

**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

**MOTION OF CLEAN COALITION TO COMPEL FURTHER RESPONSES FROM
SOUTHERN CALIFORNIA EDISON COMPANY TO DATA REQUEST CC-SCE-
DRPEP-01, QUESTIONS 6 AND 7**

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I. INTRODUCTION

Pursuant to Rule 11.3 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, Clean Coalition respectfully submits this Motion to Compel (“Motion”) and requests that the Commission compel Southern California Edison Company (“SCE”) to provide further responses to Clean Coalition Data Request CC-SCE-DRPEP-01, Questions 6 and 7. Questions 6 and 7 seek hourly, machine-readable 8760 load data (“8760 data”) for the Goleta-area substation facilities identified in the request, including both the most recent 12 months of available hourly data and historical 2024 hourly data.

The requested data are relevant to both Track 1 and Track 2 of this proceeding. Track 1 explains why the request arose: SCE disclosed that the megawatt (“MW”) values shown in the Distribution Resources Plan External Portal (“DRPEP”) substation load-profile visualizations and downloads did not accurately reflect actual substation load conditions. The Commission has required transparency regarding Integration Capacity Analysis (“ICA”) inaccuracies and missing or erroneous ICA values, and SCE’s own July 31, 2026 Biannual ICA and Data Portal Report confirms that the DRPEP substation load issue was an ICA/Data Portal data-quality issue.

Track 2 independently confirms the relevance of the same data. The Commission is considering distribution system operator (“DSO”) operational needs, distributed energy resource (“DER”) orchestration, open access to the distribution system, DER visibility, DER dispatchability/control, and reliability coordination at the transmission-distribution (“T-D”) interface. Hourly, location-specific load data is a factual baseline for evaluating where local grid needs arise, when they occur, whether they are persistent or recurring, and what data access is necessary for DERs and flexible loads to provide verifiable grid services.

SCE has refused to provide the requested data based on objections including scope, prematurity, precedent, burden, substitute 576-profile data, and customer-confidentiality and

15/15 Rule (“15/15”) concerns. None justifies categorical withholding under Rule 10.1. SCE acknowledged during the meet-and-confer process that data-sharing questions, timing and location of grid needs, and DER orchestration use cases are relevant Track 2 issues. SCE also did not quantify a burden, did not identify an adequate hourly substitute, did not identify a concrete mitigation path for confidentiality concerns, and did not explain when the request would become ripe if not now. SCE also stated that its team had already “produced the data” internally before management review determined that the data should not be released.

Clean Coalition granted SCE two extensions, provided additional use-case detail at SCE’s request, offered to discuss narrowed production and reasonable protections, participated in two meet-and-confer discussions, and provided written recaps. SCE nevertheless maintained its objections and did not provide a concrete production path. Clean Coalition therefore requests that the Commission compel SCE to produce the requested hourly, machine-readable 8760 load data, subject to reasonable protections if necessary, within ten calendar days of a ruling granting this Motion.

II. DESCRIPTION OF PARTY

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. Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of DERs—such as local renewables, demand response, and energy storage—and establishes market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that demonstrate the benefits of local renewables and other DERs.

III. FACTUAL AND PROCEDURAL BACKGROUND

A. The Requested Data Is Relevant to Both Track 1 and Track 2

In Decision 24-10-030, the Commission adopted quarterly ICA public workshops “including but not limited to inaccuracies,” and required the utilities to describe, “all known issues related to ICA accuracy and missing or erroneous ICA values, for both Generation and Load ICA,” in

biannual reports.¹ The Decision aimed to set conditions to foster transparency and accountability surrounding the implementation and accuracy of the ICA and maps by ensuring that all known issues are being identified and addressed.

The Assigned Commissioner's Amended Scoping Memo and Ruling Track 2 section on Distribution System Operational Needs and System Operator Roles and Responsibilities offers the following questions:

- What are the operational needs necessary to efficiently operate a high DER grid, unlock economic opportunities for DERs to provide grid services, limit market power, reduce ratepayer costs, increase equity, support grid resiliency, and meet State policy objectives?
- What are the existing gaps and barriers in achieving the needs identified above within our current Distribution System Operator (Utilities)? What are the potential solutions in overcoming these barriers?²

The March 23, 2026 Assigned Commissioner's Ruling on Track 1 and Track 2 DER

Orchestration then proposed a process under which each IOU would file an application to develop an investor-owned utility ("IOU") DSO-led DER orchestration framework and set an April 29, 2026 workshop to discuss that framework.³ Together, these Commission directives make data accuracy, data access, and the ability to evaluate location-specific grid needs central issues in this phase of the proceeding.

The ruling further identifies five priority areas to guide the Track 2 DER Orchestration Framework: DER visibility to the DSO, DER visibility to CAISO, DER dispatchability/control, open access to the distribution system, and reliability coordination at the transmission-distribution interface. These priority areas directly implicate the type of hourly, location-specific data needed to evaluate where local grid needs arise, when they occur, whether they are persistent or recurring, and what data access is necessary for third-party DERs and flexible loads to provide verifiable grid services.

The requested data is relevant to both tracks, but in different ways. Track 1 explains why the request arose: SCE disclosed a public-facing DRPEP/ICA load-profile error in a proceeding where the Commission has required transparency regarding ICA inaccuracies and erroneous values. Track 2 explains why the requested information remains independently relevant even

¹ D. 24-10-030, at pp. 159-160.

² R. 21-06-017 ASSIGNED COMMISSIONER'S AMENDED SCOPING MEMO AND RULING, August 11, 2023, at pp. 6-7.

³ R. 21-06-017 Assigned Commissioner's Ruling on Track 1 and Track 2 Distributed Energy Resources Orchestration, March 23, 2026.

apart from the specific DRPEP correction: the Commission is considering DSO operational needs, DER orchestration, and the gaps and barriers that prevent DERs from providing grid services. Hourly load data is foundational to evaluating the timing, location, magnitude, duration, and persistence of those grid needs.

i. Track 1: ICA Accuracy and DRPEP Data Quality.

SCE submitted its ICA and Data Portal Biannual Report on February 2, 2026. The opening section of the Biannual Report references the Commission’s Decision, noting, “In addition, as directed in the Decision, this report provides a comprehensive overview and updates for all known issues related to ICA accuracy and missing or erroneous ICA values for both Generation and Load ICA.”⁴ The report goes on to describe solutions fully implemented in 2025, including an ICA Load Profile – Unit Toggle that allows users to toggle in the ICA Load Profile widget between megawatts (MW) and amps.⁵

The first Quarterly ICA workshop of 2026 was held on March 26, 2026. There was no discussion in SCE’s slides or the following conversation identifying any issue with substation MW load profiles. Clean Coalition does not contend here that SCE intentionally withheld the issue from either forum; rather, the absence of any discussion in those forums underscores why follow-up discovery was reasonable once SCE later disclosed the problem and why the origins, timing, and correction of the issue are relevant to the Commission’s adopted ICA transparency process.

SCE’s July 31, 2026 Biannual ICA and Data Portal Report confirms that the DRPEP substation load issue was an ICA/Data Portal data-quality issue. SCE reported that it “identified and corrected a defect in the amperage-to-megawatt conversion logic affecting certain DRPEP substation load profile visualizations and downloads,” while stating that the issue was limited to displayed MW values and was resolved with corrected outputs published on May 11, 2026.⁶

That later reporting does not undermine discovery relevance; it confirms it. The fact that SCE reported the issue as part of its ICA/Data Portal reporting obligations shows that public-facing ICA and DRPEP data accuracy, correction timelines, and stakeholder transparency are directly relevant to the proceeding. It also confirms that discovery into the timing, scope, correction, and

⁴ SCE ICA and Data Portal Biannual Report, R. 21-06-017, February 2, 2026, at p. i.

⁵*Ibid.*, at p. 3.

⁶ SCE ICA and Data Portal Biannual Report, R. 21-06-017, July 21, 2026, at p. 3.

stakeholder impact of the error is reasonably calculated to lead to admissible evidence regarding whether the Commission’s ICA transparency process is capturing, disclosing, and addressing known data-quality issues in a timely manner.

ii. Track 2: DSO Data Access and DER Orchestration.

Accurate, actionable distribution data is also central to Track 2. If public-facing data is incomplete or inaccurate, stakeholders cannot meaningfully assess where DER orchestration may provide grid value, and the Commission cannot fully evaluate the data-access gaps and barriers that affect DSO implementation.

The March 23, 2026 Assigned Commissioner’s Ruling on Track 1 and Track 2 DER Orchestration proposes a process under which each IOU would file an application to develop an IOU DSO-led DER orchestration framework.⁷ The ruling describes DER orchestration as a DSO function that uses visibility, forecasting, and control or scheduling tools to identify location- and time-specific distribution needs and signal eligible DERs, directly or through aggregators, to provide verifiable services aligned with those needs.

SCE’s April 20, 2026, Opening Comments on DER Orchestration identify the following as objectives of a DSO:

- Affordability through reduced capital investment.
- Acceleration of speed to power through maximizing utilization of distribution assets.
- Distribution system benefits (e.g., reduced peak) through targeted and measurable DER action.⁸

SCE’s comments place location-specific grid needs and measurable DER actions at the center of a utility-led DSO framework. SCE states that DER orchestration efforts should account for the “unique operational requirements of SCE’s distribution and subtransmission systems.”⁹ SCE also states that DER orchestration must “enable cost-effective grid services from DERs and flexible loads” that can serve as “least-cost, best-fit alternatives” to wires investments and must create “dependable, operationally reliable DER actions.”¹⁰

⁷ Assigned Commissioner’s Ruling on Track 1 and Track 2 DER Orchestration, R.21-06-017, March 23, 2026, at pp. 1, 5.

⁸ SCE Opening Comments on DER Orchestration, R. 21-06-017, April 20, 2026, at p. 2.

⁹ *Ibid.*, at p. 2.

¹⁰ *Ibid.*, at p. 3.

To evaluate the services SCE identifies—including distribution benefits, reduced capital investment, and dependable operational DER actions—parties and the Commission must be able to assess where and when local grid needs occur, whether those needs are persistent or recurring, what DER or flexible-load services could address them, and what data-access requirements are necessary for third-party DERs and flexible loads to participate in utility-led orchestration programs. Historical 8760 hourly load data is relevant to that inquiry because it shows the timing, duration, frequency, and persistence of local load conditions at specific grid locations.

SCE’s comments also reject use of Electrification Impact Study (“EIS”) Part 2 results to identify DER orchestration pilot locations and instead suggest that targeting can be based on “current grid needs identified in the annual planning process, as well as flexibility potential.”¹¹ SCE also raises the possibility of dispatches in shorter timeframes that can address same-day issues rather than only day-ahead forecasts. These statements further underscore that Track 2 requires a record on what data is needed to identify and prioritize locations where DERs can provide grid value, evaluate flexibility potential, and support dependable DER orchestration.

B. Discovery Request and Meet-and-Confer History

SCE emailed the R.21-06-017 service list on April 28, 2026, providing notice of the substation load-profile issue and stating that a solution should be implemented on DRPEP “within a week.”¹² Clean Coalition waited until after SCE’s stated implementation timeline had passed before initiating discovery.¹³

Clean Coalition issued discovery on May 6, 2026, with a proposed response deadline of May 20, 2026.¹⁴ Clean Coalition’s data request seeks to understand when the problem with incorrect MW substation values was identified, how the issue was identified, and the timeline for implementation of a solution. Questions 6 and 7 also seek historical 8760 hourly substation load data for the Goleta substation and downstream distribution substations serving the Santa Barbara region to help verify the implemented correction, evaluate the timing, duration, and persistence

¹¹ *Ibid.*, at p. 6.

¹² Appendix B, Attachment to Data Request, at pp. B-4–B-5.

¹³ Clean Coalition issued discovery one business day after SCE’s stated one-week implementation timeline had passed, or six business days/eight calendar days after SCE’s April 28 notice.

¹⁴ Appendix C, at p. C-21.

of local grid needs, and inform Track 2 questions regarding DER orchestration and DSO data requirements.¹⁵

During the meet-and-confer process, Clean Coalition clarified that the request is directed to the electrically relevant Goleta-area substation data necessary to evaluate both the transmission-distribution interface and downstream distribution conditions in the Santa Barbara region. The Santa Barbara region provides a bounded example for evaluating these questions because it is electrically constrained, geographically vulnerable, and associated with local reliability and resilience needs, making it useful for assessing how a DSO could identify and prioritize locations where DER orchestration may provide operational value.

On May 7, 2026, SCE requested a deadline extension from May 20 to May 29, 2026. Clean Coalition granted the extension request later that day. On the morning of the extension deadline, SCE notified Clean Coalition that SCE would be unable to provide 8760 hourly load data in response to Questions 6 and 7 by the extension deadline but could provide responses to the rest of the data request. SCE's email also requested clarification on whether the data request was seeking 8760 hourly load data or 576-hour representative load profile data ("576 data"). Questions 6 and 7 requested the "most recent 12-months of hourly substation load interval data." Clean Coalition emailed later that morning to confirm the need for 8760 hourly load data to answer Questions 6 and 7.¹⁶

SCE responded to request a second extension to the following Friday, June 5, 2026. SCE described the extension as "a worst case scenario," and noted, "[SCE] may actually be able to get it to you mid-week barring any data transfer challenges."¹⁷ Clean Coalition granted the requested second extension and confirmed receipt of SCE's response to questions 1-5 and 8-10, provided at COB on May 29, 2026.

On the afternoon of Wednesday June 3, 2026, SCE sent an email suggesting, "that the data is not clearly within the scope of High DER," and requesting additional information on the potential uses for the requested data.¹⁸ SCE also asked whether the requested data are needed for a Microgrid Incentive Program (MIP) project. An hour later, Clean Coalition responded with a

¹⁵ Appendix B, at pp. B-3–B-4.

¹⁶ Appendix C, at pp. C-18–C-19.

¹⁷ *Ibid.*, at p. C-18.

¹⁸ *Ibid.*, at p. C-16.

detailed message to explain that the data is not for a new MIP project,¹⁹ clarify that the data request has no relation to any MIP projects,²⁰ and list nine total use cases—five ICA-related use cases and four DSO/DER orchestration-related use cases—for the requested data to satisfy SCE’s questions.²¹

Clean Coalition did not receive another response from SCE until June 5, 2026, the day of SCE’s second extension deadline. At that time, SCE objected to Questions 6 and 7, stating that the request was “unprecedented in the context of the High DER proceeding,” that the requested information was not relevant to the subject matter of the proceeding, and that independent validation of ICA results was not within scope.²² SCE also stated, however, that it was “exploring data sharing to support third-party development and execution of orchestration programs” and “working on a standardized approach to provide third-parties appropriate profile data to support load flex activities.”²³

Clean Coalition responded the same day. Clean Coalition explained that the Track 1 and Track 2 use cases it had provided connected the requested data to the scope of the proceeding, that the fact SCE had not previously provided 8760 hourly interval data in this proceeding is not a basis for withholding discovery under Rule 10.1, and that SCE had raised its objection only after Clean Coalition granted two extensions. Clean Coalition requested SCE’s assistance in addressing its concerns expeditiously.²⁴

SCE responded that Clean Coalition had been “very accommodating in granting the extension” and explained that “the data was quite voluminous and a system had to be set up to transfer it,”²⁵ but also stated that “the team produced the data by Monday afternoon.” Clean

¹⁹ SCE’s MIP Tranche 2 has already been awarded and no new applications are being accepted currently, nor is there any clear plan suggesting SCE has remaining MIP funds to solicit applications for another tranche.

²⁰ All relevant load data to MIP projects has been shared through proper anonymization procedures or acquisition of permission from customers prior to the application process. Applications have been submitted, scored, and awarded already; there is no need for further data and the process for acquiring it would never be discovery in the High DER proceeding.

²¹ These use cases included, among others, checking DRPEP min/max substation load values, comparing actual load shapes to DRPEP/ICA outputs, evaluating coincident and non-coincident peaks, assessing whether low available-capacity results may reflect mitigable violations, identifying candidate substations/feeders for DER orchestration, evaluating DER deferral potential, assessing T-D interface coordination, and understanding how SCE’s BESS charging methodology applies in the Goleta Load Pocket.

²² *Ibid.*, at p. C-14.

²³ Appendix D, at p. D-1.

²⁴ Appendix C, at pp. C-13-C-14.

