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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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
INDEPENDENT PROFESSIONAL ENGINEER PLAN FOR
2025-26 DISTRIBUTION PLANNING AND EXECUTION PROCESS**

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Dated: August 17, 2026

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

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Pursuant to the *Administrative Law Judges’ Ruling Setting Schedule for the 2026-2027 Distribution Planning and Execution Process Cycle*, issued April 20, 2026, Pacific Gas and Electric Company (PG&E) hereby provides the “Final IPE Plan for 2025-2026 DPEP Cycle,” prepared by Resource Innovations and attached hereto as Attachment A.

Respectfully submitted,

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By: /s/ Benjamin C. Ellis
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Attachment A

Final IPE Plan for 2025-2026 DPEP Cycle –

Pacific Gas and Electric Company



Final IPE Plan for 2025-2026 DPEP Cycle - Pacific Gas and Electric

Submitted to California Public Utility Commission

August 17, 2026

Submitted by:
Resource Innovations
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1 Introduction and Background

The Independent Professional Engineer (IPE) services for the 2025-2026 Distribution Planning and Execution Process (DPEP) Process is per CPUC decision (D.18-02-004), Administrative Law Judge's Ruling (R. 14-08-013) issued May 7, 2019, and Administrative Law Judge's Ruling Modifying DIDF (R.14-08-013) issued April 13, 2020 which defined the original IPE scope of work (Appendix A). This original scope of work has been modified by subsequent orders and rulings, as well as updates to the scope of work made by the Energy Division on March 4, 2025, which modifies the original scope and includes additional scope items to support the High DER proceeding. This updated scope of work is included as Appendix B. Further revisions made to this scope of work are discussed in Section 3.1 of the IPE Plan and reflected in Table 3-1.

The schedule for the IPE Verification and Validation (V&V) process in this cycle will follow the Administrative Law Judges' ruling setting schedule for the 2026-2027 Distribution Planning and Execution Process cycle¹ issued on April 20, 2026 and is shown below:

- Draft IPE Plan due week of May 18, 2026.
- Final IPE Plan due August 17, 2026.
- IPE Preliminary Analysis of GNA/DUPR Data Adequacy for all three IOUs due September 4, 2026.
- IPE Distribution Planning Advisory Group (DPAG) report for each IOU presenting GNA/DUPR review findings and Verification & Validation outcomes due November 6, 2026.
- IPE Post DPAG Report covering all three IOUs, comparing their filings, reviewing compliance, and making recommendations for process improvements due March 15, 2027.

¹ The ALJ ruling issued on April 20, 2026 provided the schedule for both the 2025-26 and 2026-27 DPEP cycles.

2 Description of the Plan

2.1 Definitions Used in the Plan and Other Deliverables

To facilitate understanding of the IPE scope of work, the following definitions are included and will be used in the Plan and throughout all of the IPE work products and deliverables.

Verification – Is a review performed by the IPE during which an independent check is performed to determine if the results produced were developed using data assumptions and business processes that were defined and described by the utility or are based upon standard industry approaches that do not have to be defined and described. In other words, “Did the IOU follow their own processes correctly as defined and described by the IOU?”

Validation – Is a review performed by the IPE during which an independent assessment is performed of the appropriateness of the approach taken by the utility to perform a task from an engineering, economics, and business perspective. In other words, “Are the processes implemented by the IOU the best way to identify all necessary planned solutions and investments. And to what extent were the IOU methodologies appropriate and effective?”

The IPE Plan covers the business processes that the IOUs use to identify which distribution or sub-transmission projects are recommended to proceed to implementation. One of the core purposes of the plan is to answer the question - Are the IOUs identifying every project that will be needed to provide the new or additional service requirements of their customers early enough to provide the service in a timely manner?

The business processes in the Plan are organized generally in the order that they are performed. Starting with capturing the peak load values for each circuit, using the CEC IEPR forecasts to develop utility specific system level values which are then disaggregated to the circuit level, adjusted for known and pending loads and then used to determine if there is an overload or other issue during the planning period. For circuits that have a need, the best planned investment is selected. Scenario planning, if applicable, is used to analyze three scenarios – Low, Base and High Scenarios, the results of which are incorporated into a final proposed set of planned solutions and planned projects.

3 IPE Plan

The heart of the IPE Plan is the material contained in Table 3-1. This table lists the business processes, roles of the utility and IPE, target timing and information requirements for each business process in the IPE scope. Listed below is a more detailed description of the contents:

- IOU Business Process / IPE Review Step – This column includes a number for each business process included in the table. To make it easier for readers who will be looking at more than one utility IPE Plan, the process was started with the same numbering for all three utilities and that set of numbers was maintained as much as possible. In cases where additional steps needed to be added to accommodate a utilities specific unique process a letter was added to the previous number. For example, the step after Step 3 was added and was number Step 3a. For cases where steps are not needed, they will be spelled out in the table.
- Business Process / IPE Review Step Description – This column contains a general description of the business process being reviewed.
- Plan for 2025-2026 DPEP Cycle – This column includes several types of information:
 - A brief description of what the review will include and whether it would include review of a subset of the total number of elements (i.e., circuits) or all elements and what is being examined.
 - Roles which include the role of the utility overall and the role of the IPE for both the verification and validation review. For one or both reviews, an indication is provided in most cases, for what the IPE will be checking for or confirming in the review.

Note that there are generally two approaches to performing a verification. The first is a demonstration wherein the utility develops the necessary spreadsheet or other mechanism to show how the business process developed the results of interest and the IPE performs a walk through to view the demonstration by the utility. The second approach is wherein the IPE develops a spreadsheet or other mechanism to calculate the results of interest using data provided by the utility and then compares the results to the utilities' numerical results.
- Target Timing – This column includes a target timing for the reviews in the business process in this row or in the timing that data will be provided to the IPE.

