BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Energization Timelines	Rulemaking 24-01-018

CLEAN COALITION REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGES RULING DIRECTING PARTIES TO RESPOND TO QUESTIONS ON ENERGIZATION ISSUES

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I. INTRODUCTION

Pursuant to Rule 6.2 of the Rules of Practice and procedure of the California Public Utilities Commission ("the Commission"), the Clean Coalition respectfully submits these reply comments in response to the *Administrative Law Judges* ("ALJ") *Ruling Directing Parties to Respond to Questions on Energization Issues*, issued at the Commission on June 6, 2024. Our recommendations include:

- Improving the accuracy of Load ICA maps is critical for increasing the efficiency of the energization process.
- Increased structure around the process for main panel upgrades ("MPUs") should be a focus of this proceeding.
- A utility point person should be assigned to each energization project.
- Clean Coalition supports the development of a public web portal, where the Commission can be made aware of feedback/complaints in real time.
- Decreasing the time needed to complete the preliminary design process will greatly reduce the overall time per energization.
- Additional proactive planning will make it far more likely that the IOUs will have the ability to abide by energization timelines adopted by the Commission.

II. DESCRIPTION OF PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of Distributed Energy Resources ("DER")—such as local renewables, demand

response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. COMMENTS

A. Improving the accuracy of Load ICA maps is critical for increasing the efficiency of the energization process.

In order to achieve the state's electrification goals, siting new electric vehicle charging infrastructure ("EVCI") and increasing the service available to the average commercial and residential properties will be required at high rates across the investor-owned utility ("IOU") service territories. Without a refined tool to view data about grid locations where capacity is readily available, developers will be forced to work blindly—securing a site and guessing whether a timely energization is possible—and the IOUs will in turn have to allocate a higher-than-necessary amount of resources to meeting the influx of new applications, many of which will never progress forward once the accurate grid conditions are revealed. Moreover, an inaccurate tool further negatively impacts the process by sending imprecise signals, making more difficult a process that must be optimized for efficiency to achieve a sufficiently high rate of deployments. The Clean Coalition joins the Interstate Renewable Energy Council ("IREC") in noting that the LOAD ICA maps are critically important to the subject to timely energizations. We concur that while all three IOUs must continue to work on further refinements, Pacific Gas & Electric ("PG&E") and San Diego Gas & Electric ("SDG&E") have made measurable progress in recent years.[1] In contrast, Southern California's ("SCE") Load ICA map is completely ineffective, constraining opportunities for even the smallest addition of new load in the majority of SCE's service territory, let alone the multitude of fleet electrification that will be required to electrify commercial transport in the state. The Local Government Sustainable Energy Coalition ("LGSEC") addresses the same issue in the context of local governments, providing two examples of projects that have stalled or been cancelled, and note that inaccurate

[1] IREC Response to ALJ Ruling, at p. 2.

Load ICA maps have made siting DC fast chargers difficult.[2] While ICA refinements are being addressed in the High DER proceeding, the importance of having a tool with reliable and accurate information that is actionable in the interconnection must be made clear to the Commission in this context as well. Determining appropriate timelines and successful implementation of a system that works for all types of energizations is incumbent on having viable Load ICA maps. Therefore, the Clean Coalition strongly believes that appropriating funds, Commission oversight, strict deadlines for improvements, and requiring additional utility resources/computing power to bring the maps up to a high standard are of paramount importance to meeting the goals in Assembly Bill ("AB") 50 and Senate Bill ("SB") 410.

B. Increased structure around the process for main panel upgrades ("MPUs") should be a focus of this proceeding.

The Clean Coalition agrees with the Solar Energy Industries Association ("SEIA") that part of the process of creating reasonable energization timelines must include a standard and efficient process for MPUs.[3] Many existing buildings have main panels with service ratings of 100 amp or below. However, the recommendation for full electrification is an upgrade to at least 200 amps. Therefore, the more complex, time intensive, and costly the process for completing an MPU is, the less inclined many residential and commercial facilities will be to move away from natural gas and adopt the full range of electrification measures. Clean Coalition also supports SEIA's proposal to require the IOUs to submit public reports on MPUs on a bi-annual basis. Setting a timeline for timely MPUs is important, as is collecting the data to verify that the proposed timeline is being met upon implementation.

C. A utility point person should be assigned to each energization project.

Just like the interconnection process, one of the confusing aspects of navigating the energization process can be determining that exact status of a project, which part of the utility is handling a project in a given stage, and how to get into contact with the appropriate utility staff. CALSTART explains, "Stakeholders have requested greater transparency regarding where a project stands in the queue and who is responsible for each step; the five steps outlined in this

[2] LGSEC Response to ALJ Ruling, at p. 3.
[3] SEIA Comments on ALJ Ruling, at p. 1-3.

question may include multiple sub-steps with various parties responsible, and successful energization may require moving back and forth between project stages, sometimes out of order, depending on site conditions."[4] The Clean Coalition supports assigning a specific utility employee to each project who is responsible for communicating with an applicant as a project is shepherded through the energization process. With a clear point of contact, the likelihood of information changing or multiple instances of revised cost estimates is reduced, and an applicant will not lose track of an application in what can often be a black box of internal utility operations. And in the event that material modifications to an application are needed, a single point of contact ensures that the change is conferred to the required utility staff in a timely manner, reducing the opportunity for duplicate efforts or wasted utility resources. We also support CALSTART's conclusion that in addition to the Commission's requirement to meet statutory requirements in the near term in Phase 1 of this proceeding, creating a working group to clearly define each step in the process and appropriate target timelines is an important longer-term step.[5]

D. Clean Coalition supports the development of a public web portal, where the Commission can be made aware of feedback/complaints in real time.