²⁵ *Ibid.*, at p. C-12.

Coalition understands this response to indicate that SCE had assembled the requested data internally before maintaining its objection to production.²⁶

The parties met virtually for a 30-minute meet-and-confer on June 12, 2026. During that meeting, Clean Coalition discussed narrowing the requested production from the Goleta-area and downstream facilities identified in Questions 6 and 7 to a smaller set of facilities—Goleta substation, Vegas substation, and Wasp feeder—and stated its willingness to discuss confidentiality or anonymization protections. Clean Coalition provided SCE with a written recap of the June 12 meet-and-confer later that day.²⁷ In the recap, Clean Coalition stated its understanding that SCE had acknowledged that Track 2 use cases are within the scope of the proceeding and that SCE preferred to focus further discussions on Track 2 issues. Clean Coalition’s recap further documented its understanding that SCE’s concern included the precedent that production of 8760 data could set in the High DER proceeding, because SCE had not provided 8760 data to another party in this proceeding. Clean Coalition agreed to continue discussions focused on Track 2, while preserving its position that Questions 6 and 7 are also relevant to Track 1. Clean Coalition also offered to reduce the burden on SCE by discussing a narrower production limited to the Goleta substation, Vegas substation, and Wasp feeder. Clean Coalition reiterated that it continued to seek 8760 hourly data rather than substitute datasets such as 576 data and stated its willingness to discuss confidentiality protections to address SCE’s concerns about precedent. Clean Coalition agreed to provide additional detail on Track 2 use cases, and SCE agreed to determine whether 15/15 concerns applied to the facilities discussed during the meet-and-confer. SCE also stated that it would “work up a data proposal” for Clean Coalition’s orchestration-related research and send it in advance of the next discussion, while suggesting that such a proposal may be broader than Clean Coalition’s ICA-related questions.²⁸ SCE did not contest the recap or provide any corrections. SCE did not later provide a data proposal and instead maintained its objections.

The parties agreed to a second meet-and-confer, scheduled for one hour on Wednesday, June 17, 2026. Based on the June 12 meeting and recap, Clean Coalition provided SCE with

²⁶ SCE stated on May 29, 2026, that “8760 data would be much harder for us to gather” and that SCE could not meet that day’s deadline if Clean Coalition expected 8760 data. SCE later stated on June 5, 2026, that “the data was quite voluminous and a system had to be set up to transfer it,” but that “the team produced the data by Monday afternoon.”

²⁷ Appendix C, at p. C-10.

²⁸ *Ibid.*, at p. C-11.

additional Track 2 use-case detail on June 16, 2026. Those use cases included DER orchestration siting, upgrade deferral screening, virtual power plant (“VPP”) overlay design, T-D interface coordination, and screening for load flexibility and DER orchestration.²⁹

Two hours before the scheduled June 17, 2026 meet-and-confer, SCE canceled the meeting and stated that it would provide a written response before any further meeting. Clean Coalition agreed to SCE’s proposal that SCE respond by Monday, June 22, 2026, while preserving Clean Coalition’s position that the additional Track 2 use-case detail provided at SCE’s request did not change the scope of the original request, supersede the original relevance showing, or create a basis for new objections.³⁰

On June 22, 2026, SCE sent a detailed written response maintaining its objection and identifying additional bases for refusing production, including prematurity, proportionality, data-governance, confidentiality, and the asserted adequacy of 576 data.³¹

After SCE sent its June 22 written response, Clean Coalition agreed that a further meet-and-confer remained appropriate and proposed that the parties focus on whether SCE would provide the narrowed 8760 dataset discussed during the meet-and-confer process—Goleta substation, Vegas substation, and Wasp feeder—in hourly, machine-readable form, subject to reasonable confidentiality, aggregation, or use protections if needed. Clean Coalition also stated that the additional Track 2 use-case detail it provided at SCE’s request did not change the scope of the original request, supersede the original relevance showing, or open the door to reject the request based on new objections. Clean Coalition further clarified that it was not seeking to resolve the entire future data-governance framework through the data request, nor asking SCE to endorse any Clean Coalition analysis. The immediate issue was whether the narrowed hourly dataset was discoverable under Rule 10.1 and could be produced with reasonable protections. Clean Coalition also stated that if SCE maintained its objection after the next meet-and-confer, Clean Coalition would understand the Rule 11.3 meet-and-confer process to be complete.³²

The parties held a second hour-long meet-and-confer on June 24, 2026.

Following the June 24 meet-and-confer, Clean Coalition sent SCE a written recap identifying the remaining issues and providing SCE an opportunity to correct or dispute the

²⁹ *Ibid.*, at pp. C-7–C-9

³⁰ *Ibid.*, at pp. C-6–C-7.

³¹ Appendix E, at pp. E-1–E-4.

³² Appendix C, at pp. C-5–C-6

recap. Clean Coalition stated that it remained willing to resolve the dispute without motion practice if SCE identified a concrete production path by July 3, 2026. The recap further documented Clean Coalition’s understanding that SCE viewed 8760 data sharing as premature and better addressed through a broader Commission-led data-governance process, even though SCE had acknowledged that data-sharing questions, timing and location of grid needs, and DER orchestration use cases are relevant Track 2 issues. Clean Coalition also documented that SCE did not identify when, if ever, the request would become ripe, what procedural milestone would make 8760 data sharing appropriate, or whether SCE would provide the data at that point; did not quantify the burden associated with producing the narrowed Goleta/Vegas/Wasp dataset; did not identify a mitigation path for 15/15 concerns; and did not identify an alternative dataset that would provide the same ability to evaluate the timing, magnitude, duration, frequency, persistence, and clustering of local grid needs. Clean Coalition again confirmed that it continued to seek hourly, machine-readable 8760 data responsive to Questions 6 and 7, while remaining willing to discuss a narrowed production subject to reasonable protections. Clean Coalition closed by stating: “Please let us know if SCE disagrees with any aspect of this recap. Otherwise, Clean Coalition will await SCE’s final position or concrete production path by Friday, July 3, 2026.”³³

On July 2, 2026, SCE responded to Clean Coalition’s June 26 recap. SCE stated that it would not speak to the accuracy or completeness of the recap but identified two corrections or clarifications. First, SCE corrected Clean Coalition’s characterization of the subtransmission system serving the region from “radial” to “a network configuration.” Second, SCE asserted that extrapolating 576 data into an 8760 profile would be “just as accurate/inaccurate” as using historical data with a flat annual growth rate. SCE maintained its objections.³⁴

Clean Coalition granted SCE two extensions, provided additional use-case detail at SCE’s request, narrowed the requested production to the Goleta substation, Vegas substation, and Wasp feeder, offered to discuss reasonable confidentiality, aggregation, NDA, or use protections, and participated in two meet-and-confer meetings to resolve the dispute without motion practice. SCE nevertheless maintained its objections, did not identify a concrete production path for the original or narrowed dataset, and did not agree to provide hourly,

³³ Appendix F, at pp. F-1–F-2.

³⁴ Appendix G, at p. G-1.

machine-readable 8760 data responsive to Questions 6 and 7. Clean Coalition therefore considers its Rule 11.3 meet-and-confer obligations complete and respectfully submits this Motion to Compel.

IV. ARGUMENT

A. Rule 10.1 Requires Production of Relevant, Non-Privileged Information Unless SCE Shows That Burden, Expense, or Intrusiveness Clearly Outweighs Likely Value

Rule 10.1 of the Commission’s Rules of Practice and Procedure sets forth a broad discovery standard. It provides that “any party may obtain discovery from any other party regarding any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence,” unless “the burden, expense or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.”

That standard is consistent with California Civil Discovery Act principles that the Commission has recognized in Commission proceedings. In D. 94-08-028, the Commission explained that “[f]or a party to a proceeding, a wide range of discovery procedures are available,” citing provisions of the Civil Discovery Act.³⁵ Courts construing the Civil Discovery Act have likewise held that discovery provisions “must be liberally construed in favor of discovery,”³⁶ and that “the burden of justifying any objection and failure to respond remains at all times with the party resisting” discovery.³⁷

Under these standards, SCE bears the burden of justifying its refusal to provide responses to Questions 6 and 7. SCE cannot satisfy that burden through unsupported assertions that the requested data is unprecedented, premature, better addressed through a future data-governance process, or potentially subject to confidentiality concerns without showing that the requested information is privileged, irrelevant, or that the burden, expense, or intrusiveness of production clearly outweighs its likely value.

³⁵ D.94-08-028, *Re Alternative Regulatory Frameworks for Local Exchange Carriers*, 55 Cal. P.U.C. 2d 672, at p. 677.

³⁶ *Irvington-Moore, Inc. v. Superior Court* (1993) 14 Cal.App.4th 733, 738–739.

³⁷ *Williams v. Superior Court* (2017) 3 Cal.5th 531, at p. 541, citing *Coy v. Superior Court* (1962) 58 Cal.2d 210, 220–221.

Nor do confidentiality or sensitivity concerns justify categorical withholding where reasonable protective measures can address those concerns. Commission practice recognizes the need to balance meaningful participation in Commission proceedings with appropriate protection for confidential information.³⁸ Accordingly, if SCE contends that specific portions of the requested data require protection, SCE must identify the basis for that claim and explain why confidentiality designations, aggregation, masking, anonymization, use restrictions, or other tailored protections would be insufficient.

B. Questions 6 and 7 Seek Information Relevant to the Scope of This Proceeding

Questions 6 and 7 seek a single core dataset relevant to both tracks. Track 1 explains why the request arose: SCE disclosed a public-facing DRPEP/ICA load-profile error in a proceeding where the Commission has required transparency regarding ICA inaccuracies and erroneous values. Track 2 explains why the same data remains independently relevant: hourly net-load data is the factual baseline for evaluating location-specific grid needs, DER orchestration use cases, distribution deferral screening, BESS charging analysis, and the data-access requirements of a DSO framework. Additional forecasted, engineering, or behind-the-meter data may improve later analyses, but it is not a substitute for historical 8760 data and does not defeat relevance under Rule 10.1.

i. The data is relevant to Track 1 because it arises from SCE’s DRPEP/ICA load-profile error and the Commission’s ICA transparency process.

Clean Coalition’s Track 1 request arose directly from SCE’s April 28, 2026 service-list notice that the MW values shown in DRPEP substation load-profile graphs did not accurately reflect actual substation load profiles. Clean Coalition did not initiate discovery immediately after that notice. It waited until after SCE’s stated “within a week” implementation timeline³⁹ had passed without notice that the correction had been implemented, then served targeted discovery seeking the origin, timing, scope, and correction of the issue.

³⁸ See D. 06-06-066, at pp. 2–3; see also Motion to Compel Discovery of San Diego Community Power and Clean Energy Alliance, A. 23-06-002, Nov. 22, 2023, at pp. 14–15 (discussing Commission confidentiality procedures as a means to protect sensitive information while preserving meaningful participation in Commission proceedings).

³⁹ Appendix B, Attachment to Data Request, at pp. B-4-B-5.

SCE's response to Questions 1-5 confirms that Questions 6 and 7 are connected to a live Track 1 ICA transparency issue. SCE stated that it identified the substation MW load-profile issue on April 1, 2026, determined that the displayed MW values did not accurately reflect actual substation load conditions, and traced the issue to logic associated with the substation load-profile feature introduced in October 2025.⁴⁰ SCE further explained that the issue originated from the methodology used to convert amperage values to MW for display in the DRPEP user interface. These facts confirm that Clean Coalition's request was not a generalized audit of SCE's ICA; it was targeted discovery into the origin, timing, scope, and correction of a specific public-facing ICA/DRPEP data-quality issue in a proceeding where the Commission has required transparency regarding ICA inaccuracies and missing or erroneous values.

Under Rule 10.1, Clean Coalition need not prove that the requested data will establish a particular violation or outcome; it need only show that the information is relevant to the subject matter of the proceeding or reasonably calculated to lead to admissible evidence.

The timeline also supports discovery. SCE states that it identified the issue on April 1, 2026, but the service-list notice was not sent until April 28, 2026.⁴¹ Clean Coalition does not ask the Commission to infer bad faith from that timeline. Nevertheless, the gap illustrates why the timing of identification, internal validation, public notice, and correction is reasonably calculated to lead to admissible evidence regarding whether the Commission's ICA transparency process is capturing, disclosing, and addressing known data-quality issues in a timely manner.

Questions 6 and 7 are relevant because historical hourly load data provides a factual basis to evaluate whether the corrected MW presentation aligns with actual substation load conditions and whether the error affected stakeholders' ability to understand local grid conditions. Clean Coalition's June 3 explanation identified concrete Track 1 uses for the requested hourly data, including checking whether the updated DRPEP platform's minimum and maximum substation load values align with actual hourly load data, comparing local load shapes to DRPEP/ICA outputs, evaluating coincident and non-coincident peaks, and assessing whether low available-capacity results may reflect constraints that can be mitigated rather than conditions requiring upgrades.⁴² These are not collateral issues. They relate directly to whether public-facing ICA and

⁴⁰ Appendix I, at pp. I-2–I-3.

⁴¹ Appendix B, Attachment to Data Request, at p. B-4.

⁴² Appendix C, at pp. C-14–C-16.

DRPEP data are accurate, timely, and useful for the DER siting and interconnection purposes the Commission has directed the ICA to serve.

SCE's assertion that the underlying amperage data remained accurate may ultimately bear on the merits, but it does not make the requested hourly load data irrelevant. Nor does SCE's characterization of these use cases as improper "independent validation" defeat discovery. Clean Coalition is not asking the Commission in this Motion to adjudicate every ICA result or establish a new validation process. Clean Coalition seeks targeted discovery regarding a specific DRPEP/ICA data-quality issue that SCE disclosed in this proceeding and the effect of that issue on public-facing load-profile information.

ii. The data is independently relevant to Track 2 because DER orchestration requires location- and time-specific information about grid needs.

Track 2 is not limited to abstract DSO design. The Commission is considering the operational needs of a high-DER grid, the gaps and barriers in the existing utility DSO role, and potential solutions to enable DERs and flexible loads to provide grid services. The March 23, 2026 DER Orchestration Ruling further identifies priority areas that include DER visibility to the DSO, DER dispatchability/control, open access to the distribution system, and reliability coordination at the T-D interface.⁴³ Historical 8760 hourly substation load data is relevant to those issues because it provides location- and time-specific information needed to evaluate where local grid needs arise, when they occur, whether they are persistent or recurring, and what data access is necessary for DERs and flexible loads to provide verifiable grid services.

SCE's own meet-and-confer position confirms the Track 2 relevance of the requested data. Clean Coalition understands SCE to have acknowledged that data-sharing questions, timing and location of grid needs, and DER orchestration use cases are relevant Track 2 issues.⁴⁴ SCE's objection is therefore better understood as a prematurity and data-governance objection, not a categorical relevance objection. That is not the Rule 10.1 standard. Discovery is proper where the information is relevant to the subject matter of the proceeding or reasonably calculated to

⁴³ R. 21-06-017 Assigned Commissioner's Ruling on Track 1 and Track 2 Distributed Energy Resources Orchestration, March 23, 2026, at p. 3.

⁴⁴ Appendix C, at p. C-10; Appendix E, at p. E-1 ("SCE agrees that understanding the timing and location of grid needs is an important consideration in developing a future DER orchestration framework. SCE also recognizes that improved visibility into system conditions may be relevant...")

lead to admissible evidence; Clean Coalition need not wait until the Commission has already resolved the data-governance framework before seeking discovery relevant to that framework.

A broader future data-governance framework may ultimately be necessary, but that does not make this narrowed request irrelevant now. On the contrary, the requested data provides a bounded example of the type of information parties may need to evaluate whether DER orchestration can produce verifiable grid services. SCE did not identify when the request would become ripe, what procedural milestone would make production appropriate, or whether SCE would provide 8760 data to parties at that point.⁴⁵

Clean Coalition's June 3 and June 16 explanations identified concrete Track 2 uses for the requested data. Those uses included DER orchestration siting, upgrade deferral screening, VPP overlay design, T-D interface coordination, screening for load flexibility and DER orchestration value, identifying candidate locations for distribution-connected battery energy storage systems ("BESS"), and evaluating data-access requirements for a DSO framework. These use cases are directly tied to Track 2 because they concern how parties and the Commission can identify priority feeders and substations, evaluate the magnitude and duration of local needs, assess whether DER or flexible-load services could address those needs, and determine what information third parties require to participate in utility-led orchestration programs.