Data/Information Requirements – This column includes the data or information that the IPE needs to perform its review and in some cases the date the information is required.

3.1 Revisions to the IPE Plan for this Cycle

As per the updated IPE Scope of Work, the following verification and validation steps will be skipped in this cycle since PG&E has confirmed that the business process they used in these steps are the same as those used in the prior cycle and there is no other reason to believe that this step should be included in this year's review.

- Steps 5-7 - Convert Peak Growth to 8760 Profile, Determine Net Load and Peak Load
- Steps 9-11 - Initial Comparison to Equipment Ratings, Evaluate No Cost Solutions and Comparison to Equipment Ratings after No Cost Solutions
- Step 14 - Development of capital costs for the planned investments.
- Step 19 - Compare 2025 forecast loads with actual loads

These steps are not being removed permanently from the IPE scope. In addition, as indicated earlier, these steps are only skipped in this cycle since the utility states that the business process for these steps have not changed from the prior cycle and the ED/IPE do not think there is any other reason to include them in this V&V cycle. These steps have been included in the table below and will be followed only if the process used by the utility for this cycle is different than used in the previous cycle.

As in the last cycle, Step 13 (Development of Planned Investments using Planned Standards) will be retained in this cycle to verify and validate the process used by the utilities to determine whether a planned project identified in a previous cycle is still needed based on the results of the current cycle.

In addition, the verification and validation of the following steps related to the identification and prioritization of Candidate Deferral Opportunities (CDOs) will no longer be required. However, these steps are left in the IPE plan to preserve the numbers assigned to subsequent steps to avoid any confusion.

- Step 15 - Development of Candidate Deferral Projects
- Step 17 - Prioritization of Candidate Deferral Projects into Tiers
- Step 16 - Development of operational requirements for CDOs
- Step 18 - Calculation of LNBAs for planned projects
- Step 25 - Track solicitation results to inform next cycle.

In addition, based on inputs from the ED, the following steps will be skipped in this cycle.

- Step 21 - Review plan for changes to the planning process for the next cycle
- Step 22 - Review implementing of planning standard and/or planning process.
- Step 23- Review list of internally approved capital projects (created in other distribution planning workstreams).

Two steps (Steps 27 and 28) which were added in the last cycle and will be also be included in this cycle.

- Step 27 – Review Methodology used for Prioritization of Planned Projects
- Step 28 - Review Project Execution Tracking Data and Metrics

The IPE V&V steps for 2025-2026 DPEP Cycle are shown starting on the following page.

Note: PG&E indicated that it would be categorizing pending loads into four categories – A, B1, B2 and C. PG&E indicated that it would not be determining hot spots or performing scenario analysis in this cycle. Only pending loads A and B1 will be included in the single planning case. The V&V plan shown in the table below reflects the above assumptions.

Table 3-1: PG&E IPE Review for 2025-26 DPEP Cycle

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
PROCESSES TO DEVELOP STARTING POINT LOAD, SYSTEM LEVEL VALUES AND DISAGGREGATE TO CIRCUIT LEVEL				
1	Collect 2025 actual circuit loading and adjust for weather as needed (Note: the V&V for Step 1 will be combined with Step 8)	Perform Verification for at least 10 circuits mutually selected by PG&E and the IPE; Verify the following: • Development of the AMI data for these circuits • Development of extreme, typical and low load profiles in LoadSEER. Roles: PG&E to provide a description and demonstration of the processes used for developing extreme, typical and low load profiles in LoadSEER. PG&E to also provide data for 10 sample circuits. PG&E to demonstrate how its approach is comparable to using a 1-in-10 year approach to adjust historical data to account for the potential for extreme weather conditions.	PG&E to provide the process description (specified in the data/information column) by mid August.	PG&E to provide the data/information requested below. IPE to provide the data/information provided in the last cycle for reference. Process Description: PG&E to provide a description of the following process. PG&E to indicate if any of these processes have changed since the last DPEP cycle. ▪ Development of 8760 profiles for circuits using aggregate AMI data ▪ Process for developing extreme load profiles using Method 2 and Method 3 etc.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		Verification: IPE to review the data/information and demonstrations provided by PG&E and verify that these results are carried forward in the planning process in subsequent V&V steps. Validation: IPE to review the business process for reasonableness and consistent with the objectives of the DPEP process. PG&E to demonstrate how its approach is comparable to using a 1-in-10 year approach to adjust historical data to account for the potential for extreme weather conditions.		- Any changes to the load profile development process since the last cycle. Data/Information: - Number of feeders and banks in total using Method 2 and Method 3 base load profiles. - AMI data for 10 sample circuits for the years 2021-2025. - Extreme, typical and low load profiles for the sample circuits that are used in the DPEP Demonstration: PG&E to provide a demonstration of the processes used for peak load collection, scrubbing,

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
				normalization, correction for extreme weather, as well as the development of the planning load profiles in LoadSEER if the process is different from the one used in the prior cycle.
2	Determine load and DER annual growth at the system level used in the DPEP including the application of IEPR caps.	Perform verification and validation of how system-level, annual load and DER growth forecasts (IEPR caps) are developed by PG&E using the CEC IEPR forecasts. Perform verification and validation of how the known load and pending loads are capped using the IEPR caps. Roles: PG&E to provide data and information on how the system-level annual load and DER growth forecasts are developed by PG&E using the CEC IEPR forecasts.	PG&E to provide the data/information (specified in the Data/Information Requirements column) by mid August. PG&E to provide the process description (specified in the Data/Information Requirements column) by mid August.	PG&E to provide the data/information requested below. IPE to provide the data/information provided in the last cycle as a reference. PG&E to provide the following: Data/Information: - Name(s) of the CEC IEPR forecast files and links to those files. - Excel spreadsheet used to calculate the system-level