Given the prohibitive complexity and cost of going through a formal dispute resolution process,[6] having a simple (and perhaps anonymous) platform through which the Commission can receive feedback from applicants on the energization process is an important transparency and accountability measure. Hearing the experience of applicants on the implementation of energization timelines and any suggestions for improvements or complaints is a valuable way for the Commission to be kept abreast of changing conditions over time. A major factor in the passage of AB 50 and SB 410 was the fact that the impacts of slow energization timelines were largely unknown until a few very public instances limiting much needed expansion and economic opportunities led to enough political fervor for legislative action. SEIA, IREC, the California Community Choice Association ("CalCCA"), the California Broadband & Video Association, Crown Castle Fiber LLC, Walmart INC, Voltera Power LLC, the California Solar

[4] CALSTART Response on ALJ Ruling, at p. 3.
[5] *Ibid*.
[6] IREC Response to ALJ Ruling, at p. 3.

& Storage Association ("CALSSA"), and Power America's Commercial Transportation ("PACT") all support the creation of a web portal dedicated to energization issues that can serve as a central repository for information on each of the IOU's processes.[7] Many parties also suggest that a third party should be responsible for developing and maintaining the website, especially if the results are publicly available. The consensus amongst parties on this subject should clearly demonstrate for the Commission the value of transparently recording the applicant/customer experience with the energization process.

E. Decreasing the time needed to complete the preliminary design process will greatly reduce the overall time per energization.

Tesla's comments (and associated data) very clearly show that the biggest hurdle in the existing energization process is the preliminary design process.[8] For SDG&E, Tesla experienced an average of 118, compared to a goal of 35 days and with SCE, Tesla experienced an average timeline of 125 days for Rule 15/29 (compared to a goal of 30 days) and an average timeline of 81 days for Rule 29 (compared to a goal of 30 days). We find this information to be quite useful and suggest that the Commission take this as an indication that the process needs to be significantly streamlined to achieve the state's goals. Extending distribution lines for new projects and deploying EVCI are both essential aspects of electrification efforts. Industry Coalition's suggestion to allow for partially completed plans is also worth considering.[9]

F. Additional proactive planning will make it far more likely that the IOUs will have the ability to abide by energization timelines adopted by the Commission.

Clean Coalition supports the IOUs taking proactive measures that will reduce the lead times required to complete the energization process. For example, the Industry Coalition proposes that the IOUs adopt a process similar to SMUD's future demand awareness process, where a survey is done for all large load commercial building owners and landlords to pre-determine whether

[7] SEIA Response to ALJ Ruling, at p. 5, IREC Response to ALJ Ruling, at p. 3, CalCCA Comments on ALJ Ruling, at p. 6, and California Broadband & Video Association Comments on ALJ Ruling, at p. 2, Crown Castle Fiber LLC Comments on ALJ Ruling, at p. 4, Walmart INC Comments on ALJ Ruling, at p. 6, Voltera Power LLC Comments on ALJ Ruling, at p. 6, CALSSA Comments on ALJ Ruling, at p. 6, and PACT Comments on ALJ Ruling at p. 14.
[8] Tesla Response to ALJ Ruling, at p. 2-23.
[9] Industry Coalition Response to ALJ Ruling, at p. 2-3.

development will occur and prep for potential energization applications.[10] This may require additional staff, as will significantly reducing energization timelines and abiding by adopted timelines. Likewise, the Clean Coalition has proposed in the High DER proceeding that the IOUs should proactively acquire resources that have held up deployments of grid upgrades in the past, such as transformer shortages. While we understand that alternative pathways are being created to overcome past resource bottlenecks, procuring infrastructure materials that are likely to be used can be viewed as a "least-regrets" investment approach that will in turn reduce the timeframe for completing infrastructure upgrades necessary to finish the energization process.[11] Lastly, part of the process of adopting timelines should include a clear process for handling material changes to applications or curing deficiencies. Not all applications will be perfect at the outset, and including an amendment process is more efficient than forcing an application to drop out of the queue and resubmit at a later date. Therefore, we agree with Cal.net that that Commission should, "provide clear and uniformly applied requirements for electric power applications, and if there is a deficiency, to provide timely and clear responses on how to modify a power application."[12]

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments and looks forward to continuing the dialogue on ways to streamline energizations, including adopting standard timelines.

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[10] *Ibid*, at p. 5.
[11] *Ibid*, at p. 4.
[12] Cal.net Response to ALJ Ruling, at p. 3.