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Regulatory Monitoring Services

CPUC UPDATE

July 21, 2023

Lots of activity this month regarding CPUC process issues. Substantive issues include posting hourly QC values for wind and solar for slice of day resource adequacy capacity, busbar mapping process for IRP, Track 5 of the microgrid proceeding related to multi-property tariffs, IOU energy efficiency goals, and SGIP reform. A new initiative to consider freight infrastructure planning for heavy duty EVs should prove interesting. Pilots have been announced by PG&E and SoCalGas for converting forest and agricultural biomass waste into renewable natural gas.

CPUC Coming Events

July 24	CAISO – iPE Track 2 working group
July 26	Workshop on Risk-based decision making (r.20-07-013)
July 26	I-17-02-002 – Status conference on Aliso Canyon
July 26	NEM eligibility for EV submetering protocol workshop
July 27	Supply Side Demand Response QC working group
August 1	CAISO – iPE Track 2 working group
August 2-3	2023 PSPS pre-season briefings
August 4	Comments due on busbar mapping in IRP
August 10	CPUC Voting Meeting
August 31	CPUC Voting Meeting
September 21	CPUC Voting Meeting

June 29 Voting Meeting Results

- [Res E-5270](#) – Update fixed avoided cost rates for ReMAT.
- R.21-10-002 – Resource Adequacy 2024-2026 LCR and more [D.23-06-029]
- [Res E-5274](#) – PEV Submetering implementation plan
- A.20-02-009 – PSPS Unrealized revenue methodology [49a, D.23-06-054]
- A.22-02-005 – IOUs Energy Efficiency portfolios 2024-2027 [D.23-06-055]

Powerline De-energization Rulemaking ([R.18-12-005](#), [PSPS Page](#))

The IOUs filed their 2023 PSPS Pre-season report on July 3 in advance of [briefings](#) scheduled for August 2-3. SC filed its [quarterly progress report on PSPS Advisory Board and Working Groups](#) on July 14.

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[Safety Culture Assessments OIR \(R.21-10-001\)](#)

On July 14, Joint IOUs, Cal Advocates and the SBUA submitted reply comments on the May 8 [ALJ Ruling](#) regarding the [Safety Policy Division Staff Proposal](#).

[Risk-Based framework for gas and electric IOUs \(R.20-07-013\)](#)

A July 21 [ALJ Ruling](#) entered workshop #1 material into the record and invited responses to the following questions:

1. Topic 1: Evaluation of Post-Test Years
 - 1.1. Should the investor-owned utilities (IOUs) be required to submit cost-benefit ratios (CBRs) in each of the general rate case (GRC) post-test years rather than an aggregate CBR for the entire post-test year period?
 - 1.2. Is it reasonable to assume that the reporting of CBRs for reducing-type mitigations in each of the GRC post-test years more accurately reflects the smaller remaining universe of risk than an aggregate reporting of CBRs?
 - 1.3. Should the IOUs be required to divide their risk tranches for mitigation proposals to a sufficiently granular level, in order for the reporting of CBRs in each of the GRC post-test years to be useful? If so, how should “sufficiently granular” be defined?
 - 1.4. Should and if so how should the Risk-Based Decision-making Framework (RDF) adopted in D.22-12-027 be modified to accommodate new GRC post-test year reporting requirements?
 - 1.5. Should parties consider a reporting template by which IOUs must produce the post-test year information? If yes, who should develop this reporting template and on what timeframe?
2. Topic 2: Uncertainty: Transparency Pilot
 - 2.1. Does the Risk Results Table⁴ provide a useful means to summarize and explore Risk scores across various categories (e.g., by Tranche/Attribute)? Are there other analyses on Risk scores that the Risk Results Table could support?
 - 2.2. Does the Risk Sensitivity Table⁵ provide a useful means to explain the role and importance of specified parameters and assumptions to Risk scores, etc.? The Risk Sensitivity Table quantifies how much a Risk result (e.g., risk score) would change if a specified parameter changes by a predetermined amount. Are there other measures of sensitivity that would be useful in your analysis?
 - 2.3. Does a scenario analysis⁶ help provide the same amount of transparency that a sensitivity analysis can provide?
 - 2.4. If an IOU’s sample risk does not assume a probability distribution, what analytical method/approach should be used to assess the impact of uncertainty on key parameters used in the risk modeling process?
 - 2.5. Does the Risk Model Listing Table⁷ provide a quick and useful means to determine the maturity of the models employed by the IOU?
 - 2.6. Did the criteria employed for determining Estimate Quality help you to assess the Quality of the Data and calculations? Are there suggestions or modifications that you

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would make to the criteria? Can the Estimate Quality Criteria approach employed in the Transparency Proposal appended to D.21-11-009 be improved or refined? If so, how?