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		PG&E provides description of CEC forecast used (name of the forecasts used), the EXCEL spreadsheet used and a link to CEC table(s) used. PG&E to provide description as to how known load and pending loads are used in conjunction with the IEPR caps to determine the load growth used in the DPEP. Verification: The IPE will verify the CEC forecasts are used as described by PG&E to calculate the load and DER forecast values at the system level for 10 years. IPE to review spreadsheet results and compare the result from its spreadsheet model to the results developed by PG&E. IPE to review the process used to PG&E to adjust the CEC system-level load		load growth by customer class. - Excel files containing the zonal forecasts for EV, PV, and ES. Excel file containing busbar forecasts for EE. - All known and pending load additions including amount(s), circuit name, class, type of load and in-service date. For pending loads include its category. (same as Step 4) Process Description: - PG&E to provide a description of the process used to develop system-level load growth (for customer classes) and DER growth from the CEC forecast. - PG&E to provide description as to how known loads and

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		forecasts for known load and pending load additions. Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.		pending loads are developed and how that load is modeled should it exceed the CEC forecast (IEPR cap). PG&E to indicate if any of these processes have changed since the last DPEP cycle.
3	Disaggregate load and DER annual growth to the circuit level	Perform verification and validation for circuit-level load and DER disaggregation. Roles: PG&E to provide the inputs and outputs, as well as a general description of the processes used for disaggregating system-level load growth to circuit-level and further at a class level (Domestic, Commercial, Industrial) using LoadSEER. PG&E to provide the inputs and outputs, as well as a general description of the	PG&E to provide the data/information (specified in the Data/Information Requirements column) by mid August. PG&E to provide the process description (specified in the Data/Information Requirements	PG&E to provide the data/information requested below. IPE to provide the data/information provided in the last cycle for reference. Data/Information: PG&E to provide circuit-level load growth by year and by customer class (AGR, COM, DOM, IND).

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		processes used for disaggregating system-level DER capacity to circuit-level capacity. Verification: IPE to verify that the load and DER growth values at the circuit level match with the 8760-hourly profiles for specific circuits that are chosen in Step 6. Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.	column) by mid August.	- PG&E to provide circuit-level values by year for the following DERs: PV, ES, EE, and EV (LDV and MHDV). Process Description: - General description of the process used for disaggregating system-level load to circuit-level loads and further at a class level (Domestic, Commercial, Industrial) using LoadSEER. - General description of the process used for disaggregating system-level DER capacity to circuit-level capacity and the tools/techniques used. - PG&E to indicate if any of these processes have changed since the last DPEP cycle.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
3a	Check sum of all disaggregated load and DERs same as CEC IEPR System Level values	Perform Verification on this aggregation for all circuit values as well as cross check values used in other V&V checks. Roles: Information provided by PG&E in Step 3 will also be used in this step. Verification: IPE to verify that the sums of all load and DER growth forecasts at the circuit level match the starting point system values verified in Step 2. Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.		Data needed for this step is provided in Step 3
4a	Step 4a -Gather Known Load data that is used in Step 2.	Perform V&V for a subset of circuits selected by the IPE. Roles:	PG&E to provide the requested information by Mid August.	PG&E to provide circuit-level known load additions by customer class and type for all circuits that add up to the total known load values for each year used in Step 2.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		PG&E to provide circuit-level known load additions by customer class and type for all circuits that were used to make the adjustments to the CEC IEPR forecast in Step 2. Verification: IPE to verify that the sum of the circuit-level known load additions by customer class matches with the system-level values in Step 2. IPE to verify that the circuit-level known load additions for selected circuits match with those used in LoadSEER (Starting with Step 5). Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.		
4b	Step 4b - Determine Hot Spots (Not			

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	Applicable to PG&E for this cycle)			
4c	Step 4c – Gather Pending Loads data used in Step 2	Perform V&V for a subset of circuits selected by the IPE. Roles: PG&E to provide circuit-level pending loads by customer class and type for all circuits that were used to make the adjustments to the CEC IEPR forecast in Step 2. Verification: IPE to verify that the sum of the circuit-level pending load additions by customer class matches with the system-level values in Step 2. IPE to verify that the circuit-level pending load additions for selected circuits match with those used in LoadSEER (Starting with Step 5).	PG&E to provide the requested information by Mid August.	PG&E to provide circuit-level pending load additions by customer class and type for all circuits that add up to the total pending load values for each year used in Step 2.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.		
5	Convert peak growth to 8760 profile as needed [will be skipped since process is unchanged from the last cycle]			
5a	Convert DER growth to 8760 profile as needed [will be skipped since process is unchanged from the last cycle]			
6	Derive net load profile [will be skipped since process is			

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	unchanged from the last cycle]			
7	Determine net peak load [will be skipped since process is unchanged from the last cycle]			
8	Adjust for "extreme weather" (1 in 10)	Performed as part of Step 1 (See Step 1 above)	Performed as part of Step 1 (See Step 1 above)	Provided in Step 1 (See Step 1 above)