The need for hourly data is not speculative. For operational need, deferral screening, load-flexibility targeting, and DSO use-case development, net hourly load data is valuable on its own because it reflects the loading condition observed by the utility at an electrical boundary. That information allows parties to evaluate temporal constraints, identify local peaks, compare coincident and non-coincident loading, and determine whether flexible load, storage dispatch, or DER orchestration could reduce stress on the distribution system. Gross load, precise behind-the-meter generation data, weather normalization, and forward-looking forecasts may improve certain analyses, but they are not prerequisites to making hourly substation load data relevant under Rule 10.1.

Nor does the fact that additional forward-looking information may be needed for final planning decisions make historical 8760 data irrelevant. Clean Coalition agrees that a final

⁴⁵ Appendix F, at p. F-1 (subpoint four).

planning-grade DER orchestration analysis may require forecasted load, planned upgrades, engineering constraints, and other forward-looking information. But historical hourly load data is the baseline for understanding actual load shapes, timing and duration of local peaks, seasonal patterns, ramping conditions, and persistence of constraint-relevant hours. It also helps identify what additional forecasted or engineering data would be necessary to develop a planning-grade Track 2 DER orchestration framework.

SCE's own response to Question 10 confirms that 8760 load profiles are relevant to Track 2. SCE described a methodology for estimating hourly available charging capacity for distribution-connected BESS that depends on an 8760 load profile.⁴⁶ Even if a final BESS charging analysis would use forecasted 8760 profiles, SCE's methodology confirms that hourly load profiles are the relevant form of data for evaluating available charging windows. That response directly undercuts any categorical claim that hourly load profiles are not useful for DER orchestration or distribution-connected storage analysis. The requested data would allow Clean Coalition to evaluate, at a bounded set of Goleta-area facilities, whether BESS could charge during available-capacity windows and discharge during local peak or constraint-relevant periods.

SCE did not identify an alternative dataset that is hourly, machine-readable, location-specific, and capable of supporting evaluation of the timing, magnitude, duration, frequency, persistence, and clustering of local grid needs. Nor did SCE explain how 576 data, ICA, or Grid Needs Assessment outputs would allow parties to evaluate those dimensions in the same manner as actual hourly 8760 data.⁴⁷ Those substitute datasets may serve other purposes, but they do not eliminate the relevance of the requested data under Rule 10.1.

Track 2 is not limited to whether SCE can internally identify grid needs. The Commission is also considering open access to the distribution system, DER visibility, DER dispatchability/control, and the barriers that prevent DERs from providing grid services. If SCE maintains that third parties cannot receive hourly substation load data even under reasonable protections, that position is relevant to Track 2's data-access, open-access, and DSO gap/barrier questions.

⁴⁶ Appendix I, at p. I-4.

⁴⁷ Appendix F, at p. F-1 (subpoint five and six).

C. SCE's Objections Do Not Justify Withholding Relevant Discovery

SCE bears the burden of justifying its refusal to provide discovery responsive to Questions 6 and 7. It has not carried that burden. SCE has raised numerous objections, including that the request is outside the scope of the proceeding, premature, unprecedented, burdensome, replaceable with 576-profile data or other existing datasets, and potentially subject to confidentiality or 15/15 concerns. None of those objections meets the standard required to prevent discovery under Rule 10.1.

The requested data is relevant to the development of an evidence-driven record in this proceeding. Clean Coalition provided concrete Track 1 and Track 2 use cases connecting Questions 6 and 7 to ICA transparency, DER orchestration, load flexibility, distribution deferral screening, BESS charging analysis, T-D interface coordination, and DSO data-access issues. SCE's own responses and meet-and-confer statements further confirm that the underlying subjects—data sharing, timing and location of grid needs, and DER orchestration use cases—are relevant Track 2 issues.⁴⁸ At minimum, the requested data is reasonably calculated to lead to admissible evidence.

SCE's later objections do not alter that conclusion. After Clean Coalition granted two extensions, provided additional use-case detail at SCE's request, and offered to discuss a narrowed production subject to reasonable protections, SCE reframed its objection primarily as one of prematurity and future data governance.⁴⁹ However, SCE did not identify when the request would become ripe, what procedural milestone would make production appropriate, or whether SCE would provide 8760 data to parties at that later point. Rule 10.1 does not allow a party to withhold relevant discovery because the information may also inform a future policy framework, because production may be unprecedented, because the resisting party prefers substitute datasets, or because confidentiality concerns may require reasonable protections.

The Commission should reject SCE's objections. SCE cannot convert Clean Coalition's good-faith narrowing and supplemental Track 2 use-case explanation into a basis for new objections, nor can it avoid production by asserting generalized concerns without showing that the burden, expense, or intrusiveness of production clearly outweighs the likely value of the requested information. Questions 6 and 7 seek information relevant to the subject matter of this

⁴⁸ See Appendix C, at p. C-10; Appendix E, at p. E-2; Appendix F, at p. F-1.

⁴⁹ Appendix E, at pp. E-1–E-4.

proceeding and reasonably calculated to lead to admissible evidence. SCE should be compelled to produce the requested data, subject to reasonable protections if necessary.

i. SCE’s scope and prematurity objections apply the wrong discovery standard and do not justify withholding responsive data.

SCE’s scope and prematurity objections fail because they apply a standard Rule 10.1 does not contain. SCE has asserted that production of the narrowed 8760 dataset is premature and should await a broader Commission-led data-governance process.⁵⁰ But Rule 10.1 does not allow a party to withhold relevant discovery because the information may also inform a future policy framework or because the Commission may later adopt broader data-access rules. The question is whether the requested information is relevant to the subject matter of this proceeding or reasonably calculated to lead to admissible evidence now.

SCE’s own meet-and-confer position confirms that standard is met. Clean Coalition understands SCE to have acknowledged that data-sharing questions, timing and location of grid needs, and DER orchestration use cases are relevant Track 2 issues.⁵¹ SCE’s objection is therefore better understood as a prematurity and data-governance objection, not a categorical relevance objection. But SCE did not identify when the request would become ripe, what procedural milestone would make production appropriate, or whether SCE would provide 8760 data to parties at that later point. A vague assertion that discovery may become more appropriate later is not a basis for withholding relevant discovery now.

SCE’s position also confirms why discovery is needed in this phase of the proceeding. If SCE contends that hourly substation load data should not be shared until a broader data-governance framework is developed, that position is itself relevant to Track 2’s open-access and DSO gap/barrier questions. The existence of those future framework questions does not make discovery premature; it makes the requested data, and SCE’s refusal to provide it, relevant to the issues before the Commission.

ii. “Precedent” is not a valid basis for refusing discovery.

⁵⁰ *Ibid.*

⁵¹ Appendix C, at p. C-10; Appendix E, at p. E-2.

SCE's early explanation confirms that precedent concerns played a significant role in its refusal to provide responses to Questions 6 and 7. In its June 5, 2026 email, SCE described the request for 8760 hourly load data as "unprecedented in the context of the High DER proceeding" and stated that SCE needed to "proceed with caution."⁵² SCE repeated similar concerns during the meet-and-confer process, including concern that producing 8760 data in this proceeding could set a precedent for future requests.⁵³

Clean Coalition identified the defect in that position immediately. In response to SCE's initial precedent objection, Clean Coalition explained that "the fact that SCE has not provided 8760 data thus far in this proceeding does not constitute a clear legal reason not to provide the information solicited in this data request, absent some further justification."⁵⁴ SCE did not provide that further justification.

SCE's statement that the request is "unprecedented in the context of the High DER proceeding"⁵⁵ does not establish that the data is privileged, irrelevant, unduly burdensome, technically infeasible, or otherwise outside the scope of Rule 10.1. At most, it shows that production may be new in this proceeding. Novelty is not a discovery objection.

This matters beyond the label "precedent." SCE's refusal began from an improper premise: that the absence of prior 8760 production in this proceeding justified withholding otherwise relevant discovery. SCE later reframed its refusal in terms of scope, prematurity, burden, substitute data, and confidentiality, but those objections must be evaluated under Rule 10.1 rather than against SCE's preference to avoid setting a data-access precedent. The Commission should reject any objection based on precedent and should not allow SCE to convert an improper precedent concern into a series of later objections that still do not satisfy Rule 10.1.

iii. SCE has not carried its burden to show undue burden or technical infeasibility.

SCE has not shown that the burden or expense of producing the requested data clearly outweighs its likely value. At most, SCE initially stated on May 29, 2026, that 8760 hourly load data would be more difficult to gather than 576 data and requested additional time to respond. Clean Coalition granted SCE's requested extensions. On June 5, 2026, SCE stated that the data

⁵² Appendix C, at p. C-14.

⁵³ *Ibid.*, at p. C-10; Appendix F, at p. F-1 (subpoint 5).

⁵⁴ Appendix C, at p. C-13.

⁵⁵ SCE also asserted that the data request "would set a burdensome a precedent." Appendix E, at p. E-1.

was “quite voluminous” and that “a system had to be set up to transfer it,” but also stated that “the team produced the data by Monday afternoon.”⁵⁶ That correspondence indicates that SCE had already assembled the requested data internally before maintaining its objection to production.

SCE cannot transform a data-transfer logistics issue into an undue-burden objection. Any remaining dispute therefore concerns whether SCE must produce relevant information it already assembled, not whether the request is technically infeasible or unduly burdensome. Rule 10.1 requires more than a generalized assertion that a dataset is large, unusual, or difficult to transfer. SCE must show that the burden, expense, or intrusiveness of production clearly outweighs the likely value of the requested information. SCE has not made that showing and did not identify any specific production burden that would prevent narrowed, staged, or protected production.

SCE also failed to make a burden showing as to the narrowed dataset Clean Coalition proposed during the meet-and-confer process. Clean Coalition offered to discuss a narrower production limited to the Goleta substation, Vegas substation, and Wasp feeder, subject to reasonable protections. SCE did not explain why producing that narrowed dataset would be unduly burdensome, did not provide a burden estimate, and did not identify an alternative production of hourly, machine-readable, location-specific data that would reduce burden while preserving the core information needed for Track 1 and Track 2 use cases.⁵⁷

SCE’s refusal is therefore not supported by a Rule 10.1 burden showing. Instead, SCE’s refusal rests primarily on scope, precedent, prematurity, and data-governance objections. Those objections do not establish that producing relevant discovery would be technically infeasible or that the burden of production clearly outweighs its likely value.

iv. SCE’s 576-data alternative is not an adequate substitute for hourly 8760 data.

SCE’s reliance on 576-profile data, ICA, DRPEP, or Grid Needs Assessment outputs does not justify withholding the hourly 8760 data requested in Questions 6 and 7. During the meet-and-confer process, Clean Coalition asked SCE to identify use cases where load data less granular than hourly 8760 data would be sufficient for the Track 2 use cases Clean Coalition identified. Clean Coalition understands SCE to have identified ICA and Grid Needs Assessment

⁵⁶ Appendix C, at p. C-12.

⁵⁷ Appendix F, at p. F-1 (subpoint 5-6).

processes as examples where 576 data or smaller profiles may be used.⁵⁸ Yet, SCE did not explain how those processes would allow parties to evaluate the timing, magnitude, duration, frequency, persistence, or clustering of local grid needs in the same manner as hourly 8760 data.

That distinction matters; Clean Coalition is not seeking hourly 8760 data merely to reproduce an ICA or Grid Needs Assessment output. Clean Coalition seeks the data to evaluate when and where local grid needs arise, how long they persist, how often they recur, and whether DERs or flexible loads could address those needs through orchestration, dispatch, or targeted program design. A non-hourly profile may be useful for some planning or screening purposes, but it cannot show the same sequence of actual hourly conditions. It cannot distinguish a short-duration annual peak from a broad recurring daily need, reveal clustering of constraint-relevant hours, or show whether local needs align with evening peaks, midday reverse-flow periods, steep ramps, or coincident CAISO peak periods.

SCE's reliance on ICA and Grid Needs Assessment processes also does not resolve the discovery dispute. Those processes may reflect how SCE currently summarizes or uses certain load information internally or in public-facing tools. However, Track 2 is considering whether existing DSO practices, data-access rules, and public-facing information are sufficient to enable DERs and flexible loads to provide grid services. For that purpose, the adequacy of ICA, DRPEP-derived profiles, Grid Needs Assessment outputs, or 576 data is itself a disputed Track 2 issue. SCE cannot defeat discovery by pointing Clean Coalition back to the same public-facing or summarized datasets whose adequacy for DER orchestration is part of the issue under review. Nor does SCE's assertion that extrapolating 576 data into an 8760 profile would be "just as accurate/inaccurate" as using historical data with a flat annual growth rate make 576 data an adequate substitute.⁵⁹ An extrapolated profile is still an estimate; it is not the actual hourly historical load data requested in Questions 6 and 7. Even if forecasted data may be needed for final planning decisions, historical 8760 data provides the factual baseline for evaluating actual load shapes, peak timing and duration, seasonal patterns, ramping conditions, and persistence of constraint-relevant hours. SCE's assertion that two estimation methods may be similarly

⁵⁸ Appendix F, at p. F-2 (subpoint 9); Appendix E, at p. E-1 ("SCE believes 576 data is sufficient to achieve Clean Coalition's goals.")

⁵⁹ Appendix G, at p. G-1.

imperfect does not show that a non-hourly or extrapolated dataset provides the same discovery value as actual hourly 8760 data.

SCE therefore has not identified an adequate substitute for the requested data. ICA, DRPEP, Grid Needs Assessment outputs, and 576-profile data may be useful for other purposes, but they do not preserve the hourly, location-specific record needed to evaluate the timing, magnitude, duration, frequency, persistence, and clustering of local grid needs. They cannot show the same sequence of actual hourly conditions, and they cannot answer the same Track 1 and Track 2 questions. The Commission should not allow SCE to avoid producing relevant discovery by offering summarized or extrapolated datasets that omit the very information Clean Coalition seeks.

v. Confidentiality and 15/15 concerns may justify reasonable protections, not categorical withholding.

SCE's confidentiality and 15/15 concerns do not justify withholding all responsive hourly 8760 data. At most, substantiated confidentiality concerns may justify targeted protections, including aggregation, masking, anonymization, confidentiality designation, nondisclosure agreements ("NDAs"), use limitations, partial production, or other reasonable measures. Clean Coalition repeatedly stated its willingness to discuss such protections for the original or narrowed dataset.⁶⁰ SCE nevertheless did not identify a concrete mitigation path that would allow production of all or part of the requested data.

SCE's 15/15 showing was also insufficiently specific. Even where SCE referenced potential 15/15 concerns for specific facilities, including the Goleta distribution-level substation and Wasp feeder, SCE did not explain whether the concern applied to all hours or only certain intervals, which data fields were affected, whether the concern applied to the electrically relevant T-D facility Clean Coalition was seeking, or what aggregation, masking, anonymization, confidentiality designation, NDA, use limitation, or narrowed production would resolve the issue. Nor did SCE explain why a facility-specific or interval-specific concern would require withholding the entire original or narrowed dataset.

⁶⁰ Appendix F, at p. F-1 (subpoint 6); Appendix C, at p. C-10.

SCE’s apparent reliance during the meet-and-confer process on a single-hour 15/15 concern further underscores why categorical withholding is inappropriate.⁶¹ When Clean Coalition asked the IOUs in the Second Quarter (“Q2”) Quarterly ICA Workshop to explain how they evaluate the 15/15 rule temporally, none described the rolling, hour-by-hour screen that SCE appeared to invoke during the meet-and-confer process.⁶² PG&E described a single determination per study cycle, SCE described a monthly calculation based on the previous 12 months of billed energy usage, and SDG&E described an annual evaluation using the prior 12 months of loading data.⁶³ SCE did not reconcile those written responses during the meet-and-confer process, nor did it explain during that process why any 15/15 concern would justify categorical withholding rather than tailored protections.

A substantiated confidentiality concern may warrant tailored protection; it does not warrant blanket refusal. If SCE believes a particular facility, hour, interval, or data field implicates customer confidentiality, SCE should be required to identify the affected portion of the dataset and explain why reasonable protective measures are inadequate. That requirement is especially appropriate here because Clean Coalition seeks aggregated substation- or feeder-level load data, not individual customer usage data.

