

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

Agenda ID # 20269
RESOLUTION E-5189
February 24, 2022

R E S O L U T I O N

Resolution E-5189. Southern California Edison. Approval of Remote Grid Standalone Power System Supplemental Provision Agreement.

PROPOSED OUTCOME:

- Approves with modification Southern California Edison's Advice Letter 4573-E.

SAFETY CONSIDERATIONS:

- Remote grids represent a rapid and cost-effective method for reducing wildfire risk, and thus improving the safety of the distribution system.

ESTIMATED COST:

- There are no additional costs associated with this resolution. Remote grids represent a lower cost alternative to grid hardening, maintenance and/or construction.

By Advice Letter 4573-E, Filed on 08-31-2021.

SUMMARY

This Resolution approves with modification Southern California Edison (SCE) Advice Letter (AL) 4573-E. It is reasonable for the Commission to grant SCE a tariff deviation to define the roles, responsibilities and terms associated with customers taking service from Remote Grids up to a two megawatt total cap, which we anticipate will reduce distribution grid rebuilding and maintenance costs versus traditional infrastructure construction and operations. Remote Grids are made up of a Standalone Power System and associated infrastructure that provide utility-level service to remote customers without connecting to the larger

electric system. In some cases, SCE can likely avoid substantial wildfire mitigation and distribution infrastructure costs and effectively mitigate wildfire risk by deploying Remote Grids, benefiting all distribution customers. The Commission grants SCE's request for a tariff deviation for its Standalone Power System Supplemental Provisions Agreement, attached in its Advice Letter, up to a total two megawatt cap so that SCE can best implement existing state law, Commission orders and take advantage of the opportunities offered for ratepayer savings, increased reliability and reduced fire risk by Remote Grids. We approve SCE's proposal, including a tariff deviation authorizing use of the Supplemental Provisions Agreement only for an initial set of Remote Grids up to two megawatts of historical measured peak customer load. The CPUC anticipates the experience gained here will help inform further microgrid development in furtherance of several Commission priorities as discussed herein. The actions taken in this Resolution are consistent with the vision adopted in the Commission's 2016 Distributed Energy Resources Action Plan, specifically the Commission's interest in unleashing ratepayer benefit through the strategic use of distributed energy resource investments.

BACKGROUND

On August 31, 2021, SCE filed AL 4573-E to seek approval for a Supplemental Provisions Agreement (SPA) that clarifies SCE's customer service tariffs for customers served by Remote Grids. The Advice Letter was not directed by statute or previous Commission order but reflects goals consistent with multiple Commission proceedings and orders. The Advice Letter also closely resembles a similar Advice Letter filed by Pacific Gas and Electric (PG&E) in 2020 (AL 6017-E) and approved by Commission Resolution E-5132¹ on March 18, 2021.

Previous Approval of PG&E tariff deviation for Remote Grids SPA in Resolution E-5132

¹ <https://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=372340372>

PG&E proposed and has begun implementing a similar Remote Grid initiative. This initiative was first discussed in PG&E's Wildfire Mitigation Plan,² and further detailed in PG&E AL 6017-E.³ The Commission approved a tariff deviation for PG&E's Remote Grid SPA in Resolution E-5132 on March 18, 2021. As noted in its Advice Letter, SCE "largely proposes to align its Remote Grid Pilot and associated SPA with that of Pacific Gas and Electric Company's proposal" (AL 4573-E at p. 1).

