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

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| Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future. | Rulemaking 21-06-017<br>Filed June 24, 2021 |

# CLEAN COALITION COMMENTS ON PROPOSED DECISION

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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 on the *Proposed Decision* ("PD") *Adopting Improvements to Distribution Planning and Project Execution Process* ("DPEP"), *Distribution Resource Planning Data Portals, and Integration Capacity Analysis* ("ICA") *Maps*, issued on September 13, 2024. The PD adopts significant amendments to the DPEP and ICA Data Portals, with the intention of more effectively facilitating the process of electrification. Achieving California's climate and energy goals requires efficient processes for forecasting load growth, siting and interconnecting distributed energy resources ("DER"), and conducting needed grid upgrades to support increased reliance on electricity. Clean Coalition is supportive of many of the steps that the is Commission is poised to take, especially those in the DPEP related to better integrating equity considerations, increasing the planning horizon, increasing community engagement, using bottom-up load data, incorporating load flexibility, and adding consideration of pending loads. However, Clean Coalition strongly believes that the Commission should investigate measures that have the potential to reduce grid upgrades, increase flexibility, and otherwise put downward pressures on rates while enabling fair compensation for DER deployments. This PD chooses to shift the focus of the distribution investment deferral framework ("DIF") away from DER deferral toward transparency and general distribution upgrades. We encourage the Commission not to lose sight of the value that DER deferral can bring to the ratepayers and request that language should be added to the PD proposing consideration of DER deferral in the interconnection process. An energy storage project, load flexibility, or a Community Microgrid deployment can be well suited to reduce the hosting capacity in certain locations of the distribution grid or may put off the need to upgrade a transformer. While the successes have been limited, so too have the

opportunities, and the criteria for participation quite stringent. But when successful, the record demonstrates that the value provided in the form of ratepayer savings is demonstrable. If the issue is never pursued, the ratepayers will be the big losers, in the form of higher rates due to increasing numbers of grid upgrades.

On the subject of refining the ICA data portals, we appreciate that Staff and the Commission have been receptive to some of our suggestions on improving the usability of the ICA maps, providing stakeholders a clear and consistently updated list of problems, creating a venue to address issues, and incorporating the limited generation profiles ("LGP"). Making the ICA Data Portals easier to use and the information provided clearer has the potential to result in fewer interconnection application withdrawals. Yet, major problems remain unaddressed. These fundamental issues are prohibiting the use of both Generation and Load ICA as a consistent and reliable tool for the use cases adopted by the Commission seven years ago.[1] Creating pathways to note existing inaccuracies and potential solutions is important, albeit of secondary importance to ensuing that the needed solutions are actually implemented, applied in a timely manner, and that the problem is resolved systemwide by eliminating the underlying cause of the issue in the model. While cosmetic upgrades to the ICA data portals will increase usability, developers will only rely on the data portals if the underlying data is accurate and granular, and both the models and the results are validated. Moreover, monthly updates for circuits where an upgrade or DER interconnection has occurred and in 15 days when prompted by a Rule 21 interconnection request must be conducted in the required timeframes, in accordance with previous Decisions by the Commission. Until the investor-owned utilities ("IOUs") are held accountable and required to comply with past ICA-related Decisions, the Commission's future orders will be less effective than expected.

The inability to trust ICA data, especially Load ICA data, is leading to developers relying on paying to submit interconnection applications to get trustworthy applications, fully realizing that the vast majority of submissions will likely be withdrawn. This process—of submitting initial applications to get accurate information—is an unnecessary use of both developer and utility resources. Yet, the PD does not include any comprehensive process that will remedy the issue by ensuring that ICA data is consistently accurate. And while having a forum dedicated to raising

[1] The use cases adopted in D. 17-09-026 include facilitating a streamlined and transparent interconnection process and informing siting decision.