PROCESSES TO DETERMINE CIRCUIT NEEDS AND DEVELOP GNA

9	Initial comparison to station outlet ratings or other circuit limiting			
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IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	factor to determine if ratings exceeded [will be skipped since process is unchanged from the last cycle]			
10	Incorporate load transfers, correct data errors	Perform V&V for 5-10 circuits mutually selected by the IPE and PG&E. Roles: PG&E to demonstrate how it adjusts for load transfers. Demonstration will include the impact of transfers and the data is used to predict the impact of making the proposed changes. Verification: IPE to verify the process reflected in the PG&E demonstration is consistent with the PG&E description and the result are the same as used in subsequent steps in process of developing the needs reflected in the GNA.	PG&E to provide the information requested (specified in the Data/Information Requirements column) by mid-August.	Process Description: PG&E provides a description of the load transfer process and how it determines the impact on individual circuits involved if the process is different from the one used last year. Data/Information: PG&E provides transfer information for each circuit involved. This includes the pre and post loading for the planning period for all circuits involved or impacted by the transfers.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.		
11	Final comparison to station outlet ratings or other circuit limiting factor to determine if ratings exceeded [will be skipped since process is unchanged from the last cycle]			
12	Compile GNA tables showing need amount and need timing, etc. (per IOU's documented planning standards and/or	Perform V&V on development of GNA table entries for select circuits also confirming that planning standard/process was followed. Roles:	PG&E to provide the planning standards, if any updates have been made to the standards in the last year, in the first week of September.	Data/Information: Confidential GNA tables in Excel format Process Description: Copies of planning standards/criteria if any updates

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	planning process)	PG&E to provide confidential version of Planned Investment tables in Excel format that can be filtered by the IPE. PG&E to provide list of planning standards/criteria that were used in the development of the GNA tables. Verification: IPE to review projects in the GNA report against planning standards/criteria. Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.	PG&E to provide the data/information requested (specified in the Data/Information Requirements column) by mid-August after GNA/DDOR report is completed.	have been made to the standards in the last year.

PROCESSES TO DEVELOP PLANNED INVESTMENTS AND COSTS

13a	Develop recommended Planned Projects (follow the IOU's documented	Perform V&V for three to four projects selected by the IPE confirming that planning standard/process was followed.	PG&E to provide a description of the process in early September.	Description of process used to develop proposed planned project to address identified need for distribution projects if
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IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	planning standards and/or planning process)	IPE to verify the process to identify the current set of solutions and planned projects identified in the DPEP. For this process we request PG&E include a written description of the process that it uses, a demo of the process and supporting data for selected projects jointly selected by the IPE and PG&E. Roles: PG&E to demonstrate/describe process used to determine recommended planned solution for a subset of projects. PG&E to demonstrate the application of the process in developing the planned investment for selected projects. Verification: IPE to verify the PG&E demonstration reflects the description of the process provided by PG&E. IPE to verify that results shown in the demonstration follow the described process are same as included in DDOR.	Demonstration to be completed by early September.	process is different from the last cycle.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		Validation: IPE to review the business process for reasonableness and consistency with objectives of the DPEP.		
13b	Develop solution for single investment plan (Not applicable to PG&E for this cycle)			
13c	Determine if planned solutions/projects identified in previous cycles continue to be needed and are the appropriate solution to meet the need	Perform V&V for a subset of projects selected by the IPE confirming that planning standard/process was followed. PG&E to demonstrate/describe how it determined which projects identified in previous cycles are still needed and that the proposed solutions continue to be the appropriate solutions to meet the need or that project scope has been modified or the project is no longer needed and has been removed from the plan.	PG&E to provide a description of the process in early September. Demonstration to be completed by early September.	▪ Description of the process used to confirm that existing planned solutions and projects are 1) still needed as is, 2) needed but scope has changed or 3) no longer needed. ▪ Description of the process to used revise the scope in the event the scope needs to be modified and the process used for solutions or projects that are no longer needed.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
				Data set containing all planned solutions and projects with an indication of the results of the confirmation process for each to include whether each project was a) still needed as is, b) scope needs to change (timing), c) scope needs to change sizing, project non longer needed, d) project retained because it is too late in the project to cancel.
14	Estimate capital cost for each Candidate Deferral Project (Skipped in this cycle)			

PROCESSES TO DEVELOP CANDIDATE DEFFERAL LIST AND PRIORITIZE

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
15	Development of Candidate Deferral Projects list through application of screens (timing and technical) (Removed, no longer required)			
16	Development of operational requirements (daily, monthly annually etc.) (Removed, no longer required)			
17	Prioritization of candidate deferral projects into Tiers (Removed, no longer required)			▪
18	Calculate LNBA ranges and			▪

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	values for all planned investments (Removed, no longer required)			
19	Compare 2025 forecast and actuals at circuit level (will be skipped since process is unchanged from the last cycle)			
20a	Analyze known load tracking dataset and verify the calculation of known load metrics	IPE to calculate the metrics mentioned on pages 31 and 32 of the 2023 IPE Post-DPAG Report and verify against the metrics calculated by the utility that are provided in their narrative related to the known load tracking dataset included in the GNA-DDOR report. Roles: PG&E to provide the confidential version of the known load tracking dataset	PG&E to provide requested information by early October.	Description of the tracking data set included in their 2026 GNA-DUPR filing. Information on the calculation of metrics (Excel workbook showing the formula used for calculating the metrics or something similar) that were included in their

