

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for Development of
Distribution Resources Plans Pursuant to Public
Utilities Code Section 769.

Rulemaking 14-08-013
(Filed August 14, 2014)

And Related Matters

Application 15-07-002
Application 15-07-003
Application 15-07-006
(Filed July 1, 2015)

(NOT CONSOLIDATED)

In the Matter of the Application of
PacifiCorp (U901E) Setting Forth its
Distribution Resource Plan Pursuant to
Public Utilities Code Section 769.

Application 15-07-005
(Filed July 1, 2015)

And Related Matters

Application 15-07-007
Application 15-07-008

**REPLY OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, CALIFORNIA
SOLAR AND STORAGE ASSOCIATION, AND CALIFORNIA ENERGY STORAGE
ALLIANCE TO RESPONSES TO THE MOTION FOR AN ORDER REQUIRING
REFINEMENTS TO THE INTEGRATION CAPACITY ANALYSIS**

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And Related Matters	Application 15-07-007 Application 15-07-008

REPLY OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, THE CALIFORNIA SOLAR AND STORAGE ASSOCIATION, AND THE CALIFORNIA ENERGY STORAGE ALLIANCE TO RESPONSES TO THE MOTION FOR AN ORDER REQUIRING REFINEMENTS TO THE INTEGRATION CAPACITY ANALYSIS

I. Introduction

On October 9, 2020, the Interstate Renewable Energy Council, Inc. (IREC), California Solar & Storage Association (CALSSA), and California Energy Storage Alliance (CESA) moved for an order requiring refinements to the Integration Capacity Analysis (ICA).¹ On October 20, 2020, the Administrative Law Judge (ALJ) sent an e-mail clarifying that responses to the Motion

¹ Motion An For Order Requiring Refinements To The Integration Capacity Analysis (Oct. 9, 2020) (Motion).

were due by October 26, 2020, and authorizing the filing of replies by November 5, 2020. On October 26, 2020 Pacific Gas & Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E) (collectively, IOUs), and the Public Advocates Office filed responses. Pursuant to Rule 11.1 and the ALJ's e-mail, IREC, CALSS and CESA submit this reply.

IREC, CALSSA and CESA appreciate the hard work the IOUs' have invested in developing and improving the ICA over the past several years. Since the ICA was released in December 2018, we have worked informally with the IOUs and the Energy Division to point out anomalies and request improvements to the ICA. We appreciate that the IOUs voluntarily implemented many improvements and have resolved a significant number of the problems that were first identified. However, as identified in the Motion, a number of issues remain unresolved after two years of informal process. While the informal process has been effective at narrowing the issues, it is reasonable and indeed necessary for the Commission to now actively engage with the remaining issues to ensure that the ICA is in compliance with the Commission's orders and intent and to ensure that it is a functional tool that Californians benefit from.

The stakeholders and the IOUs have discussed and/or authored comments on all the issues raised in the Motion. None of the requests or issues raised in the Motion are new to the parties in these proceedings. IREC and others thoroughly addressed these issues in its opening comments on August 1, 2019,² its reply comments on September 30, 2019,³ and then again in the

² R.14-08-013, Comments of the Interstate Renewable Energy Council, Inc. on Refinements to the Integration Capacity Analysis (Aug. 1, 2019) (IREC Aug. 1 Comments); Comments of the California Solar & Storage Association on Refinements to the Integration Capacity Analysis (Aug. 1, 2019).

³ R.14-08-013, Reply Comments of The Interstate Renewable Energy Council, Inc. on Refinements to the Integration Capacity Analysis (Sept. 30, 2019) (IREC Sept. 30 Reply Comments).

October 9, 2020 Motion. Accordingly, this reply only addresses new arguments and does not attempt to rebut the IOUs' recitation of earlier arguments.