- 2.7. Are there other kinds of analyses that you are considering that are not currently supported by the Transparency Proposal appended to D.21-11-009? Please describe.
- 2.8. What is the best approach for ensuring that future test drives of the Transparency Proposal use all of the fields in the excel spreadsheet templates by inputting actual results other than “N/A”?

Comments/replies are due August 10/17.

[Climate Change Adaptation \(R.18-04-019\)](#)

Comments to the June 2 [scoping memo](#) were submitted by five parties: PG&E, SCE, SDG&E jointly with SoCalGas, Cal Advocates, and Center for Accessible Technology. Reply comments were filed by PG&E, SCE, Cal Advocates and SBUA. The following schedule remains:

Ruling directing SMJUs to file information regarding current climate adaptation efforts (Task 4)	Summer 2023
Ruling containing Task 2 questions	Summer 2023
Workshop on CEP and DVC issues	July / August 2023
Joint workshop with R.20-07-013 on linkages between RAMP and CAVA filings and climate modeling (Task 1)	September 13, 2023
Workshops and further rulings	TBD
Proposed decision	Q1 2024

[PG&E 2021 Gas CARD Application \(A.21-09-018\)](#)

On June 30 PG&E filed a [Motion for Adoption of an all-party settlement](#) resolving all the issues in the application. “The Settlement Agreement consists of three attachments resolving all the issues in this case. The All-Customer Group Settlement (Attachment 1) resolves the following terms: Market-Responsive Electric Generation (EG) Throughput Forecast, Local Transmission (LT) Cost Allocation, Market-Responsive EG LT Rate Design, Inventory Management, Functional Storage Cost Allocation, and Core Storage. The Baja-Redwood Settlement (Attachment 2) resolves the appropriate Baja-Redwood rate differentials. The Undisputed Issues Stipulation (Attachment 3) identifies items that parties agree are undisputed.”

[Natural Gas Long-Term System Planning \(R.20-01-007\)](#)

[PG&E](#) and [SoCalGas/SDG&E](#) filed their amended 2023 gas investment annual reports as required to correct deficiencies found in their initial reports.

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[SCE 2021 GRC \(A.19-08-013\)](#)

SCE's request to suspend the briefing schedule due to pending settlement discussions was [granted](#) on July 17.

[PG&E 2023 GRC \(A.21-06-021\)](#)

On July 21 PG&E filed a Motion for Oral Arguments regarding the upcoming proposed decision in the proceeding. It requests that oral arguments be scheduled at least 15 days after the PD has been issued and at least seven days prior to the business meeting at which it will be considered.

[IOU 2019 ERRA \(A.20-04-002, A.20-02-009, A.20-06-001\)](#)

[D.23-06-054](#) was adopted on June 29 and closing the proceeding. It adopts a methodology to calculate a Utility's unrealized volumetric sales and unrealized revenues resulting from PSPS events. It declines to address the second issue, which is whether it is appropriate for the utilities to return the revenue requirement equal to the unrealized volumetric sales and unrealized revenue resulting from the 2019 PSPS events.

[SDG&E 2021 ERRA Compliance \(A.22-06-001\)](#)

A July 17 [SDG&E filed a report after conferring with parties](#) responding to a July 7 CPUC request, proposes the following schedule:

EVENT	DATE
SDG&E's Supplemental Testimony on PSPS unrealized sales and revenue calculations	August 28, 2023
Intervenor Testimony on PSPS unrealized sales and revenue calculations	September 27, 2023
Rebuttal Testimony on PSPS unrealized sales and revenue calculations	October 13, 2023
Evidentiary Hearings (if necessary) / Motion(s) to Admit Exhibits into Record	October 30, 2023
Opening Briefs on PSPS issues	November 17, 2023
Reply Briefs on PSPS issues	December 14, 2023
Proposed Decision	Quarter 1 2024

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[Net Energy Metering Proceeding \(R.20-08-020\)](#)

[D.23-06-056](#), issued June 30, denies petitions for rehearing of D.22-12-056 filed by multiple parties.

