hours. A Grid Edge DER management or orchestration platform can coordinate participating DERs served by their assets to meet customer needs while reducing load coincident with the asset's peak and improving utilization. Where this orchestration allows the IOU to defer or avoid replacement of the constrained asset, the benefits can include both the reduction in the utility-wide or program-wide peak and the deferral of the upgrade of the asset.

Experience in other jurisdictions demonstrates that this type of distribution-integrated orchestration can be implemented using commercially available technology. In Maryland Public Service Commission Case No. 9478, Baltimore Gas and Electric Company developed its utility-managed charging program through successive stages, including time-of-use charging management, active optimization, and distribution-focused load balancing. Argonne National Laboratory's evaluation of the Maryland Smart Charge Management pilot examined charging data from more than 4,600 participating devices across BGE, Pepco, and Delmarva Power & Light and evaluated time-of-use and orchestration strategies for reducing feeder-level constraints and deferring infrastructure upgrades. That experience, among others, demonstrates that a utility can deploy an orchestration platform, establish the applicable program and grid objectives, and use the platform to coordinate individual customer devices in support of those objectives.[4]

[4] Nazib Siddique et al., Argonne National Laboratory, *Advancing Grid Resilience Through Smart Charge Management: Findings from Maryland's Pilot*, ANL/25-14 (Mar. 2025).

For future IOU applications, Grid Edge DER management and orchestration platforms should be understood as part of the utility's technology architecture, not as a substitute for utility planning or operational systems. These platforms can be deployed and integrated with enterprise DERMS, advanced distribution management systems, planning tools, and other utility systems. During initial implementation, IOUs may appropriately target locations with identified constraints, planned upgrades, energization delays, or other measurable cost opportunities. Targeted deployment allows the IOU to compare the cost and performance of orchestration against the timing and cost of a conventional infrastructure solution while developing operational experience with DER availability, customer behavior, communications, and measurement.

The Commission should therefore ensure that the DER orchestration application framework supports evaluation at sufficient locational granularity, including the secondary distribution level where appropriate, and allows IOUs to propose Grid Edge DER management and orchestration capabilities as part of an IOU's technology architecture.

II. CONCLUSION

WeaveGrid appreciates the opportunity to provide input in response to the Ruling. We thank the Commission for consideration of comments and look forward to continued engagement.

Respectfully submitted,

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