

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Establish
Energization Timelines

Rulemaking 24-01-018

**CLEAN COALITION COMMENTS ON PROPOSED DECISION ESTABLISHING
TARGET ENERGIZATION TIME PERIODS AND PROCEDURE FOR CUSTOMERS
TO REPORT ENERGIZATION DELAYS**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Rules of Practice and procedure of the California Public Utilities Commission (“the Commission”), the Clean Coalition respectfully submits these comments in response to the *Proposed Decision* (“PD”) *Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays*, issued on August 12, 2024, and the *Email Ruling Partially Granting the Joint IOUs’ Request for an Extension of Time to File Reply Comments*, issued on August 26, 2024.

The PD seeks to set targets in compliance with Assembly Bill (“AB”) 50 and Senate Bill (“SB”) 410, which require the creation of targets for all types of energizations as well as mandate that the investor-owned utility (“IOU”) companies not up to date with energization requests must address the backlog in a timely manner. Each IOU that has energized less than 35% of completed energization requests by January 31, 2023, must demonstrate that 80% of completed requests have been energized by December 1, 2024. Completing energization requests in a timely manner is critical for successful building and transportation electrification. Failing to implement a streamlined process with clear targets puts the likelihood of achieving California’s climate and energy goals in jeopardy and may also hamper economic growth. Therefore, the implementation of average and maximum targets for energizations requests using Rule 15, 16, 15 & 16, and 29/45 is a welcome step forward that should ensure customer requests are answered within a reasonable amount of time. The target time periods adopted by the Commission should be implemented immediately, to promote timely energizations by all three IOUs as soon as possible. Clean Coalition appreciates the work that has been put into the development of the PD and supports the effort, though we have a few recommendations for changes that will maximize the impact of the PD.

- The maximum target time period for completing a main panel upgrade should be decreased from 60 days to 45 days, based on party recommendations.
- The PD does not comply with Public Utilities Code (“PUC”) Section 932(a)(9) and 933(e) by addressing the need for an appropriately sized and qualified workforce capable of handling energization requests without delays.
- The Commission should incorporate the idea of partial submissions to increase the lead time that the IOUs have for large load projects.
- The PD does not comply with PUC § 934(a)(1) by setting timelines for upstream capacity upgrades based on averages rather than target time periods.

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. **The maximum target time period for completing a main panel upgrade should be decreased from 60 days to 45 days, based on party recommendations.**

One of the most common upgrades associated with electrification, related to the installation of solar panels, energy storage, other DER, or increasing capacity to handle building electrification, is a main panel upgrade (“MPU”). In accordance with SB 410, the PD includes an average timeline of 30 days for an MPU. The Clean Coalition concurs that an average timeline of 30 days is reasonable. The PD then notes that CalBroadband recommends a maximum of 45 days, which

is a 50% increase from the average timeline of 30 days.¹ In the Findings of Fact, the PD sets a maximum target of 45 days, which the Clean Coalition supports.² However, number two of the Ordering section sets a maximum of 60 days, seemingly conflicting with the Conclusion of Law.³ Clean Coalition believes that for the state to achieve its climate and energy goals, efficiently conducting MPUs is of paramount importance. A maximum target of 60 days is excessive; allowing double the average time in some circumstances is needlessly lenient and may result in an unreasonable cost burden on residential customers and building owners alike. We urge the Commission to adopt a maximum target of 45 days as written in the Conclusion of Law and appropriately amend the Ordering paragraph.

B. The PD does not comply with Public Utilities Code (“PUC”) Section 935(a) by addressing the need for an appropriately sized and qualified workforce capable of handling energization requests without delays.

The PD takes important steps forward by setting average and maximum timelines for different types of energization requests before a project is considered “overdue” and reporting requirements to make sure that remedies are provided when targets are missed. However, one the question of ensuring that each IOU has the appropriate number of dedicated staff and a qualified workforce, as required by SB 410, is not adequately addressed. While the IOUs provided data to Energy Division staff about what the existing energization timelines are, the question of why energizations requests are not currently being approved at a faster rate has not been answered. The lack of clear timelines to provide sufficient motivation may be part of the solution, in which case the adoption of this PD should help jumpstart the rate of successful energizations. However, PUC § Section 935(a) and requires the Commission to consider the ability of the IOU’s workforces, which is the other side of the equation. According to PUC § 935(a), the Commission should specify that annual reporting must contain information on current levels of staffing and required staffing levels necessary to meet adopted energization targets.

