

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

**Agenda ID# 23839
RESOLUTION E-5413
December 4, 2025**

R E S O L U T I O N

Resolution E-5413. Pacific Gas and Electric, Southern California Edison, and San Diego Gas and Electric establish and use a pending loads category to inform grid upgrades in the distribution planning process.

PROPOSED OUTCOME:

- Approves, with modification, the jointly filed proposals of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) concerning the establishment and use of the pending loads category in the distribution planning process pursuant to ordering paragraph (OP) 12 of Decision 24-10-030 filed in the joint Advice Letter (AL) SCE AL 5567-E, SDG&E AL 4676-E, and PG&E AL 7630-E.

SAFETY CONSIDERATIONS:

- There are no safety considerations associated with this resolution.

ESTIMATED COST:

- There are no costs associated with this resolution. The implementation of this Resolution may impact costs in the future.

By Advice Letter 5567-E, Filed on June 27, 2025.

SUMMARY

This Resolution adopts, with modifications, the proposals of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E), together referred to as the “joint utilities,” to establish a pending loads category in the utility distribution planning process, pursuant to decision

D.24-10-030. Advice Letter 5567-E contains separate proposals from each of the joint utilities on the information and sources that will inform the pending load category, the classification of each of these sources into subcategories within the pending loads category, and how each subcategory will be used in the distribution planning process. This resolution addresses each proposal separately while directing a common approach for all three IOUs starting with the 2025-2026 Distribution Planning and Execution Process (DPEP) cycle.

This Resolution adopts a uniform pending loads framework that allows for individual differences in the sources of input data to identify pending load projects and hot spots, which are geographic areas with high load growth and capacity constraints. The pending loads framework consists of four pending loads categories depending on factors including the type, completeness of the input data, and whether the pending loads fall within an identified hot spot.

All utilities will be required to report data on all pending loads included in the distribution planning cycle in the annual Grid Needs Assessment (GNA) and Distribution Upgrade Project Report (DUPR) filings. The utilities will also include data on the hot spots that were identified and utilized in every GNA/DUPR cycle. Each utility will also describe how grid needs and planned investments are re-evaluated every distribution planning cycle based on changes in pending loads. Per Decision (D.)24-10-030, each utility will collect data for the 2027 pending load evaluation workshop and advice letter.

BACKGROUND

This Resolution disposes of Advice Letter 5567-E as ordered by D.24-10-030 (the Decision), issued on 10/23/2024. The Decision directed the joint utilities to develop and implement a pending loads category in their 2025-2026 Distribution Planning and Execution Process (DPEP) that would be informed by existing coordination efforts, planning programs, and an aggregation of publicly available information. As the Decision explains, pending loads are less certain than a known load (e.g., a customer request for service) but more certain than economic disaggregation of the California Energy Commission's Integrated Energy Policy Report (IEPR) forecast based on trends. The purpose of pending loads is to improve forecast certainty in the medium-term of the forecast to support proactive investments with the goal of meeting electric demand growth while balancing the risk of overinvestment. The Decision stated that creating a pending loads category will inform scenario planning and increase utility awareness of

where loads will likely appear in the mid-term years (i.e., approximately year two through year five) of the DPEP.

To further develop the details of the pending loads category, the Decision required a utility-facilitated public workshop to discuss two objectives: (1) how to gather energization plans from customers; and (2) how to formalize a process to utilize energization plans to plan and build infrastructure in advance of energization requests, while being mindful of cost considerations and impacts to ratepayers. This workshop was held virtually on March 14, 2025, from 9:00 AM to 3:30 PM. As directed by the Decision, following the workshop, the joint utilities filed a Pending Loads Workshop Report on April 1, 2025¹. The Decision allowed for parties to submit informal comments to the workshop report by May 1, 2025, that the joint utilities were required to consider and discuss in the Tier 3 Advice Letter. Informal comments were received from The Utility Reform Network (TURN), the Public Advocates Office (PAO), the California Community Choice Association (CalCCA), CALSTART, INC., and Powering America's Commercial Transportation (PACT).

The Decision directed the joint utilities to submit a Tier 3 Advice Letter proposing the method for developing the pending loads category and incorporating the category into the DPEP, defining the types of information considered in the pending loads category and the general criteria applied to each category, and discussing the risk of pending loads that do not materialize and how to mitigate the risk. Additionally, the Advice Letter was required to address how the information gathered at the Pending Loads Workshop and the informal comments to the Pending Loads Workshop Report influenced the utility proposals.

On June 27, 2025, SCE submitted a joint Advice Letter SCE AL 5567-E et al. to propose the implementation and use of the pending loads category in distribution planning. PG&E, SDG&E, and SCE each proposed its own pending loads implementation in Attachments A, B, and C respectively. This Resolution evaluates each utility proposal independently within the context of the proposals of each other utility.

PG&E's proposal includes:

- Sources of pending loads from direct customer engagement, community plans, studies, and regulatory agencies.
- Categories of pending loads as Category A (high confidence customer and community feedback with specific project information), Category B (medium

¹ docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M560/K976/560976504.PDF

confidence customer-based plans and regulatory compliance-based studies/trends), and Category C (low confidence preliminary customer plans and trends and non-customer-based studies).

- Minimum criteria a pending load must reach to be classified in each category.
- Treatment of each category of pending loads in the distribution planning process, included how they will inform investment planning.
- Discussion of guardrails for pending loads, including how pending loads will be reconciled with the IEPR forecast.
- Data to be reported in the 2027 Pending Loads Evaluation Advice Letter.
- How future updates to the pending loads category will be implemented; alignment of pending loads with other planning processes.
- Description of how informal party comments to the Pending Loads Workshop Report influenced the proposal.

SDG&E's proposal included:

- Reference to the Pending Loads Implementation Workshop Report as the description of the source of pending loads.
- Description of SDG&E's MD/HD TE load forecast methodology that serves as the basis for SDG&E's pending loads category.
- Indication of how the MD/HD TE load forecast will be updated in future cycles and how additional bottom-up load forecasts could serve as pending load sources in the future.
- Alternate proposal for pending loads evaluation reporting than the one included in D.24-10-030.
- Responses to informal party comments on the Pending Loads Workshop Report.

SCE's proposal included:

- Process for assessing the certainty of and classifying pending loads into Category A (high confidence customer loads), Category B1 (medium confidence customer loads), Category B2 (high confidence studies), and Category C (medium confidence studies).
- Data sources, treatment of, and alignment with the IEPR, for every pending load category.
- Discussion of the transparency of the pending loads proposal.
- Discussion of how the proposal minimizes risks to ratepayers.
- How future updates to the pending loads category will be implemented and reported.

- How SCE incorporated feedback from the Pending Loads Workshop and informal comments to the Pending Loads Workshop Report.
- How the proposed pending loads framework remains flexible to respond to changing regulatory environments.

NOTICE

Notice of AL 5567-E et al. 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

The Utilities' Pending Load ALs (SCE AL 5567-E, SDG&E AL 4647-E, PG&E AL 7630-E) were protested. SCE AL 5567-E was timely protested, following an extension of the protest period to July 22, 2025, on July 22, 2025, by Cal Advocates, CalCCA, EDF/NRDC, and TURN. SCE AL 5567-E was timely responded to on July 22, 2025, by CALSTART. SDG&E AL 4647-E was timely protested on July 22, 2025, by Cal Advocates, CalCCA, EDF/NRDC, TURN, and CALSTART. PG&E AL 7630-E was timely protested on July 22, 2025, by Cal Advocates, CalCCA, EDF/NRDC, TURN, and CALSTART.

SCE, on behalf of SCE, SDG&E, and PG&E, jointly filed reply comments to all protests and replies on July 29, 2025.

The following provides a summary of the major issues raised in the protests and the reply to each.

