BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

CLEAN COALITION COMMENTS ON PROPOSED DECISION ADDRESSING TRACK 3 ISSUES DIRECTING LARGE INVESTOR-OWNED UTILITIES TO SUPPORT AFFORDABILITY THROUGH FLEXIBLE SERVICE CONNECTIONS

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RECOMMENDED CHANGES TO THE PROPOSED DECISION

Clean Coalition strongly supports the Proposed Decision's expansion of flexible service connections ("FSCs") and requests that the Commission amend its Findings of Fact, Conclusions of Law, and Ordering Paragraphs, as detailed in Appendix A, to:

1. **Establish a shared-savings principle for non-bridging FSCs.** Recognize that customers providing dependable flexibility that avoids, defers, or reduces distribution infrastructure investments should be eligible for compensation based on a reasonable portion of verified net ratepayer savings. Require development of a technology-neutral compensation framework that accounts for customer and utility costs, performance requirements, and residual infrastructure needs, while ensuring that ratepayers retain net benefits.
2. **Accelerate development of the durable non-bridging compensation framework.** Require the durable non-bridging workshops to occur within 180 days of adoption, followed by a workshop report within 60 days and an Energy Division staff proposal within 120 days thereafter. The staff proposal should address compensation methodologies, cost-effectiveness standards, performance requirements, and implementation pathways, and lead to formal Commission consideration rather than discretionary future action.
3. **Require FSC savings to be incorporated into distribution investment decisions.** Build upon the PD's existing distribution planning requirements by directing the IOUs to adjust planned infrastructure investments when verified FSC arrangements avoid, defer, or right-size upgrades. Ensure that these outcomes affect the scope, timing, and cost of planned projects and are reflected in distribution capital plans and, where applicable, utility revenue requirements.
4. **Establish measurable savings-realization and accountability requirements.** Strengthen Appendix D and Ordering Paragraph 20 to connect FSC outcomes with identifiable infrastructure projects, document changes to planned expenditures, and distinguish projected savings from verified investment outcomes. Require transparent accounting of infrastructure costs actually avoided, deferred, or reduced, including incremental FSC implementation costs and any remaining infrastructure requirements.

5. **Retain Commission oversight until the durable FSC framework is completed.** Modify Conclusion of Law 50 and Ordering Paragraph 22 to keep R.21-06-017 open for resolution of the outstanding compensation, valuation, and implementation issues. Alternatively, designate a specific existing or successor proceeding with a defined scope and enforceable schedule before closing R.21-06-017. Serving workshop reports on other proceeding service lists should not substitute for a formal regulatory process and Commission determination.
6. **Clarify the persistent non-bridging Advice Letter requirements.** Reconcile the inconsistent Advice Letter tier designations in Section 8.1.2, Table 2, and Ordering Paragraph 11 to establish a clear and consistent implementation process for persistent non-bridging FSC offerings.

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I. INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Clean Coalition submits these comments on the *Proposed Decision* ("PD") *Addressing Track 3 Issues Directing Large Investor-Owned Utilities to Support Affordability Through Flexible Service Connections*, issued on October 20, 2026.

Clean Coalition strongly supports the PD's expansion of flexible service connections ("FSCs") and, in particular, its recognition that these arrangements can provide durable alternatives to unnecessary distribution infrastructure investments. By enabling customers to utilize existing grid capacity through controlled load, onsite generation, energy storage, and other flexible technologies, the Commission can accelerate energization, support electrification, and reduce ratepayer costs.

The PD represents substantial progress toward the framework Clean Coalition advocated in its opening and reply comments. It establishes standardized persistent non-bridging service pathways, allows customers to transition from temporary to persistent arrangements, extends offerings across the large investor-owned utilities ("IOUs"), and requires tracking of infrastructure costs avoided or deferred through FSCs.

However, the PD stops short of establishing a framework for compensating customers whose durable operating commitments provide measurable ratepayer savings. Although the PD acknowledges the importance of customer costs, avoided infrastructure investments, and appropriate cost offsets, it defers these questions to future workshops without requiring a subsequent Commission determination.