Commission confidentiality procedures are designed to preserve both confidentiality and meaningful party participation; they are not a mechanism for converting a generalized confidentiality concern into categorical withholding of relevant discovery. SCE cannot invoke confidentiality as a black box. The Commission should therefore reject SCE’s confidentiality and 15/15 objections as a basis for categorical withholding.

vi. SCE cannot convert Clean Coalition’s good-faith narrowing and supplemental use-case explanation into a basis for new objections.

Clean Coalition’s willingness to narrow the requested production and provide supplemental Track 2 use-case detail did not waive its original relevance showing, change the scope of Questions 6 and 7, or create a basis for SCE to assert new objections.⁶⁴ Clean Coalition granted

⁶¹ Appendix F, at p. F-1 (subpoint 6).

⁶² The Q2 Quarterly ICA Workshop took place on June 25, 2026, from 10 am – 3 pm.

⁶³ Appendix H, at p. H-1.

⁶⁴ Appendix C, at p. C-5 (“Clean Coalition does not agree that providing that detail changed the scope... or opened the door to reject the request based on new objections. The additional use cases are extensions of the same Track 2

SCE's requested extensions, participated in multiple meet-and-confer discussions, provided written recaps, offered to discuss a narrowed production limited to the Goleta substation, Vegas substation, and Wasp feeder, provided additional Track 2 use case detail at SCE's request, and repeatedly stated its willingness to discuss reasonable confidentiality, aggregation, anonymization, NDA, or use protections. Those efforts were made to resolve the discovery dispute without motion practice, not to narrow Clean Coalition's rights under Rule 10.1.

SCE requested additional detail, and Clean Coalition provided it to facilitate resolution of the dispute; SCE should not now be allowed to treat that response as a basis for expanding the grounds for refusal. The additional Track 2 use-case explanation did not transform the request into a different request, require Clean Coalition to prove strict necessity for each proposed use case, or allow SCE to withhold the requested data because SCE disagrees with how Clean Coalition might analyze it. The question remains the one Rule 10.1 asks: whether the requested information is relevant to the subject matter of the proceeding or reasonably calculated to lead to admissible evidence, unless the burden, expense, or intrusiveness of production clearly outweighs its likely value.

Nor did Clean Coalition's proposed narrowing make the original request overbroad or concede that only the narrowed dataset is relevant. Clean Coalition continued to seek hourly, machine-readable 8760 data responsive to Questions 6 and 7, while offering the narrowed Goleta/Vegas/Wasp production as a reasonable path to resolve the dispute. SCE did not accept that path, did not propose a concrete alternative, and did not explain why reasonable protections would be insufficient.

The Commission should not allow SCE to convert Clean Coalition's cooperation into a procedural disadvantage. Clean Coalition's efforts to narrow the dispute, provide additional explanation, and offer protections confirm that it acted in good faith; they do not excuse SCE's failure to produce relevant discovery or to justify withholding under Rule 10.1.

**D. The Commission Should Compel Production Responsive to Questions 6 and 7,
Including the Electrically Relevant Goleta-Area Facilities and the Wasp Feeder,
Subject to Reasonable Protections if Necessary**

issues discussed during the parties' prior meet-and-confer: DER orchestration, load flexibility, VPP design, distribution deferral screening, and T-D interface coordination.")

Clean Coalition requests that the Commission compel SCE to provide machine-readable 8760 load data responsive to Questions 6 and 7, including both the most recent 12 months of available hourly data and the historical 2024 hourly data requested. That production should include the Goleta-area facilities identified in Question 6, including the Goleta facility or facilities that serve as the relevant transmission-distribution interface and the downstream distribution substations identified in Question 6. Because the Wasp feeder was discussed during the meet-and-confer process as part of Clean Coalition's narrowed production proposal and is relevant to the same Goleta-area Track 2 use cases, Clean Coalition also requests that SCE be required to produce hourly 8760 load data for the Wasp feeder.

SCE should produce the data in native, machine-readable format, such as CSV or Excel, with sufficient metadata to identify the facility, date, hour, units, and any applicable time zone or data-field definitions. To the extent SCE contends that a facility name used by Clean Coalition does not correspond to the electrically relevant facility in SCE's system records, SCE should be required to identify the electrically relevant facility or facilities necessary to provide the requested Goleta-area hourly load data and produce data for those facilities.

If SCE substantiates a specific confidentiality or 15/15 concern, production should be made subject to reasonable confidentiality, aggregation, anonymization, masking, NDA, use limitation, or partial-production protections as appropriate. SCE should not be permitted to withhold the entire dataset based on a generalized confidentiality concern. At minimum, SCE should be required to identify the specific facility, interval, data field, or portion of the dataset for which it claims protection is necessary and explain why reasonable protective measures are inadequate.

In the alternative, and at minimum, if the Commission declines to compel full production responsive to Questions 6 and 7, the Commission should compel SCE to produce the narrowed dataset discussed during the meet-and-confer process: hourly, machine-readable 8760 load data for the Goleta-area T-D/substation facilities, the Vegas substation, and the Wasp feeder, subject to reasonable protections if necessary. Any production ordered by the Commission should be completed within ten calendar days of a ruling granting this Motion.

V. CONCLUSION

For the reasons stated above, Clean Coalition respectfully requests that the Commission grant this Motion and compel SCE to provide further responses to Data Request CC-SCE-DRPEP-01,

Questions 6 and 7. SCE should be required to produce hourly, machine-readable 8760 load data responsive to those questions, including both the most recent 12 months of available hourly data and the historical 2024 hourly data requested, for the Goleta-area facilities identified in Question 6, including the relevant T-D facility or facilities and downstream distribution substations.

Because the Wasp feeder was discussed during the meet-and-confer process as part of Clean Coalition's narrowed production proposal and is relevant to the same Goleta-area Track 2 use cases, Clean Coalition also requests that SCE be required to produce hourly 8760 load data for the Wasp feeder. Any production ordered by the Commission should be subject to reasonable protections if necessary and completed within ten calendar days of a ruling granting this Motion. If the Commission declines to compel full production, Clean Coalition requests, in the alternative and at minimum, that the Commission compel production of the narrowed Goleta-area T-D/substation, Vegas substation, and Wasp feeder dataset discussed during the meet-and-confer process.

Respectfully submitted,

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Dated: August 19, 2026

Appendix A: Proposed Ruling

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

[PROPOSED] RULING GRANTING MOTION OF CLEAN COALITION TO COMPEL DISCOVERY

On August 19, 2026, Clean Coalition filed a Motion to Compel further responses from Southern California Edison Company (“SCE”) to data request CC-SCE-DRPEP-01, Questions 6 and 7.

The Motion requests an order directing SCE to provide machine-readable 8760 load data responsive to Questions 6 and 7, including both the most recent 12 months of available hourly data and the historical 2024 hourly data requested. That production shall include the Goleta-area facilities identified in Question 6, including the Goleta facility or facilities that serve as the relevant transmission-distribution interface and the downstream distribution substations identified in Question 6. Because the Wasp feeder was discussed during the meet-and-confer process as part of Clean Coalition’s narrowed production proposal and is relevant to the same Goleta-area Track 2 use cases, SCE shall also produce hourly 8760 load data for the Wasp feeder. SCE shall produce the data in native, machine-readable format, such as CSV or Excel, with sufficient metadata to identify the facility, date, hour, units, and any applicable time zone or data-field definitions. To the extent SCE contends that any facility name used by Clean Coalition does not correspond to the electrically relevant facility in SCE’s system records, SCE shall identify the electrically relevant facility or facilities necessary to provide the requested Goleta-area hourly load data and produce data for those facilities.

If SCE contends that any specific facility, interval, data field, or portion of the dataset requires confidential treatment, SCE shall identify the affected portion and provide the information subject to reasonable confidentiality, aggregation, anonymization, masking, nondisclosure, use-limitation, or partial-production protections as appropriate. SCE shall not withhold the entire dataset based on a generalized confidentiality or 15/15 concern.

IT IS RULED THAT Clean Coalition's Motion is granted. SCE shall provide the requested information to Clean Coalition no later than 5:00 p.m. Pacific Time on the tenth calendar day after issuance of this Ruling.

SO ORDERED.

Dated: _____, 2026 at San Francisco, California.

Administrative Law Judge

Appendix B: Clean Coalition Data Request CC-SCE-DRPEP-01, Questions 1–10

CLEAN COALITION’S FIRST DATA REQUEST TO SOUTHERN CALIFORNIA EDISON COMPANY

Proceeding Number: R. 21-06-017

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

Date: May 6, 2026

Response Due: May 20, 2026

To: Southern California Edison Company
William Yu
E-mail: William.W.Yu@sce.com
Ari Altman
Email: ARI.ALTMAN@sce.com

Originated By: Clean Coalition
Ben Schwartz
Email: ben@clean-coalition.org

Cc: Legal Administration
Email: Legal.Admin@sce.com
Jennifer Pezda
Email: jennifer.pezda@sce.com

Data Request No: 001

I. GENERAL INSTRUCTIONS

- a. In responding to the following requests, please set forth the request and then state SCE’s response.
- b. Each request should be deemed continuing in nature. Thus, if SCE acquires additional information regarding any such request, SCE should supplement its response as soon as possible following its receipt of such additional information.
- c. In the event that SCE objects to any request on the ground that the information sought is irrelevant or immaterial to any issue in the above-captioned matter, please state the specific basis for such objection, including the basis for any contention that such information is not or does not appear “reasonably calculated

to lead to the discovery of admissible evidence....” CPUC Rules of Practice and Procedure, Rule 10.1.

- d. In the event that SCE asserts any privilege against the release of any information sought in any request, please specify the privilege asserted and explain the basis of its assertion. In addition, with respect to any document asserted to be privileged, please identify such document.
- e. In the event that SCE asserts that any information or document sought is public information or is publicly available, please specify:
 - i. The title of the document or other source in which the information may be found;
 - ii. The specific page and line number or other precise reference to where the information can be found; and
 - iii. Where the document or other source containing the information can be found.
- f. In the event that SCE asserts that any requested information is not available in the form requested, please disclose the following:
 - i. In what form the information currently exists, including identifying documents;
 - ii. Whether it is possible under any circumstances (and, if so, what circumstances) for SCE to provide the information in the form requested;
 - iii. The procedures or calculation necessary to provide the information in the form requested;
 - iv. The length of time (in hours and days) necessary for SCE to prepare the information in the form requested; and
 - v. The earliest dates, time period and location that representatives of Clean Coalition may inspect SCE’s files, records, or documents in which the requested information currently exist.
- g. Terms.
 - i. The terms “documents,” “working papers,” “studies,” “reports,” “records,” “surveys,” “examinations,” “research,” “reviews,” “summaries,” “papers,” “notes,” “memos,” and “analysis” are interchangeable and should not be construed to limit the scope of the material sought by this discovery.
 - ii. The terms “data,” “figures,” “information,” “assumptions,” “facts,” “statistics,” “measurements,” “findings,” and “results” are interchangeable and should not be construed to limit the scope of the material sought by this discovery.
 - iii. “SCE” refers to Southern California Electric Company.
 - iv. Capitalized terms shall have the same meaning as defined in Rule 21, section C (Definitions).
 - v. To the extent any other terms are unclear, please assume a reasonable meaning for the term, state the assumed meaning, and respond to the discovery request using the assumed meaning of the term.
- h. All load data should be provided in .csv format.
- i. Identify for each response the person(s) sponsoring the response and corresponding job title(s).

II. DATA REQUEST QUESTIONS

The following questions are regarding an email from SCE to the R. 21-06-017 service list on April 28, 2026, about incorrect substation load profile information in SCE's Distributed Resources Plan External Portal (DRPEP). The email is reproduced below as Appendix A.

1. Please explain when the SCE team identified the issue with the substation load profiles, as referenced in the following quote from the April 28, 2026, email. "Specifically, at this time the load values shown in megawatts (MW) on substation load profile graphs do not accurately reflect actual substation load profiles."
 - a. Detail the process that SCE used to determine that the substation load values are incorrect and provide all associated documents.
 - b. Was the error identified the result of a methodological issue, incorrect inputs, or improper results validation?
2. Are the erroneous substation load values present throughout all substations in SCE's service territory or limited to a certain number of substations?
3. How soon will SCE be able to fully implement a resolution that corrects the erroneous substation load values?
 - a. Is SCE on target to implement a solution based on the timeline provided in the email or is a delay likely? Provide all relevant documents.
4. Provide SCE's cost estimate for the implementation process of the change that resulted in erroneous substation load values and the expected cost of implementing the solution.
 - a. If SCE does not have any such cost-estimate, for what type of error or ICA remediation solution would a cost-estimate be developed?
5. Will the erroneous substation load values impact SCE's ability to "reactivate circuits that are currently inactive on their ICA maps by September 30, 2026," as required in Resolution 5440, issued April 9, 2026?
 - a. If yes, provide details about how the timeline for reactivating circuits will be impacted, including documentation.
6. Provide the most recent 12-months of hourly substation load interval data in .csv format and the operating voltage ("kV") for the Goleta substation and the substations that it feeds (e.g., downstream of the Goleta substation), including the following:
 - a. Isla Vista
 - b. Vegas
 - c. Part P.T.
 - d. Barwick P.T.
 - e. Via Huerto P.T.
 - f. Nogal P.T.
 - g. La Cumbre P.T.
 - h. San Marcos
 - i. Westfall P.M.
 - j. Playa
 - k. Santa Barbara
 - l. Ashley P.T.

- m. Montecito
 - n. Tatanka P.T.
 - o. Ortega
 - p. Nidever P.T.
 - q. Carpinteria
 - r. Canalino P.T.
 - s. Casitas
7. Provide 12 months of historical data from 2024 for the substations listed above in Question 6.
 8. Provide a list of behind-the-meter generating capacity aggregated at each electrical substation listed above in Question 6.
 9. Provide any internal load forecasts or peak demand estimates for the region served by the substations listed above in Question 6.
 - a. Are distribution grid constraints in the region coincident with the CAISO-controlled grid? Provide a comparison that details similarities and differences during peak, off-peak, and super off-peak periods.
 10. Provide the charging formula SCE uses to determine when front-of-meter distribution-connected batteries are able to charge, including all relevant papers.
 - a. Is there a specific formula for the region served by the substations listed in Question 6?
 - b. If yes, provide the unique formula, requirements, and historical evidence.

Attachment to Data Request: April 28, 2026, Email from SCE to High DER Service List

From: **Case Admin** <Case.Admin@sce.com>

Date: Tue, Apr 28, 2026 at 10:04 AM

Subject: Service List: R.21-06-017 - SCE Notice on DRPEP

Southern California Edison Company (SCE) is informing stakeholders of an upcoming correction to the Integration Capacity Analysis (ICA) layer of the [Distributed Resources Plan External Portal \(DRPEP\)](#). Specifically, at this time the load values shown in megawatts (MW) on substation load profile graphs do not accurately reflect actual substation load profiles. Values in MW were recently added based on stakeholder input, supplementing the values in Amps that were previously reported, and unfortunately the MW logic utilized was incorrect.

Our team has identified the cause of the issue and is implementing a fix to correct the load calculations displayed in the ICA substation load profile. This update will ensure the graphs more closely reflect true substation loading conditions and should be pushed out to DRPEP within a week.

Regards,

Ari Altman
Senior Advisor
Grid Modernization Policy
Regulatory Affairs
(626) 302-4946/ext. 24946
2244 Walnut Grove Ave., Rosemead, CA 91770

Sent on behalf of Ari Altman by,
SOUTHERN CALIFORNIA EDISON COMPANY
CASE ADMINISTRATION
Case.Admin@sce.com



Appendix C: Consolidated Discovery Correspondence and Meet-and-Confer Emails Regarding Questions 6 and 7

This appendix consolidates related email correspondence between Clean Coalition and SCE regarding Data Request CC-SCE-DRPEP-01, Questions 6 and 7. Emails are presented in reverse chronological order as they appeared in the consolidated email chain. Attachments are omitted unless otherwise noted.

Contents:

July 2, 2026 — SCE response to June 26 recap
June 26, 2026 — Clean Coalition recap of June 24 meet-and-confer
June 22, 2026 — SCE written response and Clean Coalition meeting outline
June 17, 2026 — SCE cancellation and Clean Coalition response
June 16, 2026 — Clean Coalition supplemental use-case explanation
June 12, 2026 — First meet-and-confer and recap
June 5, 2026 — SCE objection and follow-up correspondence
June 3, 2026 — SCE clarification request and Clean Coalition use-case response
May 29/June 1, 2026 — Responses, 8760 clarification, and extension
May 7, 2026 — First extension
May 6, 2026 — Data request submission

July 2, 2026 — SCE response to recap of second meet-and-confer and Clean Coalition acknowledgement of receipt.