Pending Loads Definition and Framework

Pending Loads Scope:

CALSTART argues that PG&E and SDG&E propose pending loads frameworks that are too restrictive. CALSTART claims PG&E's proposal would require customers to invest heavily before their projects meet the Category A or B minimum requirements, specifically permitting and construction progress milestones, making it too difficult for PG&E to build proactively to serve them. CALSTART claims that Medium Duty and Heavy Duty (MD/HD) electric vehicle (EV) customers will not invest in their projects until they are confident that infrastructure will be available, therefore not qualifying for

Category A or B pending loads and preventing PG&E from considering them in grid planning at the timelines needed to make the developer's project economically viable. EDF/NRDC make the same argument, claiming that PG&E's minimum criteria may result in many legitimate, maturing projects being excluded from Categories A and B. CALSTART claims SDG&E's proposal, which only considers its MD/HD Transportation Electrification forecast, fundamentally fails to provide a framework for ensuring that necessary sources of information are captured in pending loads. CALSTART did not protest SCE's proposal, suggesting that it appropriately balances the need to plan proactively with safeguards to prevent overbuilding, and urges the Commission to approve SCE's pending loads advice letter. EDF/NRDC similarly pose that SCE's proposal could offer greater flexibility than other proposals while still maintaining sufficient planning rigor.

PG&E Reply: PG&E agrees that its proposed confidence criteria for Category A and B customer plans risks insufficiently reflecting the likelihood that a load will materialize and require customers to spend potentially hundreds of thousands of dollars developing their project to meet the minimum criteria. In response, PG&E proposes to update their minimum criteria to the following:

Category A Minimum Criteria	Category B Minimum Criteria	Category C Minimum Criteria
- Design is specific (e.g., single lines or preliminary electrical design complete, building or site development plans complete, approved city plan) - Preliminary Design is complete (e.g., high level single line, proposed building or site development plan, proposed city plan). - Location is specific (e.g., latitude and longitude or specific parcel, or specific locations within a	- Preliminary Design is complete (e.g., high level single line, proposed building or site development plan, proposed city plan). - Preliminary Design has begun but is not complete. - Location is specific (e.g., latitude and longitude or parcel without site control; or locations proposed within a government or community plan). - Electrical Demand (peak capacity and load	- Preliminary Design has begun but is not complete - Location is indicated but not specific. - Electrical Demand can be estimated but is uncertain and based on Distribution Engineer estimation - Interconnection Year provided is a range and DE will estimate based on the current development status and prior experience with similar requests

government or community plan). - Electrical Demand (peak capacity and load type/profile) can accurately be estimated (e.g., either electrical demand is provided, such as known square footage with load type). - Interconnection year is specific and realistic based on the current development status and prior experience with similar requests. - Key permits are approved or in final state of submission (Environmental (CEQA), Caltrans, or Railroad Crossing permits, if required). - Key permits have been submitted (Environmental (CEQA), Caltrans, or Railroad Crossing permits if required). - Funding is secured or project is in construction (e.g., Project has obtained funding or project/plan qualifies for a defined funding source such as a government plan or program). - Funding source is specified.	type/profile) can accurately be estimated (e.g., either electric demand is provided or a basis for comparable demand is provided, such as known square footage with load type). - Interconnection year is specific and realistic based on the current development status and prior experience with similar requests - Key permits have been submitted (Environmental (CEQA), Caltrans, or Railroad Crossing permits). - Key permits have been identified (Environmental (CEQA), Caltrans, or Railroad Crossing permits). - Funding source is specified.	Key permits have not been identified (Environmental (CEQA), Caltrans, or Railroad Crossing permits).
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SDG&E Reply: SDG&E argues that its pending load framework is appropriate for its service territory and that the framework does not only consider MD/HD loads because it can be updated in the future to include more types of loads if SDG&E develops additional studies.

Uniformity Across IOUs:

Cal Advocates and CalCCA argue that the Commission should not approve different pending loads frameworks for each utility. Cal Advocates asserts that D.24-10-030 required the utilities to propose in the AL “the method for developing the pending loads category” which indicates a single joint utility proposal. Furthermore, Cal Advocates argue that utility-specific pending load frameworks make pending loads unwieldy and complicated to implement and oversee. CalCCA argues that adopting consistent processes across utilities for determining confidence levels, discount factors, and criteria for exceeding the IEPR will ensure new customers are treated fairly regardless of what service territory they are in, simplify oversight, and provide ratepayer protection.

IOU Reply: The utilities did not directly reply to this protested issue.

The Use and Treatment of Studies

In Support of Studies:

CALSTART supports the use of studies to inform pending loads and being allowed to exceed the IEPR. CALSTART argues that the goal of pending loads is to ensure that utilities are collecting and evaluating sufficient and necessary information, which includes both customer information and studies to form a complete picture, and that the use of the information to inform a single investment plan is different. CALSTART thus argues that all pending load sources should be captured, even if they are later deemed insufficient to warrant infrastructure investment.

In Opposition of Studies:

Cal Advocates, CalCCA, and TURN oppose the use of studies as justifications to exceed the IEPR. These parties argue strongly against using third-party and utility-developed studies because they offer low confidence and introduce a risk of over investment. They raise concerns about the opaque nature of many studies, the validity and consistency of

the methodology of studies, and the removal of meaningful boundaries on distribution planning. Cal Advocates suggests that if customer-based study inputs exist, that utilities should assess the data directly to determine whether it is sufficiently certain to use directly in pending loads, not factored into a study. Further, Cal Advocates argues that studies should inform the transparent and well-vetted IEPR forecast process, where the CEC can use them to inform the development of the forecast that ultimately informs the utilities DPP. CalCCA supports Cal Advocates' view and adds that studies should only be allowed in Category C for disaggregation of the IEPR. Cal Advocates proposes that a second valid use of studies is the identification of hot spots as discussed below.

Joint IOU Reply: PG&E, SDG&E, and SCE jointly reiterate the importance of using reliable, transparent, and high-confidence data sources in pending loads. They argue that studies provide important information that, though not yet manifested into specific customer requests, bridges a critical gap in the forecast. They contend that due to California's electrification goals and the growing demand for large capacity projects associated with data centers there is reasonable high confidence that pending loads based on studies will materialize despite using limited customer-based information. On the topic of transparency, they argue that third-party proprietary studies are transparent because the authors may be willing to participate in discussions to explain the analysis and that stakeholders may contract with the authors themselves to receive the proprietary information. The utilities agree with Cal Advocates that the CEC should use third party studies to inform the IEPR forecast, but stress that the two-year time lag between the IEPR and the DPEP creates the need for utilities to use the third-party data directly.

Confidence Assessments:

CALSTART and Cal Advocates support the use of assessing the confidence that pending loads will turn into applications for service in different forms. CALSTART supports SCE's approach to confidence assessment based on the maturity of the individual pending load, claiming that it enables proactive grid investment without relying on full customer commitments. Cal Advocates supports the assessment of confidence by category for categories A, B, and C with predefined treatments for each. CalCCA supports confidence assessment, but urges consistency across utilities due to the fact that different proposals treat the same input sources with very different

confidence levels. For example, PG&E proposes to treat local government plans as high confidence while SCE proposes to treat the same input source as low-confidence.

IOU Reply: The utilities did not directly reply to this protested issue.

Discount Factors:

SCE proposes the use of discount factors as a part of the assessment of confidence of individual pending loads. SCE's application of a discount factor, based on its proposal, would be determined based upon a lack of specificity provided by either customers or studies. The discount factors for Category B1, B2, and C could result in a discount of up to 30 percent that would be applied based upon the need to balance the lack of specificity with the intent of supporting appropriate incorporation of such loads into forecasting efforts to achieve proactive grid build out. In practice this would mean that a discount of up to 30 percent would reduce a project's requested capacity by 30 percent.

The use of discount factors is supported by CALSTART, CalCCA, and EDF/NRDC. CALSTART endorses SCE's proposal to apply discount factors to individual pending loads according to perceived confidence. CalCCA supports the application of discount factors but urges standardization to how they are applied and defined. Similarly, EDF/NRDC support the discount factor approach but call for greater transparency in how discount rates are developed and applied. EDF/NRDC would like to see utilities provide an empirical basis for discount percentages to ensure they reflect real project materialization rates. Cal Advocates cautions that the use of project-specific discount factors, as proposed in SCE's framework, would introduce "additional layer of complication" for oversight and argues that discount factors should not be used.

PG&E Reply: In response to CALSTART, PG&E disagrees with using a discount factor like SCE. PG&E would assign PG&E's best estimate of the actual expected load for a pending load, consistent with how it treats all load requests. PG&E believes that a more effective approach is to categorize pending loads by confidence level and apply planning guardrails at the framework level, rather than negotiating load adjustments customer by customer. In response to Cal Advocates, PG&E agrees with this concern, arguing that applying discount factors on a per-customer basis would likely lead to

unnecessary and potentially contentious back-and-forth between the utility and customers over what portion of the load should be planned for.

