BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for Development of
Distribution Resources Plans Pursuant to Public
Utilities Code Section 769.

Rulemaking 14-08-013
(Filed August 14, 2014)

(A902E)

And Related Matters.

A.15-07-002
A.15-07-003
A.15-07-006

(NOT CONSOLIDATED)

In the Matter of the Application of PacifiCorp
(U901E) Setting Forth its Distribution Resource
Plan Pursuant to Public Utilities Code Section 769.

A.15-07-005
(Filed July 1, 2015)

And Related Matters.

A.15-07-007
A.15-07-008

COMMENTS OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E), AND SAN DIEGO GAS AND ELECTRIC COMPANY
(U 902-E) ON ASSIGNED COMMISSIONER’S RULING PROPOSING SCOPE AND
SCHEDULE FOR LONG TERM REFINEMENT DISCUSSIONS ON INTEGRATION
CAPACITY ANALYSIS AND LOCAOTIONAL NET BENEFITS ANALYSIS

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May 3, 2017
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I. INTRODUCTION


II. SCHEDULE FOR WORKING GROUPS

The Joint IOUs support the ACR’s proposed creation of succinct scoping documents that summarize the past discussions and relevant framing questions pertaining to the long-term refinement scoping items identified for the next round of discussions because the documents will help the Working Groups (“WG”) begin their discussions in an efficient and effective manner.
The Joint IOUs believe that the most efficient and practical method to create these scoping documents is to assign the task of preparing these two scope documents to the Joint IOUs, who can then circulate the documents to the WG participants for review.

However, for each of these two scoping documents (one for ICA, one for LNBA scoped items) to be properly written, sufficient time must be provided. Furthermore, these documents will necessarily be based upon the final scope, which the ACR indicates will be identified in the forthcoming Ruling finalizing the revised scoping items (“Final Ruling”). Thus, the Joint IOUs recommend that the Final Ruling should adopt a revised schedule that allows the following timeline: 15 days for the scoping documents to be completed; 30 days for the first WG meeting to take place, i.e., within 15 days after the scoping documents are final; and then, monthly meetings for the ICA and LNBA track of the WGs respectively. The Joint IOUs also recommend that the Final Ruling revise the requirement for interim status reports, reducing from three envisioned in the ACR to only two interim status reports. The first status report, addressing Group I items, should be due at the end of August 2017. A second status report covering Groups II, III and Out of Scope items, should be due at the end of October 2017. The Final Report would be due six months from the date the first WG meeting is held. Furthermore, the Joint IOUs recommend that the Commission delegate to the Director of the Energy Division an ability to extend the deadlines as needed.

III. SCOPE AND PRIORITY OF ICA WORKING GROUP TOPICS

A. General Discussion of ICA Working Group Scope

The Joint IOUs generally support the ICA long-term refinement scope and schedule, and offer some recommendations for the Commission’s consideration as it finalizes the scope, schedule and prioritization. It is important to note that the IOU staff responsible for addressing long-term refinements will be the same staff to perform the initial roll out of the ICA methodology. This means that any refinements to the methodology will by necessity take resources away from efforts to fully deploy ICA. Therefore, the Joint IOUs recommend that the WG group focus on developing implementation plans for long-term refinements for the final
report, and not attempt to determine the methods and values during that time frame. These implementation plans could include the scope of the desired refinement, a work plan for how to achieve the refinement and, where feasible, a schedule for implementation. To deal with the more complex technical issues anticipated in the long-term refinement efforts, the Joint IOUs recommend that working group be joined by additional entities that have expertise in power system analysis. To the extent that certain long-term refinements have already been incorporated into the existing ICA tools, they can and should be deployed in the initial rollout of the respective tools.

**B. Additional Discussion on Specific Topics**

There are two significant items that remain to be addressed by the Joint IOUs and power flow software vendors that are not yet ripe for inclusion in the initial rollout. Item 4 (operational flexibility) and Item 5 (smart inverter modeling) are not likely to be incorporated into the ICA without significant study and work to determine the appropriate methods and values. The operational flexibility (“OpFlex”) criterion used by the IOUs in Demo A, while heuristic in nature, represents a good first approximation of the level at which distributed energy resources (“DERs”) may impact the operational capability of the distribution system. A sufficiently accurate and agreeable replacement for the OpFlex criterion using a more analytical or probabilistic approach will likely take months, and possibly years, to develop, given the complexity of distribution system operations. Furthermore, an ICA value determined by taking into account all levels of operational possibilities (OpFlex) would likely significantly reduce ICA value on a node below what is necessary. To mitigate stakeholder concerns, the IOUs have agreed to display two values on the ICA maps, one limited by the OpFlex criterion, and one not limited by the OpFlex criterion.