From: **Ben Schwartz** <ben@clean-coalition.org>
Date: Thu, Jul 2, 2026 at 5:11 PM
Subject: Re: (External):Re: (External):Re: High DER: SCE/Clean Coalition Sync Up on DR
To: Belinda Vivas <belinda.l.vivas@sce.com>
Cc: Ari G Altman <ARI.ALTMAN@sce.com>, Michael Barigian <Michael.Barigian@sce.com>, Craig Lewis <craig@clean-coalition.org>, David Castle <David.Castle@sce.com>, Asad Ullah Bux <Asad.U.Bux@sce.com>, Kate Torres <Kate.Torres@sce.com>, Antonio Nunez <antonio.nunez@sce.com>, William W Yu <William.W.Yu@sce.com>

Hi Belinda,

I have received your email and thank you for going through the recap.

-Ben Schwartz

On Thu, Jul 2, 2026 at 4:55 PM Belinda Vivas <belinda.l.vivas@sce.com> wrote:
Good Afternoon Ben:

Thank you for your email. As you noted, the “recap” represents Clean Coalition’s characterization of the meeting. SCE has already presented its positions and will not be speaking to the accuracy or completeness of the “recap.” Notwithstanding this, SCE would like to note the following:

- Point #7 in the “recap” appears to include a factual error – see correction in red: “...SCE’s subtransmission system serving the region is ~~radial~~ **a network configuration** and not represented in the same manner as facilities shown in public maps or DRPEP.”
- Point #8 in the “recap” appears to be incorrect. SCE did, in fact, suggest extrapolating the load shapes from the 576 data to construct an 8760 profile and asserted that this approach would meet the requirements stated at an appropriate level of accuracy given where we are in the proceeding: “hourly, machine-readable, location-specific, and capable of supporting evaluation of timing, magnitude, duration, frequency, persistence, and clustering of local grid needs.” In other words, extrapolating the 576 to construct an 8760 is seen as just as accurate/inaccurate as taking historical data and applying a flat 2% per year growth rate.

SCE remains willing to reach a resolution with Clean Coalition but this must happen within the proper scope of the proceeding and the discovery rules. SCE therefore maintains its objections.

Thank you,

Belinda Vivas

Senior Advisor
Grid Innovation | Grid Policy
M. 909-202-1673
3 Innovation Way, Pomona, CA 91768

June 26, 2026 — Clean Coalition recap of second meet-and-confer

From: **Ben Schwartz** <ben@clean-coalition.org>
Date: Fri, Jun 26, 2026 at 4:59 PM
Subject: Re: (External):Re: High DER: SCE/Clean Coalition Sync Up on DR
To: Ari G Altman <ARI.ALTMAN@sce.com>, Michael Barigian <Michael.Barigian@sce.com>
Cc: CraigLewis <craig@clean-coalition.org>, David Castle <David.Castle@sce.com>, Asad Ullah Bux <Asad.U.Bux@sce.com>, Kate Torres <Kate.Torres@sce.com>, Antonio Nunez <antonio.nunez@sce.com>, Belinda Vivas <belinda.l.vivas@sce.com>, William W Yu <William.W.Yu@sce.com>

Hi Ari,

Thank you again for meeting on Wednesday. It took me a little while to digest everything. Below is Clean Coalition's recap of the June 24 meet-and-confer. I am also attaching the recap as a Word document for convenience.

Recap of Clean Coalition – SCE Meet & Confer on June 24, 2026 (from 10-11 am)

1. Clean Coalition remains willing to resolve this without motion practice if SCE identifies a concrete production path. However, absent such a path by Friday July 3, 2026, Clean Coalition will understand the Rule 11.3 meet-and-confer process to be complete.
2. Clean Coalition understands SCE to have maintained its objection that the request is outside the proper scope of the proceeding, though SCE's explanation during the meeting focused primarily on prematurity: namely, SCE's view that data-sharing questions may be relevant to Track 2 but should be addressed later through a broader Commission-led data-governance process.
3. Clean Coalition understands SCE to have stated that production of the narrowed 8760 dataset is premature and would not lead to admissible evidence at this stage of the proceeding. Clean Coalition disagrees with that position. Clean Coalition understands SCE to have acknowledged that data-sharing questions, timing and location of grid needs, and DER orchestration use cases are relevant Track 2 issues. Clean Coalition continues to view the narrowed 8760 dataset as reasonably calculated to inform those issues, including what data is needed, whether 576 data is an adequate substitute, and what confidentiality or aggregation protections may be appropriate. Clean Coalition provided additional Track 2 use-case detail at SCE's request to facilitate resolution of the dispute. Clean Coalition does not understand that additional detail to have narrowed, superseded, or waived the relevance basis for Questions 6 and 7.
4. Clean Coalition asked SCE to identify when the request would become ripe, what procedural milestone would make 8760 data sharing appropriate, and whether SCE would

provide 8760 data to parties at that point. Clean Coalition understands that SCE did not identify such a milestone or commit to future production.

5. Clean Coalition understands that SCE has raised burden, cost, and precedent concerns during the meet-and-confer process, although SCE stated during the June 24 meeting that burden is not its primary basis for objection. Clean Coalition understands that SCE did not quantify the burden associated with producing the narrowed Goleta/Vegas/Wasp dataset or identify a concrete production condition that would resolve those concerns.
6. Clean Coalition understands SCE to have stated that the Wasp feeder and the low-voltage Goleta substation raise 15/15 concerns. Clean Coalition further understands SCE to have applied the 15/15 screen based on a single hour of the year. Clean Coalition asked SCE to explain the basis for applying the screen in that manner and whether any mitigation, including aggregation, masking, normalization, confidentiality designation, NDA, use limitations, or partial production, would allow production of any portion of the narrowed dataset. Clean Coalition understands that SCE did not identify during the meeting any mitigation path that would allow production of all or part of the narrowed dataset.
7. Clean Coalition understands SCE to have stated that the Goleta-area system includes distinctions between low-voltage distribution substations and subtransmission/T-D facilities, and that SCE's subtransmission system serving the region is radial and not represented in the same manner as facilities shown in public maps or DRPEP. Clean Coalition requested that SCE identify the electrically relevant facilities needed to respond to the request for Goleta-area hourly load data. Clean Coalition understands that SCE did not provide a complete list of such facilities or identify how those distinctions would allow SCE to provide a modified production.
8. Clean Coalition understands SCE to have stated that historical 8760 load data is insufficient for forward-looking planning because future load growth, forecast assumptions, planned upgrades, and operational constraints may differ from historical conditions. Clean Coalition agrees that a final planning-grade analysis may require additional forecasted and engineering data. However, Clean Coalition does not agree that this makes historical 8760 data irrelevant or not reasonably calculated to inform Track 2 issues. Historical hourly load data provides the baseline for understanding actual load shapes, timing and duration of local peaks, seasonal patterns, ramping conditions, and the persistence of constraint-relevant hours. It also helps identify what additional forecasted or engineering data would be needed for a Track 2 DER orchestration framework. SCE's response to Question 10 confirms that 8760 load profiles are relevant to distribution-connected BESS charging analysis, even if a final application would use forecasted 8760 profiles. Clean Coalition understands that SCE did not identify an alternative dataset that would be hourly, machine-readable, location-specific, and capable of supporting evaluation of timing, magnitude, duration, frequency, persistence, and clustering of local grid needs.
9. Clean Coalition asked SCE to identify use cases where 576 data would be sufficient in place of 8760 hourly data for the Track 2 use cases Clean Coalition identified. Clean Coalition understands SCE to have identified ICA and grid needs assessment processes as examples where 576 data or smaller profiles may be used. Clean Coalition does not understand SCE to have explained how those examples would allow parties to evaluate the timing, magnitude, duration, frequency, persistence, or clustering of local grid needs in the same manner as hourly 8760 data. Clean Coalition also does not understand SCE to

have explained how reliance on ICA or DRPEP-derived profiles resolves Clean Coalition's concern that, for Track 2 purposes, the adequacy of public-facing data for DER orchestration is itself an issue in dispute.

10. Clean Coalition continues to seek hourly, machine-readable 8760 data responsive to Questions 6 and 7 of Clean Coalition's data request. For purposes of resolving this discovery dispute without motion practice, Clean Coalition has been willing to discuss a narrowed production limited to the Goleta substation, Vegas substation, and Wasp feeder, subject to reasonable confidentiality, aggregation, NDA, or use protections.

Please let us know if SCE disagrees with any aspect of this recap. Otherwise, Clean Coalition will await SCE's final position or concrete production path by Friday, July 3, 2026.

Best regards,

Ben Schwartz

June 22, 2026 — SCE submits written response detailing objections and Clean Coalition responds, with an outline for the second meet-and-confer meeting.

On Mon, Jun 22, 2026 at 4:18 PM Ben Schwartz <ben@clean-coalition.org> wrote:
Hi Ari,

I agree that keeping the hour on Wednesday would be useful. Clean Coalition remains willing to meet once more to determine whether the parties can resolve this discovery dispute without motion practice.

To keep the discussion productive, Clean Coalition understands the immediate question to be whether SCE will provide the narrowed 8760 dataset discussed during the meet-and-confer process—Goleta substation, Vegas substation, and Wasp feeder—in hourly, machine-readable form, subject to reasonable confidentiality, aggregation, or use protections if needed.

Clean Coalition provided additional Track 2 use-case detail at SCE's request to facilitate resolution of this dispute. Clean Coalition does not agree that providing that detail changed the scope of the original request, superseded the original relevance showing, or opened the door to reject the request based on new objections. The additional use cases are extensions of the same Track 2 issues discussed during the parties' prior meet-and-confer: DER orchestration, load flexibility, VPP design, distribution deferral screening, and T-D interface coordination.

For the upcoming meeting, Clean Coalition proposes that the parties focus on the specific basis, if any, that prevents SCE from providing the narrowed dataset. In particular:

1. Is SCE maintaining that the narrowed dataset is not relevant to Track 2?
2. Is SCE asserting burden as an independent basis for refusal? If so, what is the estimated burden for the narrowed dataset?
3. Is SCE asserting a confidentiality, 15/15, cybersecurity, or operational-security concern? If so, what specific data is affected and what mitigation would allow production?

4. Is SCE asserting that 576 data is an adequate substitute? If so, how would 576 data allow parties to evaluate the timing, magnitude, duration, and frequency of local grid needs in the same manner as hourly 8760 data?

Clean Coalition is not seeking to resolve the entire future data-governance framework through this data request. Nor is Clean Coalition asking SCE to endorse any Clean Coalition analysis. The immediate issue is whether the narrowed hourly dataset is discoverable under Rule 10.1 and can be produced with reasonable protections.

If SCE maintains its objection after the next meet-and-confer, Clean Coalition will understand the Rule 11.3 meet-and-confer process to be complete.

Best regards,

Ben Schwartz

On Mon, Jun 22, 2026 at 3:13 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

After careful consideration, the SCE team submits its response (attached) to your request for 8760 data to support Track 1 and Track 2 inquiries in the High DER proceeding.

We'll continue to hold the 10-11am timeslot on Wednesday, June 24th to discuss further with you. If you'd like any change to that plan, please let me know.

Regards,

Ari

Ari Altman

Senior Advisor

Grid Modernization Policy

Regulatory Affairs

(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

June 17, 2026 — SCE cancels second meet-and-confer and Clean Coalition accepts SCE's proposal for SCE to send a detailed response on June 22, 2026.

From: **Ben Schwartz** <ben@clean-coalition.org>

Date: Wed, Jun 17, 2026 at 12:30 PM

Subject: Re: (External):Re: High DER: SCE/Clean Coalition Follow-up Meet and Confer on DR

To: Ari G Altman <ARI.ALTMAN@sce.com>

Cc: CraigLewis <craig@clean-coalition.org>, Asad Ullah Bux <Asad.U.Bux@sce.com>, David Castle <David.Castle@sce.com>, Kate Torres <Kate.Torres@sce.com>, Antonio Nunez <antonio.nunez@sce.com>, William W Yu <William.W.Yu@sce.com>, Michael Barigian <Michael.Barigian@sce.com>, Belinda Vivas <belinda.l.vivas@sce.com>

Hi Ari,

I understand SCE's desire to fully address the use cases we posed. All of these are extensions of the subjects I provided in my initial email response to you from June 3, 2026 connecting with Track 2 and the need for 8760 hourly load data. Clean Coalition accepts SCE's proposal to cancel the meeting today and submit a response by COB on Monday (June 22). With that being said, I think it is important to get a meeting on the calendar, unless SCE feels that an additional meeting will not be necessary. We are available for a follow up meeting on Wednesday or Friday of next week.

We are looking to close this issue off and receive data by the end of the month.

Best regards,

Ben Schwartz

On Wed, Jun 17, 2026 at 12:10 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Craig and Ben,

Thank you for the detailed updates on your intended use cases. Given the breadth of topics you cover, SCE believes it would be best to cancel today's meeting and submit to you a written response in advance of any future meeting. We can provide you our response by COB, Monday the 22nd.

Regards,

Ari

Ari Altman
Senior Advisor
Grid Modernization Policy
Regulatory Affairs
(626) 302-4946/ext. 24946
2244 Walnut Grove Ave., Rosemead, CA 91770

June 16, 2026 — Clean Coalition provides additional use-case details.

From: **Ben Schwartz** <ben@clean-coalition.org>
Date: Tue, Jun 16, 2026 at 3:54 PM

Subject: Re: High DER: SCE/Clean Coalition Follow-up Meet and Confer on DR
To: Ari G Altman <ARI.ALTMAN@sce.com>
Cc: CraigLewis <craig@clean-coalition.org>, Asad Ullah Bux <Asad.U.Bux@sce.com>, David Castle <David.Castle@sce.com>, Kate Torres <Kate.Torres@sce.com>, Antonio Nunez <antonio.nunez@sce.com>

Hi Ari:

Thank you for providing an agenda to guide the meeting tomorrow. As requested, Clean Coalition provides the following Track 2 use cases to support tomorrow's meet-and-confer follow up, without waiving Clean Coalition's position that the data is also relevant to Track 1/ICA issues.

At the outset, Clean Coalition recognizes that historical 8760 load data alone does not provide a complete forward-looking DER orchestration framework. Forecasted load growth, limiting equipment, planned upgrades, existing and forecasted DER adoption, and operational constraints may also be needed for a final planning-grade assessment. However, hourly load data is the foundational screening dataset for identifying the timing, magnitude, duration, and frequency of local grid needs. It is also directly relevant to SCE's own response to Question 10, which states that SCE's planning methodology for hourly available charging capacity for distribution-connected BESS depends on an 8760 load profile.

Clean Coalition identifies the following Track 2 use cases:

1. **DER orchestration siting:** Hourly load data helps identify which substations or feeders have recurring, temporally concentrated peaks that could be addressed through load flexibility, storage dispatch, or VPP programs. A location with a handful of short-duration annual peaks is a different orchestration candidate than one with broad daily overload risk.
2. **Upgrade deferral screening:** 8760 data allows parties to estimate the magnitude, timing, and duration of load reductions needed to defer or reduce traditional upgrades. Without hourly data, it is difficult to distinguish a 2 MW need for 20 hours per year from a 2 MW need for 1,000 hours per year.
3. **VPP overlay design:** Hourly data can show whether a VPP should target evening peaks, midday reverse-flow periods, shoulder-season conditions, steep ramps, or coincident CAISO peak periods. This is directly related to DER dispatchability/control and the operational needs of a high-DER grid.
4. **T-D interface coordination:** The Goleta Load Pocket is a useful case study because it is electrically constrained and located at the edge of the grid, with both local reliability issues and resilience concerns due to geography and extreme weather risk. Hourly substation data helps evaluate whether distribution-level flexibility could reduce stress at the T-D interface, support reliability coordination, and reduce dependence on transmission-side solutions.
5. **Screening for load flexibility and DER orchestration value:** Hourly load data helps identify when and where flexible capacity may provide distribution-system value by showing the timing, magnitude, duration, and frequency of local loading conditions. This does not require Clean Coalition to develop a final compensation framework from the data alone. Rather, it provides the factual basis for determining whether a location warrants further utility review, targeted DER orchestration, load-flexibility program design, or a more granular secondary-distribution analysis.