SCE further defines Remote Grids in AL 4573-E:

The term "Remote Grid" as used in this advice letter refers to permanently islanded distribution facilities serving certain customers who are generally located in some of the remote portions of SCE's distribution system. The Remote Grid facilities will include a SPS made up of local sources of electricity supply, as well as distribution and service facilities to connect one or more customers to the SPS, as shown in Figure 1. Local sources of electricity supply may include, but are not limited to, solar photovoltaic generation, wind turbine generation, battery energy storage systems, and fuel-based generation. (AL 4573-E at p. 2)

² See PG&E's 2020 Wildfire Mitigation Plan, page 5-19.

https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2020-Wildfire-Safety-Plan.pdf

³ https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_6017-E.pdf

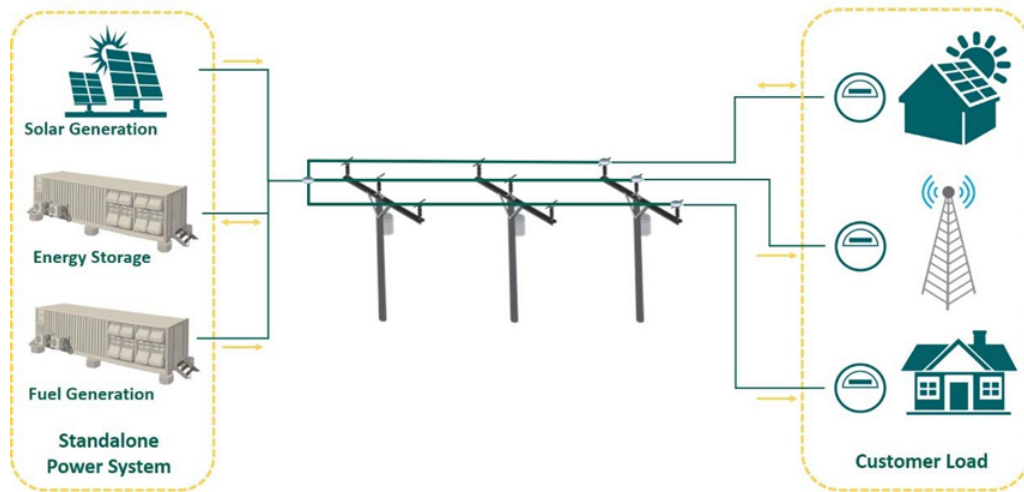


Figure 1: Diagram of example components of a Remote Grid

SCE Remote Grids Cost-Effectiveness

In AL 4573-E, SCE says it “will focus on locations where remote grids provide benefits both in cost and time for restoring utility-provided electrical service to remote customers affected by damaged lines. SCE will use the learnings from the initial deployments to evaluate potential expansion of Remote Grids in the future to provide cost-effective, safe, and reliable service to remotely located customers while reducing wildfire risk.” (AL 4573-E at p. 3).

In some cases, Remote Grids are likely to be both significantly less expensive and more effective at reducing wildfire risk than other wildfire mitigation measures. Certain distribution lines run for significant distances through High Fire Threat Districts to serve a small number of remotely located customers. De-energizing, decommissioning, and removing these lines and serving the remotely located customers with Remote Grids may avoid the cost of infrastructure hardening, avoid the cost of continued line maintenance, and reduce wildfire risk in a manner more cost-effective than other wildfire mitigation measures. The benefits of these avoided costs and reduced risks are expected to accrue to all distribution customers.

SCE is not Seeking any Incremental Cost Recovery in this Advice Letter

SCE notes in its AL that it is not seeking any incremental cost recovery. SCE will track and record any Remote Grid costs appropriately in existing memorandum, balancing, or other accounts in accordance with current Commission guidance (AL 4573-E at p. 5).

Remote Grids can be Consistent with Standard Utility Service

Although Remote Grids represent a somewhat novel and innovative grid technology, it is reasonable to expect that they can be deployed to provide reliable service consistent with standard utility tariffs. SCE notes that “Remote Grid facilities will generally provide the customer with service akin to SCE’s service obligations under other customer line extension agreements (i.e., agreements pursuant to Rule 15, Distribution Line Extensions)” (AL 4573-E at p. 2). SCE asserts that Remote Grids do require small changes and clarifications to SCE tariffs as noted in the Standalone Power System SPA.