A workshop has been scheduled for July 26 to explore potential pathways to allow NEM customers to use the plug-in EV Submetering protocol per [D.22-08-024](#).

[GTSR/DAC \(A.22-05-02\)](#)

A June 23 [ALJ Ruling](#) set aside submission of the record, instead seeking party “cost-effectiveness analyses and potential cost shift estimates for existing, modified, and new community renewable energy program proposals, as well as party comment on specific timelines for implementation, the appropriateness of Avoided Cost Calculator based compensation for front-of-the-meter resources, and enumeration of the quantifiable and measurable benefits to both participating and non-participating ratepayers of a Green Access Program proposal. Responses/replies are due July 31, August 10. Specifically:

1. The record in this proceeding is deficient in regards to the cost-effectiveness of existing, modified, and new community renewable energy program proposals. Parties should submit Total Resource Cost, Ratepayer Impact Measure, and Program Administrator Cost test results for their proposals based on the Standard Practice Manual and adhere to previous Commission guidance on the application of cost-effectiveness evaluation and tests.
2. AB 2316 requires that any new community renewable energy program must be deemed beneficial to all ratepayers:
 - a. How should any cost shift of or cost impact on nonparticipating ratepayers of existing, modified, or new community renewable energy proposals be quantified?
 - b. What would be the resulting cost shift for new community renewable energy program proposals? How would this compare to any cost shifts associated with existing or modified programs? How do the costs of new community renewable energy program?
3. addresses three motions related to admission of testimony in the proceeding. It basically admits the testimony. proposals compare to the costs of wholesale clean energy resources. Provide all assumptions (size of program, compensation rate, outside funding or incentives, administrative costs, etc.).
 - a. For new community renewable energy proposals, what would be the potential monthly bill impacts for non-participating ratepayers should the proposals be adopted? For new community renewable energy proposals, what would be the potential monthly bill impacts for participating ratepayers should the proposals be adopted?
 - b. Beyond bill impacts, what would the quantifiable and measurable benefits be to non-participating ratepayers of a new community renewable energy program? Similarly, beyond bill impacts, what would the quantifiable and measurable

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- benefits be to participating ratepayers of a new community renewable energy program?
4. If a community solar project has no on-site load and is installed “in front of the meter,” is it appropriate for it to be considered a demand-side resource and compensated using values based on the Avoided Cost Calculator rather than least-cost best-fit evaluation through the integrated resource planning process? Identify which avoided cost values would be appropriate to apply and why they are appropriate.
 5. For new community renewable energy program proposals not based on existing or modified programs, describe the specific timelines for the contracting, construction, interconnection, subscription, and billing for such new programs.

[Resource Adequacy Proceeding \(R.21-10-002\)](#)

[D.23-06-029](#) was issued on July 5, adopting local capacity obligations for 2024 - 2026, flexible capacity obligations for 2024, and program refinements. It also closes the proceeding. On July 20, Energy Division released workbooks for [in-state solar/wind](#) and [out-of-state wind](#). The numbers are based on 70% exceedance for solar southern wind and 80% summer exceedance and 65% non-summer exceedance for northern wind and wind. The values will be used to establish RA values for wind and solar beginning in 2024.

On July 27, Energy Division and CEC staff will co-lead the kick-off meeting for the incentive-based supply-side demand response (SSDR) qualifying capacity (QC) working group pursuant to Decision 23-06-029. During this meeting, stakeholders will discuss key issues presented by ED and CEC staff and determine the timing and cadence of future working group meetings. The meeting agenda will be sent to the service list(s) in advance of the meeting.

[Integrated Resource Planning Rulemaking \(R.20-05-003\)](#)

A July 18 workshop reviewed proposed updates to the Busbar Mapping Methodology, specifically to:

- Provide an overview of the busbar mapping process and its role in the transmission planning process.
- Present new and updated datasets from the CEC for use in the mapping criteria.
- Familiarize stakeholders with the updates to the criteria and the criteria alignment thresholds.
- Give opportunity to stakeholders to ask questions and provide comments on the busbar mapping methodology and the proposed criteria.
- Request stakeholder’s informal written feedback to be incorporated in the final updated methodology.