SCE Reply: SCE opposes Cal Advocates' protest. SCE asserts the discount factor serves as a confidence-weighted filter to calibrate a pending loads inclusion in the forecast, and that formal Commission oversight should not be required.

The Definition and Use of Hot Spots

Hot Spot Identification:

CALSTART, CalCCA, Cal Advocates, and EDF/NRDC support the use of hot spots, which are geographic areas of high load growth and capacity constraints. CALSTART supports the identification of hot spots and the proposed identification criteria, including multiple customer projects, policy drivers, and infrastructure gaps. Cal Advocates supports each utility using utility and third-party studies, in addition to direct data on known and pending loads, to identify Hot Spots. EDF/NRDC support the proposed hot spot identification methodologies but want them to align with state policies such as SB 671, the Clean Freight Corridor Efficiency Assessment, and the Low Carbon Fuel Standard, and for utilities to document and report how the hot spots align with these regulatory drivers and geographical priorities. EDF/NRDC also urge SDG&E to adopt hot spots in their proposal.

SDG&E Reply: In response to EDF/NRDC's request for SDG&E to use hot spots, SDG&E asserts its existing forecasting and planning practices have the same objectives as the "Hot Spot" proposals advanced by PG&E and SCE: integrating the very elements that the Hot Spot designation seeks to capture, including historical growth trends, known customer projects, community and regulatory plans, and study results.

Hot Spot Guardrails:

CALSTART supports the use of lower-confidence load sources within hot spots to be included for investment planning. Cal Advocates endorse hot spots and using medium-confidence pending loads to exceed the IEPR in these locations but calls for strict oversight. Citing the risk of utilities deploying too many hot spots and increasing ratepayer risk, Cal Advocates recommends requiring utilities to obtain annual Tier 2 Advice Letter approval for hot spot designations. Additionally, Cal Advocates

recommends requiring the utilities report in their Grid Needs Assessment and Distribution Upgrade Project Reports which lower confidence pending loads located in Hot Spots have contributed to exceeding the IEPR. CalCCA argues that PG&E's broad definition creates significant flexibility to designate hot spots, which could undermine transparency and increase the risk of overinvestment. CalCCA calls for stakeholder input on the record to inform the definition, identification, and designation of hot spot locations.

Joint IOU Reply: In response to Cal Advocates proposal to a required Tier 2 Advice Letter for hot spot designations, PG&E and SCE contend that formal requirements for Tier 2 filings add procedural burdens and introduce unnecessary delays. Furthermore, the IOUs plan to publish their pending load data in the annual GNA/DUPR which stakeholders will be able to view and provides transparency to where hot spots are identified without the need for a Tier 3 Advice Letter.

PG&E Reply: In response to CalCCA's argument that hot spot identification requires additional guardrails, PG&E proposes to add the criteria that a "hot spot" is also a capacity-constrained area, to improve alignment with SCE's definition. PG&E responds to EDF/NRDC and TURN protests that PG&E requires additional hot spot guardrails due to an overly-broad definition, specifically that any pending load could be treated as incremental to the IEPR in a hot spot, even if lacked locational details. PG&E clarifies that for a Pending Load to qualify as a hot spot, it must have enough locational specificity to clearly be located within the hot spot.

Reconciling Pending Loads with the IEPR Forecast

Cal Advocates, TURN, CalCCA, and EDF/NRDC support clear and consistent rules for how pending loads are reconciled with the IEPR and when they are allowed to exceed it. Cal Advocates and TURN assert that the IEPR should remain the authoritative cap on load forecast and emphasize that Category A loads should be the only category eligible to exceed IEPR caps. CalCCA emphasizes the need for standardization in applying exceedance criteria including the ability to exceed the IEPR by pending load category. EDF/NRDC call for clearer rules on how known and pending loads are sequentially added (i.e., known loads first, then Category A and B, then C only for disaggregation) to be compared with the IEPR cap.

Joint IOU Response: The utilities jointly argue that it is important for reliable, transparent, and high confidence data sources to inform pending loads, even if they are studies or third-party data. These inputs provide important information that, though not yet manifested into specific customer requests, will drive future requests and bridge a critical gap between the lead time from customer requests to energization need date. This is why both PG&E and SCE propose that certain studies be allowed in Category B or B2.

PG&E Response: In response to EDF/NRDC, PG&E clarifies that Category C is used to improve IEPR disaggregation and is not adding new load, as the load is “from” the IEPR, not the Category C pending load.

Future Changes to Pending Loads

Changes for PG&E and SCE:

CalCCA and TURN oppose utility proposals that give the utility discretion to revise the pending loads framework, including types of input data, without adequate stakeholder review. CalCCA recognizes that there is value in administrative simplicity but maintains that potential changes to the pending loads framework, even if methodological, could have implications for energization and ratepayers. CalCCA calls for the rejection of PG&E and SCE proposals to eliminate stakeholder vetting and Commission approval of methodological and fundamental pending loads framework changes. TURN proposes utilities hold a workshop and submit a Tier 3 Advice Letter to modify the pending loads framework in the future.

PG&E and SCE Reply: PG&E and SCE jointly contend that CalCCA mischaracterizes the position as an attempt to bypass regulatory approval. They argue that the framework would not require ongoing approval each year as long as the pending loads are identified in the manner laid out within the approved framework. Further, the utilities will discuss their pending loads framework annually at the Distribution Forecast Working Group (DFWG) and Distribution Planning Advisory Group (DPAG) workshops and include them in the annual GNA/DUPR filing. PG&E reiterates that it, individually, proposes the use of a Tier 2 Advice Letter to request modifications to the framework.

Changes for SDG&E:

EDF/NRDC object to leaving it to SDG&E's complete discretion as to whether, when, and how to include the additional load types in future iterations of the pending loads category. CalCCA states that SDG&E proposes that it may develop pending loads for other categories in the future but has not yet defined methodologies or criteria. TURN argues that SDG&E should not be permitted to change their pending loads framework, including types of input data, without adequate stakeholder input and Commission approval.

SDG&E Reply: SDG&E did not directly respond to this protested issue.

SDG&E Proposal

Lack of Defined Framework:

CALSTART, Cal Advocates, CalCCA, and EDF/NRDC protest SDG&E's entire proposal framework. CALSTART states that SDG&E fails to propose a coherent framework for identifying or evaluating pending loads. Cal Advocates objects to SDG&E not categorizing pending loads by data source or confidence level. CalCCA argues the absence of structure increases the risk of missing load types like building electrification and data centers. EDF/NRDC assert SDG&E does not adequately seek to define or identify pending loads within SDG&E's service territory or how they differ from general forecasting.

SDG&E Reply: SDG&E disagrees with the arguments that SDG&E's proposal is inadequate. SDG&E contends the intent of the pending loads framework is to identify load growth that may not be captured in existing utility planning processes or in the IEPR's system-level forecasts, and that the proposed framework is tailored to the characteristics of the SDG&E service territory and customer needs. SDG&E opposes the notion that there is a one-size-fits-all approach to pending loads and the proposal provides a sound and effective framework for integrating pending loads into SDG&E's distribution planning process.

Exclusion of all Non-MD/HD Loads:

CALSTART, CalCCA, and EDF/NRDC argue that SDG&E's proposal is too narrowly focused on MD/HD EV loads and does not meet the requirements of Decision

D.24-10-030. EDF/NRDC state that SDG&E unreasonably excludes all categories of loads other than medium- and heavy-duty vehicle electrification load from consideration. CALSTART states that SDG&E's proposal misses the opportunity to ensure sufficient proactive planning.

SDG&E Reply: SDG&E disagrees with the argument that the proposal does not meet the requirements of D.24-10-030 because the language in the decision does not require a minimum number of pending load types. Furthermore, SDG&E is prepared to include other pending load categories in the future, if appropriate. SDG&E contends that the focus on the MD/HD category is not limited but rather strategic because it is what is seeing the most growth in SDG&E's service territory.

Lack of Customer or Third-Party Data:

CALSTART, Cal Advocates, and CalCCA object to the lack of customer-specific data in SDG&E's pending loads proposal. EDF/NRDC claim that SDG&E's proposal does not actually seek to identify pending loads to "fill the gap between applications for service at specific locations that are underway and trend-based dispersed load growth across the system," as the decision orders. Further, they argue, SDG&E's bottom-up forecast lacks data on the timing of the load growth for a particular site, a key element of pending loads. Additionally, reliance on the MD/HD EV Forecast leaves the utility reliant on econometric forecasting assumptions which pending loads were meant to help avoid. CalCCA argues that SDG&E's pending loads forecast undermines the Commission's and stakeholders' ability to assess the accuracy or usefulness of pending loads and reduces transparency and accountability. Cal Advocates is broadly against allowing utility studies to exceed the IEPR.