The inclusion of smart inverter functionality into the ICA will be an important step that will help to show the integration capacity of the distribution system based on the full capabilities of future DERs, but inclusion is premature at this time. The ability of the ICA to incorporate smart inverters depends upon several factors: the automation capabilities built into power flow tools (CYME, Synergi), the application of methodologies of available functions and the application of methodologies of future functions that are still undergoing technical standard development. For example, questions for ICA development could include whether to only include the initial Smart Inverter requirements unidentified by Phase I and what Smart Inverter
functions under these requirements should be modeled within the ICA. In addition, as tariff revisions that support additional Smart Inverter functionalities are not yet fully developed and contingent on work underway at the national standard level (UL 1547 and 1547.1), it would be premature to have them applied within the ICA.

Performing studies to update the Operational Flexibility criterion and include smart inverters will take resources and time which will impede system wide rollout of the ICA if those studies are required before November 15, 2017. ICA WG meetings discussed the complexities of adopting other methods, as detailed technical projects would need to be scoped and performed. Furthermore, the current state of Operational Flexibility is an improvement from the historic fifteen percent (15%) rule. For these reasons, the Joint IOUs recommend that the WG focus instead on developing an implementation plan to address these issues after the initial system wide rollout is complete.

Group III, Item C of the ACR refers to “Interactive Maps:” The Joint IOUs recommend the Final Ruling clarify how it defines or anticipates future map features. The maps are currently “interactive” where users can interact, click, and navigate in a map view to get ICA data.

In Group 1 Item 1 of the ACR “Further define ICA planning use case and methodologies,” it will be important to understand the relationship with a DER forecast and how it is applied to the ICA methodology. Future WG discussions should identity the general technique of how to apply a DER forecast into the ICA methodology. Understanding this first will help provide a foundation for understanding how ICA can be considered within the distribution planning process.

IV. SCOPE AND PRIORITY OF LNBA WORKING GROUP TOPICS
A. General Discussion of LNBA Working Group Scope

The Joint IOUs generally agree with the ACR’s proposed scope and prioritization of issues for continuing LNBA long-term refinement discussions, and offer a few comments for the Commission’s consideration as it finalizes the scope, schedule and prioritization. The ACR envisions that the long-term refinement discussions shall span six months from the date of the first Working Group meetings, resulting in the submission of the Final Long-Term Refinement reports. The ACR requires the Working Group to initiate discussions on long-term refinement topics in the order in which they are grouped. The Joint IOUs are anticipating that the highest priority, i.e., Group I, items alone will require a significant amount of time and effort to address.
For example, the Working Group is yet to develop a clear understanding of how to quantify the services that smart inverters could provide, the number and distribution of smart inverters needed to obtain a particular level of service. Similar foundational questions remain for many of the items, and it is likely that the Working Group will not be able to fully discuss many of these items and achieve successful outcomes in six months, requiring the working group to “table” many items as described in the ACR.  

The Joint IOUs also agree with the ACR that the value proposition of Group III items is speculative and potentially low, and that the Working Group should only address these issues if time permits. Additionally, the Joint IOUs support the ACR’s identification of items that are out of scope for the Working Group’s continuing LNBA long-term refinement discussions.

However, in the context of out-of-scope items, the ACR currently states “The LNBA calculates estimated avoided costs (or deferral benefits) and does not include DER integration costs.” The Joint IOUs observe that the benefit components currently included in the LNBA can be positive or negative, depending on the location and characteristics of the DER being evaluated. A negative LNBA component indicates increased rather than avoided cost. In order to achieve the defined goal of “identify[ing] optimal locations for the deployment of distributed resources,” it is important to assess locational benefits in a consistent way, even if the benefits are negative at certain locations. Furthermore, DER hosting costs – defined as ratepayer funded costs caused by DERs connecting to the grid – are an equally important factor in determining optimal locations. These costs must be taken into account in the context of DER sourcing.