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		included in their 2026GNA-DUPR filing. PG&E to also provide information on how they calculated the metrics (for example, Excel workbook showing the formula used for calculating the metrics or something similar) that were included in their narrative of the known load tracking dataset. Verification: IPE to analyze the known load tracking dataset provided in the 2026 GNA-DUPR filing and verify the known load metrics calculated by the utility. Validation: IPE to review the approach and process used by the utility to calculate the metrics using known load tracking dataset.		narrative of the known load tracking dataset.
20b	Analyze pending load tracking dataset and verify the calculation of	The IPE to review the pending loads tracking data format, definitions, and processes and reporting that the utility used in the 2025/26 DPEP cycle. If		Confidential version of the pending load tracking dataset included in their 2025-2026 GNA-DUPR filing.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
	pending load metrics, as applicable – including review of categorization of PL and supporting information.	applicable, IPE to also review the calculation of pending load metrics. Roles: PG&E to provide the confidential version of the pending load tracking dataset included in their 2026 GNA-DUPR filing. PG&E to also provide information on how they calculated the metrics (for example, Excel workbook showing the formula used for calculating the metrics or something similar) that were included in their narrative of the pending load tracking dataset. PG&E to demonstrate to the processed used for categorization of PL into A, B1, B2 and C and supporting information. Verification: IPE to analyze the pending load tracking dataset provided in the 2026 GNA-DUPR filing and verify the pending load metrics calculated by the utility.		Categorization results (table with pending load showing which PL category that it belongs to). For 10 randomly selected pending loads by the IPE and IOU, provide supporting information for each criteria that needs to be met for inclusion in its category.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		Validation: IPE to review the approach and process used by the utility to calculate the metrics using pending load tracking dataset.		
OTHER IPE WORK				
21	Optional - Review plan for changes to the planning process for the next cycle (2026-27 DPEP) (skipped, no longer required)	In		
22	Review implementing of planning standard and/or planning process (skipped, no longer required)			

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
23	Review list of internally approved capital projects (skipped, no longer required)			
24	Respond to and incorporate DPAG comments	Include in IPE DPAG Report.	Completed by IPE in Mid-November	
25	Track solicitation results to inform next cycle (Removed, no longer required)			
26	Treating confidential material in the IPE report	Confidentiality – the following steps will be followed to ensure that the IPE Reports treat confidential material consistent with the rules and procedures of the CPUC. The dates provided for these steps are tentative and will be finalized based on discussions with PG&E. a. The IPE will hold an early meeting with IOU (and potentially the ED)		

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		to discuss process for PG&E to flag those items they intend to request Confidentiality treatment and on what basis. IPE may provide feedback to ED in lieu of having the ED attend the meeting with the IOU and IPE. Discussion to be held by September 15. b. Date: October 20, 2026 - The IOU will review all the documents¹ sent to the IPE for the V&V process for confidential information and highlight any information (in addition to information that is already highlighted) that is confidential. The IOU will also develop an equivalent set of documents with the confidential information redacted. At the end of this process, there should be a set of confidential documents that can be included as a part of the		

¹ Documents refers to any document provided to the IPE by the IOU that was not included in the IOU's public version of the GNA/DDOR reports. These documents will be included as attachments to the body of the IPE report as required by a CPUC ruling.

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		confidential IPE DPAG report and a set of public documents. c. IPE will provide the confidential version of the body of the draft IPE Report to the IOU by <u>October 20, 2026</u> (the body of the report to include all but the documents provided in previous item) for final IOU confidentiality review. d. IOU checks the draft confidential report for confidentiality and correctness and provides their comments/markups by October 30, 2026. e. After review and signoff, the IPE produces the final confidential and draft reports by November 3, 2026. f. IOU requests CPUC confidential treatment using standard procedures. g. IOU files public version of the IPE report based on the schedule		

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
		provided by the CPUC – <u>November 6, 2026</u> h. IOU files revised public report if CPUC rejects any requests for confidential treatment; otherwise, process is complete, and no further action is needed.		
27	Review Methodology used for Prioritization of Planned Projects	Perform verification and validation of the process, if any, used by utilities to prioritize planned projects for execution. Roles: Utility to provide the process, if any, used by utilities to prioritize planned projects for execution. Utility also to provide the results of the prioritization, if applicable. Verification and Validation: The verification and validation process will be determined after discussions with the utility.	Late September/Early October	TBD

IOU Business Process / IPE Review Step	Business Process / IPE Review Step Description	Plan for 2025-26 DPEP Cycle	Target Timing	Data/Information Requirements
28	Review Project Execution Tracking Data and Metrics	Perform verification and validation of the projection execution tracking data. Roles: Utility to provide the projection execution tracking data. Verification and Validation: The verification and validation process will be determined after discussions with the utility.	Late September/Early October	TBD

Appendix A CPUC 4/13/20 Ruling Excerpts

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Attachment A

Listing of Schedule and IPE-Specific Reforms for the 2020-2021 DIDF Cycle

1. IPE-specific reforms for the 2020-2021 DIDF Cycle are implemented within the IPE Scope of Work presented in Attachment B.
2. IOU contracts with the IPE for the full scope of work identified in Attachment B shall be executed by the IOUs to allow for IPE Plan development to begin as soon as possible, ideally on or before **April 17, 2020**.
3. The IOUs shall work with the IPE and Energy Division to develop IPE Plans specific to each IOU such that the IPE can submit the Draft IPE Plans to Energy Division for review on or before **May 15, 2020**.
4. The IPE scope of work may be modified by Energy Division as needed for the IPE to successfully complete each assignment. The IOUs will promptly submit a Tier 1 Advice Letter to notice changes in scope should a scope change differ significantly from the scope described in Attachment B. Minor changes should not necessitate an Advice Letter filing.
5. As required by Energy Division on an annual basis, Pre-DPAG and Post-DPAG activities may include workshops; new, re-opened, suspended, or modified working groups (e.g., Distribution Forecast Working Group); and IOU presentations and deliverables.
6. During the Post-DPAG period and in consultation with the IPE, Energy Division may identify exemplary GNA/DDOR documentation components, analytical approaches, or data strategies implemented by one or more IOUs and require that each IOU implement the reform in future DIDF cycles.