ICA-related issues is important, knowing that the conversation and implementation process will be conducted in a transparent manner, rather than a closed-off discussion between the investor-owned utility ("IOU") and Energy Division staff that cuts off participation by other stakeholders remains a major concern. The record includes clear documentation of these substantive issues by numerous parties and the PD should be amended to require solutions be implemented in a timely manner. We recommend:

- The PD should be amended to include discussion of foundational flaws with the ICA Data Portals raised by parties in comments.
- The Commission should reiterate that the IOUs must update circuits that have been upgraded or where DERs have been interconnected monthly, and update data in 15 days when prompted by a Rule 21 interconnection request.
- The Commission should reiterate that the ICA Data Portals must be usable for interconnections and energizations. The standard should be "actionable" data.[2]
- Southern California Edison should be required to address all known ICA issues within one year of a Decision.
- Each IOU should validate ICA results to ensure that zero values are not erroneous and limiting factors are the result of actual grid constraints.
- Each IOU must update the model inputs to ensure that ICA results represent the most up to date grid conditions from the current calendar year.

## 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 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

[2] Green Power Institute Opening Comments on Staff Proposal, at p. 10. "In order to improve the actionability of the Load and Generation ICA the CPUC should revisit the intended ICA capabilities, as well as revisit, revise and potentially develop new use cases. Defining use cases should be part of defining "actionability."'

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. Southern California Edison should be required to address all known ICA-related issues identified in quarterly reports within one year of the passage of this decision.

As written, the PD does not address the detailed record that has been developed detailing the major flaws with Southern California Edison's ("SCE") ICA Data Portals. The PD must be corrected to include extensive part comments and require the implementation of a solution as soon as possible. SCE's ICA data portals are plagued with issues, from a majority of circuits containing zero hosting capacity for new loads,[3] to circuits that have not been refreshed in years,[4] to a failure to provide any information on Generation hosting capacity for around 30% of all circuits.[5] When compounded, these shortcomings make the data portals difficult to rely on at for siting of either new load or generation, let alone for consistent usage in the interconnection process. This represents a clear failure to comply with requirements set by the Commission in D. 17-09-026.[6] While the Commission had an expectation at the time that refining the ICA data portals and ensuring that the quality improved to the point of consistent usability might take a year or more, the fact that seven years have gone by, and substantial issues remain is a major concern. The Clean Coalition strongly believes that the Commission must address SCE's ICA shortcomings since improving the viability of the ICA is a central theme of the PD. Other parties have concurred throughout the comment process, with IREC proposing that the Commission should require SCE to fix all known issues within one year of a Decision being adopted.[7] The Clean Coalition continues to support IREC's recommendation.[8] The PD should be amended to reflect the record that demonstrates clear deficiencies with SCE's data portals and require SCE to make the needed changes to be in compliance with the Commission's determinations. The PD notes that the data portals are intended to, "(1) to further the Utilities' efforts to support customer

[3] Interstate Renewable Energy Council ("IREC") Opening Comments on Staff Proposal, at p. 11.
[4] Clean Coalition Comments on Staff Proposal, at p. 5.
[5] California Solar and Storage Alliance ("CALSSA") Opening Comments on Staff Proposal, at p. 2.
[6] See D. 17-09-026, at p. 27-28.
[7] IREC Opening Comments on Staff Proposal, at p. 4.
[8] Clean Coalition Reply Comments on Staff Proposal, at p. 7.

use of clean energy technologies; (2) to assist the Commission in streamlining the interconnection process; and (3) to help California meet its clean energy goals."[9] Fundamental flaws exist in SCE's data portals that prevent each of these three aspects from being achieved across SCE's service territory; we therefore reiterate that making cosmetic changes such as requiring SCE to include a descriptive x-axis to load profiles is ineffective without first having accurate underlying data. Inaccurate models and fault results render a tool unworkable. Substantial changes are needed, and the Clean Coalition urges the Commission to correct the PD to reflect the record and ensure that SCE addresses these issues, ideally within the next year.