II. Utilities' ICA improvements do not obviate the need for an update to data validation plans.

IREC, CALSSA and CESA appreciate that the IOUs have improved their ICA data since the initial roll-out in December 2018.⁴ The existence of prior improvements does not undermine the usefulness of allowing stakeholders and the Commission to review the IOUs' current data validation efforts. The Motion asks IOUs to document the results of their data validation efforts to date, problems discovered or efficiencies realized in ICA implementation, and plans for ICA improvements. This is not an onerous request. As SDG&E noted, validation efforts are "ongoing and continue to be defined and developed by each IOU."⁵ It is thus reasonable for the Commission to be informed about the evolution of those efforts. Moreover, neither parties in this proceeding nor the Commission have the skillset necessary to expertly review a data validation plan. Thus, the Commission should hire a consultant to help it understand and suggest best practices for the plans. The additional transparency provided by requiring such documentation will allow stakeholders visibility into IOU practices and preserve the integrity of the ICA over time.

Next, SCE and SDG&E argue that the use of the ICA in the Rule 21 interconnection process is reason to delay the Commission's review of their existing data validation processes in

⁴ Response of Southern California Edison Company to the Motion for an Order Requiring Refinements to the Integration Capacity Analysis, at 4-6 (Oct. 26, 2020) (SCE Response); Pacific Gas and Electric Company's Response to Joint Motion for an Order Requiring Refinements to the Integration Capacity Analysis, at 3-4 (Oct. 26, 2020) (PG&E Response).

⁵ Response of San Diego Gas & Electric to the Joint Parties' Motion for an Order Requiring Refinements to the Integration Capacity Analysis, at 3 (Oct. 26, 2020) (SDG&E Response).

this proceeding.⁶ Yet an ongoing validation process is essential precisely because the Commission intends to use the ICA in Rule 21. Without a documented validation process, future problems with the ICA could go undetected and negatively impact the interconnection process. Moreover, nothing in the decision authorizing the use of ICA in Rule 21 requires a robust validation process.⁷ SDG&E observes that D.20-09-035 requires reporting to determine how often the ICA’s monthly update cadence fails to show the grid’s current condition at the site of an interconnection request.⁸ Reviewing the need for more frequent updates to the ICA resulting from changes in grid conditions is not the same as validating ICA results. Therefore, the Commission should grant the Motion and order the IOUs to file updated data validation plans.

III. Uniform Load results should be useful for state policymakers and developers seeking to guide the placement of new load.

Meeting the challenge of climate change and California’s goal of carbon neutrality by 2045 will require the extensive electrification of transportation and buildings, and state policy supports the decarbonization and electrification of the transportation sector. For example, the Motion cited Governor Newsom’s executive order requiring that all sales of new passenger cars and trucks be zero-emission by 2035.⁹

In addition, under A.B. 2127 the California Energy Commission (CEC) must “prepare a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals,” and is authorized to “seek

⁶ SCE Response at 3-4; SDG&E Response at 2-4.

⁷ See R.17-07-007, D.20-09-035, Decision Adopting Recommendations from Working Groups Two, Three, and Subgroup (Sept. 30, 2020).

⁸ SDG&E Response at 3; D.20-09-035 at 206 (Ordering Paragraph 4 requires IOUs to “track when the Integration Capacity Analysis outdated values lead to Interconnection Requests failing the Initial Review.”).

⁹ California Executive Order N-79-20 (Sept. 23, 2020).

data and input relating to electric vehicle charging infrastructure from . . . the Public Utilities Commission [and] electrical corporations.”¹⁰ If improved, the ICA’s Uniform Load results could help the state and CEC achieve these goals by enabling customers to more efficiently site and design electric vehicle charging stations without incurring the cost and delays associated with grid upgrades. CEC staff have discussed with the Energy Division, IREC and the IOUs the staff’s interest in using Uniform Load results to inform the analysis required by A.B. 2127.