The [CPUC’s presentation](#) is very informative and includes detail on:

- The role of busbar mapping in the IRP and TPP
 - Focused on anticipated new utility-scale generation and storage not yet in the baseline.

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- Describes changes to the methodology to be used in the 2024-2025 TPP.
- Describes the busbar mapping process, noting the following categories for busbar mapping criteria:
 - 1. System level transmission capability
 - 2. Substation level interconnection viability
 - 3. Land-use implications and feasibility factors
 - 4. Environmental (conservation and biological) impact factors
 - 5. Community and environmental (societal) impact factors
 - 6. Commercial development interest
 - 7. Consistency with prior TPP portfolios

The CEC [presentation](#) covered land-use and environmental screens, intended to provide a more accurate assessment of future resource location by existing substation location. It includes a new metric for solar technology that includes “parcelization,” defined as: The average number of unique parcels 0.5 miles from anywhere within the parcel. It provides the following summary of land use metric modifications:

On

Previous Cycle of Busbar Mapping	Upcoming Cycle of Busbar Mapping
Percent Build Out: Depends on Low Implication Environmental Model Results (Solar), Custom Renewable Energy Zones (Wind), KGRA and BLM Geothermal Leasing Areas (Geothermal)	Percent Build Out: Depends on technical resource potential available under Core Land-Use Screen (solar and geothermal), CPUC’s further reduced technical resource potential available under Core Land-Use Screen (Wind)
Environmental Factors:	Environmental Factors:
Biodiversity	Biodiversity
Connectivity	Connectivity
Landscape Intactness	Irreplaceability
Natural Landscape Blocks	Landscape Intactness
Irreplaceability	Wetlands from CA Nature Habitat and Land Cover (FVEG Derived)
Native Species Richness	High CEC Cropland Index Model
Rarity	Stand-Alone Metrics:
Stand-Alone Metrics:	High Fire Threat Districts
High Fire Threat Districts	Development Feasibility:
Important Bird Areas	Parcelization

The Draft Methodology for Resource-to-Busbar Mapping for the TPP and other relevant documents are available [here](#). Comments on the updates to the busbar mapping methodology are due August 4.

At least 11 parties filed responses to the May 30, WPTF and CESA [petition to modify](#) (PTM) the CPUC decisions regarding Mid-Term Reliability (MTR) procurement of long lead time resources. Based on those comments, there appears to be general support for the proposed extensions to the COD requirement for LLT resources to come online beyond June 1, 2028, but no later than June 1, 2031.

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[PCIA Rulemaking \(R.17-06-026\)](#)

The proceeding is now closed.

[Provider of Last Resort \(R.21-03-011\)](#)

At least nine parties filed opening briefs on July 10. Reply briefs are due July 31 and a proposed decision in October.

[High DER Future Grid Enhancements \(R.21-06-017\)](#)

Other than the IOUs, only Cal Advocates and the Clean Coalition submitted comments on the Kevala Electrification Impacts Study. Reply comments are due July 21.

[DER Successor proceeding \(R.22-11-013\)](#)

A July 10 [ALJ Ruling](#) requested comment on additional reimbursable funds for the 2024 avoided cost calculator update process. It estimated that some \$250,000 will be needed to cover excess expenses for the rest of 2023, noted that a CPUC decision will be required to approve that funding, and requested comments/replies on July 17/21.

A July 17 [ALJ Ruling](#) requests comments on the scope of work for the consultant and the Data Working Group. Comments are due August 11.

[Microgrid Proceeding \(R.19-09-009\)](#)

A [Scoping ruling](#) was issued on July 18 for Track 5, which will consider Microgrid Multi-Property Tariff. The issues to be determined or otherwise considered are:

1. What guiding principles should the Commission adopt to assist in the development of a microgrid multi-property tariff?
2. . Whether PG&E should modify its Community Microgrid Enablement Tariff for the purposes of a statewide, microgrid multi-property tariff.
3. 3. Whether PG&E, SCE, and SDG&E should form a single, unified multi-property tariff, for statewide application. Should this single, unified multi-property tariff be modeled from PG&E's Community Microgrid Enablement Tariff?
4. 4. To what extent should a single, unified microgrid multi-property tariff align with or impact environmental and social justice communities; including the extent to which it could impact achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan?