### B. ICA results should be validated to ensure accuracy and identify potential issues in the model.

The PD notes, "the Staff Proposal maintains that not all zero and low hosting capacity scores require distribution upgrades,"[10] and recommends increasing the amount of information provided about the limiting criteria. The Clean Coalition appreciates that this step is being taken and supports the proposal as necessary to improve the workability of the ICA maps for developers. However, the fact that there are limiting factors that may not require grid upgrades and false zero values that suggest no hosting capacity is available on a circuit when hosting capacity does exist suggests that there is a need to validate the ICA results. Requiring reporting on all annual refinements—another valuable step—does not go as far as ensuring that the model's outputs reflect actual grid conditions. The ICA values should be as up to date as possible and as close to the results of a study conducted by a utility engineer as is feasible. Large percentages of zero values and/or other incorrect outputs may point to yet unidentified errors in the inputs or model itself that should be corrected. The PD should reflect the Clean Coalition's request to require the IOUs to:

- Conduct a circuit-by-circuit analysis to update feeder load profiles, removing outdated information to improve data inputs.
- Conduct an analysis of model outputs to validate the results for accuracy.
- Ensure that ICA data is refreshed if inaccuracies are detected due to an interconnection application, update information monthly, and refresh once annually.

[9] PD, at p. 6
[10] *Ibid,* at p. 133.

- Make data results available in a transparent fashion so stakeholders may conduct their own analysis without having to go through the data request process.[11]

Doing so will help promote accurate and granular ICA Data Portals, capable of achieving the use cases envisioned by the Commission in D. 17-09-026. In addition, with accurate results, the Commission will have the ability to consider new use cases.

### C. The Commission should implement enforcement measures to ensure compliance with past Decisions and this one.

In D. 17-09-026, the Commission clearly stated that the ICA data portals are being developed for use in siting DER, interconnection of resources, and distribution planning. In some cases, the lack of accurate data is preventing this from occurring, an issue that has not been sufficiently addressed over the last seven years, while in other cases the lack of timely data refreshes is the culprit. For example, an investigation by IREC found that PG&E is not incorporating ICA in Screen M and N of the Rule 21 interconnection process,[12] as is required by the Commission in Resolution E-5172. While this issue was raised in the first Interconnection Discussion Forum ("IDF") in 2024, the IDF is an informal process, lacking the binding resolution of a Commission Decision that can ensure a solution is implemented. Also revealed in the first IDF, SCE reported the issue of its exclusion criteria resulting in no outputs for 30% of total circuits on the system. We appreciate that SCE is choosing to submit quarterly progress reports to promote transparency. However, the larger issue remains; the IOUs are only required to report refinements annually and implementing solutions at their own pace. When issues are raised by stakeholders, there is no process to ensure that the problem is addressed a timely manner or that stakeholders are included in conversations about the development of solutions. This PD does address the need for timely reporting on any and all ICA-related issues with the adoption of quarterly reports. The Clean Coalition lauds the choice to suggest a reporting framework in the staff proposal and supports the Commission's logic in expanding the scope of the initial proposal to include quarterly reports. Quarterly reports will be an important step forward in promoting transparency and accountability. Yet, it is necessary to accompany a reporting requirement with some sort of compliance mechanism to enforce the need for timely implementation of solutions.

[11] Clean Coalition Opening Comments on Staff Proposal, at p. 6.
[12] IREC Comments on Staff Proposal, at p. 26.

At present, the IOUs do not have a clear reason to move forward in developing refinements with urgency, often leading to extended timelines for the rollout of solutions. The PD should be amended to reflect party comments on this subject. For example, Green Power Institute ("GPI") proposed turning the ICA data portals over to a third party. Given GPI's extensive involvement with the development of the ICA, it is appropriate for the Commission to consider this suggestion. Likewise, many parties proposed the development of an ICA Working Group,[13] which would meet more regularly than a quarterly workshop. Lastly, the Commission may consider a clearer penalty, such as a monetary penalty in the form of revoking cost recovery for IOUs that fail to comply with Commission Decisions.[14] With numerous parties making comments in both opening and reply comments on the Staff Proposal, it is reasonable for the PD to include a discussion on the subject.