(end of Attachment A)

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Attachment B
IPE Scope of Work for DIDF Implementation

Term

- January 1st each year to July 31st the following year with the term subject to update by Energy Division if needed to support each DIDF cycle.

Pre-DPAG Period

- Develop an **IPE Plan** for each IOU describing the GNA/DDOR review process and detailed approach to Verification and Validation of all data used by the IOUs to prepare their DIDF filing materials.
 - Verification and Validation will include a thorough investigation of the following IOU processes, among others:
 - Collecting circuit loadings and performing weather adjustments;
 - Determining load and DER annual growth on the system level;
 - Disaggregating load and DER annual growth to the circuit level;
 - Checking sum of all disaggregated load and DERs against system-level values;
 - Adding incremental known loads to circuit level forecasts;
 - Developing load, DER, and net load profiles and determining net peak loads;
 - Adjusting for extreme weather;
 - Comparisons to equipment ratings to determine if ratings will be exceeded;
 - Incorporating load transfers, phase transfers, correcting data errors;
 - Compiling GNA tables showing need amount and timing; and
 - Following the IOU's planning standard and/or planning process.
 - GNA/DDOR report review will include an in-depth analysis of the following IOU steps, among others:
 - Developing recommended solutions (planned investments);
 - Implementing the IOU's planning standards and/or planning process;
 - Estimating capital costs for planned investments;

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- Developing list of candidate deferral projects through application of screens (timing and technical);
 - Developing operational requirements;
 - Prioritization of candidate deferral projects into tiers;
 - Calculating LNBA values; and
 - Comparing prior-year forecast and actuals at circuit level for candidate deferral projects.
- Work directly with the IOUs and Energy Division to develop draft plans as needed. Development of the draft IPE Plans may include, among other activities:
 - Meeting with the IOUs and Energy Division to identify and understand each business process and tool used to complete their GNA/DDOR filings.
 - Facilitate or participate in stakeholder workshops to receive feedback on the IPE Plans.
 - Review and incorporate comments in the final IPE Plans.
 - Submit final IPE Plans to Energy Division and the IOUs with recommendations for future improvements to the plans.
 - Other technical support assignments as defined by Energy Division to ensure the IPE and Energy Division will receive from the IOUs the data and cooperation necessary to complete the required evaluation of the GNA/DDOR filings.

DPAG Period

- Participate in all workshops and meetings during the DPAG period. Prepare and deliver presentations or handouts as requested by Energy Division (*e.g.*, final IPE Plan presentations).
- Develop an *IPE Preliminary Analysis of GNA/DDOR Data Adequacy* for all three IOUs.
- Review any comments on the preliminary analysis that may be received and discuss the results with Energy Division.

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- Facilitate meetings with Energy Division and the IOUs to correct data inadequacies and prepare further documentation and provide technical support as needed.
- Fully implement each IPE Plan as defined in the final IPE Plans.
- Develop an ***IPE DPAG Report*** for each IOU presenting GNA/DDOR review findings and Verification & Validation outcomes.
- Submit the draft reports to Energy Division for review and (if necessary) to the IOUs to check for confidential information that may be included or to clarify specific details.
- Circulate the final IPE DPAG Reports to stakeholders (public and confidential versions).
- Other technical support assignments as defined by Energy Division to ensure the DPAG process is successfully completed.

Sample Size

- The scope of review conducted by the IPE for each IOU process may encompass the full set of circuits/projects or a subset/sample of circuits or projects. Where sampling is determined to be appropriate by the IPE in consultation with Energy Division, the size of the sample set for each case will be determined by the IPE based on the application of engineering judgement.

Post-DPAG Period

- Develop a single ***IPE Post-DPAG Report*** covering all three IOUs; comparing their current and prior filings; evaluating DIDF DER procurement, operational, cost, and contingency planning outcomes; reviewing IOU compliance; and making recommendations for process improvements and DIDF reform.
- Coordinate with and support the Independent Evaluator (IE) with IE activities and the development of IE reports as needed.
- Submit the draft report to Energy Division for review and (if necessary) to the IOUs to check for confidential information that may be included.

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- Submit the final report to Energy Division and prepare public versions as needed.
- Support Energy Division with their review of DIDF reform comments, including comments on any IPE tasks.
- Support Energy Division’s review of RFO materials and RFO outcomes.
- Attend RFO and procurement meetings and provide technical support as requested by Energy Division.
- Coordinate with the Independent Evaluator to support their evaluation and provide technical support at the discretion of Energy Division.
- Other technical support assignments as defined by Energy Division to develop and evaluate potential DIDF reforms and track and evaluate deferral opportunities that may be subject to ongoing review in other proceedings (e.g., pursuant to General Order 131-D).

List of IPE DIDF Deliverables

1. ***IPE Plan*** for each IOU describing the GNA/DDOR review process and approach to Verification & Validation for the underlying data.
2. ***IPE Preliminary Analysis of GNA/DDOR Data Adequacy*** for all three IOUs.
3. ***IPE DPAG Report*** for each IOU presenting GNA/DDOR review findings and Verification & Validation outcomes.
4. ***IPE Post-DPAG Report*** covering all three IOUs, comparing their filings, reviewing compliance, and making recommendations for process improvements and DIDF reform.