SDG&E Reply: SDG&E contends that its distribution planning process already incorporates a robust customer engagement framework. SDG&E states that direct outreach and coordination with customers are foundational components of SDG&E's planning methodology. Customer load energization requests and plans are actively integrated into SDG&E's circuit- and substation-level load forecasts and the implementation of a separate pending load category solely based on customer information offers limited additional value. In response to the EDF/NRDC argument on the lack of timing of the load growth, SDG&E argues its bottom-up forecasting methodology does consider timing based on the type of site and its alignment with

policy drivers and adoption rates. As more detailed customer-specific information is available, including timing, that information is incorporated into SDG&E's existing planning process. In response to CalCCA's argument that SG&E's forecast lacks transparency, SDG&E claims it has presented the approach at the DFWG, documented it in the Pending Load Implementation Workshop Report and Advice Letter, and responded to multiple data requests with detailed forecasts. SDG&E contends the level of detail provided is consistent with, and in many cases exceeds, that of the IEPR forecasts.

Absence of Guardrails and Confidence Levels:

CALSTART and CalCCA protest SDG&E's lack of proposed methodology to assess confidence in its forecast and lack of guardrails that can increase the likelihood of overinvestment. CALSTART states that confidence assessment is necessary to weigh the likelihood of pending loads materializing and without them there is no way to prevent speculative overbuilding. CalCCA states that omitting confidence levels for various types of pending loads data and not using discount factors to account for uncertainty risks over-investing in grid upgrades at ratepayers' expense. CalCCA recommends that SDG&E should be required to modify its pending loads framework to include separate categories based on different confidence levels and data types.

SDG&E Reply: SDG&E states the Decision does not mandate the use of discount factors or confidence levels. SDG&E argues that its pending load proposal is built on a high-confidence, bottom-up forecast, therefore the forecasts already reflect a high degree of confidence, and there is no practical need to further categorize them into confidence categories. Further, applying a generic discount factor would risk undermining the integrity of a forecast that is already calibrated to reflect realistic load growth potential.

Reporting and Evaluation Plan:

EDF/NRDC argue that SDG&E's Pending Loads Evaluation and Reporting proposal fails to comply with OP 14 of D.24-10-030 which requires utilities to report on the percentage of pending loads that became energization requests in the form of a table that includes each pending load used in forecasting to date, deviance of load size from pending load to actual known load, deviance of load timing between pending loads and actual known load, differences in the accuracy and usefulness of pending loads by load

category (i.e., end use), differences in the accuracy and usefulness of pending loads by information source and/or methodology, and the expected in-service date of projects initiated as a result of the pending loads category. EDF/NRDC object to SDG&E's proposal which omits all required evaluation elements and instead proposes only a high-level report on total pending MW across 15 years, which would not allow the Commission to assess the effectiveness of the pending loads category.

SDG&E Reply: SDG&E argues it is impractical to conduct individual project-level comparisons given the nature of study-based pending loads. SDG&E also contends that comparing the aggregated known and pending load amounts on a load category basis provides the Commission with a clearer view of load growth projections for the given pending load category, without becoming mired in the granularity of every single load.

DISCUSSION

The Commission has reviewed the Advice Letter, the protests, and the replies, and makes the following modifications to the utility proposals. For clarity, an overview is provided at the beginning of the discussion section, then the rest of the section follows the same order as the protests section.

Overview

The Commission has considered the proposals and protests of all parties and has found the following pending loads framework to best capture and utilize pending loads in a manner that adequately assesses confidence and balances proactive planning with risk mitigation.

The framework, to be implemented by all utilities starting in the 2025-2026 DPEP, adopts the categories of SCE, the minimum requirements of PG&E, utilizes hot spots to allow medium confidence information to exceed the IEPR, and creates guardrails so that non-customer-based studies inform the process but do not contribute to a load growth forecast that exceeds the IEPR forecast.

As specified in Table 1 and Table 2, each pending load category is made up of a certain type of information and specific approach for use in distribution planning scenarios. Category A pending loads are based on customer provided information with high specificity and are therefore assigned high confidence that the pending loads will result

in applications for service² and are reasonable to plan for. For this reason, Category A pending loads can be used in the base scenario to exceed the IEPR if the total energy from the known loads and pending loads surpasses the energy demand forecast established in the CEC's IEPR for a given load sector in a given year for a utility's service territory. Similarly, Category B pending loads are based on customer provided information, but with less specificity than in Category A. Category B1 pending loads are customer projects that are a few steps of development away from being Category A pending loads. Pending Loads in Category B1 are considered medium confidence to materialize and are also reasonable to plan for and allowed to exceed the IEPR forecast. Category B2 pending loads are informed by customer-based studies and studies or analysis based on regulatory compliance.³ These types of studies capture areas where sources of information indicate there will be load growth that may not be fully captured by customer information. In this case, Category B2 pending loads can be used to fill in the missing customer information and create a more accurate picture of the expected load growth. Category B2 pending loads are not allowed to exceed the IEPR, they will be capped at the IEPR unless the pending loads are in a hot spot. This means that if known loads and pending loads from Category A and B1 combine to more load growth than the IEPR forecasts for a given year, pending loads in category B2 cannot be used to exceed the IEPR unless they are in a hot spot, as defined in this resolution. Finally, pending loads in Category C include preliminary customer project information that does not meet the minimum criteria of Category B1 and other studies or analysis. Category C pending loads may inform the disaggregation of the IEPR, but are never allowed to exceed the IEPR. To sufficiently describe the sources that can be included in each category, this categorization framework shall be combined with the minimum criteria proposed by PG&E for customer data and study data, described in Table 2.

² *Known loads* are formal requests for service originating from customers who submitted through a formal application that includes specific information related to the magnitude of the load requested, the location, and the timeline.

³ Customer-based data inputs may include EV charging plans, vehicle telematics, and municipal zoning data. For studies or analysis based on regulatory compliance requirements, this may include local jurisdiction development plans, utility analysis-based compliance obligations, and industry trends.

Table 1: Adopted Pending Load Categorization and Use

Pending Load Category	Description	Use in Base Scenario
A	High confidence projects and are based on detailed customer plans	Can Exceed IEPR
B1	Medium confidence projects based on less detailed customer plans	Can Exceed IEPR
B2	Studies based on customer-based data inputs, and utility analysis-based compliance obligations.	Capped at IEPR except for hot spots
C	Preliminary customer plans and trends and non-customer-based studies	Capped at IEPR always

Table 2: Adopted Pending Loads Minimum Criteria

Category A Minimum Criteria	Category B1 Minimum Criteria	Category B2 Minimum Criteria	Category C Minimum Criteria
• Preliminary Design is complete (e.g., high level single line, proposed building or site development plan, proposed city plan). • Location is specific (e.g., latitude and longitude or specific parcel, or specific locations within a government or community plan). • Electrical Demand (peak capacity and load type/profile) can accurately be estimated (e.g., either electrical demand is provided, such as known square footage with load type). • Energization year is specific and realistic based on the current development status and prior experience with similar requests. • Key permits have been submitted (Environmental (CEQA), Caltrans, or Railroad Crossing permits if required). • Funding source is specified.	• Preliminary Design has begun but is not complete. • Location is specific (e.g., latitude and longitude or parcel without site control; or locations proposed within a government or community plan). • Electrical Demand (peak capacity and load type/profile) can accurately be estimated (e.g., either electric demand is provided or a basis for comparable demand is provided, such as known square footage with load type). • Energization year is specific and realistic based on the current development status and prior experience with similar requests • Key permits have been identified (Environmental (CEQA), Caltrans, or Railroad Crossing permits).⁴	• Customer-based data inputs (e.g., EV charging plans, vehicle telematics, municipal zoning data, etc.). • Or for longer term analysis-based studies, regulatory compliance obligations used to forecast load growth in Hot Spots⁵ where the exact customer is not yet known. • Published methodology, based on customer data inputs, and assumptions.	• Location is indicated but not specific. • Electrical Demand can be estimated but is uncertain and based on distribution engineer estimation • Energization year provided is a range and the distribution engineer will estimate based on the current development status and prior experience with similar requests • Studies that do not meet the minimum criteria of B2⁶

The pending load category minimum criteria shall be adopted by all three utilities. The minimum criteria set the standard for what information can be included in each category of pending loads. Each pending load will be evaluated against the minimum criteria for each category and must meet all the minimum criteria to be included in a

⁴ The customer demonstrates that they are aware of what permits are required and the approval process for their project.

