

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

Order Instituting Rulemaking to Modernize the
Electric Grid for a High Distributed Energy
Resources Future.

Rulemaking 21-06-017
Filed June 24, 2021

**CLEAN COALITION REPLY COMMENTS ON THE PROPOSED DECISION
ADOPTING IMPROVEMENTS TO DISTRIBUTION PLANNING AND PROJECT
EXECUTION PROCESS, DISTRIBUTION RESOURCE PLANNING DATA PORTALS,
AND INTEGRATION CAPACITY ANALYSIS MAPS**

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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 reply 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 Commission should implement the Interstate Renewable Energy Council’s (“IREC”) recommendation to institute a binding 18-month timeline for correct any ICA deficiencies identified in quarterly workshops.
- Investor-Owned Utility (“IOU”) requests to reduce the number of workshops or reports will reduce much-needed transparency and should be denied.
- The public and ICA users should be notified if a major ICA issue is identified that will impact results.
- We support Green Power Institute’s (“GPI”) recommendation that the Commission should clarify venues and timelines for ICA-related reforms to be conducted in the Rule 21 proceeding (“R. 17-07-007”).
- The Commission should adopt the Vehicle-Grid Integration Council’s (“VGIC”) proposal to create Limited Load Profile and integrate them into the ICA maps.
- Clean Coalition supports Vote Solar’s proposed equity metrics (number of CARE/FERA customers, CalEnviroscreen 4.0, and whether a facility serves a disadvantaged community).
- We agree with GPI and Small Business Utility Advocates (“SBUA”) that the Distribution Upgrade Projects Report should consider integration of Distributed Energy Resources (“DER”) and other non-wires alternatives.
- Advanced Energy United is correct that bridging strategies do exist for long-term scalable load management and that Finding of Fact #14 should be deleted.

- The Commission should clarify that a consultant will be responsible for conducting the Electrification Impacts Study (“EIS”) Part 2.
- We support GPI’s request to include DER integration in the Distribution Investment Deferral Framework (“DIDF”) and SBUA’s request to consider other non-wires alternatives in the DIDF.¹

II. COMMENTS

A. The Commission should require a binding 18-month timeline to implement solutions following ICA workshops.

As IREC correctly points out, in instances when no deadlines have been put in place to correct ICA deficiencies, the IOUs have had the ability to drag their feet, often only taking action when publicly prompted by stakeholders.² In this PD, the Commission very clearly recognizes the important role that the ICA data portals must play to achieve state climate and energy goals in siting and interconnection of DER. Requiring quarterly reporting and workshops is an important step forward, one that the Clean Coalition is strongly supportive of, but the additional effort is only worthwhile if it is followed up by tangible progress to remedy the errors and deficiencies that are identified in a timely manner. As has become clear over the last few years, issues raised with the ICA are often major in scope, impacting the core functionality of the tool, rather than smaller issues that can be refined and implemented over a number of years. An 18-month binding timeline gives the IOUs enough time to develop and apply solutions without being overly restrictive.

B. IOU requests to reduce the number of workshops or reports will reduce much-needed transparency and should be denied.

Clean Coalition disagrees with the IOUs that the number of reports or workshops is onerous and should be reduced.³ SCE describes having “concerns”, but never provides specific on what the concerns. Like PG&E and SDG&E, the only issue raised with the proposed schedule is the availability of staff time. If anything, the IOU argument raises the need to consider additional staff and computing resources, not reducing proposed reporting. Likewise, SDG&E’s argument

¹ GPI Comments on PD, at p. 15-16 and SBUA Comments on PD, at p. 6.

² IREC Comments on PD, at p. 6.

³ SCE Comments on PD, at p 6, SDG&E Comments on PD at p. iv, and PG&E Comments on PD at p. 6-7.

that quarterly reports may cause stakeholder fatigue⁴ should not be accorded any weight by the Commission. As a stakeholder that has been involved in the process of refining the ICA maps over the last seven years, the Clean Coalition can confidently say that repeating comments about needed refinements and seeing issues go unsolved leads to far more fatigue than quarterly reports about **all** ICA-related problems and identified solutions ever will. The lack of progress toward ensuring that the ICA data portals are accurate and actionable justifies the clear need for workshops and quarterly reporting. Insufficient oversight and transparency surrounding the process of identifying ICA-related problems and implementing solutions have led to progress that occurs at a snail's pace, often two steps forward and one step back when a new issue crops up. We strongly support the Commission's decision to increase reporting and require workshops to ensure that all ICA-related issues are raised publicly and can be addressed. At this time, there is no indication that reducing the proposed number of reports and workshops is a prudent solution. The Commission should first implement the schedule and verify compliance before considering evidence of duplicative efforts or approving the IOU's request.