(end of Attachment B)

Appendix B Updated Scope of Word Dated March 4, 2025

Proposed IPE Scope of Work (Draft)

Proposed Changes to Current Scope of Work

Current IPE Scope	Recommendations
Step 1 - Collect 2024 Actual Circuit Loading and adjust/normalize for weather as needed	Keep in future cycles
Step 2 - Determine Load and DER Annual Growth on System Level	Keep in future cycles
Step 3 - Disaggregate Load and DER Annual Growth to the Circuit Level	Keep in future cycles
Step 3a - Check sum of all disaggregated load and DERs same as CEC IEPR System level values	Keep in future cycles
Step 4 - Add Incremental Load Growth Projects to Circuit Level Forecasts (those loads not in CEC forecast)	Keep in future cycles
Step 5 - Convert DER growth load to 8760 or 576 profile as needed	Recommend skipping unless process changed.
Step 5 - Convert peak of load to 8760 or 576 profile as needed	Recommend skipping unless process changed.
Step 5 - Convert base forecast and weather normalization adjustment to 8760 or 576 profile as needed	Recommend skipping unless process changed.
Step 6 - Derive net load profile	Recommend skipping unless process changed.
Step 7 - Determine net peak load	Recommend skipping unless process changed.
Step 8 - Adjust for extreme weather	Keep in future cycles
Step 9 - Initial comparison to equipment ratings to determine if ratings exceeded	Recommend skipping unless process changed.
Step 10 - Evaluate no cost solutions - incorporate load transfers, phase balancing, correct data errors	Recommend skipping unless process changed.
Step 11 - Comparison to equipment ratings to determine if ratings exceeded	Recommend skipping unless process changed.
Step 12 - Compile GNA tables showing need amount and need timing, etc (consistent with IOU's documented planning standards and/or planning process)	Keep in future cycles
Step 13 - Develop Recommended solution and generate list of Planned Investments (follow the IOU's documented planning standards and/or planning process)	Keep in future cycles

Step 14 - Estimate capital cost for candidate deferral projects	Eliminate
Step 15 - Development of Candidate Deferral Projects list through application of screens (timing and technical)	Eliminate
Step 16 - Development of operational requirements for CDO (daily, monthly, annually, etc)	Eliminate
Step 17 - Prioritization of Candidate Deferral Projects into Tiers	Eliminate
Step 18 - Calculation of LNBA ranges and values for all planned projects.	Eliminate
Step 19 - Compare 2023 Forecast and Actuals at Circuit Level [proposed change would increase from ~10% of circuits to include all circuits if possible]	Keep in future cycles
Step 20 - Analyze known load tracking dataset and verify the calculation of known load metrics	Keep in future cycles
Step 22 - Review implementing of planning standard and/or planning process	Eliminate
Step 23 - Review list of internally approved capital projects	Eliminate
Step 24 - Respond to and incorporate DPAG comments	Keep in future cycles
Step 25 - Track solicitation results to inform next cycle	Eliminate
Step 26 - Treating confidential material in the IPE report	Keep in future cycles

Proposed Additions to IPE Scope of Work

Decision	New items	IPE Scope
3.1-Allow Utilities to Use Bottom-Up, Known Load Data to Determine Growth	Definition of Reliable Bottom-up Data (as well as, Customer energization Request, Known Load, Pending Load etc.) (Page 42) Note: Decision 3.1 allows Utilities to use reliable bottom-up data to estimate total load growth in a given year, even if it exceeds the forecasted load growth based on the IEPR for that year. Further, this decision directs that, in years without reliable bottom-up data, total growth should correspond to the forecast amount and not be adjusted downwards.	Annual verification and validation for the use of known loads already being performed as a part of Step 2 of the current V&V process. No new steps required.
3.2 – Require Utilities to Improve Method for Setting Caps on Load Growth from IEPR data.	IOU to work with CEC and CPUC to staff in developing proposals for the method and accounting for discrepancies between the system and circuit level. (Page 43) Decision 3.2 further focuses on developing proposals for the method and accounting for discrepancies between the system and circuit level (forecasts). The forecast at the system level (IEPR) is a coincident peak load forecast and is not necessarily equal to the sum of the peak loads on all the circuits. So, a methodology needs to be devised to develop circuit level forecasts that takes this into account. This decision approves, with one modification, the recommendation to require Utilities to submit Advice Letters proposing how they will improve their methods for setting caps on load growth based on the IEPR forecasts and other data. Utilities shall file Tier 3 Advice Letters. (Page 47)	Verify and validate IOUs' use of methodology for accounting for discrepancies between the system and circuit level load forecasts in the DPP. Annual starting 2025-2026 cycle. Annual verification and validation of methods for setting caps on load growth from IEPR data already covered under Step 2 of the current V&V process. No new steps required.
3.4 – Require Utilities to Expand the DPP Forecast Horizon to Align with IEPR and Expand the Planning Horizon to 10 Years.	To ensure transparency, utilities shall provide a description of the thermal capacity evaluation methodology in the annual GNA report (Page 55)	No new steps required to verify the expanded DPP planning horizon. The current V&V will be extended from 5 years to 10 years. Annual starting 2025-2026 cycle.