⁵ Hot Spots are defined in this resolution to be a specific geographical and capacity-constrained electrical area with forecasted load growth from multiple sources including known loads, Category A, and Category B1 pending loads. See complete definition in Hot Spots discussion section.

pending load category. This allows the framework to assess the confidence of pending loads at the category level, rather than assessing the confidence of pending loads individually. This is important because pending loads categories are used differently to inform the investment plan.

Pending Loads Definition and Framework

The Commission disagrees with Cal Advocates' protest and finds that D.24-10-030 does not explicitly require the IOUs to submit a single unified framework proposal. The Commission also acknowledges the utility argument that different service territories, processes, and technical capabilities of each utility create a significant challenge to implement an entirely unified framework. However, the Commission agrees with CalCCA that some standardization is needed to avoid substantially different customer treatment across California. Therefore, the Commission takes steps in this resolution to align on a unified pending loads framework, including pending loads categories and minimum criteria as described in this Resolution, but leaves room for individual utilities to operate differently within the adopted framework by including different sources of information.

The Use and Treatment of Studies

Cal Advocates, CalCCA, and TURN protest the use of studies as pending loads that are allowed to exceed the IEPR. CALSTART and the Joint IOUs argue that studies are necessary to provide the entire picture of load growth beyond customer information. The Commission considers the protests by Cal Advocates, CalCCA, and TURN against studies and the replies by CALSTART and the joint utilities in favor, and finds it fitting to limit, but not entirely prevent, the ability of pending loads based on studies to exceed the IEPR. The core intent of pending loads is to utilize high confidence, customer-based information to improve the forecast of where load growth will occur to inform planning processes. We understand that new reliable, bottom-up information can exceed the IEPR forecast, and we provide a pathway within pending loads for this allowance through Category A and B1 pending loads.

We believe that the IEPR, in conjunction with pending loads, scenario planning⁷ and upcoming IEPR cap adjustments⁸ proposals, is sufficient to provide an accurate picture of aggregate load growth at the distribution level. The utility proposals lack a clear proposal for how studies would be translated into specific pending loads with location, timing, and magnitude. The Commission agrees with Cal Advocates' suggestion that to the extent bottom-up studies are based on customer information, that information may be used directly in pending loads Category A or B1, if it meets the minimum criteria established in Table 2, instead of through the study output. The Commission finds it prudent to prohibit the use of studies in Category A and B1 because these studies are not based on high or medium-confidence customer-based projects and including studies in these categories risks over-investing in the system and adding unnecessary costs to ratepayers. Studies may be used through pending load Category B2, if study criteria are met, and otherwise through Category C for disaggregation of the IEPR forecast.

The Commission may revisit the use and treatment of studies at a later date.

Pending Loads Confidence Assessments and Discount Factors

We agree with CalCCA that the description provided by SCE on the creation and application of discount factors to individual projects lacks sufficient detail for assessing the certainty of pending loads and third-party validation of categorization. SCE does not include the details of the certainty assessment that will be used to evaluate all pending loads. We agree with Cal Advocates argument that project-specific confidence assessments applied through discount factors introduces significant complexity and

⁷ Ordering Paragraph 6: Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) must implement the use of scenario planning in the distribution planning and execution process (DPEP) beginning with the 2025-2026 DPEP cycle. Scenario planning forecast adoption and investment plan results shall be discussed, respectively, at the annual Distribution Forecast Working Group and annual Distribution Planning Advisory Group workshops. The results of the workshop adopted in Ordering Paragraph 7 below will inform the scenario planning framework.

⁸ Ordering Paragraph 2: Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Utilities) must improve the method for setting caps on load growth from the Integrated Energy Policy Report data with the objective of accurately estimating load growth. Beginning with the 2025-2026 Distribution Planning and Execution Process, Utilities shall work with Commission and California Energy Commission staff in developing proposals for the method and accounting for discrepancies between the system and circuit level. Utilities shall discuss the proposals, including implementation, in annual Distribution Planning Advisory Group, or successor, workshops.

difficulty to oversee. We agree with PG&E's argument that applying discount factors on a per-customer basis may be contentious with customers and it is simpler to apply confidence at the category level. For these reasons, we order the adoption of PG&E's detailed list of minimum criteria be applied to each pending load category. Each pending load will be evaluated against the minimum criteria for each category and must meet all of the minimum criteria in order to be placed in a given category.

The Definition and Use of Hot Spots

We agree in general with PG&E that hot spots are areas with multiple indications of load growth resulting in a capacity constrained electrical area. We also agree with PG&E that for a Pending Load to qualify as located within a hot spot, it must have enough locational specificity to clearly be located within the hot spot. Based on comments the Commission adopts the following hot spot definition:

(i) a geographical area that is served by electrical infrastructure that is expected to experience substantial forecasted load growth from multiple sources including known loads, Category A, and Category B1 pending loads, and (ii) that area includes specific electrical infrastructure, i.e., substations and circuits which are forecasted to be capacity-constrained within the five-year planning period. An area is capacity constrained if the total capability of its infrastructure is only marginally greater than the demand served by the infrastructure after all low cost/no cost solutions have been considered. A hot spot will be considered a constrained area if the difference between the total capacity and total demand is less than or equal to half the total amount of Category B2 pending loads. If this occurs, all Category B2 pending loads served in the specific capacity constrained area may exceed the IEPR if necessary.

A hypothetical illustrative example: Total capacity is 100 MW, total demand is 90 MW, the difference or capacity margin is 10 MW ($100 - 90 = 10$). Category B2 pending loads are 20 MW. This electrical area is capacity constrained, because 10 MW is $\leq$ equal to half the total Category B2 pending loads. ($10 \text{ MW} \leq 20 \text{ MW} / 2$). All Category B2 loads in this hot spot would be allowed to exceed the IEPR if necessary.

This hot spot definition will help identify least-regrets investment areas where it is appropriate to include lower certainty pending loads data from Category B2 above the IEPR forecast.

The Commission agrees with the joint utilities that annual Advice Letter approval of hot spots is burdensome and declines to adopt this requirement. However, the response

that the Joint Utilities provided on how the utilities will identify hot spots is inadequate and we provide a more specific and transparent approach below.

The Commission finds it necessary for the utilities to report a list of identified hot spots and utilized hot spots in the GNA/DUPR. In their GNA/DUPR filings, the utilities shall provide quantitative support for each forecast year of the five-year planning period for each hot spot: (i) the list of Known Loads and Pending Loads in the hot spot, and (ii) the calculations used for determining that the hot spot is capacity constrained including the list of infrastructure (including but not limited to substation banks, circuits and ties) and their capabilities, the forecasted demand within the hot spot and the available margin between the two.

The Commission declines to adopt EDF/NRDC's proposal to include state policy into hot spots because there is no direct method to incorporate them into distribution planning and the IEPR already reflects state policy. However, to the extent that a study identifies the locational impacts of these policies, the utilities are encouraged to use them to help identify hot spots. The Commission also acknowledges the role that the Transportation Electrification Proactive Planning (TEPP) work product originating from the R.23-12-008 Transportation Electrification Policy and Infrastructure proceeding may play as a potential future source of data focused on identifying hot spots in transportation corridors. The TEPP may be informed by state transportation electrification policies and could eventually serve as a source for hot spot identification or inform a different category of pending loads.

Reconciling Pending Loads with the IEPR

The Commission agrees with Cal Advocates, TURN, CalCCA, and EDF/NRDC calls for clear and consistent rules for how pending loads are reconciled with the IEPR and when they are allowed to exceed it, for the purpose of informing distribution planning efforts. We find that bottom-up studies should be allowed to be included in Category B2 but not be allowed to exceed the IEPR forecast, except for in a hot spot. To accomplish this, all IOUs must adopt the pending loads categories and structure of SCE, including Category A (high confidence customer loads), Category B1 (medium confidence customer loads), Category B2 (high confidence, bottom-up studies), and Category C (low confidence customer loads and medium confidence studies). Further, additional

details of how and when pending loads can exceed the IEPR are included in the resolution to the joint IOU scenario planning advice letter.