Clean Coalition recommends four targeted improvements:

1. **Recognize the principle of shared savings** for durable non-bridging FSCs that provide verified net ratepayer benefits, while establishing a timely process to develop an appropriate compensation methodology.

2. **Establish an enforceable regulatory pathway** following the durable non-bridging workshops to ensure that a standardized compensation framework is developed and considered by the Commission without unnecessary delay.
3. **Require actual savings realization** by incorporating verified FSC outcomes into distribution investment decisions, capital plans, and reporting requirements so that avoided, deferred, or right-sized infrastructure produces measurable ratepayer benefits.
4. **Preserve Commission oversight** by retaining R.21-06-017 until outstanding durable FSC issues are resolved, or establishing a specific successor proceeding with defined responsibilities and deadlines.

These modifications would strengthen the PD's affordability objectives while preserving its substantial progress toward expanding FSC deployment.

II. DESCRIPTION OF PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources ("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.

III. COMMENTS

A. The PD Appropriately Recognizes the Significant Ratepayer Savings Available Through Non-Bridging FSCs

Clean Coalition strongly supports the PD's direction to establish persistent non-bridging versions of the Standard Offer, including the ability for customers to transition from existing bridging arrangements without automatically triggering an upgrade. These provisions represent important progress toward treating customer flexibility as a durable distribution-grid resource rather than merely a temporary response to energization delays.

Section 5 of the PD provides a particularly compelling basis for expanding FSC deployment. The Commission recognizes that conventional distribution upgrades can require substantial capital investment, often costing hundreds of thousands or millions of dollars, while relatively minor grid mitigations can resolve certain capacity constraints at significantly lower cost.[1]

[1] PD, at p. 25.

Rather than building new infrastructure to accommodate infrequent peak conditions, FSCs can enable additional load to be served safely through existing facilities while customers remain within agreed operating limits.

The PD further recognizes that deferring infrastructure investments provides ratepayer benefits beyond the initial cost of an avoided upgrade. Deferral can allow utilities to consolidate multiple sequential upgrades into a single project, size infrastructure to actual rather than forecast load growth, and postpone the additional revenue requirements associated with new utility assets. These benefits demonstrate that FSCs can improve the efficiency of both infrastructure investment and utilization of existing distribution assets.

Importantly, these savings opportunities are not limited to temporary bridging arrangements. When a customer can reliably operate within an established operating envelope over an extended period, an upgrade may be deferred until existing infrastructure reaches the end of its useful life, additional load materializes, or an appropriately sized investment becomes necessary. In other cases, a durable contractual commitment may eliminate the need for a particular upgrade altogether.

Clean Coalition therefore supports the PD's distinction between bridging, persistent non-bridging, and durable non-bridging solutions, while emphasizing that both non-bridging categories can produce measurable infrastructure savings. These benefits should be evaluated based on actual operational performance and the resulting infrastructure requirements, rather than assuming that an upgrade must eventually be constructed simply because additional load has been connected.

The PD also appropriately directs the IOUs to evaluate FSC mitigations before proceeding with ratepayer-funded upgrades. Section 5.1 recognizes the importance of incorporating these evaluations into ordinary engineering and capacity assessment processes, including consideration of customers who have not independently requested a flexible connection.[2] This approach can identify lower-cost solutions early enough to influence customer project design and utility investment decisions.

Clean Coalition particularly supports expanding standardized offerings across the large IOUs and preserving technology-neutral participation pathways that accommodate customer-owned

[2] *Ibid*., at pp. 26-32.

generation, storage, microgrids, managed charging, demand flexibility, and other qualifying technologies.

Together, these provisions establish a strong foundation for reducing unnecessary infrastructure expenditures. **The remaining challenge is ensuring that cost-effective FSC arrangements are adopted at sufficient scale and that the resulting infrastructure savings are actually realized for ratepayers.** This requires an appropriate customer value proposition, transparent valuation, and meaningful integration into utility distribution planning.

B. The Commission Should Recognize Shared Savings as a Principle for Compensating Non-Bridging FSCs

The PD's principal remaining shortcoming is its failure to establish an affirmative framework for compensating customers whose durable FSC commitments avoid, defer, or reduce ratepayer-funded infrastructure investments.