On July 31, 2023, PG&E shall submit its Community Microgrid Enablement Tariff into the record of this proceeding as stated in the Track 5 below:

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Track 5 Schedule

EVENT	DATE
PG&E Submittal of its Community Microgrid Enablement Tariff into the Record	July 31, 2023
ALJ Ruling: Ordering PG&E, SCE, and SDG&E to Develop and Submit a Pro-Forma Standard Multi-Property Microgrid Tariff, and Any Necessary Utility-Specific Deviations, that is Based on PG&E's Community Microgrid Enablement Tariff, into the Record	August 9, 2023
PG&E, SCE, and SDG&E Submit Pro-Forma Standard Multi-Property Microgrid Tariff, and Any Necessary Utility-Specific Deviations, into the Record	October 9, 2023
Opening Comments, limited to no more than 15 pages, to IOU Pro-Forma Standard Multi-Property Microgrid Tariff, and Any Necessary Utility-Specific Deviations, filed and served	October 27, 2023
Reply Comments, limited to no more than 10 pages, to IOU Pro-Forma Standard Multi-Property Microgrid Tariff, and Any Necessary Utility-Specific Deviations, filed and served	November 10, 2023
ALJ Ruling: Energy Division Staff Proposal on Multi-Property Microgrid Tariffs	January 22, 2023
Energy Division Public Workshop on Energy Division Staff Proposal on Multi-Property Microgrid Tariffs	February 5, 2024
Opening Comments to Energy Division Staff Proposal on Multi-Property Microgrid Tariffs, filed and served	February 19, 2024
Reply Comments to Energy Division Staff Proposal on Multi-Property Microgrid Tariffs, filed and served	March 11, 2024
Proposed Decision	Within 90 days from submission of Track 5 record

[Advance Demand Flexibility Through Electric Rates OIR \(R.22-07-005\)](#)

On July 14, California Efficiency + Demand Management Council (Council), California Solar & Storage Association (CALSSA), Center for Energy Efficiency and Renewable Technologies (CEERT), Clean Coalition, Solar Energy Industries Association (SEIA), and Utility Consumers' Action Network (UCAN), filed a joint motion requesting public participation hearings (PPH) on issued being addressed in Track A of this proceeding. Their justification is their belief that the impact of implementing residential income-graduated rates will be significant. They request that at least 8 PPHs be scheduled.

A July 18 [ALJ Ruling](#) granted a joint IOU motion to extend Track A deadlines as follows:

- Opening comments on the June 19 ruling are due on July 31, 2023.
- Joint Case Management Statement is due on August 11, 2023.
- Reply comments on the June 19 ruling are due on August 21, 2023.

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[Demand Response Applications \(A.22-05-002 et al\)](#)

Phase II opening briefs were submitted on July 14.

[Energy Efficiency \(R.13-11-005\)](#)

A July 5 [proposed decision](#) would adopt the following 2024-2035 Total System Benefit (TSB) and Energy Efficiency Goals for IOUs as follows:

Table 1: Adopted TSB and Energy Efficiency Goals for PG&E (2024-2035)

Year	Incentive Programs	Codes and Standards		
	TSB	GWh	MW	MMTherms
2024	\$211,992,628	1,071.2	201.9	23.0
2025	\$211,860,888	1,008.4	184.7	22.5
2026	\$212,385,721	987.2	180.7	14.5
2027	\$216,621,492	909.8	165.9	14.8
2028	\$227,558,742	830.0	157.8	13.8
2029	\$238,185,795	659.5	132.0	13.1
2030	\$222,939,809	599.0	123.2	12.7
2031	\$228,458,369	565.9	118.3	12.2
2032	\$244,634,558	530.2	110.0	11.4
2033	\$261,850,172	502.5	104.3	11.0
2034	\$265,251,413	417.5	94.0	10.7
2035	\$282,251,303	401.6	89.5	10.3

Table 2: Adopted TSB and Energy Efficiency Goals for SCE (2024-2035)

Year	Incentive Programs	Codes and Standards		
	TSB	GWh	MW	MMTherms
2024	\$112,534,778	1,071.2	186.5	-
2025	\$117,062,964	1,008.4	172.4	-
2026	\$128,212,309	987.2	168.9	-
2027	\$142,456,365	909.8	154.7	-
2028	\$154,873,672	830.0	147.1	-
2029	\$166,183,167	659.5	121.9	-
2030	\$123,108,254	599.0	113.3	-
2031	\$130,090,469	565.9	108.7	-
2032	\$134,974,655	530.2	101.0	-
2033	\$136,958,995	502.5	95.8	-
2034	\$139,056,217	417.5	85.9	-
2035	\$144,496,948	401.6	81.6	-