Valuation of DERs during procurement processes or tariffs designed for DER deployment or incentives in utility’s DER programs must take into account all of the costs that utility customers will bear when deploying DERs. This is consistent with AB 327’s goals of maximizing locational benefits and minimizing incremental costs of integrating DERs to yield net benefits to utility customers.

1 “[for items that prove unworkable at this stage] the Working Group is directed, in the status reports and Final Long-Term Refinement report, to document the extent of discussions, reasons(s) for rescinding or tabling the topic, and relevant considerations (if any) for further discussions beyond the Working Group.” (p.16).
2 Table 6, Proposed Scope and Prioritization of LNBA Long-Term Refinement Items (p. 14).
3 For a DER such as BTM PV, many benefits may be quantified as avoided costs, such as avoided cost of procuring energy; for other DERs, and/or DERs in other locations, the same component could be a negative avoided cost. The simplest example is EVs resulting in additional energy procurement rather than avoiding it.
In Section B below, the Joint IOUs have offered a few specific recommendations regarding the scope items listed in the ACR.

**B. Joint IOUs’ Recommendations on Specific Scope Items & Prioritization.**

The Joint IOUs offer below their recommendations regarding a few of the items in the ACR.

<table>
<thead>
<tr>
<th>Group I</th>
<th>Recommended Change</th>
<th>Comments</th>
</tr>
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<tbody>
<tr>
<td>Item B</td>
<td>Consolidate with 2iii</td>
<td>In order to streamline the evaluation of smart inverter capabilities, the Joint IOUs suggest consolidating this with inclusion of hourly VAR profiles. Once DER requirements can be stated in terms of both real and reactive power, smart-inverter capabilities will broadly be included without requiring in-depth study of the specific mechanism of operationalizing those capabilities (e.g. autonomous settings, dispatchability or communication requirements)</td>
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<tr>
<td>Item 2i</td>
<td>None</td>
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<td>Items 2ii, D</td>
<td>None</td>
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<td>Item 2iii</td>
<td>None</td>
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<tr>
<td>Item 4</td>
<td>None</td>
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</table>
| Item 5 | None | The Joint IOUs support formation of this technical subgroup, and emphasize the importance of CAISO involvement. This item will also be evaluated in the CAISO’s TAC initiative, and suggest a consolidation of efforts, especially since this topic will likely extend beyond six months.  