Standalone Power System SPA

In its Advice Letter, SCE requests that the Commission find reasonable and approve its proposed Standalone Power System SPA, a form that supplements existing tariffs and service agreements under SCE Electric Rules 3, 15 and 16. The SPA identifies certain exceptions to current SCE electric rules that are reasonable or necessary to provide and maintain safe and reliable service using the Remote Grid facilities (AL 4573-E at p. 7-8). The reasonableness and necessity of these exceptions are discussed in the Discussion section below.

The SPA would be offered by SCE to certain remote customers on a limited basis, but would not be available to all customers.

NOTICE

Notice of AL 4573-E was made by publication in the Commission’s Daily Calendar. Southern California Edison states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

SCE's AL 4573-E was timely protested by the Public Advocates Office (Cal Advocates) and by the Coalition of California Utility Employees (CUE).

SCE responded to the protests of Cal Advocates and CUE on September 27, 2021.

Cal Advocates Protest - September 20, 2021

In its protest, Cal Advocates recommends that the Commission (1) lower the cap for SCE's Remote Grid pilot from the proposed five megawatts to two megawatts of total customer peak load, (2) require SCE to file a report on the Remote Grid pilot two years after implementation, and (3) require SCE to verify cost effectiveness of Remote Grid projects by comparing them to other planned distribution investments. Cal Advocates point to the precedent of Resolution E-5132, approving PG&E's Remote Grid SPA, where the Commission capped projects at two megawatts of total load and required PG&E to submit a report on its Remote Grid Initiative two years after implementation.

Cal Advocates also recommends that the cost effectiveness of Remote Grids be compared to alternative projects included within SCE's distribution planning process. Cal Advocates references a presentation on Remote Grids they received from SCE (Attachment 1 of Cal Advocates Protest), and notes that two of the three potential Remote Grid sites are currently powered by backup generators and no alternative distribution investments have been planned.

CUE Protest - September 20, 2021

In its protest, CUE cautions the Commission against allowing Remote Grids to be owned by any entity other than a regulated utility. CUE draws attention to the following line in AL 4573-E: "For initial pilot deployments, SCE plans to own, operate, and maintain the Remote Grid facilities and equipment. SCE may evaluate other ownership models in the future upon the completion and evaluation of the pilot." CUE argues that ownership of Remote Grids by any entity other than a regulated utility would violate Public Utilities Code sections 218 and 399.2.

SCE Reply to Protests – September 27, 2021

In its reply to the CUE protest, SCE notes that this Advice Letter approves a SPA only for initial Remote Grid pilot projects, all of which would be fully owned by SCE. SCE further notes that it would return to the Commission for additional regulatory review and approval before implementing any alternative ownership models in the future. Finally, SCE clarifies that the intent of its statement was to raise the possibility of third-party ownership of Distributed Energy Resources related to a Remote Grid, but not the actual Remote Grid system.

In its reply to the Cal Advocates protest, SCE notes that it has no objections to lowering the cap for SCE's Remote Grid pilot from the proposed five megawatts to two megawatts of total customer peak load and has no objections to a requirement that SCE submit an evaluation report of Remote Grid projects two years after the first project comes online. However, SCE argues against Cal Advocates' suggested requirement that SCE compare Remote Grid projects to currently planned alternative distribution investments. Specifically, SCE argues that (1) a similar analysis is already conducted as an initial step in evaluating Remote Grid projects, (2) this requirement would go against existing processes, because currently SCE does not need to get project-by-project approval for distribution line upgrades, and (3) a requirement of this sort would unnecessarily delay Remote Grid projects, and as such restrict the utility's ability to restore power in a reasonable manner. SCE notes that cost-effectiveness information would be more appropriate to include in the Remote Grid evaluation report recommended by Cal Advocates.