Future Changes to Pending Loads

The Commission agrees with CalCCA and TURN that changes to the pending load framework must not be at the utilities' sole discretion. Specifically, the Commission agrees that utilities should not be able to alter the treatment of, or add, *types* (e.g., customer information, studies, alternate forecasts, etc.) of pending load data. However, utilities should be able to add *sources* (e.g., individual customer plans, each study) of pending load data without an extended approval process, so long as the sources of data are of the *types* of data allowed in pending loads and meet the criteria of a category.

Furthermore, there must be an opportunity for stakeholder input and reform to the pending loads framework. To ensure the success of pending loads framework and to protect ratepayers that the Commission be able to collect stakeholder input and make timely adjustments given the annual DPEP cycle. Therefore, Energy Division is granted authority to direct the three utilities to make changes to the pending loads reporting requirements on an annual basis so that valuable data is collected and reported correctly and consistently to inform the DPEP process. Energy Division shall post such changes to the R.21-06-017 service list.

However, the Commission, through this proceeding or a successor, may seek additional comments on potential needed adjustments to the pending loads framework as needed.

Finally, D.24-10-030 in Ordering Paragraph 14 established an evaluation process for pending loads that includes minimum reporting criteria, annual reporting on the use and impact of pending loads in the annual DPAG Workshop in September, a pending loads evaluation workshop and a Tier 3 Pending Loads Evaluation Advice Letter in September 2027. The contents of this Pending Loads Evaluation Advice Letter are further discussed in subsequent sections of this Resolution.

The Commission agrees with TURN, CalCCA, and EDF/NRDC objections to leaving it to SDG&E's discretion as to whether, when, and how to include the additional bottom-up studies in future iterations of the pending loads category. As described in the sections above, the Commission directs SDG&E to adopt the minimum criteria for

bottom-up studies, as detailed in Category B2 in Table 2, if SDG&E is to include additional bottom-up studies.

SDG&E Proposal

The Commission finds that SDG&E sufficiently describes its MD/HD TE Study, the only source of pending load information it proposed. SDG&E also proposes that “localized forecast of other load forecast components,” like its MD/HD TE Study, may be included as sources of pending loads in the future. While we believe there is a place for bottom-up, customer-based studies in the pending loads framework, Category B2 in particular, we are not convinced by SDG&E’s loose descriptions of what constitutes these studies. We are more convinced by the definition offered by PG&E: “Pending Load Category B[2] also includes studies that are primarily based on data from customers and analysis-based studies of load growth for regulatory compliance obligations where substantial load growth is expected in a specific area where the exact customer is not yet known.” We find it reasonable to hold SDG&E to the same standard set by PG&E for the inclusion of bottom-up studies in the pending load category. For SDG&E to include other load forecast components in the future, they must meet these criteria to be categorized as Category B2 and therefore utilized as a Category B2 pending load. If the future load forecast components do not meet this standard, they are to be categorized as Category C and utilized as such.

We agree with the protests of CALSTART, Cal Advocates and CalCCA that SDG&E’s proposal does not include any data sources that leverage incomplete customer applications, customer pre-applications, or customer plans. While portions of SDG&E’s MD/HD study data represent bottom-up localized inputs, this does not reflect the valuable data that may be obtained through direct utility outreach to customers or customer pre-application information or plans that are submitted to the utility. This type of information is central to the pending loads category. We disagree with SDG&E’s assertion that creating a pending loads category has no practical benefit, even if SDG&E already utilizes this information. First, SDG&E does not make it clear in its response how this data is used in its DPP. Second, pending loads are of a different quality than known loads and should therefore be reported distinctly. Furthermore, this creates the opportunity to differentiate pre-applications and customer plans at different stages of completeness to be assigned to Category A or Category B1. This reflects the certainty of these data clearly and transparently.

We find it reasonable to require SDG&E to align with the categories and treatments of pending loads in tables 1 and 2 above, including to create Category A of pending loads that include customer plans and pre-application data informed by direct customer engagement and community plans, as proposed by PG&E and SCE. We direct SDG&E to incorporate these Category A loads into its pending load framework in the 2025-2026 DPP cycle. We find SDG&E's proposed use of the MD/HD TE study, once published, to be sufficiently informed by bottom-up localized data as to be included in pending load Category B2.

We agree with EDF/NRDC's protest that SDG&E's proposed 2027 Pending Loads Evaluation data reporting is inadequate. The Commission finds that the intended purpose of pending loads is to increase utility awareness of *where* load will likely appear in the mid-term years of the DPP, when known loads are not yet identified. SDG&E's pending loads proposal assigns the pending loads from the MD/HD TE study to the circuit level. Therefore, SDG&E should still be able to make a comparison between pending loads and energization requests on an aggregate basis (metric 1 from Ordering Paragraph 14). Additionally, as described above, we find it reasonable to require SDG&E to create pending loads Category A and B1 to capture customer and community plans and pre-application information. The pending loads in Category A shall be reported and compared to the known loads as described in D.24-10-030. Therefore, we find it reasonable to require SDG&E to report the Pending Loads Evaluation data as described in the Decision.⁹

Pending Loads Annual Reevaluation Guardrail

All three IOUs have proposed the re-evaluation of grid needs and planned investments on an annual basis as a primary guardrail for investments related to pending loads (and known loads). We agree that this is a key guardrail; however, the process by which the IOUs will re-evaluate and report the results of this re-evaluation has not been well defined. PG&E states that their "primary guardrail for pending loads is the existing

⁹ D.24-10-030 Ordering Paragraph 14: ...At a minimum, Utilities shall include in their Pending Loads Evaluation Advice Letter: (1) an analysis of the percentage of pending loads that became energization requests in the form of a table that includes each pending load used in forecasting to date; (2) deviance of load size from pending load to actual known load; (3) deviance of load timing between pending loads and actual known load; (4) differences in the accuracy and usefulness of pending loads by load category (i.e., end use); (5) differences in the accuracy and usefulness of pending loads by information source and/or methodology; and (6) the expected in-service date of projects initiated as a result of the pending loads category.

DPEP process. PG&E's DPEP process re-evaluates all grid needs and planned investments on at least an annual basis, which would include any needs or investments associated with Pending Loads." SDG&E states "Relevant to risk mitigation, the DPP itself provides protection. The annual DPP cycle acts to refresh data on an annual basis providing flexibility to advance, delay or otherwise modify planned upstream distribution capacity upgrades in accordance with evolving service area conditions and needs." SCE states "Additionally, the infrastructure planning and execution process inherently enables flexibility that can respond to changes in load forecasts. Grid buildout projects occur in stages. If customer energization requests materialize slower than expected, corresponding projects can be modified, delayed, or potentially put on hold till the expected projects progress or other projects backfill them."

The Commission finds it is appropriate to require the IOUs to provide a detailed description of the process that they use to re-evaluate grid needs and how they propose to provide any information related to the change in needs in the GNA. Furthermore, it is appropriate to require the IOUs to provide a detailed description of the process that they use to re-evaluate planned investments and how they propose to provide this information in the DUPR. Particularly, the IOUs shall provide more information in the GNA on how the project execution process will work when pending loads change based on the categorization (for example, a customer plan developing from Category B to Category A) or pending loads do not materialize into known loads, and how this process might be different for pending loads in hot spots. It is critical to fully understand the guardrails related to pending loads.

Reporting Pending Loads in the GNA and DUPR

The annual reporting of pending loads was insufficiently addressed by each utility. PG&E proposed to include the following data fields in the GNA/DUPR for customer-based pending loads:

- Facility ID
- Unique Identifier
- Load Type
- Capacity (MW)
- Source of Information (e.g., Customer, Community, Third Party Study)
- Forecast In Service Year
- Category of Pending Loads (A, B1, B2, C)

PG&E proposed to include the following data fields in the GNA/DUPR for studies used as the basis of pending loads:

- Source of information (e.g., Customer data, forecasting models, etc.)
- Data Access (e.g., links to public data, or provider of data if not publicly available)
- Detailed Methodology, including how data sources are translated into Pending Loads.
- Categorization of Pending Loads obtained from the study

These data fields include less information than included in PG&E's previously filed 2024 GNA/DDOR which included the following data fields:

- Circuit
- Unique Identifier
- Type
- Category
- IEPR Status
- Current Cycle Load Amount (MW)
- Initial Service Request Date
- Current Cycle Expected In-Service Date
- Status
- Actual In-Service Date
- Actual Load Amount (MW)

Additional reporting requirement.