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Table 3: Adopted TSB and Energy Efficiency Goals for SDG&E (2024-2035)

Year	Incentive Programs	Codes and Standards		
	TSB	GWh	MW	MMTherms
2024	\$45,004,630	219.4	38.2	2.3
2025	\$45,267,492	206.5	35.6	2.3
2026	\$45,878,572	202.2	34.9	1.5
2027	\$47,996,979	186.3	31.9	1.5
2028	\$53,596,931	170.0	30.3	1.4
2029	\$54,624,969	135.1	25.0	1.3
2030	\$47,447,704	122.7	23.3	1.3
2031	\$50,003,487	115.9	22.3	1.2
2032	\$53,833,829	108.6	20.7	1.1
2033	\$60,192,598	102.9	19.6	1.1
2034	\$59,986,628	85.5	17.5	1.1
2035	\$64,740,053	82.2	16.6	1.0

Table 4: Adopted TSB and Energy Efficiency Goals for SoCalGas (2024-2035)

Year	Incentive Programs	Codes and Standards		
	TSB	GWh	MW	MMTherms
2024	164,432,152	-	-	25.6
2025	188,742,137	-	-	25.0
2026	203,872,384	-	-	16.1
2027	215,483,664	-	-	16.5
2028	227,299,260	-	-	15.4
2029	237,409,377	-	-	14.6
2030	208,882,271	-	-	14.2
2031	218,897,464	-	-	13.6
2032	237,492,445	-	-	12.6
2033	254,060,765	-	-	12.3
2034	269,208,582	-	-	11.9
2035	293,622,127	-	-	11.5

Comments on the PD are due July 25.

[Clean Energy Financing Options \(R.20-08-022\)](#)

Comments on the [proposed decision](#) were submitted by nine parties, replies by seven.

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Freight Infrastructure Planning

During a May 23 workshop, CPUC Staff presented a “[Draft Proposal](#): Zero-Emission Freight Infrastructure Planning, to address the need for proactive planning of long lead time utility-side electrical infrastructure” that it has developed. The FIP Framework is described as follows:

- The FIP Framework discussed today [5/23/23] is a staff proposal for how to develop “investment grade” inputs/assumptions and MDHD charging scenarios to be used in long-term grid planning to identify MDHD freight electric infrastructure needs.
- The FIP Framework, as proposed, facilitates the identification of medium/long-term TE electrical infrastructure needs.
 - FIP plans for to-the-meter (utility-side) infrastructure (distribution, substation and transmission), not behind-the-meter infrastructure for chargers.
 - FIP is focusing on MDHD freight in the implementation assessment because it will have significant and localized impacts on the electric infrastructure.
- Proactive identification of TE electrical infrastructure necessary to accommodate future loads will reduce the likelihood that long-lead upgrades are not online when necessary.
- Staff will work with stakeholders during FIP implementation to identify other vehicle classes/types that are dependent on long lead time infrastructure, e.g., LDV DCFC and FCEV, etc.

FTP suggests a series of proposed reforms:

- Reform 1: Establish process for developing common MDHD inputs for use in DPP, IRP, IEPR, and GRC
 - Establish fleet-centric stakeholder process that vets forecasting/planning inputs and charger scenarios.
- Reform 2: Implement MDHD IEPR forecasting process that better considers infrastructure risk and timing by studying a wider range of scenarios.
 - Risks that could impact MDHD adoption forecast:
 - Uncertainty regarding long-term electric rates and how they will impact MDHD electric vehicle adoption.
 - Delayed construction of distribution/transmission infrastructure
 - Future charging behavior (e.g., load shapes) of MDHD and LDV DCFC is different than what was assumed in planning, resulting in an infrastructure buildout that doesn't align with actual MDHD charging behavior.
- Reform 3: Develop framework that can optimize fleet and electric sector needs while meeting policy goals.
 - Consider policy goals (e.g., air quality, DACs, and cost minimization) and mobility needs, which are the current and future truck routes that are inflexible from a fleet business perspective.
 - Identify MDHD charging zones, this could include: “Ready-to-electrify” zones that don't require major infrastructure investments.