SCE and SDG&E appear to argue the Grid Needs Assessment (GNA), and not the ICA’s Uniform Load results, should be used to inform siting decisions for new load.¹¹ However, the GNA does not provide results that are granular enough to support the detailed analysis performed by the CEC’s models, or to inform the siting of new load today. The ICA’s power flow simulations use a nodal analysis that examines each device on the grid and provides more detailed data about grid conditions than the GNA. The GNA is not capable of providing information to a customer looking to cite an electric vehicle at a particular location on their system.

PG&E states that “[l]oad ICA data is of sufficient quality for information-only use.”¹² SDG&E states that “[l]oad ICA data is of good quality and sufficient for the ICA use-cases.”¹³ SCE, on the other hand, argues that they do not know what the use case is for the Load ICA and rather than defending the validity of the Load ICA they point the Commission to the GNA instead.¹⁴ It is notable that none of the three IOUs actually attempt to explain at all what the Load

¹⁰ Pub. Resources Code § 25229.

¹¹ SCE Response at 10; *see* SDG&E Response at 10.

¹² PG&E Response at 6.

¹³ SDG&E Response at 10.

¹⁴ SCE Response at 9 (“Due to the absence of an agreed upon use case for the application of Load ICA results, the Load ICA values have not been of focus.”).

ICA results even mean at this point. PG&E notes that their Load ICA results changed significantly as a result of their validation efforts,¹⁵ but this actually raises even more questions as to what the Load ICA results means in light of the now substantial difference between PG&E's results and those of SCE and SDG&E. It is clear from reading the IOUs responses that Commission action is necessary to clarify what the ICA Load results signify and to ensure they are meeting the Commission's intent that they inform the siting of DERs.

Today, distributed energy resource developers face both the cost of grid upgrades and long delays while waiting for IOUs to complete upgrades to facilitate the installation of new EV chargers. If the Uniform Load results were useful for making or even informing siting decisions, developers could immediately use them to locate sites where no upgrades are needed. Moreover, A.B. 841 will allow IOUs to rate-base upgrades required to facilitate beneficial electrification.¹⁶ As with any authorization to increase rate base, it is important that the Commission have visibility into whether the utility is appropriately determining the need for upgrades such that there can be certainty that these investments are indeed necessary. The Commission should ensure that the ICA is a functioning transparency tool that allows distributed energy resources to fully utilize existing distribution system capacity and thereby protects ratepayers from the cost of unnecessary system upgrades.

The Commission should not hesitate to order IOUs to comply with its previous decisions and provide useful Uniform Load results. The IOUs should have published useful Uniform Load results in December 2018, but almost two years later they have not. The IOUs complain that they

¹⁵ PG&E Response at 6.

¹⁶ Pub. Utils. Code § 740.19 (effective Jan. 1, 2021).

have a lot of work to do in a variety of regulatory proceedings.¹⁷ This does not excuse their failure to comply with the intent of D. 17-09-026, which authorized use of the iterative method because it expected “ICA values should be adequately representative to inform a DER developer’s project design and siting.”¹⁸ The Uniform Load results today are not adequately representative of the hosting capacity for new load, and are not useful to inform a DER developer’s project design and siting.¹⁹ Indeed it is not even clear that they are useful for anything at all. The Commission and stakeholders may want to explore the prudence of the IOUs’ expenditures over the past two years on a tool that does not provide useful Uniform Load results. The Commission should not hesitate to require the IOUs to comply with its prior decisions and the statutory requirement that distribution resource plans enable the optimal siting of distributed energy resources.²⁰

IV. San Diego Gas & Electric ignores the data redaction standards set by the Commission in these proceedings by failing to publish the location of certain distribution facilities and ICA data on its map.

SDG&E reiterates that that it “has longstanding concerns regarding the publication of . . . transmission and substation data.”²¹ This is not new information for the parties in this docket or the Commission. Parties and the Commission have examined SDG&E’s and the other IOU’s longstanding concerns multiple times and the Commission has ruled against those concerns

¹⁷ PG&E Response at 6; SDG&E Response at 13-14.

