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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 REQUESTING COMMENT ON ASSIGNED COMMISSIONER'S PROPOSAL ON FLEXIBLE SERVICE CONNECTIONS

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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 Requesting Comments on Assigned Commissioner's Proposal on Flexible Service Connections* ("Ruling"), issued on July 7, 2026, in accordance with the schedule as modified on July 10, 2026.[1]

I. OPENING COMMENTS

Responsive to the questions posed by the Ruling, WeaveGrid offers comments on the following questions on the *Assigned Commissioner's Proposal* ("Proposal").

- **Section 2. The Affordability Opportunity: Reducing Customer and Ratepayer Costs Through Flexible Capacity Solutions**

WeaveGrid agrees that ratepayers, faced with affordability challenges prompted by load growth, stand to benefit from flexible service connection solutions proposed to support a utility's ability to utilize existing infrastructure more efficiently, reduce unnecessary infrastructure costs, and provide valuable operational experience with technologies that will be increasingly necessary

[1] *E-mail Ruling Granting Schedule Modification* issued by Administrative Law Judge Justin Regnier on July 10, 2026.

to support California's electrification goals and proliferation of distributed energy resources ("DERs").

These benefits are particularly significant where electric vehicles, batteries, and other flexible loads can be managed within utility-defined capacity limits during the hours in which a local distribution constraint is present. Flexible service connections can therefore help utilities accommodate additional load while reducing or deferring infrastructure investments otherwise driven by asset peak conditions.

Grid Edge DER management and orchestration platforms can support utility implementation of these arrangements. These platforms may be procured and deployed by utilities to integrate with customer DERs, translate utility-defined operating envelopes and capacity limits into device-level operating schedules, and provide utilities with the visibility and performance information needed to manage flexible service connections reliably. When integrated with utility planning, operational, and enterprise DER management systems, Grid Edge DER management and orchestration platforms can extend utility capabilities to customer devices and distribution assets that may not be efficiently managed through centralized systems alone.

Further, as the Commission contemplates a final decision in Application 24-11-007, Electric Rule No. 30, WeaveGrid recommends that the Commission consider how flexible service connections may be used to complement efforts that can expedite energization timelines, minimize short-term infrastructure costs, and realize long-term savings.[2]

- **Section 4. Operating Envelopes and Dynamic Capacity Management**

WeaveGrid supports the Proposal's recommendation that the Commission advance Grid Edge DER management and orchestration platforms as a means of implementing flexible service connections, particularly for residential EV charging and constraints affecting secondary distribution infrastructure. Grid Edge DER management and orchestration platforms can complement enterprise DERMS by extending utility visibility and orchestration capabilities to distributed customer devices and localized grid conditions.

[2] *Application of Pacific Gas and Electric Company (U39E) for Approval of Electric Rule No. 30 for Transmission-Level Retail Electric Service* ("Application 24-11-007")

The Commission should provide utilities flexibility to procure and deploy Grid Edge DER management and orchestration platforms that can integrate with existing utility systems, support utility-defined operating envelopes, and manage participating DERs in accordance with utility program and operational requirements. This approach can allow each utility to build from its existing systems and technical readiness while progressing toward the common capabilities necessary to scale flexible service connections.

II. CONCLUSION

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

Respectfully submitted,

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