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- Optimal zones that best meet both business needs and energy or electric sector requirements and policy goals
 - Zones of highest priority for infrastructure development due to long lead time
 - Any other zone type that would prove useful to planning agencies and the market.
- Reform 4: Explore the option for an interagency process for coordinated charging infrastructure funding that is informed by planning.
 - Reform 5: Establish inter-agency feedback loop between electric infrastructure planning and CARB to inform assessment of ACF and other ZEV regulations implementation.

Comments in response to 26 questions in the staff proposal (Slides 52-55) were due July 21. Preliminary Implementation Assessment results will be published in Q3 of 2023 and a staff proposal in implementation in Q4. Exactly what procedure is used to implement FTP policies remains to be seen.

[PG&E Real Time Rate for EV charging \(A.20-10-011\)](#)

[D.23-07-003](#) was issued on July 13. It includes no substantive changes from the [proposed decision](#).

[PG&E EV Charge 2 Application \(A.21-10-010\)](#)

The statutory deadline for this proceeding was extended to December 26, 2024.

[SDG&E EV Rate Application \(A.21-12-008\)](#)

Reply briefs have been filed.

[2018 RPS Proceeding \(R.18-07-003\)](#)

All LSEs so required appear to have filed their draft 2023 RPS procurement plans on July 17. FYI, [PG&E's Public report](#) is some 2,164 pages in length.

[BioMAT \(R.22-10-010\)](#)

Four sets of reply comments were filed on June 29 in response to the May 25 [ALJ ruling](#) requests comments on workshop questions and modifies the schedule.

[Biomass to RNG Pilots \(PG&E - A.23-06-023, SoCalGas A.23-06-024\)](#)

On June 30 PG&E filed an [application](#) for a pilot project undertaken with West Biofuels, LLC , to use \$17 million in Cap-and-Trade funds to develop a facility to convert forest waste to RNG. The pilot is undertaken in response to D.22-02-025 and results from an RFO issued in February. It would include a fluidized bed gasifier and a supplemental methanation process to convert the resulting syngas-produced CO₂ into methane by adding green hydrogen and

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thus have no CO₂ or other air emissions. The project will develop from an existing gasifier in Woodland. The RNG produced would be injected into PG&E's pipelines to support its RNG development process. Solid waste would also be minimized.

SoCalGas also filed a separate [application](#), for a project in Kern County to be developed by San Joaquin Renewables. LLC, to convert agricultural waste into biomethane funded by \$13.4 million of its Cap-and-Trade revenues. Its residual CO₂ could be sequestered for other uses.

New Small Generator Incentive Program (R.20-05-012)

A July 12 [ACR was issued](#) seeking comment on the following questions regarding the SGIP program and Heat Pump Water Heater program improvements.

- **Question #1:** Should the Commission require SGIP implementers to simultaneously educate and connect customers to available home efficiency and electrification programs so as to streamline customer targeting, eligibility, outreach, installations and data sharing?
- **Question #2:** If your answer to Question 1 was yes, should SGIP PAs, developers and/or applicants be required to: (a) partner with approved installation contractors of other programs to coordinate simultaneous offerings and installations? and (b) establish non-disclosure agreements and share pre- and post-enrollment customer data with other program implementers to enable close coordination with SGIP?
- **Question #3:** What should be required from the PAs, applicants, or developers to ensure that low-income customers participating in the SGIP program are simultaneously able to take advantage of home efficiency and electrification measures offered by other programs? How should the customer experience be made seamless? How will sharing resources for customer verification, outreach and education with other programs reduce administrative costs for SGIP in the long-term?
- **Question #4:** Should the Commission update the definition of a qualifying DR program to allow customers in electric POU territories that do not have a CAISO-integrated DR program to be eligible to participate in the SGIP HPWH Program? If it should be changed, then how should the CPUC expand program eligibility so as to allow electric POU customers to participate in the program?
- **Question #5:** Should certain existing DR programs be considered as qualified programs so that customers enrolling in these programs are eligible for the SGIP HPWH Program? What should be the criteria to consider a DR program as a qualifying program under SGIP HPWH Program rules?
- **Question #6:** Should the Commission allow the SGIP HPWH Program implementer to use CBECC software, in addition to CBECC-Res, so that multi-family buildings with large central systems can qualify for SGIP HPWH Program incentives?