Section 9.1.2 acknowledges that determining conventional upgrade costs, evaluating customer expenditures, and establishing appropriate cost offsets are important policy questions.[3] The PD further recognizes the recommendations of Clean Coalition, Cal Advocates, and Utility Consumers' Action Network ("UCAN") that customer compensation should be limited to a reasonable portion of verified net ratepayer savings.[4] Nevertheless, it declines to direct implementation of durable non-bridging solutions pending further consideration.

Clean Coalition recognizes that additional analysis may be necessary to establish standardized methodologies. However, uncertainty regarding the precise compensation mechanism should not prevent the Commission from adopting the underlying principle that customers providing verified distribution-grid benefits may receive a reasonable share of the value created.

Section 8.2.2 concludes that compensation is not necessary for customers electing to transition from existing bridging arrangements to persistent non-bridging service. Clean Coalition agrees that compensation may not be necessary in every case.[5] Expedited energization, avoided customer contributions, or reduced customer-side construction costs may provide sufficient value for certain customers to voluntarily accept a non-bridging arrangement.

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[3] *Ibid*., at p. 106.
[4] *Ibid*., at p. 105.
[5] *Ibid*., at p. 90. ("As discussed earlier in this decision, there are benefits to customers taking advantage of a non-bridging solution, including avoided construction and avoided customer-side costs.")

However, these benefits should not be presumed sufficient for customers who must invest in additional equipment, controls, onsite generation, or energy storage and accept ongoing operating limitations. **A customer's willingness to bear these costs is not necessarily aligned with the value that its flexibility provides to the distribution system.** Without an appropriate mechanism for recognizing that value, customers may decline economically beneficial arrangements, and utilities may instead proceed with more expensive conventional upgrades.

This concern is reflected in the proceeding record. Multiple parties, including SDG&E, IREC, EDF, and UCAN, have questioned whether uncompensated non-bridging arrangements will attract sufficient participation.[6] The PD itself recognizes the relationship between customer costs, the attractiveness of durable FSC offerings, and their ultimate cost-effectiveness.[7]

Compensation for these arrangements should not be considered a new expense unrelated to utility infrastructure investment. When an enforceable customer commitment avoids, defers, or right-sizes a ratepayer-funded upgrade, compensation can represent the cost of procuring a lower-cost alternative to that investment. **Appropriate compensation is therefore a mechanism for realizing ratepayer savings, not simply distributing savings after they occur.**

A standardized framework should compare the net present value of the reasonably foreseeable conventional upgrade with the costs and benefits of the FSC arrangement. This evaluation should account for utility implementation expenses, customer equipment and operating costs, contractual commitments, performance requirements, and any residual need for future infrastructure.

Compensation could take the form of an upfront incentive, recurring payment, bill credit, or comparable mechanism, conditioned on continued compliance with agreed operating requirements. The framework should remain technology-neutral, avoid duplicate compensation for the same benefits, and ensure that incentives are limited to a reasonable portion of verified net ratepayer savings.

Although durable contractual arrangements provide a particularly clear basis for compensation, the framework should not categorically exclude persistent non-bridging connections where verified infrastructure deferral or avoidance creates measurable benefits.

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[6] *Ibid*., at p. 104.
[7] *Ibid*., at p. 106.

Eligibility should reflect the value, duration, and dependability of the service provided rather than relying exclusively on the formal classification of the FSC.

The Commission need not determine the precise compensation formula in this decision. It should, however, recognize the principle of shared savings and establish a clear pathway for developing an appropriate mechanism. Doing so would strengthen voluntary participation, support cost-effective customer investments, and increase the likelihood that the substantial infrastructure savings recognized by the PD are ultimately realized.

C. The Durable Non-Bridging Workshop Must Lead to Timely Commission Action

Clean Coalition supports the PD's direction in Section 9.1.2 and Ordering Paragraph 14 to examine wires baselines, cost comparisons, contractual requirements, cost offsets, and verification of net ratepayer savings through stakeholder workshops.[8]

However, the PD requires the workshops to occur within one year of adoption and a report to follow within 60 days, without establishing a deadline for subsequent Commission consideration. Section 9.1.2 states only that Energy Division may develop a staff proposal following the report.