C. The public and ICA users should be notified if a major ICA issue is identified that will impact results.

IREC and GPI both raise the issue of requiring the IOUs to notify ICA users and the relevant service lists about issues that impact ICA results.⁵ SCE used this tactic during an 8 month ICA update with a popup to informed users that the ICA results may not be accurate or dependable for making siting decisions, albeit not in the 48-hour time period that IREC is requesting. The Clean Coalition supports this option as important for the sake of transparency and to increase user trust in the results of the tool. We urge the Commission to adopt IREC's proposal.

D. Clean Coalition supports GPI's recommendation that the Commission should clarify venues and timelines for ICA-related reforms to be conducted in the Rule 21 proceeding.

Changes to the ICA methodology, particularly the use case surrounding the utilization of ICA in the Rule 21 interconnection process will be required in the future. In the past, R. 17-07-007

⁴ SDG&E Comments on PD, at p. 12.

⁵ IREC Comments on PD, at p. 10 and GPI Comments on PD, at p. 16.

has been the proper forum for these discussions, such as the adoption of Proposal 8 and subproposals from the Working Group 2 & 3 reports in D. 20-09-035. However, the proceeding has been largely inactive almost two years, with no indication that the hiatus will be ended anytime soon. Clean Coalition referenced this issue in comments on the Staff Proposal.⁶ We agree with GPI that the Commission should issue guidance here, or as a joint ruling with the judge for R. 17-07-007. The efforts made in this proceeding toward improving the ICA data portals, but there is value in having a venue to consider some of the more granular changes on how to incorporate ICA into the interconnection process.

E. The Commission should approve the creation of a Limited Load Profile for use in the ICA.

Rollout of the Limited Generation Profile pilot is still occurring, adopted by the Commission on the premise that DER can reduce exports in response to grid conditions to avoid otherwise necessary distribution upgrades. The same is true for loads if a power control system has been deployed at a site. While the energization proceeding (“R. 24-01-018”) may consider standards for partial energizations following a Motion by Enphase Energy, the subject of ICA refinements remains within the scope of this proceeding. Therefore, Clean Coalition supports VGIC’s proposal⁷ to develop a Limited Load Profile that can be integrated with the Load ICA tool. A Limited Load Profile is an extension of the original ICA use cases envisioned by the Commission, which will increase the usability of the data portals. We recognize that this request is likely to be a long lead time issue and success will be incumbent on the availability of accurate and granular Load ICA data.

F. The Commission should clarify that a consultant will be responsible for conducting the EIS Part 2.

Numerous stakeholders note confusion or concerns surrounding the assignment of an EIS Part 2 to the IOUs. The Utility Consumers Action Network (“UCAN”) notes that the Order Instituting Rulemaking clearly identifies that a consultant will conduct the study and allocates

⁶ Clean Coalition Reply Comments on Staff Proposal, at p. 7.

⁷ VGIC Comments on PD, at p. 6.

funds to hire a consultant.⁸ Vote Solar recommends that Kevala continue the development of the report.⁹ Based on participation in this proceeding and accompanying workshops, Clean Coalition has been led to believe that Kevala is responsible for authoring the study, and unless the Commission has changed that position via Ruling or Order, we request clarification on the intended author. In addition, we support the request raised in the comments of Environmental Defense Fund and Natural Resources Defense Council (“EDF/NRDC”) to provide stakeholders an opportunity to review and comment in a workshop before and after the study is completed.¹⁰ Advanced Energy United also requests that the PD be amended to allow stakeholder the opportunity to provide input on the goals/methodology of the study.¹¹ Given the party requests, Clean Coalition proposes the Commission clarify that Kevala will complete the study, require workshops before & after, and allow parties to provide input prior to the study being conducted.

III. CONCLUSION

The Clean Coalition appreciates the opportunity to submit reply comments on the PD. We support many of the ICA and DPEP changes proposed by the Commission and urge the adoption of a few more stringent proposals including requiring a binding timeline of 18 months following a quarterly ICA workshop.

Respectfully submitted,

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⁸ UCAN Comments on PD, at p. 2-3.

⁹ Vote Solar Comments on PD, at p. 6.

¹⁰ EDF/NRDC Comments on PD, at p. 6.

¹¹ Advanced Energy United Comments on PD, at p. 6.