¹⁸ R.14-08-013, D. 17-09-026, Decision on Track 1 Demonstration Projects A (Integration Capacity Analysis) and B (Locational Net Benefits Analysis), at 30 (Oct. 6, 2017).

¹⁹ In addition to the problems described earlier, both the CEC and a developer pointed out to IREC that some of SCE’s load values are negative. IREC brought these questionable values to SCE’s attention.

²⁰ Pub. Utils. Code § 769(b).

²¹ SDG&E Response at 8.

multiple times.²² In 2018 the Administrative Law Judge found that SDG&E and the other IOUs “failed to carry their burden of proving, that the information that they wish to redact from . . . public online maps and/or make subject to a non-disclosure agreement, meets the definition of Critical Electrical Infrastructure Information that should be protected from public disclosure on confidentiality (*i.e.* physical or cybersecurity) grounds.”²³ In Rulings on July 24, 2018 and December 17, 2018, the Commission identified limited categories of information, *i.e.*, customer load data that violates the 15/15 rule, that the IOUs may redact from the ICA Maps.²⁴ Moreover, the Commission made clear that if an IOU would like to redact data due to security or critical infrastructure concerns, it is incumbent upon the IOU to demonstrate that the redacted information fits within one of seven clearly identified categories, namely to facilitate black start or serve one of the following: military installations, regional water supplies, public safety establishments, major transportation facilities, level 1 trauma centers, or over 60,000 meters.²⁵ SDG&E has not even attempted to show the facilities it redacts meet the standard the Commission set in this docket. The Commission should not allow SDG&E to flout its explicit orders regarding the redaction of substations and other distribution facilities from its map.

²² For a full summary of the history of the Commission’s rulings in this area, see R.08-08-009, Response of the Joint Parties to Joint Petition of PG&E, SDG&E, and SCE for Modification of D. 10-12-048 and Resolution E-4414 to Protect the Physical Security and Cybersecurity of Electric Distribution and Transmission Facilities, at 2-7, Jan. 9, 2019.

²³ R.14-08-013, Administrative Law Judge’s Ruling Resolving Confidentiality Claims Raised by PG&E, SCE, and SDG&E as to Distribution System Planning Data Ordered by D.17-09-026 and D.18-12-004, at 2 (December 17, 2018) (ALJ’s December 17, 2018 Ruling on Confidentiality).

²⁴ See R.14-08-013, Administrative Law Judge’s Ruling Addressing PG&E, SCE, and SDG&E’s Claims for Confidential Treatment and Redaction of Distribution System Planning Data Ordered by Decisions 17-09-026 and 18-02-004 (July 24, 2018) (ALJ’s July 24, 2018 Ruling on Confidentiality) (allowing redaction customer load data, rejecting redaction of data on other grounds absent a specific Commission authorization).

²⁵ ALJ’s July 24, 2018 Ruling on Confidentiality at 20-21.

IREC has provided extensive documentation of SDG&E's failure to comply with the Commission's orders in these proceedings;²⁶ accordingly, we do not respond to all of SDG&E's arguments in this reply. However, we would be remiss not to reply that SDG&E's claim that it "does not over-redact data"²⁷ rings hollow when the facilities the Commission explicitly ordered the IOUs to publish in the ICA, including substations,²⁸ are not visible on SDG&E's map.

V. Conclusion

These dockets include an extensive record that support the need for immediate action to improve the ICA. The Commission should expeditiously issue an order requiring refinements to the ICA.

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²⁶ IREC Aug. 1 Comments at 6-8; IREC Sept. 30 Reply Comments at 12-14; Motion at 8-12.

²⁷ SDG&E Response at 6.

²⁸ ALJ's December 17, 2018 Ruling on Confidentiality at 11-14; ALJ's July 24, 2018 Ruling on Confidentiality.

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