Each utility shall provide data for Pending Loads A, B1 and B2 similar to the data provided for Known Loads and include that data in the Known Load Tracking data and track each pending load reported similar to how known loads are tracked from year to year and include these pending loads in the metrics that are now reported for Known Loads in the GNA/DUPR. The IOUs must consult with Energy Division prior to the GNA/DUPR filing date to confirm the fields and formats for how pending loads should be reported in the GNA/DUPR.

In addition, in the interest of preserving the relevant data from prior filings and updating the reporting requirements with the proposed data, PG&E, and all utilities shall report, at minimum, the following data fields in their spreadsheet for customer-based pending loads:

- Facility ID

- Unique Identifier
- Load Type (consistent with those reported in known loads)
- Category (consistent with those reported in known loads)
- Source of information (e.g., Customer, Community Engagement Plan, database)
- Capacity (MW)
- Forecast In Service Year
- Category of Pending Loads (A, B1)
- Hot Spot located within, if any
- IEPR Status

We accept PG&E's proposal to report data on studies used to inform the distribution planning process. This reporting requirement shall be applied to PG&E and all utilities to report, at a minimum, data on studies used as the basis for pending loads.

- Source of information (e.g., study, forecasting models, etc.)
- Data Access (e.g., links to public data, or provider of data if not publicly available)
- Detailed Methodology, including how data sources are translated into Pending Loads
- Categorization of Pending Loads obtained from the study (B2 or C)
- Hot Spot location, if any and applicable

In addition, as previously specified, utilities should report a list of identified hot spots and utilized hot spots in the GNA/DUPR with sufficient detail to allow for known loads and pending loads reported as a part of the filing, as well as the information that supports the identification of the hot spots, to be connected to the hot spots.

Finally, all three utilities shall report pending loads evaluation data in the 2027 pending loads evaluation workshop and advice letter as specified in D.24-10-030 Ordering Paragraph 14. That ordering paragraph requires that the content of the pending loads evaluation advice letter and the data needed to be collected shall be finalized by this Resolution. The text of OP 14 is as follows:

No later than September 30, 2027, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company shall submit the Tier 3 Pending Load Evaluation Advice Letter. The required contents of the Pending Loads Evaluation Advice Letter and the data needed to be collected shall be considered during the Pending Loads Implementation Workshop and

finalized in the disposition of the Pending Loads Implementation Advice Letter. At a minimum, Utilities shall include in their Pending Loads Evaluation Advice Letter: (1) an analysis of the percentage of pending loads that have become energization requests in the form of a table that includes each pending load used in forecasting to date; (2) deviance of load size from pending load to actual known load; (3) deviance of load timing between pending loads and actual known load; (4) differences in the accuracy and usefulness of pending loads by load category (i.e., end use); (5) differences in the accuracy and usefulness of pending loads by information source and/or methodology; and (6) the expected in-service date of projects initiated as a result of the pending loads category.

We find that the reporting data identified in this resolution is sufficient for the pending loads evaluation advice letter and the six content requirements for the advice letter as specified in D.24-10-030 Ordering Paragraph 14 are sufficient for the evaluation of pending loads with the following edits of criteria 1 and 4 and one new criteria 7:

(1) an analysis of the percentage of pending loads that have become energization requests or were cancelled/removed in the form of a table that includes each pending load used in forecasting to date;

(4) differences in the accuracy and usefulness of pending loads by load type (i.e. commercial, industrial etc.) and load category (i.e., end-use such as MDHD EV, light duty EV etc.).

(7) How the risks of pending loads that do not materialize can be mitigated.

Community Engagement Plans as an Input to Pending Loads

SCE does not reference Community Engagement Plans as a source of pending loads. SCE includes “customer inputs” as the data source informing both Category A and Category B1 pending loads. SCE cites “customer projects where the customer has not submitted a complete energization application” as the basis for the customer inputs and uses the examples of “customer fleet electrification where locations and load amounts are known, but the timing is still tentative, or a large industrial distribution center where location and timing are known, but load amount is still uncertain.” Similarly, SDG&E’s pending loads proposal does not include any data sources that leverage incomplete customer applications, customer pre-applications, or customer plans. SDG&E’s only proposed source of pending load data is the bottom-up MD/HD TE study.

Neither SCE nor SDG&E reference the Community Engagement Plans, or the outreach described therewithin, as a source of customer input. Conversely, PG&E explicitly references the Community Engagement Plans as the source of pending loads for both the “direct customer engagement” and “community plans” types of pending load sources. Decision 24-10-030 specifies in the Community Engagement Plan section 3.13 that the Community Engagement Plans must address community feedback in DPP using pending loads. Furthermore, in response to SCE’s question to the Commission about how to incorporate feedback from community engagement meetings, the Commission stated on page 111 of the Decision that “coordination and customer outreach efforts should be included as a minimum requirement of the pending loads category.”

We find it is reasonable that SCE and SDG&E use the community outreach opportunities described within each utility’s Community Engagement Plan to collect information on community plans and load growth projects to inform Category A and Category B1 pending loads. Furthermore, SCE and SDG&E should make this connection clear in future reporting on pending load sources.

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 AND CONCLUSION

1. Decision (D.)24-10-030 directed Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E), to file a joint Advice Letter to propose a method for developing a pending loads category and incorporating the category into the distribution planning process, define the types of information considered in the pending loads category and the general criteria applied to each

category, and discuss the risk of pending loads that do not materialize and how to mitigate the risk.

2. On June 27, 2025, the joint utilities filed their proposals to implement and use a pending loads category in the distribution planning process beginning in the 2025-2026 distribution planning cycle.
3. On July 22, 2025, SCE AL 5567-E et al. was timely protested by and was responded to by CALSTART, The Public Advocates Office (Cal Advocates), California Community Choice Association (CalCCA), Environmental Defense Fund and National Resource Defense Council (EDF/NRDC), and The Utility Reform Network (TURN).
4. On July 29, 2025, SCE, on behalf of SCE, PG&E, and SDG&E responded to the protests submitted by CALSTART, Cal Advocates, CalCCA, EDF/NRDC, and TURN and the responses submitted by CALSTART.
5. It is reasonable to adopt the pending loads categories (A, B1, B2, C) proposed by SCE.
6. It is reasonable to require SDG&E to align its proposal more closely with PG&E and SCE.
7. It is reasonable to require standardization of each utility's pending loads proposal by applying the best aspects of each proposal to all utilities.
8. D.24-10-030 does not explicitly require the IOUs to submit a single unified framework proposal.
9. It is reasonable to restrict pending loads based on studies not to exceed the IEPR.
10. It is prudent to prohibit the use of studies in Category A and B1.
11. The description of SCE's discount factor methodology lacks sufficient detail for assessing the certainty of pending loads and third-party validation of categorization of pending loads.
12. It is appropriate for PG&E, SCE, and SDG&E to adopt the minimum criteria for each pending load category as proposed by PG&E.
13. Hot spots are appropriately defined as specific geographical and capacity-constrained areas with forecasted load growth from multiple sources including known loads, Category A, and Category B1 pending loads. Hot spots are further defined in detail in the Hot Spots section. It is reasonable for less certain pending loads in Category B2 to exceed the IEPR if they are in a hot spot. This hot spot definition will help identify least regrets investment areas where it is appropriate to include lower certainty pending loads data from Category B2 above the IEPR forecast.
14. Approval of hot spots via annual Advice Letter would be burdensome and ineffective.