This leaves an important gap between identifying solutions and implementing them. The workshop report may provide valuable information, but its completion does not ensure that the Commission will establish a compensation framework or authorize durable non-bridging offerings.

Furthermore, the proceeding has already developed a substantial record concerning the economic benefits of durable FSCs, the need for customer incentives, and the appropriate use of wires baselines and verified savings. Although additional analysis is warranted, the Commission should avoid allowing further procedural development to delay implementation of a framework that could reduce ratepayer-funded infrastructure investments.

Clean Coalition recommends accelerating the workshop deadline to within 180 days of adoption, retaining the requirement for a report within 60 days afterward, and directing Energy Division to prepare a staff proposal within 120 days after the report in Track 3 of this proceeding.

The staff proposal should evaluate standardized compensation options, methodologies for determining verified net savings, appropriate contractual and performance requirements, and

[8] *Ibid*., at pp. 107-108; 173-174.

implementation pathways for the IOUs. It should also identify the recommended Commission actions necessary to authorize durable non-bridging offerings and preserve stakeholder participation.

These steps would not prejudge the appropriate compensation methodology or require the Commission to adopt an inadequately supported formula. Rather, they would establish a defined process for resolving the outstanding questions already identified in the PD. The Commission should also establish a formal venue and schedule for considering the staff proposal, rather than relying on future discretionary action. As discussed further in Section E, this requires preserving an appropriate procedural mechanism through which the Commission can consider, modify, and ultimately adopt the necessary policy requirements.

D. FSC Savings Must Be Reflected in Distribution Investment Planning and Execution to Deliver Actual Ratepayer Benefits

Clean Coalition strongly supports the PD's recognition that FSCs should be integrated into the utilities' distribution planning processes. Section 5.1.2.1 expressly finds Clean Coalition's and UCAN's recommendations persuasive and directs the IOUs to incorporate updates to their FSC evaluation processes into annual distribution planning proposals.[9]

The PD also adopts Appendix D, which requires reporting on infrastructure upgrades avoided, deferred, resized, or constructed, together with the incremental utility and customer costs associated with FSC arrangements.[10] These requirements represent meaningful progress toward evaluating flexible connections as alternatives to conventional infrastructure.

However, incorporating FSC evaluations and reporting their potential savings is not equivalent to realizing those savings for ratepayers. An FSC should not be credited with avoiding or deferring a distribution upgrade while the utility continues to plan, authorize, or recover costs associated with substantially the same investment without accounting for the FSC's impact.

This distinction is particularly important given the PD's own affordability findings. Section 5 explains that the financial benefits of infrastructure deferral arise from avoiding premature investments, consolidating future upgrades, and delaying new revenue requirements. Those

[9] *Ibid*., at pp. 35-36.
[10] *Ibid*., Appendix D, at p. 3.

benefits depend on actual changes to the timing, scope, or necessity of utility infrastructure expenditures.

The PD should therefore build upon Section 5.1.2.1 and Ordering Paragraph 2 by requiring the IOUs to reconcile verified FSC outcomes with their distribution planning and capital investment processes. The existing requirement to report updates to FSC evaluation procedures should be supplemented with an affirmative obligation to reflect the infrastructure consequences of successful FSC arrangements.

When an FSC eliminates the need for a planned upgrade, the corresponding project should be removed from future investment plans to the extent that the need has been eliminated. When an upgrade is deferred, the planned in-service date and associated expenditures should be revised. Where an FSC allows a smaller or differently configured upgrade, the investment plan should reflect the remaining infrastructure need rather than the original, more expensive project.

The Grid Needs Assessment and Distribution Upgrade Project Report process provides an existing mechanism for documenting these changes. Appendix D already requires the utilities to track the amount of capital investment avoided or deferred, the disposition of the baseline upgrade, and incremental implementation costs.[11] Clean Coalition recommends strengthening these requirements by linking reported FSC outcomes to identifiable infrastructure projects and corresponding changes in planned capital expenditures.

Such reporting should distinguish projected savings from verified investment outcomes and account for subsequent load growth, operational requirements, and any remaining need for infrastructure. Where an upgrade remains necessary, the associated savings should be evaluated based on the actual deferral, reduction, or consolidation achieved, rather than treating all deferred expenditures as permanently avoided.