3.5 – Require Utilities to Use Scenario Planning to Improve Forecasting and Disaggregation	Workshops to develop scenario planning methodology and process. (Page 59) Utilities shall develop scenario planning capabilities that enable them to: (1) analyze multiple forecasts; (2) identify capacity deficiencies for each scenario and report them in the annual GNA; and (3) develop one investment plan informed by the multiple scenarios and reported in the DDOR or successor filing. (Page 61)	Attend workshop. One Time. Estimated Q1 2025 Verify and validate each DPP scenario and how utilities create one investment plan informed by multiple scenarios in the annual DPEP. Annual starting 2025-2026 cycle. • Develop draft IPE Plan for V&V of scenario planning – Q2 2026 • Finalize IPE plan – Q3 2026 • Perform V&V Q3 2026
3.6 - Require Utilities to Improve Disaggregation Methodology for Load Growth	Require Utilities to Improve Disaggregation Methodology for Load Growth (Page 62) This decision adopts the recommendation to require Utilities to improve disaggregation methodologies for load growth and distributed energy resources but delays implementation to the 2027 GNA and the 2026-2027 DPP cycle. To track progress toward improved disaggregation in the interim, Utilities shall report annually in the GNA on the development of advanced disaggregation methodologies and present these at the annual Distribution Forecast Working Group workshops or successor workshops. (Page 65)	Verify and validate the improved disaggregation methodology. Annual starting 2026-2027 cycle. Q3 2027. • Develop draft IPE Plan for V&V of improved disaggregation methodology – Q2 2027 • Finalize IPE plan – Q3 2027 • Perform V&V Q4 2027
3.7 - Require Utilities to Create Pending Loads Category in the DPP	Utilities are directed to provide pending load data and include the source of the data in the annual known load tracking filing, as part of the GNA/DDOR or successor report and orally reported during the DPAG or successor workshop (Page 76)	Attend workshop. One Time. Estimated Q1/Q2 2025 Verify and validate pending load data and source in annual reports and DPAG or successor workshop. Annual starting 2025-2026. • Develop draft IPE Plan for V&V of Pending Loads – Q2 2026 • Finalize IPE plan – Q3 2026 • Perform V&V Q3 2026

3.8 – Require Utilities to Develop Prioritization Methods Beyond the Current Consideration of Project Need Dates	Utilities to report how projects identified throughout the distribution planning horizon have been prioritized for execution. This decision also requires inclusion of this information in the annual GNA/DDOR or a successor report instead of the previously required Advice Letter (83)	Verify and validate the process used by utilities to prioritize projects for execution. Annual starting 2024-2025 cycle. - Develop draft IPE Plan for V&V of prioritization methodology – Q2 2025 - Finalize IPE plan – Q3 2025 - Perform V&V Q3 2025
3.9 – Require Utilities to Consider Distribution Planning Results in Other Distribution Work	Utilities to consider distribution planning results in other distribution work aka Integrated planning (Page 83) A workshop shall be held by Utilities during the third quarter of 2025 to present Utility proposals for integrated planning and solicit feedback from stakeholders on issues presented, including cost containment considerations. A second workshop shall be held by Utilities no more than eight weeks following the first workshop to present updated proposals based on feedback from the first workshop. (Page 86)	Attend workshop. One Time. Estimated Q3/Q4 2025. Verify and validate that integrated planning projects meet the established requirements. Annual starting 2026-2027. - Develop draft IPE Plan for V&V of integrated distribution planning – Q2 2027 - Finalize IPE plan – Q3 2027 - Perform V&V Q3 2027
3.11 – Require Utilities to Prepare a Load Flexibility DPP Assessment	Require Utilities to Prepare a Load Flexibility DPP Assessment. (Page 98)	Review EIS Part 2 studies and attend workshop. One Time. Estimated Q1 2026.
3.15 – Require Utilities to Include Metrics to Evaluate Equity in Utility Distribution Plan Reporting	Require Utilities to Include Metrics to Evaluate Equity in Utility Distribution Plan Reporting (Page 119) The Commission clarifies that while these metrics are requested for evaluation purposes, there is no framework wherein equity metrics are used for forecasting or planning distribution. The intention of this proposal is an annual evaluation of equity in distribution planning and does not involve modifying the planning process based on equity considerations. (Page 123)	Support the ED and the IOUs in finalizing and standardizing the tracking and reporting of the Equity Metrics. One Time. Estimated Q2 2025. Verify and validate equity metrics calculated by the utilities and reported by the utilities annually. Annual starting 2025-2026 DPP cycle. - Develop draft IPE Plan for V&V of equity metrics – Q2 2026 - Finalize IPE plan – Q3 2026 - Perform V&V Q3 2026

3.16 – Require Utilities to Include Metrics to Track Project Execution in Utility Distribution Plan Reporting	Require Utilities to Include Metrics to Track Project Execution in Utility Distribution Plan Reporting (Page 123) *also see Table 12 and Table 13. Table 12 * Additional Details for All Ongoing and Prior Three Years Completed Distribution Capacity Projects Table 13* Additional Project Execution Tracking Data	Support the ED and the IOUs in finalizing and standardizing the tracking and reporting required to track project execution based on Table 12, 13, and the requirements of R24-01-018 (Appendix B - Decision Establishing Target Energization Time Periods And Procedure For Customers To Report Energization Delays). One Time. Estimated Q2 2025 Verify and validate the project execution data and metrics submitted by the utilities. Annual starting 2024-2025 DPP cycle. • Develop draft IPE Plan for V&V of project execution metrics – Q2 2025 • Finalize IPE plan – Q3 2025 • Perform V&V Q3 2025
3.18 - Require Utilities to Facilitate Better Coordination and Data Sharing Between the DPP and Transportation Electrification Planning	Require Utilities to Facilitate Better Coordination and Data Sharing Between the DPP and Transportation Electrification Planning (Page 135)	Verify and validate how TEPP outputs are used in DPP. Annual starting 2025-2026 earliest. • Develop draft IPE Plan for V&V of TEPP coordination – Q2 2026 • Finalize IPE plan – Q2 2026 • Perform V&V Q3 2026

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