DISCUSSION

The Commission has reviewed the Advice Letter and the protests, and finds that, with modifications, SCE's proposed Remote Grid Standalone Power System Supplemental Provision Agreement (SPA) is consistent with its duties to provide safe, reliable electric service within its territory, and includes deviations from existing tariffs that are reasonable and/or necessary to implement a limited volume of Remote Grids to mitigate wildfire risk from electrical infrastructure in a cost-effective and timely manner. In this section, we respond to various issues raised by party protests, and we provide directed modifications to SCE.

It is reasonable and necessary for SCE to clarify the respective roles and responsibilities of both SCE and participating Remote Grid customers

Although Remote Grids can provide utility-level service to customers, they function differently from standard distribution lines and require some clarifications of and deviations from existing SCE tariffs in order to realize potential savings for distribution customers. First, the standard distribution line is replaced by local generation potentially including solar, batteries, and a generator, which may require a new land easement. Second, the Remote Grid system is designed to meet the customer's precise load and cannot draw on the larger electric system to easily increase capacity. Third, the Remote Grid system cannot accept energy exports to the same extent as the grid at large, limiting customer behind-the-meter generation. Fourth, it may be exorbitantly expensive and/or dangerous for SCE to restore standard distribution service to Remote Grid customers in the event of termination of Remote Grid service. No parties protested the reasonableness or necessity of tariff changes related to these technical and functional differences of Remote Grid systems.

Given the difference between Remote Grid systems and standard distribution lines, we find it necessary and reasonable for SCE to clarify the respective roles, restrictions placed upon, and responsibilities of both SCE and participating Remote Grid customers, in order to realize potential savings for distribution customers. Further, we find it reasonable for SCE to record a memorandum regarding the customer's Remote Grid service with the appropriate county recorder in order to ensure that potential successor owners of the property will be aware of the Remote Grid rules and restrictions. We note that, aside from the changes described in the SPA, all other utility obligations under SCE's approved tariffs apply, including Rule 2 governing the standard of service.

The Advice Letter Process is Appropriate Under General Order 96-B

No protestors objected to the use of the Advice Letter process to approve SCE's Remote Grid SPA. However, when approving PG&E's related Advice Letter (AL 6017-E) protestors did raise this issue, and the Commission both (1) clarified exactly how PG&E's request fell under General Order (GO) 96-B and (2) waived certain obligations that normally result from requesting tariff deviations. SCE's AL 4573-E follows a similar process, and thus similar waivers are reasonable.

The Advice Letter requests the Commission approve a deviation from SCE's tariffs for a limited total volume of customer load in order to conform the tariffs to previous Commission orders, and allow SCE to pursue Remote Grids to the extent they may fulfill its existing obligations. As such, the approval of the Standalone Power System SPA requested in AL-4573-E is appropriate for the Advice Letter process under GO 96-B. The actions taken in this Resolution are also consistent with the vision adopted in the Commission's 2016 Distributed Energy Resources Action Plan,⁴ specifically the Commission's interest in unleashing ratepayer benefit through the strategic use of distributed energy resource investments.

The Commission also considers AL 4573-E to be appropriate for the AL process because it follows GO 96-B in requesting "Commission authorization to deviate from its tariffs." Remote Grids may provide cost savings only in very particular locations, where a small number and size of customer loads are located at the end of a long section of radial distribution line that otherwise would not need to exist.

Remote Grids provide greater benefit to ratepayers the sooner they are deployed. The 2022 fire season fast approaches, and SCE has a limited opportunity to use Remote Grids to mitigate wildfire risk before it arrives. Opportunities to use Remote Grids to replace damaged distribution infrastructure are also both rare and, because the infrastructure may need to be rebuilt or hardened without a clear alternative, fleeting. Given this situation, the Commission sees Remote Grids as representing unique opportunities to reduce ratepayer costs and increase public safety, arising only at specific times and in specific places. To seize opportunities of this sort, it is appropriate for SCE to submit an Advice Letter seeking to deviate from its tariffs.