6. **Identifying candidate locations for distribution-connected BESS:** SCE’s response to Question 10 states that its planning methodology for estimating hourly available charging capacity for front-of-meter distribution-connected BESS depends on an 8760 load profile. The requested data would allow Clean Coalition to begin identifying locations where BESS may be able to charge during available-capacity windows and discharge during local peak or constraint-relevant periods. This use case is directly relevant to Track 2 because it helps identify where DERs may provide operational value through a DSO/DER orchestration framework.

7. **Data-access standards for a DSO framework.** Track 2 is not just about one project—it is about identifying what information third parties need to provide grid services. If SCE’s position is that 8760 substation load data cannot be shared even under reasonable confidentiality, aggregation, or use protections, that is itself relevant to the “open access to distribution system” and DSO gap/barrier questions under consideration in Track 2.

Clean Coalition remains willing to discuss reasonable narrowing, confidentiality protections, and any specific 15/15 concerns SCE identifies. However, Clean Coalition continues to view hourly, machine-readable 8760 data as the appropriate dataset for these use cases because non-hourly summaries, static hosting-capacity values, and 576 profiles do not provide the same ability to evaluate the timing, magnitude, duration, and frequency of local grid needs.

Best regards,

Ben Schwartz

June 12, 2026 — First meet-and-confer, Clean Coalition recap, and SCE statement that it would “work up a data proposal”

On Fri, Jun 12, 2026 at 4:41 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Agenda:

- Confirm whether narrowed scope of 8760 ICA data (Goleta substation, Vegas substation, and Wasp feeder) can be provided by SCE for Clean Coalition’s Track 1 use cases
- Discuss potential data that SCE can offer to address Track 2 (DSO/DER orchestration) use cases, which SCE agrees are valid and in scope for Track 2.
- SCE to share 15/15 confidentiality concerns, if any, relating to requested data.

Microsoft Teams meeting

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From: **Ben Schwartz** <ben@clean-coalition.org>

Date: Fri, Jun 12, 2026 at 4:12 PM

Subject: Re: High DER: SCE/Clean Coalition Sync Up on DR

To: Ari G Altman <ARI.ALTMAN@sce.com>

Cc: David Castle <David.Castle@sce.com>, Asad Ullah Bux <Asad.U.Bux@sce.com>, Kate Torres <Kate.Torres@sce.com>, Antonio Nunez <antonio.nunez@sce.com>, Belinda Vivas <belinda.l.vivas@sce.com>, Craig Lewis <craig@clean-coalition.org>

Hi Ari,

Thank you to the SCE team for taking the time to meet. Scheduling an hour-long meeting from 2-3 pm on Wednesday (6/17) works well for the Clean Coalition team. Below is a recap and action items from the meeting today, as I understand them. Let me know if there is anything SCE objects to thus far to ensure that the meeting on Wednesday can be as productive as possible from the outset.

Best regards,

Ben Schwartz

Recap:

- Clean Coalition understands SCE's position to be that providing 8760 data for every substation in the Santa Barbara region will set a new precedent in the High DER proceeding, since SCE has not provided 8760 data to another party in this proceeding thus far.
- Clean Coalition understands SCE to have acknowledged that the Track 2 (DSO/DER orchestration) use cases are within the scope of the High DER proceeding and that SCE prefers to narrow the scope down to Track 2 issues.
- Clean Coalition agreed to move forward with a discussion on Track 2 use cases, but by the end of the meeting had not officially dropped Track 1 use cases.
- Clean Coalition reiterated a desire to receive 8760 hourly load data rather than alternatives like 576 data (from DRPEP).
- Clean Coalition offered to reduce the burden on SCE by requesting 8760 data for a smaller area (such as the Goleta substation, Vegas substation, and Wasp feeder, for example).
- Clean Coalition and SCE have agreed to an hour-long meet and confer next week to continue the dialogue.
- Clean Coalition demonstrated a willingness to discuss confidentiality during the next meeting to address SCE's concerns about precedent.

Action items:

- Clean Coalition to provide more detail about Track 2 uses for the requested data.
- SCE to determine any 15/15 rule applicability based on the substations Clean Coalition has requested data for.
- SCE to find a time for an hour-long meeting next week. Wednesday (6/17) works best for the Clean Coalition team.

On Fri, Jun 12, 2026 at 3:56 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:

Hi Ben,

The SCE ICA/DRPEP team would be happy to continue our conversation with you next Wednesday during any of the following time slots:

- 2-3pm
- 3-4pm
- 4-5pm

We will work up a data proposal for your orchestration-related research and send that to you in advance, as that may be broader than the specific ICA-related questions you had. We'll also inform you in advance whether we can provide the 8760 data for the two substations and the circuit you mentioned for the ICA-related analysis.

Regards,

Ari

Ari Altman

Senior Advisor

Grid Modernization Policy

Regulatory Affairs

(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

-----Original Appointment-----

From: Ari G Altman

Sent: Monday, June 8, 2026 10:09 AM

To: Ari G Altman; David Castle; Kate Torres; Asad Ullah Bux; Antonio Nunez; Ben Schwartz

Cc: Belinda Vivas

Subject: High DER: SCE/Clean Coalition Sync Up on DR

When: Friday, June 12, 2026 3:00 PM-3:30 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

Agenda: SCE and Clean Coalition to discuss the recent data request on 8760 ICA data.

Microsoft Teams meeting

Join: <https://teams.microsoft.com/meet/236467748949281?p=fTxovY220KxicHHRxM>

Meeting ID: 236 467 748 949 281

Passcode: nK2yj2Pz

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Phone conference ID: 572 626 324#

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June 5, 2026 — SCE objects to Questions 6 and 7, Clean Coalition responds with questions about SCE's justification and timing concerns, SCE acknowledges Clean Coalition's concerns, and the parties schedule a meeting for the next week.

From: **Ben Schwartz** <ben@clean-coalition.org>

Date: Fri, Jun 5, 2026 at 5:38 PM

Subject: Re: (External):Re: (External):Re: SCE's Data Request Responses to R.21-06-017 DER Integration OIR: CC-SCE-DRPEP-01 01-10

To: Ari G Altman <ARI.ALTMAN@sce.com>

Cc: William W Yu <William.W.Yu@sce.com>

I appreciate the insight, and just read through the SCE objection. Bad timing on my part that I didn't see it in my inbox until after I had already sent the response to your email. I may send over some thoughts next week, but otherwise will look out for that invite.

-Ben Schwartz

On Fri, Jun 5, 2026 at 5:30 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:

Hi Ben,

I completely agree you were very accommodating in granting the extension. To provide a bit of insight into our process, the data was quite voluminous and a system had to be set up to transfer it, as we do not produce 8760 data in this proceeding. Thus, the extension was required to proceed. In fact, the team produced the data by Monday afternoon, but after multiple rounds of

management review, it was determined that it should not be released. I let you know as early as I could that there was a concern.

I will send out an invite to you as soon as I can confirm availability on our end (it's after hours now on Friday). Look for the invite on Monday for either of the two timeslots you mentioned.

Regards,

Ari

Ari Altman

Senior Advisor

Grid Modernization Policy

Regulatory Affairs

(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

From: Ben Schwartz <ben@clean-coalition.org>

Sent: Friday, June 5, 2026 5:16 PM

To: Ari G Altman <ARI.ALTMAN@SCE.COM>

Cc: William W Yu <William.W.Yu@sce.com>

Subject: Re: (External):Re: (External):Re: SCE's Data Request Responses to R.21-06-017 DER Integration OIR: CC-SCE-DRPEP-01 01-10

Hi Ari,

I think a meeting sounds like a good next step and am available Thursday (6/11) afternoon and all day on Friday (6/12). Let me know what works best. I am interested in seeing the official objection response, but from my perspective I

I am interested in seeing the official objection response, but from my perspective I have provided SCE with a fairly substantial, but non-exhaustive, list of the uses for this data, all of which falls within the scope of the High DER proceeding, and am looking for an explanation of why that has been deemed an insufficient explanation by the SCE team. "Out of scope" is not an accurate characterization, in light of the extensive list I provided. And the fact that SCE has not provided 8760 data thus far in this proceeding does not constitute a clear legal reason not to provide the information solicited in this data request, absent some further justification.

As far as procedure goes, I was quite taken aback that you raised this issue for the first time two days before SCE's proposed deadline to provide the answers to Questions #6 & #7, after requesting two extensions. Addressing this issue prior to Day 20 (after receipt of the data request) would have been preferable. I hope that SCE will act in good faith and work with me to address this issue expeditiously.

Have a good weekend.

Best regards,

Ben Schwartz

On Fri, Jun 5, 2026 at 2:14 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

After extensive deliberation between SCE's system planning team, Legal, and Reg, we have determined that at this point, we must object to questions 6 and 7 in the data request, pending further clarification of your needs. An 8760 request is unprecedented in the context of the High DER proceeding, so we must proceed with caution.

For your awareness, you will be receiving the formal objection later this afternoon, but I also wanted to give you the opportunity to schedule a call with our team to further discuss your data needs. If you provide some times you are available next week, I will find a time to chat.

Regards,

Ari

Ari Altman

Senior Advisor

Grid Modernization Policy

Regulatory Affairs

(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

June 3, 2026 — SCE requests clarification regarding use cases, and Clean Coalition provides Track 1 and Track 2 explanations.

From: **Ben Schwartz** <ben@clean-coalition.org>

Date: Wed, Jun 3, 2026 at 3:30 PM

Subject: Re: (External):Re: SCE's Data Request Responses to R.21-06-017 DER Integration

OIR: CC-SCE-DRPEP-01 01-10

To: Ari G Altman <ARI.ALTMAN@sce.com>

Cc: William W Yu <William.W.Yu@sce.com>

Hi Ari,

The data has multiple uses for us, each of which addresses a component of the record that is being developed in the High DER proceeding. On the Microgrids piece you mentioned, this request is not related to MIP projects or any other immediately imminent project. We are working with SCE separately on MIP projects that are moving forward in the Santa Barbara

region, for which we already have the necessary design, plan, and load information. Since the microgrids proceeding has been re-opened, if I were seeking data for that purpose I would have first reached out to the SCE MIP team with whom we work closely, and followed up with a data request in that proceeding (R. 19-09-009) if necessary. This request is focused on load data for the sake of ICA methodology, ICA accuracy, distribution system operators, and DER orchestration.

ICA:

- The 8760 data will help us check the min/max substation load values in the now updated DRPEP platform to verify the accuracy of the fix SCE has implemented.
- In previous iterations of comments, Clean Coalition has raised the issue that certain feeders in the region have not been updated in a timely manner and there is data available for download in DRPEP that is multiple years old.
- We are looking to see what the load shape in the region looks like and how closely it aligns with the load shape in SCE's entire service territory and the CAISO duck curve chart. Substation data will help us understand coincident versus non-coincident peaks.
- Many of the feeders in the Goleta Load Pocket, especially downtown Santa Barbara, have little to no available capacity. The results of this data request will help determine the accuracy of those results and can tell us whether some of the violations can potentially be mitigated to reveal additional available capacity without an upgrade.
- 5760 data is more granular than ICA data and should be an effective tool to compare the DRPEP results in the region with actual data.

DSO/DER Orchestration:

- This data will help us select priority feeders/substations within the Goleta Load Pocket that may be candidate feeders for DER orchestration and/or DER deferral.
- Because the region sits at the end of SCE's grid and has only one main connection to the transmission grid, the data provides a great opportunity to determine the potential for transmission deferral in a region with relatively high DER penetration (and significant solar potential) and to think more about the T-D substation interface as a delineation between CAISO and a DSO.
- This data will provide the basis for the amount of generation/load necessary to increase the effective peak capacity available or defer upgrades in an isolated area of the distribution grid.
- This data will help us understand how the charging formula that SCE provided as a response to Question #10 is applied in the Goleta Load Pocket.

I appreciate your keen focus on not setting a new precedent. This data request, however, sits clearly within the confines of ICA and has additional value in the context of the High DER proceedings' focus on DER orchestration. I am happy to continue this dialogue as needed, but continue to expect a response from SCE on Friday as has been indicated will be feasible.

Best regards,

Ben Schwartz

On Wed, Jun 3, 2026 at 2:39 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

As the SCE team was assembling the data for questions 6 and 7, it occurred to us that the data is not clearly within the scope of High DER. Can you provide more information as to why Clean Coalition needs this particular 8760 data? Based on the locations mentioned, we believe this may be related to the microgrid project you presented on at the May 21st Track 2 workshop, but as we understand it, the projects that went through SCE's microgrid's team (MIP) were already approved and so wouldn't necessarily need new data. Notably, that proceeding is now closed.

If you can provide a sufficient need for this data to support an ongoing project, we may be able to find another way to provide it, perhaps as a non-docketed request, but we are uncomfortable providing it in the context of R.21-06-017 (High DER), as neither we nor the other IOUs provide 8760 data to stakeholders in the context of that proceeding, and we prefer not to set a precedent for providing such granular data where it doesn't clearly inform pending Commission scope in the proceeding.

Regards,

Ari

Ari Altman

Senior Advisor

Grid Modernization Policy

Regulatory Affairs

(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

May 29, 2026 and June 1, 2026 — SCE provides responses to Questions 1-5 and 8-10, confirms requested extension to June 5, 2026, and confirms that the data for Questions 6 and 7 should be ready before the June 5 deadline.

From: **Ben Schwartz** <ben@clean-coalition.org>

Date: Mon, Jun 1, 2026 at 3:12 PM

Subject: Re: SCE's Data Request Responses to R.21-06-017 DER Integration OIR: CC-SCE-DRPEP-01 01-10

To: Case Admin <Case.Admin@sce.com>

Cc: Ari G Altman <ARI.ALTMAN@sce.com>, William W Yu <William.W.Yu@sce.com>, Richard.Khoe@cpuc.ca.gov <Richard.Khoe@cpuc.ca.gov>, matt.miley (cpuc.ca.gov) <matt.miley@cpuc.ca.gov>, Abhishek@cpuc.ca.gov <Abhishek@cpuc.ca.gov>

Hi all,

Thank you for sending over the response for questions 1-10, with the answers to questions 6 and 7 expected to be received on June 5, 2026.

-Ben Schwartz

On Fri, May 29, 2026 at 3:04 PM Case Admin <Case.Admin@sce.com> wrote:

R.21-06-017	
Data Request No.	CC-SCE-DRPEP-01
Questions-Completed	01-10

Attached are SCE's Responses to Data Request set & questions noted above. Please feel free to contact us if you require further assistance.

Thank you
SOUTHERN CALIFORNIA EDISON COMPANY
CASE ADMINISTRATION
Case.Admin@sce.com

"This transmission may contain confidential information. If you are not entitled to receive confidential information in this proceeding, please destroy this material and contact case.admin@sce.com regarding your receipt of this material."

From: **Ari G Altman** <ARI.ALTMAN@sce.com>
Date: Mon, Jun 1, 2026 at 8:00 AM
Subject: RE: (External):Re: (External):R. 21-06-017 Clean Coalition Data Request 001 to Southern California Edison Company
To: Ben Schwartz <ben@clean-coalition.org>
Cc: William W Yu <William.W.Yu@sce.com>, Asad Ullah Bux <Asad.U.Bux@sce.com>

Hi Ben,

Yes, that's correct, I meant Friday, June 5th (sorry, was typing too quickly!). But as I mentioned, the team believes we can get it to you ahead of that date, potentially as early as tomorrow. I appreciate your patience.

You should have already received responses to questions 1-5 and 8-10.

Regards,

Ari

Ari Altman
Senior Advisor
Grid Modernization Policy
Regulatory Affairs
(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

May 29, 2026 — SCE requests confirmation of 8760 data format, Clean Coalition confirms request for 8760 data, second SCE extension request, and Clean Coalition granting of request

From: Ben Schwartz <ben@clean-coalition.org>
Sent: Friday, May 29, 2026 3:57 PM
To: Ari G Altman <ARI.ALTMAN@SCE.COM>
Cc: William W Yu <William.W.Yu@sce.com>; Asad Ullah Bux <Asad.U.Bux@sce.com>
Subject: Re: (External):Re: (External):R. 21-06-017 Clean Coalition Data Request 001 to Southern California Edison Company

Hi Ari,

That sounds good. I didn't see a date for the extension (so correct me if you meant something other than next Friday), but that is workable for me.