## IV. CONCLUSION

The Clean Coalition appreciates the opportunity to comment on the PD. We urge the Commission to make modification to the PD that address more fundamental issues of data inaccuracies and the need for swift solution implementation, including an enforcement mechanism to ensure that the IOUs are properly complying with past Commission Decisions.

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[13] Parties supporting an increased flow of information include IREC, CALSSA, VGIC, GPI, and Cal Advocates.

[14] See IREC Comments on Staff Proposal, at p. 15 and 25.

Recommended Findings of Fact

- The limiting criteria on a circuit impacts the ability to site a generating resource or new load in a particular location without incurring an additional cost.
- 26. The ICA maps, not the Interconnection portal, assist customers in determining optimal location siting <u>if the data is accurate</u>.
- The ICA data portals are currently insufficient to provide accurate and actionable data that can be used in siting and interconnection of both resources and loads.
- At least one third of the circuits in SCE's ICA data portals currently have zero values because the data is considered "unavailable".
- Developers looking to site new loads such as EV chargers are unable to rely on the Load ICA Data Portal for accurate information on the existing state of the distribution grid.
- In D. 17-09-026 the Commission required that the ICA data portals be capable of use in siting and interconnection of DER.
- The availability of accurate and granular ICA data portals is critical to enable California to meet climate and energy goals in a timely manner.

Recommended Conclusions of Law

<u>(55) It is reasonable to require that ICA data is downloadable through the API.</u>

<u>(56) It is reasonable to require PG&E to enable bulk download of ICA and DIDF map data in several formats.</u>

<u>(57) It is reasonable to require SCE to implement solutions for all known ICA issues in one year following the adoption of this Decision.</u>

<u>(58) It is reasonable to reaffirm that SCE, SDG&E, and PG&E must update ICA data monthly for circuits that have been upgraded or where DERs have been interconnected, and update data in 15 days when prompted by a Rule 21 interconnection request.</u>

<u>(59) It is reasonable to require that SCE, SDG&E, and PG&E must validate all ICA results to ensure that zero values are not erroneous and limiting factors are the result of actual grid constraints.</u>

<u>(60) It is reasonable to require SCE, SDG&E, and PG&E must update the model inputs to ensure that ICA results represent the most up to date grid conditions from the current calendar year.</u>

# Appendix A

**Excerpts from D. 17-09-026**

1. "We agree with the Working Group that ICA results can be used to inform interconnection siting decisions and to facilitate a streamlined and transparent interconnection process, and adopt the ICA interconnection streamlining and online map use case." (27)
2. "In the near-term, ICA results may be used to identify grid locations facing hosting capacity constraints in light of DER growth scenarios that would be candidates for grid upgrades to accommodate projected DER growth. In the future, ICA results may guide sourcing and procurement of DER solutions in specific locations with available hosting capacity and locational value." (28)
3. "We echo the Working Group's consensus (Table 1, Item 8) that ICA values should be adequately representative to inform a DER developer's project design and siting for use in the interconnection process…" (30)
4. "For the initial implementation of ICA for interconnection purposes, we order the IOUs to update ICA results for changed circuits (i.e. circuits that have been upgraded or have new DER interconnections) on a monthly basis (Table 1, Item 9). The Commission can revisit this update frequency determination once the IOUs and developers have gained sufficient experience utilizing monthly-updated ICA results as part of the Rule 21 interconnection process." (30-31)

Conclusion of Law:

3. "The Integration Capacity Analysis use cases for online maps and interconnection streamlining, as well as for distribution planning, should be adopted." (57)

Ordering Paragraph:

5. "IOUs shall calculate ICA values with and without the No Reverse Flow at Supervisory Control and Data Acquisition Devices constraint for initial system-wide rollout in the same way they modeled these scenarios in Demo A." (59)