We conclude that AL 4573-E seeks a reasonable deviation from SCE tariffs in order (1) "to conform the tariffs to the requirements of a statute or Commission

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[http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Commissioners/Michael_J_Picker/DER%20Action%20Plan%20\(5-3-17\)%20CLEAN.pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/About_Us/Organization/Commissioners/Michael_J_Picker/DER%20Action%20Plan%20(5-3-17)%20CLEAN.pdf)

order” and (2) “to get Commission authorization to deviate from its tariffs,” and is thus appropriate under GO 96-B General Rule 5.1.

According to GO 96-B, General Rule 9.5.6, SCE is generally required to list the name and location of each customer taking service under a tariff deviation:

Except and to the extent excused by statute or Industry Rule or other Commission order, each utility shall compile and publish in its tariffs a list of all contracts and other deviations under which the utility provides service at rates or under conditions other than those contained in its tariffs then in effect. For each such contract or other deviation, the list shall state: the name and location of the customer; the type or class of service; dates of execution and expiration; the date and number of the Commission order authorizing the contract or other deviation; and the utility’s most comparable rate schedule, together with a summary of how the contract or other deviation differs from that schedule.⁵

In this case, SCE requests approval to use a specific form, the Standalone Power System SPA, to cover up to five megawatts of historical peak measured customer load. This deviation was not requested by, or on behalf of, potential remote grid customers in particular. We anticipate the limited approval of this form will lead to savings for all distribution customers, but potential remote grid customers may object to their names and locations being published publicly in SCE’s tariffs. Without a Commission order excusing SCE from this General Rule, SCE would be required to reveal individual identifying information of particular residential customers, customers who agree to a tariff deviation for the benefit of all distribution customers. In addition, frequent updates to SCE’s List of Contracts and Deviations⁶ would present an unnecessary barrier to the deployment of Remote Grids and create unnecessary additional work for both SCE and Commission staff. Given that this Resolution approves the limited use of the SPA and that additional reporting of customer information raises privacy concerns, we find it reasonable to exempt SCE from the requirements of GO 96-B, General Rule 9.5.6. In lieu of these requirements, we find it reasonable for SCE to

⁵ GO 96-B, General Rule 9.5.6, emphasis added.

⁶ https://library.sce.com/content/dam/sce-doelib/public/regulatory/tariff/electric/list-of-contracts-&-deviations/ELECTRIC_CANDD_List_of_C&D.pdf

maintain an internal list of remote grid customers available to the Commission upon request. SCE may consider this internal list confidential but should strive to make some amount of reporting publicly available so that these initial projects can be referenced. SCE shall annually submit a Tier 1 informational Advice Letter with Energy Division, including this list, to fulfill the transparency goals of General Rule 9.5.6.

SCE's initial Remote Grid pilot should be limited to two megawatts of historical peak measured customer load

Cal Advocates recommended that the cap on Remote Grid pilot projects be lowered from the five megawatts of customer load proposed by SCE to a two megawatt cap consistent with PG&E's Remote Grid Initiative and Resolution E-5132. SCE had no objection to this modification. As such, we find it reasonable and necessary to impose a limit of two megawatts of historical measured peak customer load SCE's use of the Standalone Power System SPA in order to qualify as a deviation under General Order 96-B, General Rule 5.1, and in order to prevent a larger than expected use of the SPA.

It is unnecessary to require SCE to consider Remote Grid pilot projects by comparing them to already-planned alternative distribution investments

In its protest, Cal Advocates recommends that the cost effectiveness of Remote Grid projects be compared to alternative distribution investments already planned within SCE's standard distribution planning process. SCE objected to this recommendation, noting that a similar analysis is already conducted as an initial step in evaluating Remote Grid projects and a requirement of this sort would unnecessarily delay Remote Grid projects, and as such restrict the utility's ability to restore power in a reasonable manner. We agree with SCE that it is unnecessary to plan out alternative investments through SCE's standard distribution planning process when an initial analysis reveals a Remote Grid to be more cost effective than alternatives. In addition, this could significantly delay Remote Grid pilot projects. We note that this Resolution approves no cost recovery for Remote Grid projects, and that all Remote Grid costs would be evaluated in separate Applications or Proceedings, such as the SCE General Rate Case.