Best regards,

Ben Schwartz

On Fri, May 29, 2026 at 2:32 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

We will pivot to provide the 8760 data, which comes from a different repository. Questions 1-5 and 8-10 will be over to you by COB today, and are undergoing final processing now.

I'd like to ask for an extension to COB Friday for the 8760 data in questions 6 and 7. That's actually a worst case scenario, as we may actually be able to get it to you mid-week barring any data transfer challenges.

Please let me know if that is acceptable on your end.

Regards,

Ari

Ari Altman
Senior Advisor
Grid Modernization Policy
Regulatory Affairs
(626) 302-4946/ext. 24946
2244 Walnut Grove Ave., Rosemead, CA 91770

From: Ben Schwartz <ben@clean-coalition.org>
Sent: Friday, May 29, 2026 10:32 AM
To: Ari G Altman <ARI.ALTMAN@SCE.COM>
Cc: William W Yu <William.W.Yu@sce.com>; Asad Ullah Bux <Asad.U.Bux@sce.com>
Subject: Re: (External):Re: (External):R. 21-06-017 Clean Coalition Data Request 001 to Southern California Edison Company

Hi Ari,

For the work that we are doing, 8760 hourly data is important. Please let me know when you will be able to return the full 8760 data, and I look forward to seeing the other responses today.

-Ben Schwartz

On Fri, May 29, 2026 at 10:19 AM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

We are completing the data request today about our external portal (DRPEP). For the following two questions, we would like to know if you intended to request 576 or 8760 “hourly” data.

-
6. Provide the most recent 12-months of hourly substation load interval data in .csv format and the operating voltage (“kV”) for the Goleta substation and the substations that it feeds (e.g., downstream of the Goleta substation), including the following:
 7. Provide 12 months of historical data from 2024 for the substations listed above in Question 6.
-

For your awareness, 8760 data would be much harder for us to gather, and we are unable to meet today’s deadline if that is what you’re expecting, but we can deliver all the remaining responses today.

Please let me know your preference.

Thank you,

Ari

Ari Altman
Senior Advisor
Grid Modernization Policy
Regulatory Affairs
(626) 302-4946/ext. 24946
2244 Walnut Grove Ave., Rosemead, CA 91770

May 7, 2026 — First SCE extension request and Clean Coalition granting of request

From: Ben Schwartz <ben@clean-coalition.org>
Sent: Thursday, May 7, 2026 2:47 PM
To: Ari G Altman <ARI.ALTMAN@SCE.COM>
Cc: William W Yu <William.W.Yu@sce.com>; Legal Admin <Legal.Admin@sce.com>; Jennifer Pezda <jennifer.pezda@sce.com>
Subject: Re: (External):Re: (External):R. 21-06-017 Clean Coalition Data Request 001 to Southern California Edison Company

Hi Ari,

I agree that the request is fairly substantial and approve of the extension.

-Ben Schwartz

On Thu, May 7, 2026 at 2:27 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

After reviewing the data request, which is fairly substantial, SCE would like to request an extension from Wednesday, May 20th to Friday, May 29th.

Please let me know if you approve of this change.

Regards,

Ari

Ari Altman
Senior Advisor
Grid Modernization Policy
Regulatory Affairs
(626) 302-4946/ext. 24946
2244 Walnut Grove Ave., Rosemead, CA 91770

May 6, 2026 — Data Request submission and confirmation of receipt

From: Ben Schwartz <ben@clean-coalition.org>
Sent: Wednesday, May 6, 2026 4:06 PM
To: Ari G Altman <ARI.ALTMAN@SCE.COM>
Cc: William W Yu <William.W.Yu@sce.com>; Legal Admin <Legal.Admin@sce.com>; Jennifer Pezda <jennifer.pezda@sce.com>
Subject: (External):Re: (External):R. 21-06-017 Clean Coalition Data Request 001 to Southern California Edison Company

Great, thank you Ari.

-Ben Schwartz

On Wed, May 6, 2026 at 3:54 PM Ari G Altman <ARI.ALTMAN@sce.com> wrote:
Hi Ben,

Acknowledging receipt.

Regards,

Ari

Ari Altman

Senior Advisor

Grid Modernization Policy

Regulatory Affairs

(626) 302-4946/ext. 24946

2244 Walnut Grove Ave., Rosemead, CA 91770

From: Ben Schwartz <ben@clean-coalition.org>

Sent: Wednesday, May 6, 2026 3:36 PM

To: William W Yu <William.W.Yu@sce.com>; Ari G Altman <ARI.ALTMAN@SCE.COM>

Cc: Legal Admin <Legal.Admin@sce.com>; Jennifer Pezda <jennifer.pezda@sce.com>

Subject: (External):R. 21-06-017 Clean Coalition Data Request 001 to Southern California Edison Company

Hi Ari and William,

See the attached Clean Coalition's First Data Request to Southern California Edison Company. The data request is attached as both a pdf and word document. Please confirm receipt of this email and return the completed request within 10 business days.

Best regards,

Ben Schwartz

--

Ben Schwartz

Policy Director

Clean Coalition

(626) 232-7573

ben@clean-coalition.org

www.clean-coalition.org

Appendix D: SCE June 5, 2026 Objection to Questions 6 and 7

SCE's Response to R2106017:CC-SCE-DRPEP-01 Supplemental - Sent on Friday June 5, 2026, at 4:54 PM

Data Request No.	CC-SCE-DRPEP-01 Supplemental
Questions - Completed	Q.06-07 Supplemental
Questions - Pending	0

Attached is SCE's Data Request Response for the set noted above.

Please feel free to contact us if you require further assistance.

Thank you.

Southern California Edison Company

Case Administration

Case.Admin@sce.com

Attachment:

“SCE objects to these requests as they call for information that is not relevant to the subject matter of this proceeding. Independent validation of ICA results is not within the scope of the High DER proceeding. Third party identification of beneficial areas to deploy orchestration is also not currently within the scope of the High DER proceeding. SCE notes, however, that it is exploring data sharing to support third-party development and execution of orchestration programs, and is working on a standardized approach to provide third-parties appropriate profile data to support load flex activities.”

Appendix E: SCE June 22, 2026 Written Response Maintaining Objection to 8760 Data Request

SCE Response to Clean Coalition Data Request Seeking 8760 Circuit Data June 22, 2026

Southern California Edison Company (SCE) appreciates Clean Coalition's continued engagement in the High DER proceeding and your interest in advancing solutions that support grid modernization, distributed energy resources (DERs), and long-term reliability objectives.

SCE shares your and the Commission's vision for a high DER future and supports the development of a durable DER orchestration framework. SCE also recognizes the important role that third parties like Clean Coalition can play in developing load flexibility, storage, virtual power plant (VPP) resources, and other DER capabilities that may, under appropriate circumstances, help address local grid needs and reduce reliance on traditional infrastructure solutions. SCE is actively participating in various Commission-led efforts, most notably in Track 2 of the High DER proceeding, to define how these capabilities can be enabled in a coordinated, secure, and cost-effective manner.

SCE, however, for the reasons below, objects to your data request submitted in the High DER proceeding seeking 8760 substation and feeder-level load data for Goleta and Vegas substations and the Wasp circuit. While SCE appreciates the interests underlying the request, the request is, among other reasons, overly broad, unreasonable, not proportional to the questions currently before the Commission in this proceeding, would set a burdensome a precedent, and seeks a category of granular operational and planning data that is not necessary to resolve the identified issues at this stage. SCE believes 576 data is sufficient to achieve Clean Coalition's goals.

SCE's Understanding of Clean Coalitions Data Request Scope and Purpose

The Commission's current work in this proceeding is focused on completing updates to distribution system planning (Track 1), as well as DSO operational need, and DER orchestration concepts (Track 2). These questions can be addressed using existing record information, stakeholder input, and Commission-led analysis without requiring production of raw 8760 substation or feeder-level load data.

As described in your correspondence, the requested data is intended to support a range of objectives, including:

- Reviewing and verifying minimum and maximum substation load values in DRPEP;
- Assessing the accuracy of recent updates or fixes to platform outputs;
- Comparing DRPEP and ICA results to underlying system conditions;
- Evaluating whether available capacity results accurately reflect local conditions;
- Analyzing regional load shapes and coincident peak behavior;
- Identifying candidate locations for DER orchestration, deferral opportunities, and other localized analyses; and
- Evaluating conditions within the Goleta Load Pocket as a potential case study.

SCE appreciates these interests. However, these stated purposes indicate that the request is oriented toward independent analysis of system conditions and evaluation of utility planning and platform outputs, rather than obtaining information necessary to resolve discrete issues currently

before the Commission. Under CPUC Rule 10.1 – Discovery from Parties, “Any party may obtain discovery from any other party regarding any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, *if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.*” (emphasis added). As there is no standing order from the Commission to provide or review raw 8760 substation or feeder-level load data, your request is improper.

Track 1 Considerations – Planning Is Currently Being Improved According to Commission Direction, and Additional Granular Discovery of Data is Unwarranted

With respect to planning processes and data tools, SCE supports the continued evolution of data portals, Integration Capacity Analysis (ICA), and related tools to ensure that stakeholders have access to actionable and useful information to inform participation in planning discussions.

However, the Track 1 framework is designed to provide standardized, fit-for-purpose information through curated public tools. It is not structured to support independent reconstruction or re-analysis of utility planning outputs using raw operational datasets. Your request explicitly seeks data to verify platform outputs (e.g., DRPEP values), assess the accuracy of recent updates, and compare published results with what is described as “actual” data. To the extent there are questions regarding the accuracy or timeliness of platform outputs, those issues are more appropriately addressed through the Commission’s established processes for reviewing planning methodologies, data tools, and platform updates. This is in fact the purpose of the standing quarterly meetings, at which such questions are routinely discussed.

In addition, providing the requested dataset would not, by itself, enable meaningful validation of planning results. Such results depend on a range of modeling assumptions, system conditions, engineering criteria, and analytical frameworks that are not captured in the requested data alone. As a result, requests of this nature may create significant data production burdens without reliably achieving the stated objective, and misuse of the data, however unintentional, would risk generating flawed conclusions.

Expanding discovery to include this type of dataset would also move beyond the structured framework established for planning and tool development and could lead to broader requests for additional modeling inputs and data elements. This outcome would be inconsistent with how the Commission has sought stakeholder participation in distribution planning and goes beyond what is required by the Commission’s current framework for this proceeding, and is improper.

Track 2 Considerations – Policy Is Still Under Development and Data Production at This Time is Premature

SCE agrees that understanding the timing and location of grid needs is an important consideration in developing a future DER orchestration framework. SCE also recognizes that improved visibility into system conditions may be relevant in a future operational context.

With that said, the consideration of these concepts does not make production of full 8760 substation or feeder datasets appropriate at this stage of the proceeding. The Commission can evaluate the policy questions associated with orchestration, DSO roles, and barriers to DER participation without requiring production of granular system data in this context. Similarly, while the Goleta Load Pocket may present an interesting case study for conceptual discussion, it

is not a Commission-designated proceeding test case that would necessitate production of detailed hourly system data through this request.

With respect to third-party participation, SCE recognizes and supports the important role that non-utility entities can play in developing DER solutions. The question at issue here, however, is not whether such participation is valuable, but rather how data access should be structured to support that participation in a consistent, secure, and policy-aligned manner.

Additionally, the breadth of the stated orchestration use cases further underscores that the request is exploratory and analytical in nature, rather than focused on a specific issue that requires resolution at the current stage of Track 2 of the proceeding – in short, this data request is premature and thus not ripe for consideration.

The Appropriate Forum for Data Access and Governance

SCE agrees that questions regarding what data should be available to third parties—and in what form—are important to the development of a durable DER orchestration framework. The Commission has established dedicated processes to address these issues comprehensively, including consideration of:

- Appropriate use cases for data access;
- Data granularity and structure;
- Confidentiality and privacy protections;
- Cybersecurity and operational considerations;
- Standardization and consistency across utilities; and
- Data delivery mechanisms and accessibility.

These are complex, interrelated issues that benefit from a structured, Commission-led policy framework. Addressing them through a single discovery request would not provide the comprehensive and durable solution needed to support long-term data access, and would potential put one part at a particular advantage vis a vis other parties. [SCE footnote: Likewise, making the requested data available to all parties would come at a significant cost.] SCE remains committed to participating constructively in the Commission’s ongoing work to develop appropriate data-sharing frameworks and to supporting solutions that enable effective use of DERs and third-party innovation in a high-DER future. Your data request, however, is inappropriate at this point in the proceeding.

A Constructive Path Forward

SCE remains committed to working collaboratively with stakeholders and the Commission to advance the development of effective DER-related policy and data frameworks. SCE is willing to continue engaging on:

- The types of information that may be useful to support DER orchestration and third-party participation;
- How planning and operational information can be presented in formats that are accessible and meaningful; and
- Future enhancements to data tools and processes consistent with Commission direction.

SCE is also open to continued dialogue regarding how specific questions raised in your request may be addressed at an appropriate level of detail within the scope of this proceeding.

Conclusion

SCE appreciates the objectives underlying your request and shares the broader goal of continually enhancing the capabilities of the grid through enablement and leveraging of DERs. At the same time, for the reasons described above, SCE respectfully objects to this request as overbroad and not reasonably necessary to resolve the issues before the Commission in this proceeding.

Please let us know if you would like to discuss further.

Appendix F: June 26 Clean Coalition recap of the June 24 meet-and-confer Recap of Clean Coalition – SCE Meet & Confer on June 24, 2026 (from 10-11 am)

1. Clean Coalition remains willing to resolve this without motion practice if SCE identifies a concrete production path. However, absent such a path by Friday July 3, 2026, Clean Coalition will understand the Rule 11.3 meet-and-confer process to be complete.
2. Clean Coalition understands SCE to have maintained its objection that the request is outside the proper scope of the proceeding, though SCE's explanation during the meeting focused primarily on prematurity: namely, SCE's view that data-sharing questions may be relevant to Track 2 but should be addressed later through a broader Commission-led data-governance process.
3. Clean Coalition understands SCE to have stated that production of the narrowed 8760 dataset is premature and would not lead to admissible evidence at this stage of the proceeding. Clean Coalition disagrees with that position. Clean Coalition understands SCE to have acknowledged that data-sharing questions, timing and location of grid needs, and DER orchestration use cases are relevant Track 2 issues. Clean Coalition continues to view the narrowed 8760 dataset as reasonably calculated to inform those issues, including what data is needed, whether 576 data is an adequate substitute, and what confidentiality or aggregation protections may be appropriate. Clean Coalition provided additional Track 2 use-case detail at SCE's request to facilitate resolution of the dispute. Clean Coalition does not understand that additional detail to have narrowed, superseded, or waived the relevance basis for Questions 6 and 7.
4. Clean Coalition asked SCE to identify when the request would become ripe, what procedural milestone would make 8760 data sharing appropriate, and whether SCE would provide 8760 data to parties at that point. Clean Coalition understands that SCE did not identify such a milestone or commit to future production.
5. Clean Coalition understands that SCE has raised burden, cost, and precedent concerns during the meet-and-confer process, although SCE stated during the June 24 meeting that burden is not its primary basis for objection. Clean Coalition understands that SCE did not quantify the burden associated with producing the narrowed Goleta/Vegas/Wasp dataset or identify a concrete production condition that would resolve those concerns.
6. Clean Coalition understands SCE to have stated that the Wasp feeder and the low-voltage Goleta substation raise 15/15 concerns. Clean Coalition further understands SCE to have applied the 15/15 screen based on a single hour of the year. Clean Coalition asked SCE to explain the basis for applying the screen in that manner and whether any mitigation, including aggregation, masking, normalization, confidentiality designation, NDA, use limitations, or partial production, would allow production of any portion of the narrowed dataset. Clean Coalition understands that SCE did not identify during the meeting any mitigation path that would allow production of all or part of the narrowed dataset.
7. Clean Coalition understands SCE to have stated that the Goleta-area system includes distinctions between low-voltage distribution substations and subtransmission/T-D facilities, and that SCE's subtransmission system serving the region is radial and not represented in the same manner as facilities shown in public maps or DRPEP. Clean Coalition requested that SCE identify the electrically relevant facilities needed to respond to the request for Goleta-area hourly load data. Clean Coalition understands that SCE did not provide a complete list of such facilities or identify how those distinctions would allow SCE to provide a modified production.

