



**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 Resources
Future.

Rulemaking 21-06-017

**REPLY 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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July 31, 2026

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ASSIGNED COMMISSIONER’S PROPOSAL ON FLEXIBLE SERVICE
CONNECTIONS**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Weave Grid, Inc. (“WeaveGrid”) hereby submits these reply 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. REPLY COMMENTS

Responsive to the questions posed by the Ruling and opening comments filed by parties, WeaveGrid offers reply comments on the following sections in the *Assigned Commissioner’s Proposal* (“Proposal”):

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

WeaveGrid agrees with Pacific Gas and Electric Company (“PG&E”) that a timeline of 180 days after a Decision to file a Tier 2 Grid Edge DERMS Advice Letter to expand and scale

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

Grid Edge DERMS for residential EV charging is prudent given the timeline associated with PG&E's 2027-2030 submittal.²

Importantly, the Commission should preserve utility flexibility to deploy the mitigation best suited, including utility Grid Edge DER management and orchestration platforms, rather than imposing a default mitigation. Any requirements should focus on the ability to maintain participating loads within utility-defined operating limits, coordinate flexible resources in response to constraints affecting customer service or shared distribution assets, and provide the information necessary for utilities to operate flexible service connections reliably.

Avoiding or deferring a customer service-panel upgrade is an important use case. Smart service panels, meter collars, power control systems, and similar equipment may be effective tools for accomplishing that objective. They are not, however, the only means of managing load within available grid capacity and should not be established as the exclusive or presumptively preferred solutions. Depending on the relevant constraint, a utility may be able to achieve the required outcome through software-based coordination of EV charging, bidirectional vehicles, batteries, and other flexible resources, or through a combination of customer-side equipment and software-based orchestration.

As experience with flexible service connection grows, utilities should be able to continue evaluating additional approaches such as those emerging from the success in other demonstration programs, as appropriate (*i.e.*, EPIC 4.04, etc.).

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

WeaveGrid agrees with Southern California Edison Company ("SCE") that grid-edge controls offer ratepayer benefits in the potential to defer certain customer-side and distribution - system upgrades through more localized management of distribution constraints.³

As the Proposal recognizes, the imports and exports of customers served by a common transformer, secondary conductor, feeder, or other distribution facility collectively affect the loading of that shared asset. Grid-edge DER management and orchestration therefore should not

² *Pacific Gas and Electric Company's (U 39 E) Opening Comments on the Assigned Commissioner and Administrative Law Judge's Ruling Requesting Comments on Assigned Commissioner's Proposal on Flexible Service Connections and Questions in Sections 2 and 4* ("PG&E Opening Comments") at pp. 12-14.

³ *Southern California Edison Company's (U 338-E) Comments on Assigned Commissioner's Proposal and Section 2 and Section 4 Questions Regarding Flexible Service Connections* ("SCE Opening Comments") at p. 11.

be understood as limited to managing loads within a single customer premise. It can also coordinate participating resources across multiple premises in relation to the capacity or operating constraint of the shared distribution asset.

For example, a utility could coordinate a smart service panel at one premise with EV charging or a battery at another premise served by the same transformer or feeder. The particular resources and control methods may differ among customers, but they can operate together to maintain aggregate loading within utility-defined limits. This capability can improve utilization of existing infrastructure and accommodate continued load growth without requiring the same equipment to be installed at every participating premise.

The opening comments also demonstrate that the terms “Grid Edge DERMS” and “Enterprise DERMS” are not yet used consistently in this record. SPAN proposes to define Grid Edge DERMS principally as a tool that manages multiple loads within a single customer premise and suggests that a smart panel may itself constitute a self-sufficient Grid Edge DERMS.⁴ SCE, by contrast, recommends that grid-edge and enterprise capabilities be understood as parts of an integrated architecture.⁵ WeaveGrid agrees that greater clarity would be useful, but the Commission should not adopt definitions that equate Grid Edge DERMS with a customer-premises power control system.

Any definition should instead be functional and tied to the Commission’s intended outcomes. For purposes of this proceeding, Grid Edge DERMS should encompass capabilities that translate utility-defined operating limits or distribution constraints into coordinated schedules or dispatch instructions for participating devices and provide the visibility and performance information needed for reliable utility operation. Those capabilities may be distributed among utility systems, grid-edge computing, cloud-based systems, customer equipment, and device or original-equipment-manufacturer interfaces, and should operate in coordination with the utility’s enterprise systems. The Commission should also recognize that the grid edge encompasses the broader low voltage distribution edge beyond ADMS control and is not limited solely to behind-the-meter resources.

Those benefits are not limited to customer-side panel or service upgrades and include the

⁴ *Opening Comments of SPAN.IO on the Ruling Requesting Comment on Assigned Commissioner’s Proposal on Flexible Service Connections* (“SPAN.IO Opening Comments”) at p. 8.

⁵ SCE Opening Comments at pp. 9-10.

potential to defer or avoid upgrades to service transformers, secondary conductors, laterals, feeders, and other distribution facilities.

Further, as stated in our Opening Comments, WeaveGrid agrees that utilities should retain the flexibility that recognizes the varying stages of readiness to allow each utility to build from existing systems and progress 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 these reply comments and look forward to continued engagement.

Respectfully submitted,

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