15. It is reasonable for utilities to report a list of identified hot spots and utilized hot spots in the GNA/DUPR with sufficient detail as to allow for known loads and pending loads reported as a part of the filing, as well as the information that supports the identification of the hot spots, to be connected to the hot spot.
16. It is reasonable and beneficial for the utilities to report all identified and utilized hotspots in the annual GNA/DUPR filing as described in detail in the Hot Spots section.
17. The Transportation Electrification Proactive Planning (TEPP) work product originating from R.23-12-008, Transportation Electrification Policy and Infrastructure proceeding, is a potential future source of pending load data focused on transportation corridors.
18. It is reasonable for the categorization framework proposed by SCE to be combined with the minimum criteria proposed by PG&E for customer data and study data.
19. It is reasonable to hold SDG&E and SCE to the same standard set by PG&E for the inclusion of bottom-up studies in the pending load category.
20. SDG&E's pending load proposal does not reflect the valuable data that may be obtained through direct utility outreach to customers or customer pre-application information or plans that are submitted to the utility.
21. It is reasonable to require SDG&E to comply with the pending load categorization and usage framework in Tables 1 and 2, including creation of Category A of pending loads that include customer plans and pre-application data informed by direct customer engagement and community plans.
22. It is reasonable to require PG&E, SCE, and SDG&E to report the Pending Loads Evaluation data as described in D.24-10-030 Ordering Paragraph 14 with the minor adjustments to criteria 1 and 4 and a new criteria #7 listed in the Reporting section.
23. Changes to the pending load framework should not be at the utilities' sole discretion.
24. Utilities should not be able to alter the treatment of, or add, *types* (e.g., customer information, studies, alternate forecasts, etc.) of pending load data within the pending load framework without approval from the Commission.
25. Utilities should be able to add *sources* (e.g., individual customer plans, each study) of pending load data without an extended approval process, so long as the sources of data are of the *types* of data allowed in pending loads and meet the criteria of a category.
26. It is reasonable and beneficial for Energy Division staff to be authorized to direct the three utilities to make changes to the pending loads reporting requirements on an

annual basis so that valuable data is collected correctly and consistently to inform future changes to the framework.

27. The process by which the IOUs will re-evaluate all grid needs and planned investments and report the results of this re-evaluation has not been well defined.
28. It is appropriate to require the IOUs to provide a detailed description of the process that they will use to re-evaluate grid needs and how they propose to provide any information related to the change in needs in the GNA.
29. It is appropriate to require the IOUs to provide a detailed description of the process that they will use to re-evaluate planned investments and how they propose to provide this information in the DUPR. The annual reporting of pending loads was insufficiently addressed by each utility.
30. PG&E, and all utilities should report, at minimum, the following data fields in their spreadsheet for customer-based pending loads: Facility ID, Unique Identifier, Load Type (consistent with those reported in known loads), Category (consistent with those reported in known loads), Source of information (e.g., Customer, Community Engagement Plan, Database), Capacity (MW), Forecast In Service Year, Category of Pending Loads (A, B1), Hot spot located within if any, and IEPR Status.
31. PG&E, and all utilities should report, at minimum, the following data fields in their spreadsheet for study-based pending loads: Source of information (e.g., study, forecasting models, etc.) , Data Access (e.g., links to public data, or provider of data if not publicly available), Detailed Methodology, including how data sources are translated into Pending Loads. Categorization of Pending Loads obtained from the study (B2 or C), and Hot Spot location, if any.
32. It is reasonable to require the IOUs to consult with Energy Division prior to the GNA/DUPR filing date to confirm the fields and formats for how pending loads should be reported in the GNA/DUPR.
33. Neither SCE nor SDG&E reference the Community Engagement Plans, or the outreach described therein, as a source of customer inputs to pending loads.
34. It is reasonable for SCE and SDG&E to use the community outreach opportunities described within each utility's Community Engagement Plan to collect information on community plans and load growth projects to inform Category A and Category B1 pending loads.

35. It is reasonable for the pending loads categories, as adopted and modified by this resolution, to be implemented in the 2025-2026 DPP cycle.

THEREFORE IT IS ORDERED THAT:

1. The request of the Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company to establish and use the pending loads category in the distribution planning process as requested in Advice Letter 5567-E et al. is approved with modifications set forth below and otherwise specified herein.
2. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall adopt the pending loads categories A, B1, B2, and C and shall use pending loads in their distribution planning processes as detailed in Table 1 of this Resolution.
3. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall adopt the minimum criteria for each pending load category as detailed in Table 2 of this Resolution. Each pending load must meet all minimum criteria for the category in which it is placed.
4. Pending loads in Category B2 (study-based pending loads that meet the Category B2 minimum criteria detailed in Table 2) shall be capped at the California Energy Commission's Integrated Energy Policy Report (IEPR) except where they are located within an identified hot spot; in such hot spots Category B2 pending loads may be included above the IEPR in the base scenario.
5. Studies categorized as Category C (non-customer-based studies or studies that do not meet the Category B2 criteria detailed in Table 2) shall be used only to inform the disaggregation of the California Energy Commission's Integrated Energy Policy Report (IEPR) and shall not be used to justify investments that would cause load to exceed the IEPR forecast.
6. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall define hot spots as:
 - (i) a geographical area that is served by electrical infrastructure that is expected to experience substantial forecasted load growth from multiple sources including known loads, Category A, and Category B1 pending loads, and

- (ii) that area includes specific electrical infrastructure, i.e., substations and circuits which are forecasted to be capacity-constrained within the five-year planning period.
- (iii) An area is capacity constrained if the total capability of its infrastructure is only marginally greater than the demand served by the infrastructure after all low cost/no cost solutions have been considered. A hot spot will be considered a constrained area if the difference between the total capacity and total demand is less than or equal to half the total amount of Category B2 pending loads.
- (iv) If this occurs, all Category B2 pending loads served in the specific capacity constrained area may exceed the California Energy Commission's Integrated Energy Policy Report.

All utilities shall report, in their annual Grid Needs Assessment (GNA) and Distribution Upgrade Progress Report (DUPR) filings, a list of identified capacity constrained areas and which of these are designated as hot spots with sufficient detail to connect known loads and pending loads to each hot spot. The utilities in their GNA/DUPR filings shall provide quantitative support for each forecast year of the five-year planning period for each hot spot: (i) the list of Known Loads and Pending Loads in the hot spot, and (ii) the calculations used for determining that the hot spot is capacity constrained including the list of infrastructure (including but not limited to substation banks, circuits and ties) and their capabilities, the forecasted demand within the hot spot and the available margin between the two. The IOUs must consult with Energy Division prior to the GNA/DUPR filing date to confirm the fields and formats for how pending loads should be reported in the GNA/DUPR.

7. San Diego Gas & Electric Company (SDG&E) shall align its Pending Loads framework with that of Pacific Gas and Electric Company and Southern California Edison Company, as summarized in Tables 1 and 2.
8. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall report the Pending Loads Evaluation data in 2027 as a part of the Pending Loads Evaluation Workshop and Advice Letter, as described in the Decision D.24-10-030 Ordering Paragraph 14, and as modified in this resolution.

9. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company may add sources of pending load data without prior Commission approval so long as the sources of data are of the data types permitted by this Resolution and meet the minimum criteria of the category they will be used in. Any new sources shall be reported in the next Grid Needs Assessment/Distribution Upgrade Progress Report.
10. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall provide a detailed description, in the Grid Needs Assessment, of the process they use to re-evaluate grid needs and provide any information related to the changes in needs.
11. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall provide a detailed description, in the Distribution Upgrade Project Report, of the process that they use to re-evaluate planned investments, how the project execution process works when pending loads change based on the categorization or Pending Loads do not materialize into Known Loads, and how this process is different for Pending Loads in Hot Spots.
12. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall report, at minimum, the following data fields in their spreadsheet for customer-based pending loads along with the annual Grid Needs Assessment/Distribution Upgrade Project Report filings: Facility ID, Unique Identifier, Load Type (consistent with those reported in known loads), Category (consistent with those reported in known loads), Source of information (e.g., Customer, Community Engagement Plan, Database), Capacity (MW), Forecast In Service Year, Category of Pending Loads (A, B1), Hot spot located within if any, and California Energy Commission's Integrated Energy Policy Report Status.
13. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall report in their annual Grid Needs Assessment and Distribution Upgrade Project Reports, at minimum, data on studies used as the basis of pending loads: Source of information (e.g., study, forecasting models, etc.), Data Access (e.g., links to public data, or provider of data if not publicly available), Detailed Methodology (including how data

sources are translated into Pending Loads), and Categorization of Pending Loads obtained from the study (Category B2 or C), hot spot location, if applicable.

14. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company shall use the community outreach opportunities described within its Community Engagement Plan to collect information on community plans and load growth projects to inform pending loads. This connection shall be made clear in reporting on pending load sources in the Grid Needs Assessment.
15. The pending loads framework, as described here within, shall be implemented in the 2025-2026 DPEP cycle for Pacific Gas and Electric Company Southern California Electric Company, and San Diego Gas & Electric Company.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on December 4, 2025; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added
upon adoption of the resolution

Dated December 4, 2025, at San Francisco, California