Comments/replies are due August 1/11.

A July 12 [ALJ Ruling](#) requested comment from parties regarding funding authorized by AB 209 and improving outcomes for low-income customers under the SGIP. Noting that \$280

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million has been appropriated for the 2023-2024 FY and \$350 million proposed for 2024 through 2026, it asks 20 questions in all on the following topics:

- Allocation of the Updated AB 209 budget
- Marketing, Education, and Outreach (ME&O) for POU and other Non-IOU Customers
- SGIP Solar Incentive
- SGIP Alignment with Existing Low-Income Programs
- Measurement and Evaluation
- Use of Administrative Funds
- Other SGIP Program Changes

See the Ruling for details of the questions. Comments/replies are due August 1/11.

[PURPA OIR \(R.18-07-017\)](#)

D.23-06-026, issued on June 29, closed the proceeding.

[Aliso Canyon Investigation \(I.17-02-002\)](#)

A June 30 [ALJ ruling](#), scheduled a status conference on July 26 at 1 pm. Prior to filing the status conference statements on July 21, the parties were to meet and confer to assess whether agreement exists about the procedural steps, the disputed issues of material fact, or discovery issues. The status conference statements will address the following:

1. Potential disputes of material fact,
2. Plans for discovery, and possible discovery disputes,
3. Witnesses who will be available for cross examination if an evidentiary hearing is held, and
4. A proposed schedule.

[CCA Procurement](#)

On June 23, SCE filed Advice 5056-E, seeking approval of the sale of 35% of its long-term bundled RECs in its PCIA-eligible portfolio to CCSF generated from the remainder of 2023 through 2040, which is the end of the term of the longest contract in SCE's PCIA-eligible RPS portfolio. The PCC 1 projects are all located within California, Nevada, New Mexico, and Arizona and are either directly interconnected with or dynamically transferred to the CAISO balancing authority.

[Utility Procurement](#)

[PG&E](#)

[PG&E Generation Asset transfer \(A.22-09-018\)](#)

Evidentiary hearings for this proceeding are scheduled for August 21-22, 24-25, and 28.

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Diablo Canyon Extension (R.23-01-007)

A [proposed decision](#) was issued on July 5 addressing funding for the Diablo Canyon Independent Safety Committee (DCISC), increasing compensation for committee members and directing PG&E to track the DCISC 2023-2024 operational costs associated with assessing the potential for extending operations of the plant.

Resource Adequacy Capacity

On July 14, PG&E announced that it had concluded its [2023 CPE](#) local RA RFO and is no longer considering offers for 2024 delivery.

SCE

Nothing new to report.

SDG&E

On July 5, SDG&E announced RFOs for import RA capacity for mid-term reliability and [2024-2025 summer reliability](#). Submissions were due July 14.

Transmission Projects

General Order 131 Update (R.23-05-018)

Opening comments were submitted by at least 23 parties. Many of the comments focus on simplifying the CPUC's process and removing redundancies to help speed the approval process.

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SCD Energy Solutions is an independent energy consulting practice that helps clients profitably and effectively negotiate the challenges of the electricity markets in the Western US.

SCD has been focused on the development, implementation and ongoing evolution of competitive markets since 1994. We are deeply familiar with processes, participants and priorities at play, and realize that competitive success in the electric supply industry requires a strategic understanding of regulatory bodies and policies.

Our results-oriented approach is informed by having been active in the industry for the last 30 years. We understand the big picture, appreciate the complex give and take of the industry, know where to go to get answers, and concentrate on our clients' specific needs.

Who We Are

SCD Energy Solutions is an independent energy consulting practice that provides strategic, creative and directed solutions to help clients profitably and effectively negotiate the electricity industry in the Western US, particularly in California.

What We Do

SCD Energy Solutions provides regulatory support, analysis and advocacy. We track the vast amount of information available and:

1. Identify what is useful and important.
2. Clarify the strategic implications.
3. Define opportunities.
4. Develop responses and positions that support the business needs of our clients.

Who We Serve

If you are a developer interested in understanding the California market, an energy consumer interested in renewable energy but unsure of the economics, a new resource or load needing to interconnect with a utility, or a market participant trying to understand some complex energy policy, we can help!

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