8. Clean Coalition understands SCE to have stated that historical 8760 load data is insufficient for forward-looking planning because future load growth, forecast assumptions, planned upgrades, and operational constraints may differ from historical conditions. Clean Coalition agrees that a final planning-grade analysis may require additional forecasted and engineering data. However, Clean Coalition does not agree that this makes historical 8760 data irrelevant or not reasonably calculated to inform Track 2 issues. Historical hourly load data provides the baseline for understanding actual load shapes, timing and duration of local peaks, seasonal patterns, ramping conditions, and the persistence of constraint-relevant hours. It also helps identify what additional forecasted or engineering data would be needed for a Track 2 DER orchestration framework. SCE's response to Question 10 confirms that 8760 load profiles are relevant to distribution-connected BESS charging analysis, even if a final application would use forecasted 8760 profiles. Clean Coalition understands that SCE did not identify an alternative dataset that would be hourly, machine-readable, location-specific, and capable of supporting evaluation of timing, magnitude, duration, frequency, persistence, and clustering of local grid needs.
9. Clean Coalition asked SCE to identify use cases where 576 data would be sufficient in place of 8760 hourly data for the Track 2 use cases Clean Coalition identified. Clean Coalition understands SCE to have identified ICA and grid needs assessment processes as examples where 576 data or smaller profiles may be used. Clean Coalition does not understand SCE to have explained how those examples would allow parties to evaluate the timing, magnitude, duration, frequency, persistence, or clustering of local grid needs in the same manner as hourly 8760 data. Clean Coalition also does not understand SCE to have explained how reliance on ICA or DRPEP-derived profiles resolves Clean Coalition's concern that, for Track 2 purposes, the adequacy of public-facing data for DER orchestration is itself an issue in dispute.
10. Clean Coalition continues to seek hourly, machine-readable 8760 data responsive to Questions 6 and 7 of Clean Coalition's data request. For purposes of resolving this discovery dispute without motion practice, Clean Coalition has been willing to discuss a narrowed production limited to the Goleta substation, Vegas substation, and Wasp feeder, subject to reasonable confidentiality, aggregation, NDA, or use protections.

Please let us know if SCE disagrees with any aspect of this recap. Otherwise, Clean Coalition will await SCE's final position or concrete production path by Friday, July 3, 2026.

Appendix G: SCE July 2 response to the June 26 recap

On Thu, Jul 2, 2026 at 4:55 PM Belinda Vivas <belinda.l.vivas@sce.com> wrote:
Good Afternoon Ben:

Thank you for your email. As you noted, the “recap” represents Clean Coalition’s characterization of the meeting. SCE has already presented its positions and will not be speaking to the accuracy or completeness of the “recap.” Notwithstanding this, SCE would like to note the following:

- Point #7 in the “recap” appears to include a factual error – see correction in red: “...SCE’s subtransmission system serving the region is ~~radial~~ **a network configuration** and not represented in the same manner as facilities shown in public maps or DRPEP.”
- Point #8 in the “recap” appears to be incorrect. SCE did, in fact, suggest extrapolating the load shapes from the 576 data to construct an 8760 profile and asserted that this approach would meet the requirements stated at an appropriate level of accuracy given where we are in the proceeding: “hourly, machine-readable, location-specific, and capable of supporting evaluation of timing, magnitude, duration, frequency, persistence, and clustering of local grid needs.” In other words, extrapolating the 576 to construct an 8760 is seen as just as accurate/inaccurate as taking historical data and applying a flat 2% per year growth rate.

SCE remains willing to reach a resolution with Clean Coalition but this must happen within the proper scope of the proceeding and the discovery rules. SCE therefore maintains its objections.

Thank you,

Belinda Vivas
Senior Advisor
Grid Innovation | Grid Policy
M. 909-202-1673
Innovation Way, Pomona, CA 91768

Appendix H: Q2 Excerpt from Integration Capacity Analysis 2026 Second Quarter Workshop Follow-Up Responses Regarding the 15/15 Rule

Source: *Integration Capacity Analysis 2026 Second Quarter Workshop Follow-Up Responses*

Relevant excerpt: Responses to Clean Coalition question regarding temporal evaluation of the 15/15 Rule.

Excerpt begins:

Integration Capacity Analysis 2026 Second Quarter Workshop Follow-up Responses

1. ASK (all IOUs): Please provide clarity on how 15/15 rule is evaluated, particularly temporally.
 - a) **PG&E Response:** PG&E evaluates the 15/15 confidentiality rule as a single determination per study cycle, not as a rolling hour-by-hour test. The customer-count and single-customer-share metrics are assessed at the cycle's peak-demand hour, and the single-customer metric is that customer's share of the circuit's peak load.
 - b) **SCE Response:** SCE interprets the question to refer only to the relative energy consumption criteria of the 15/15 rule. As such, SCE calculates each customer's share of energy consumption by *dividing the customer's total billed energy usage (kWh)* over the previous 12 months by the *total billed energy usage (kWh)* of all customers on the relevant segment over the same 12-month period. Where this quotient is greater than 15%, the relative energy consumption criteria is satisfied (passed). This check is performed monthly using the latest 12 months of billed usage.
 - c) **SDG&E Response:** SDG&E evaluates the 15/15 rule annually. The evaluation reviews the previous 12 months of loading data for each circuit and identifies the timestamp of the circuit's peak load. The net load of each Customer meter at that timestamp is compared to the circuit load. If any single Customer contributes 15% or more of the circuit's peak load, the circuit is included on the 15/15 list. Circuits serving 15 or fewer Customers are also included on the 15/15 list. Separate evaluations are performed for buses and substations using the same methodology.

Excerpt ends.

Appendix I: SCE May 29, 2026 Responses to Clean Coalition Data Request CC-SCE-DRPEP-01, Questions 1–5 and 8–10

Southern California Edison

R.21-06-017 – DER

Integration OIR

**DATA REQUEST SET CC - SCE - DRP E
P - 01**

To: Clean Coalition

Prepared by: Asad

Ullah Bux Job Title:

Tech Spec Advisor

Received Date: 5/6/2026

Response Date: 5/29/2026

Question 01-10:

The following questions are regarding an email from SCE to the R. 21-06-017 service list on April 28, 2026, about incorrect substation load profile information in SCE’s Distributed Resources Plan External Portal (DRPEP). The email is reproduced below as Appendix A.

1. Please explain when the SCE team identified the issue with the substation load profiles, as referenced in the following quote from the April 28, 2026, email.
“Specifically, at this time the load values shown in megawatts (MW) on substation load profile graphs do not accurately reflect actual substation load profiles.”
 - a. Detail the process that SCE used to determine that the substation load values are incorrect and provide all associated documents.
 - b. Was the error identified the result of a methodological issue, incorrect inputs, or improper results validation?
2. Are the erroneous substation load values present throughout all substations in SCE’s service territory or limited to a certain number of substations?
3. How soon will SCE be able to fully implement a resolution that corrects the erroneous substation load values?
 - a. Is SCE on target to implement a solution based on the timeline provided in the email or is a delay likely? Provide all relevant documents.
4. Provide SCE’s cost estimate for the implementation process of the change that resulted in erroneous substation load values and the expected cost of implementing the solution.
 - a. If SCE does not have any such cost-estimate, for what type of error or ICA remediation solution would a cost-estimate be developed?
5. Will the erroneous substation load values impact SCE’s ability to “reactivate circuits that are currently inactive on their ICA maps by September 30, 2026,” as required in Resolution 5440, issued April 9, 2026?
 - a. If yes, provide details about how the timeline for reactivating circuits

will be impacted, including documentation.

6. Provide the most recent 12-months of hourly substation load interval data in .csv format and the operating voltage (“kV”) for the Goleta substation and the substations that it feeds (e.g., downstream of the Goleta substation), including the following:
 - a. Isla Vista
 - b. Vegas
 - c. Part P.T.
 - d. Barwick P.T.
 - e. Via Huerto P.T.
 - f. Nogal P.T.
 - g. La Cumbre P.T.
 - h. San Marcos
 - i. Westfall P.M.
 - j. Playa
 - k. Santa Barbara
 - l. Ashley P.T.
 - m. Montecito
 - n. Tatanka P.T.
 - o. Ortega
 - p. Nidever P.T.
 - q. Carpinteria
 - r. Canalino P.T.
 - s. Casitas
7. Provide 12 months of historical data from 2024 for the substations listed above in Question 6.
8. Provide a list of behind-the-meter generating capacity aggregated at each electrical substation listed above in Question 6.
9. Provide any internal load forecasts or peak demand estimates for the region served by the substations listed above in Question 6.
 - a. Are distribution grid constraints in the region coincident with the CAISO-controlled grid? Provide a comparison that details similarities and differences during peak, off- peak, and super off-peak periods.
10. Provide the charging formula SCE uses to determine when front-of-meter distribution- connected batteries are able to charge, including all relevant papers.
 - a. Is there a specific formula for the region served by the substations listed in Question 6?
 - b. If yes, provide the unique formula, requirements, and historical evidence.

Response to Question 01-10:

1. The issue with the substation load profile megawatt (MW) values was identified by the SCE team on April 1, 2026. At that time, it was determined that the MW values displayed in the substation load profile graphs/downloadable file did not accurately reflect the actual substation load conditions.

- a. During an internal quality assurance review of the DRPEP datasets, SCE identified an anomaly in the substation load profile visualizations, where certain charted values exhibited unusually high peaks that were not consistent with expected operating conditions or system-of-record data. This condition was traced to logic associated with the substation load profile feature introduced in October 2025. Specifically, the issue originated from methodology used to convert Amperage (A) values to Megawatts (MW) for display purposes within the DRPEP user interface. SCE confirms that the underlying Amperage data, which is sourced directly from system-of-record datasets, has remained accurate and unaffected. The discrepancy was limited to the derived MW values presented in the visualization layer and did not impact the integrity of the source data or any planning analyses that rely on those inputs. Upon identification of the issue, SCE performed a root cause analysis and developed a corrected conversion methodology. This updated logic has been implemented to ensure that MW values are accurately derived from the corresponding Amperage inputs. Validation checks have been conducted to confirm alignment with system-of-record data.
2. The issue was attributed to the Amps-to-MW conversion logic and was limited to substation load profiles displayed in DRPEP visualizations and downloadable outputs. It is best classified as an improper results validation issue, as discrepancies were not identified through existing validation controls. The underlying system-of-record data was not affected. This issue affected the megawatt (MW) visualization and downloadable files for all substation load profiles.
3. SCE successfully remediated the underlying issue. Corrected substation load profiles and downloadable files were made available to DRPEP users on May 11, 2026 as planned
 - a. The solution was implemented with no delay
4. This update did not result in any incremental costs and was implemented within existing operational resources.
 - a. Cost estimates are developed for enhancements that require new functionality, system changes, or expanded scope beyond existing capabilities. These activities are typically managed through project-based funding. Minor defect resolution and routine maintenance activities are addressed within existing operational resources and are not associated with specific cost estimates.
5. This has no impact to SCE's ability to reactivate circuits that are currently inactive on ICA map. The substation load profile errors were isolated to conversion logic that has since been corrected, posing no additional challenges to circuit reactivation.
 - a. N/A
6. The response to Question #6 will be provided at a later date.
7. The response to Question #7 will be provided at a later date.
8. Please refer to the attached file for aggregated substation generation data. [See JPEG

below)

9. Within the GNA layer and downloadable planning assumptions, SCE provides substation-level forecasts including peak demand estimates for the substations referenced above.
 - a. DRPEP does not maintain data or analyses that enable a direct comparison between distribution system constraints and CAISO-controlled grid conditions. Based on internal verification, SCE personnel are not aware of any existing analysis or dataset for the referenced substations that would support such a comparison.
10. SCE utilizes both planning-based methodologies and real-time operational controls to determine the charging capability of front-of-meter, distribution-connected battery energy storage systems (BESS).

From a planning perspective, SCE applies the following formula to estimate available charging capacity:

Hourly Available Capacity = [95% of the most limiting component's rating] – [8760 load profile]

Application of this methodology requires:

- The forecasted 8760-hour load profile for the most limiting distribution component;
- The number of as-available Battery Electric Storage System (BESS) projects connected to that limiting component; and
- The aggregated gross nameplate capacity of those connected BESS resources.

From an operational perspective, SCE's control systems dynamically manage charging behavior. The Constraint Management System (CMS) calculates charging limits based on real-time grid conditions and communicates allowable charging levels to BESS facilities at regular intervals (e.g., approximately every 30 seconds). CMS monitors system conditions and BESS charging behavior to ensure compliance with system constraints and to prevent overload conditions, issuing alerts or notifications as necessary.

The DRPEP platform is not designed to develop, store, or provide charging equations or static charging tables for BESS facilities, and therefore does not contain data specific to such derivations.

- a. The methodology described above is applied consistently across SCE's service territory.
- b. N/A

Answer to Question 8:

	A	B	C	D	E	F	G
1	SUB_NAME	SYS_NAME	SUBSTATION_VOLTAGE	EXISTING_GEN(MW)	QUEUED_GEN(MW)	TOTAL_GEN(MW)	
2	Ashley P.T.	Goleta 220/66 System	16/4.16 kV	0.226	0.008	0.234	
3	Barwick P.T.	Goleta 220/66 System	16/2.4 kV	0.047	0	0.047	
4	Canalino P.T.	Goleta 220/66 System	16/2.4 kV	0	0	0	
5	Carpinteria	Goleta 220/66 System	66/16 kV	16.762	11.737	28.498	
6	Casitas	Santa Clara 220/66 System	66/16 kV	7.421	2.478	9.899	
7	Goleta	Goleta 220/66 System	66/16 kV	1.414	0.81	2.224	
8	Isla Vista	Goleta 220/66 System	66/16 kV	5.078	1.442	6.52	
9	La Cumbre P.T.	Goleta 220/66 System	16/4.16 kV	0.494	0.066	0.561	
10	Montecito	Goleta 220/66 System	16/4.16 kV	1.497	0.83	2.327	
11	Nidever P.T.	Goleta 220/66 System	16/2.4 kV	0.054	0.017	0.071	
12	Nogal P.T.	Goleta 220/66 System	16/4.16 kV	0.274	0.027	0.302	
13	Ortega	Goleta 220/66 System	66/33 kV	0	0	0	
14	Par P.T.	Goleta 220/66 System	16/2.4 kV	0.013	0	0.013	
15	Playa	Goleta 220/66 System	16/4.16 kV	2.183	0.191	2.375	
16	San Marcos	Goleta 220/66 System	66/16 kV	9.545	2.211	11.756	
17	Santa Barbara	Goleta 220/66 System	66/4.16 kV	2.224	0.205	2.429	
18	Santa Barbara	Goleta 220/66 System	66/16 kV	17.827	4.468	22.295	
19	Tatanka P.T.	Goleta 220/66 System	16/4.16 kV	0.207	0.1	0.307	
20	Vegas	Goleta 220/66 System	66/16 kV	10.425	3.784	14.209	
21	Via Huerto P.T.	Goleta 220/66 System	16/4.16 kV	0.186	0.02	0.207	
22	Westfall P.M.	Goleta 220/66 System	16/4.16 kV	0.928	0.105	1.033	

Appendix J: Excerpt from SCE’s July 31, 2026 Integration Capacity Analysis and Data Portal Biannual Report

Source: Southern California Edison Company, *Integration Capacity Analysis and Data Portal Biannual Report*, R. 21-06-017, July 31, 2026, p. 3.

Page 3 — Data Accuracy & Alignment Issues

Excerpt begins:

Data Accuracy & Alignment Issues

During this quarterly reporting cycle, SCE identified and corrected a defect in the amperage-to-megawatt conversion logic affecting certain DRPEP substation load profile visualizations and downloads; the issue was limited to displayed MW values, did not affect underlying system-of-record data or planning analyses, and was fully resolved with corrected outputs published on May 11, 2026.

In response to stakeholder feedback, SCE identified that the DRPEP “Forecasted Circuit Load Profiles” download feature was temporarily providing historical circuit load profile data while forecast datasets remained under development; SCE implemented user-facing disclosures to clarify the dataset content and will publish forecasted circuit load profiles as part of future DRPEP enhancements.

Excerpt ends.