These requirements would also support the development of the compensation framework discussed above. A transparent relationship between the conventional infrastructure baseline, the actual investment outcome, and net ratepayer savings would provide a defensible basis for determining what portion of the realized value could reasonably be shared with participating customers.

The Commission should therefore strengthen the PD by requiring that FSC savings be incorporated into actual distribution investment decisions, capital forecasts, and, where

[11] *Ibid*.

applicable, revenue requirements. This would ensure that the benefits of flexible connections are not limited to theoretical or reported savings, but instead translate into measurable reductions in the costs borne by California ratepayers.

E. The Commission Should Not Close the Proceeding While Essential Durable FSC Issues Remain Unresolved

Clean Coalition is concerned that the PD proposes to close R.21-06-017 despite expressly recognizing that significant policy questions concerning durable non-bridging FSCs remain unresolved.

Section 9.1.2 concludes that issues involving wires baselines, cost comparisons, customer cost recovery, and durable contractual arrangements require further development through a formal proceeding rather than the advice letter process.[12] Similarly, Section 14.2.2 declines to adopt a valuation methodology, recognizing that additional consideration is necessary to ensure that relevant costs and benefits are appropriately captured.[13] Nevertheless, Conclusion of Law 50 finds it reasonable to close the proceeding, and Ordering Paragraph 22 directs that R.21-06-017 be closed.[14]

These provisions create a procedural disconnect between the PD's recognition that further formal regulatory action is necessary and its failure to establish a forum in which that action will occur.

Ordering Paragraph 14 requires the IOUs to hold workshops and prepare a report but does not require a subsequent Commission determination. Although the report must be served on several proceeding service lists, service of a report does not establish a scoped issue, assigned schedule, or obligation for the Commission to resolve its recommendations.[15] Section 9.1.2 further makes development of an Energy Division staff proposal discretionary.[16]

As a result, the PD would close the proceeding while leaving the implementation of durable non-bridging solutions dependent on future actions for which no formal regulatory process or deadline has been established.

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[12] Proposed Decision, at p. 106.
[13] *Ibid*., at pp. 150-151.
[14] *Ibid*., at p. 166; 177.
[15] *Ibid*., at pp. 173-174.
[16] *Ibid*., at p. 108. ("Energy Division staff **may** develop a staff proposal following the service of the workshop report. [emphasis added]")

This is particularly concerning because durable FSCs are central to the PD's stated affordability objectives. The Commission recognizes that these arrangements can avoid or reduce infrastructure investments, but without a compensation and valuation framework, some of the most economically beneficial opportunities may never be implemented. Closing the proceeding before establishing a pathway to resolve these issues risks undermining the very ratepayer savings the PD seeks to capture.

Clean Coalition therefore recommends that the Commission retain R.21-06-017 for the limited purpose of completing the outstanding durable non-bridging framework. The Commission should establish a defined schedule for the workshop report, Energy Division staff proposal, stakeholder comments, and subsequent consideration of the policy requirements necessary for implementation.

Alternatively, if the Commission determines that closing R.21-06-017 is appropriate, it should expressly designate an existing or successor formal proceeding to address these outstanding issues, establish the necessary procedural scope, and require a timeline for consideration and resolution. Merely identifying other proceedings to receive the workshop report would not provide an equivalent level of accountability.

Clean Coalition is not requesting that the Commission delay implementation of the FSC provisions already supported by the record. Those requirements should proceed as directed. Rather, the Commission should preserve the procedural oversight necessary to complete the durable FSC framework while the initial offerings are being implemented.

The Commission should therefore modify Conclusion of Law 50 and Ordering Paragraph 22 to retain the proceeding until the outstanding durable non-bridging issues have been addressed, unless a specific alternative regulatory venue with an enforceable schedule is established.

IV. CONCLUSION

Clean Coalition appreciates the Commission's substantial progress toward expanding flexible service connections as durable, cost-effective alternatives to unnecessary distribution infrastructure. We strongly support the PD's standardized non-bridging pathways, expanded customer choice, and integration of FSCs into utility engineering and planning processes.