Remote Grid Systems Should Be Initially Classified As Distribution Assets

We agree with SCE that it is reasonable to characterize Remote Grids as distribution assets to the limited extent and actual service volume authorized by this Resolution. As discussed above, this Resolution allows SCE to deploy Remote Grids up to a limited cap. The effect of these projects is anticipated to reduce costs for distribution customers due to both reduced wildfire risk and avoided maintenance or replacement of distribution infrastructure. If a future enlarged Remote Grid Program comes before the Commission, we may reconsider many of these issues in light of experience gained by SCE. We may need to address potential effects on generation rates. However, we choose not to sacrifice the greater benefits to distribution customers from a limited and rapid deployment of Remote Grids in the face of their likely insignificant effects on generation rates. We urge SCE to maintain detailed records on all projects – both those considered for inclusion in the scope of the initiative as well as those fully implemented – so that the information can be utilized in future analysis.

SCE Must Report to the Commission on the Performance of Initial Remote Grid Systems

In its protest, Cal Advocates requests that the Commission “require SCE to prepare and provide a report on the Remote Grids Pilot and the impacts of this pilot” (Cal Advocates protest at p. 4). In its reply, SCE had no objection to Cal Advocates’ request, and proposes that the report be submitted two years after the first project comes online (SCE reply at p. 2).

We find it reasonable to require SCE to file a report describing the Remote Grid projects two years after the first Remote Grid comes online, in line with what was required of PG&E in Resolution E-5132. The report should include environmental impacts information for Remote Grids, as well as information about the process undertaken to identify projects, design projects, remove projects from consideration, and to implement projects. System operational data, including reliability information, should be provided to demonstrate how the systems compare to SCE’s reliability statistics. As requested by Cal Advocates, the report should also include an alternatives analysis for generation technologies selected at each site, including descriptions of efforts taken to procure clean generation, and cost information for the Remote Grid projects.

SCE should not require all Remote Grid customers to become bundled customers

No parties objected to SCE's proposal to require all Remote Grid customers to become bundled customers, taking distribution and generation service from SCE. However, this requirement deviates from PG&E's Remote Grid SPA, approved in Resolution E-5132. A Remote Grid is isolated from the larger grid and would not physically receive any energy from the larger grid or the wholesale energy markets, removing the need for an entity to procure this generation. Instead, energy would be provided directly by the Remote Grid Standalone Power System, which would be owned and managed by SCE as a distribution asset. Given that a Remote Grid customer has no need for standard generation service, and that such service is effectively independent and unrelated to a Remote Grid system, we see no reason to require Remote Grid customers to become bundled customers. In addition, a generation provider such as SCE or a CCA may still offer services or programs to a customer outside of directly providing energy, and customers should retain the right to choose a provider of these services. As such, we direct SCE to strike clause 11 from their proposed Remote Grid Standalone Power System SPA and to allow both bundled and unbundled customers to receive Remote Grid service.

The CUE Protest is noted, but does not affect pilot approval of SCE's SPA

Both CUE's protest and SCE's reply emphasize that SCE plans to own, operate, and maintain Remote Grid facilities and equipment for all pilot deployments of Remote Grids allowed under this Resolution. CUE's protest objects to other ownership models, which are not being considered here. As such, CUE's protest is not directly relevant to this Resolution.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS

1. Remote Grids may be useful to mitigate wildfire risk from electrical infrastructure in a cost-effective and timely manner, reducing costs for distribution customers and improving public safety.
2. Deploying Remote Grids may facilitate SCE in carrying out previous Commission orders and fulfilling its existing obligations.
3. It is reasonable and necessary for SCE to execute the Supplemental Provisions Agreement with Remote Grid participants to clarify the respective roles, restrictions placed upon, and responsibilities of both SCE and the participating customer.
4. To the extent the Supplemental Provisions Agreement for the Remote Grid varies from or clarifies existing SCE electric rules, tariffs, or programs, those deviations and clarifications are necessary and reasonable for the limited volume of customer load approved herein.
5. It is reasonable for SCE to record a memorandum regarding the customer's Remote Grid participation with the appropriate county recorder in order to ensure that successor owners of the property will be sufficiently aware of the Remote Grid rules and restrictions.
6. The Advice Letter process under General Order 96-B may be used by a utility to gain authorization of a discrete deviation from its generally applicable tariff under General Rule 5.1.
7. It is reasonable and necessary to impose a limit of two megawatts of historical measured peak customer load on the extent to which SCE can use the Standalone Power System Supplemental Provisions Agreement in order to qualify as a deviation under General Order 96-B, General Rule 5.1, and in order to prevent a larger than expected use of the Supplemental Provisions Agreement.
8. For the initial set of Remote Grid customers, it is reasonable to maintain the customer's current tariff options and rate structure.

9. All Remote Grid systems installed, up to the two megawatt cap approved herein, should be characterized as distribution assets for cost accounting purposes unless and until the Commission provides alternative direction.
10. It is reasonable to require SCE to file a report describing and evaluating its deployed Remote Grid projects and their environmental impacts two years after the first Remote Grid comes online.
11. It is reasonable for SCE to allow both bundled and unbundled customers to receive Remote Grid service.
12. Requiring SCE to update its List of Contracts and Other Deviations in its tariffs with the names and locations, as well as other information, for all remote grid customers covered by the tariff deviation approved herein (according to General Order 96-B, General Rule 9.5.6) would raise privacy concerns and present an unnecessary barrier to the deployment of remote grids.
13. It is reasonable to exempt SCE from the requirements of General Order 96-B, General Rule 9.5.6, for remote grid customers up to the two megawatt cap approved herein, and to instead require SCE to maintain an internal list of remote grid customers and to submit an Advice Letter annually to the Commission listing these participants.

THEREFORE IT IS ORDERED THAT:

1. The request of SCE to approve the Remote Grids Standalone Power System Supplemental Provisions Agreement and the deviation from and clarifications to existing tariffs that it contains, as requested in Advice Letter 4573-E, is approved with the modifications set forth below and otherwise specified herein.
2. SCE must strike clause 11 from its proposed Supplemental Provisions Agreement and allow bundled and unbundled customers to receive Remote Grid service.
3. The approval of the Supplemental Provisions Agreement applies only to an initial set of remote grid customers up to a total of two megawatts of operational systems, based on the historical measured peak customer load.
4. Two years after the first remote grid comes online under the terms of one of these Agreements, SCE must submit a report describing its Remote Grid projects to the Energy Division via compliance filing to the Commission's Energy Division Central Files, and distribute that report to the R.19-09-009

service list. The report must include, at minimum, (1) the actual average level of renewables used by the Standalone Power Systems and an estimate of the greenhouse gas and criteria pollutant emissions from the projects, (2) system operational data, including reliability information, (3) an alternatives analysis for generation technologies selected at each site, and (4) cost information for the Remote Grid Projects. SCE should include other information about the experience gained from the implementation of this initiative. This report may be standalone or cite already submitted information in SCE's regular reports to the Wildfire Safety Division.

5. SCE shall be exempt from the requirement of General Order 96-B, General Rule 9.5.6 to publicly list customers with tariff deviations, for remote grid customers up to the two megawatt cap approved herein. In lieu of the requirements of General Rule 9.5.6, SCE must maintain an internal list of remote grid customers served under the tariff deviation approved herein and, if the list has changed, annually provide this list to the Energy Division via compliance filing to the Commission's Energy Division Central Files. The list may be, in part or in full, confidential.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on February 24, 2022; the following Commissioners voting favorably thereon:

Rachel Peterson
Executive Director