¹ PD, at p. 33.

² PD, at p. 71.

³ PD, at p. 79 and page 33.

C. The Commission should incorporate the idea of partial submissions to increase the lead time that the IOUs have for large load projects.

Clean Coalition continues to support the adoption of a “partial submission” process as raised by the Industry Coalition.⁴ The Industry Coalition describes this option as an SCE proposal for the “utility to analyze a specific project based on a reduced set of submittal requirements.”⁵ For projects that have a long lead time and/or have a large load—such as medium and heavy-duty charging fleets—the IOUs may need multiple years to plan in advance and prepare for new wires and substation upgrades. Substation upgrades can take upwards of five years and completing a new substation close to nine years, making it difficult to line the timeframe of a business planning a development with the actual timeline required to conduct the upgrades. We see this option as a way for developers to determine the feasibility of a project in concert with the utility as the details become available, rather than waiting until every part of a project is worked out to approach the utility only to learn that the energization timeline will render the plan unworkable.

D. The PD does not comply with PUC § 934(a)(1) by setting timelines for upstream capacity upgrades based on averages rather than target time periods.

In the PD, the Commission sets targets for other types of energizations based on Electric Tariffs but chooses not to do so for upstream upgrades due to the additional complexity and unpredictability of distribution upgrades as well as the lack of data from the IOUs.⁶ While this approach is understandable given the shortcomings of the record, setting timelines is inconsistent with the plain language in PUC § 934(a)(1), which requires the Commission to “establish reasonable average and maximum target energization time periods,” that, “ensure that work is completed in a manner that minimizes delay in meeting the date requested by the customer to the greatest extent possible and prioritizes work in a manner consistent with Sections 932 and 933.” These target time periods must include the time required for grid upgrades as laid out in PUC § 932(a)(5), which states, “To improve the speed at which energization and service upgrades are performed, each electrical corporation that distributes electricity must improve its advance planning, engineering, and construction of increased distribution and transmission system

⁴ Clean Coalition Reply Comments on ALJ ruling, at p. 5.

⁵ Industry Coalition Response to ALJ Ruling, at p. 2-3

⁶ PD, at p. 35.

capacity.” The timelines in the PD for upstream grid upgrades are based on existing average data—though not from all three IOUs. Basing a timeline on the status quo does not effectively minimize delays, it simply allows the continuation of a business-as-usual approach. Clean Coalition contends that complying with SB 410 requires the creation of target time periods to increase efficiency, not just the creation of a loose timeline that does not result in any real change. If the Commission determines that creating target time periods is not possible at this time, the PD should reflect that determination, and the issue should be scoped into Phase 2 of the proceeding. Clearly more data is required as is a debate on the voracity with which the IOUs can reasonably speed up the process to help ensure California achieves its climate and energy goals.

IV. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these comments on the PD. We urge the Commission to clarify that the maximum target time period for MPUs is 45 days not 60 days, address the need for information on IOU workforce size and ability, implement Partial Submissions, and address the need for target time periods for upstream grid upgrades. If not possible prior to the adoption of this PD, the Commission should clarify that the work will be completed in Phase 2 of this proceeding.

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Appendix – Recommended Changes

Finding of Fact:

“Collecting and analyzing data regarding the large electric IOU’s compliance with the targets established in Section 7 of this decision, Energization Targets, and workforce qualifications and levels, is critical to the Commission’s ability to support the energization processes.”

“Adopting a Partial Submission process for each of the IOUs will better enable cohesion between the development process for large load projects and the required time to conduct upstream grid upgrades.”

Ordering Section:

2. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (the large electric investor-owned utilities (IOU)) shall complete all work necessary to implement a main panel upgrade within an average of 30 business days and a maximum of ~~60~~ 45 business days.