The PD recognizes significant opportunities to reduce ratepayer costs through greater utilization of existing grid assets and avoidance or deferral of conventional infrastructure

investments. Realizing these savings, however, requires more than establishing flexible service offerings. Customers must have an appropriate incentive to provide dependable flexibility, utilities must translate successful FSC arrangements into actual infrastructure investment decisions, and the Commission must retain a clear mechanism for completing the outstanding policy framework.

We urge the Commission to recognize the principle of compensation based on verified net ratepayer savings, establish a timely process for implementing durable non-bridging arrangements, require infrastructure savings to be reflected in distribution capital plans, and preserve an appropriate formal proceeding until these issues are resolved.

These targeted modifications would preserve the PD's significant advances while strengthening its ability to deliver lasting affordability, electrification, and grid-utilization benefits.

Respectfully submitted,

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Appendix A: Changes to Findings of Fact, Conclusions of Law, and Ordering Paragraphs

1. Add a Finding of Fact addressing the ratepayer value of non-bridging FSCs:
Non-bridging flexible service connections can avoid, defer, or reduce ratepayer-funded distribution infrastructure investments by enabling additional load to be served through existing grid capacity. Appropriate compensation for verified customer flexibility may increase voluntary participation and allow ratepayers to realize savings that would otherwise remain unavailable.

2. Add a Conclusion of Law establishing a shared-savings principle:
It is reasonable to develop a technology-neutral compensation framework for qualifying non-bridging flexible service connections that provide verified net ratepayer savings. Compensation should be based on a reasonable portion of the verified benefits, account for implementation and residual infrastructure costs, and remain subject to appropriate performance requirements.

3. Modify Ordering Paragraph 14 to establish an accelerated and enforceable process:
The durable non-bridging workshops shall occur within 180 days of issuance of this decision. The workshop report shall be served within 60 days following conclusion of the workshops. Within 120 days after service of the workshop report, Energy Division shall prepare and serve a staff proposal evaluating compensation methodologies, cost-effectiveness standards, performance requirements, and implementation mechanisms for durable non-bridging flexible service connections. The Commission shall establish a formal proceeding or identify an existing proceeding for consideration of the proposal and establish a schedule for further action.

4. Supplement Ordering Paragraph 2 to require the integration of verified FSC outcomes into distribution planning:
Following approval of the High Distributed Energy Resources Flexible Service Connection Implementation Advice Letters, each IOU shall include updates to its FSC evaluation process in its annual Distribution Planning Process submissions. The IOUs shall also incorporate the verified infrastructure investment impacts of FSCs into their distribution planning processes, including adjustments to the scope, timing, or necessity of planned upgrades where supported by FSC performance and anticipated system needs.

5. Supplement Ordering Paragraph 20 and Appendix D to strengthen savings realization:
For FSCs that avoid, defer, or right-size a planned distribution upgrade, the IOUs shall identify the corresponding infrastructure project, document changes to its planned scope, timing, and cost, and reconcile those changes with applicable distribution planning and capital investment records. Reporting shall distinguish projected avoided costs from verified infrastructure investment outcomes and document the actual infrastructure expenditures avoided, deferred, or reduced.

6. Delete or modify Conclusion of Law 50 and Ordering Paragraph 22:
Replace Conclusion of Law 50 with:

It is reasonable to retain R.21-06-017 for the limited purpose of resolving outstanding policy issues concerning durable non-bridging flexible service connections, unless the Commission establishes a specific formal proceeding with a defined schedule for addressing those issues.

Replace Ordering Paragraph 22 with:
Rulemaking 21-06-017 shall remain open for the limited purpose of completing the durable non-bridging flexible service connection framework, including consideration of compensation, valuation, and implementation requirements. The Commission may close the proceeding upon resolution of these issues or following their transfer to a designated formal proceeding with an established schedule for further action.

7. Reconcile the Advice Letter tier requirements:
Ordering Paragraph 11 specifies Tier 3 Advice Letters for persistent non-bridging solutions, while Section 8.1.2 and Table 2 identify the Persistent Non-Bridging Solutions Advice Letter as Tier 2. The PD should clarify the intended tier and make the narrative, implementation schedule, and Ordering Paragraph consistent.