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<table>
<thead>
<tr>
<th><strong>Group II</strong></th>
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<tr>
<td>Item 3</td>
<td>Clarify</td>
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<tr>
<td>The Joint IOUs request that the CPUC clarify the definition of &quot;Renewable Integration Cost&quot; noted in the &quot;Assigned Commissioner's Ruling (1) Refining Integration Capacity and Location Net Benefit Analysis Methodologies and Requirements; and (2) Authorizing Demonstration Projects A and B.&quot; As described in all three IOUs’ final Demo B reports, the IOUs included the renewable integration cost adopted in D.14-11-042 in the RPS proceeding. The IOUs believe that other WG members are unclear about the appropriateness of this adder in the LNBA, and whether this was the Commission’s intention.</td>
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<td>Item 7</td>
<td>None</td>
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<td>The Joint IOUs agree that the uncertainty metric will require coordination with the deferral screening framework under development in DRP Track 3, Sub-track 3. The uncertainty metric can be provided as a separate piece of information but should not be reflected in the LNBA calculation.</td>
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<td>Item 11</td>
<td>None</td>
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<tr>
<td>Item 12</td>
<td>Move to Group III</td>
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<td>The Joint IOUs reiterate that an asset life extension/reduction study would require significant time and resources to accomplish and recommend that Item #12 be reprioritized to Group III to be accomplished if time and resources permit.</td>
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<th><strong>Group III</strong></th>
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<tr>
<td>Items A, 8, 9</td>
<td>None</td>
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<td>The Joint IOUs agree there is value in exploring potential DER benefits beyond the planning horizon (10 years), however as the Commission recognized in the ACR, &quot;such values are speculative and likely difficult to quantify for practical use&quot;, and the IOUs will only dedicate resources to the development of these items if time permits. Generally, any DER value streams beyond ten years will be discounted to reflect uncertainty and it may not be in ratepayers’ interest to for IOUs speculate on any such value. The development of items related to value beyond the planning horizon may be more appropriate to pursue after the development of item 7 in group II above.</td>
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<td>Item 13</td>
<td>None</td>
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<td>Similar to items A, 8, and 9, the Joint IOUs agree it is wise to explore the potential value of any additional situational awareness DERs may provide, but any “value of data-as-service for situational intelligence is likely hard to quantify” as the commission ruling stated and difficult to standardize for a technology-agnostic calculator.</td>
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<td>Item 14</td>
<td>None</td>
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<td>Per the commission “Value proposition is speculative and potentially low; Working group should only address these issues if time permits.” The joint IOUs would like to again emphasize DERs may positively or negatively impact reliability depending on the technology type and area of installation. The pursuit of this item should remain low priority.</td>
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<tr>
<th>Item 16</th>
<th>None</th>
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<td>Per the Commission “Value proposition is speculative and potentially low; Working group should only address these issues if time permits.” Similar to item 12, this topic likely requires scientific research to enable the IOUs to be able to quantify the dollar value of deferred maintenance derived from DERs contributions with any degree of certainty. Asset vendors, R&amp;D groups like EPRI, NREL or Lawrence Livermore lab, and academic institutions are better positioned to perform the research necessary to come to a conclusion that could be widely applied and accepted.</td>
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<tr>
<th>Item 17</th>
<th>Move to Out of Scope category</th>
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<td>The Joint IOUs note that when equipment fails, its replacement needs to be installed immediately in order to restore service to customers. It is unlikely that there will be sufficient time after failure to analyze whether existing DER penetration would support downsizing of the replacement equipment, let alone consider installing new DERs. Furthermore, even if existing DERs can provide grid services, there is not enough time for the IOUs to commercially acquire these grid services. Given all these issues and lack of potential value, the Joint IOUs recommend that this item be moved to Out of Scope category.</td>
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V. CONCLUSION

The Joint IOUs appreciate the opportunity to provide these comments.

Respectfully submitted,

SAN DIEGO GAS & ELECTRIC COMPANY

By: /s/ Jonathan J. Newlander

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On behalf of the Joint IOUs

May 3, 2017
BEFORE THE PUBLIC UTILITIES COMMISSION
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), AND SAN DIEGO GAS AND ELECTRIC COMPANY (U 902-E) ON ASSIGNED COMMISSIONER’S RULING PROPOSING SCOPE AND SCHEDULE FOR LONG TERM REFINEMENT DISCUSSIONS ON INTEGRATION CAPACITY ANALYSIS AND LOCATIONAL NET BENEFITS ANALYSIS on all parties identified in R.14-08-013, A.15-07-002, A.15-07-003, A.15-07-005, A.15-07-006, A.15-07-007, and A.15-07-008 by electronic mail, U.S. mail for those parties without an email address and by Federal Express to the assigned Administrative Law Judge.

Dated at San Diego, California, this 3rd day of May, 2017.

/s/ Darleen Evans
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<td>FOR: COMMUNITY CHOICE PARTNERS, INC.</td>
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<td></td>
<td>2120 UNIVERSITY AVENUE, BERKELEY, CA 94704</td>
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<td>DEEPAK DIVAN</td>
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<td>JOHNSON CONTROLS, INC.</td>
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<tr>
<td>TIM MCRAE</td>
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<td>VARENTEC</td>
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<tbody>
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# California Public Utilities Commission

## Service Lists

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**FILER:** PACIFICORP  
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<thead>
<tr>
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<th>City, State Zip</th>
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<td>Peter T. Pearson</td>
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<td>Rachel Golden</td>
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MGR - BUS. DEVELOPMENT (RBNA/PJ-BGT)
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<td>NEW POWER TECHNOLOGIES</td>
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<td>ANTHONY HARRISON</td>
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<td>ALLISON A. JOHNSON</td>
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<td>DEREK JONES</td>
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<td>RICHARD BEADLE</td>
<td>NEXANT, INC.</td>
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<td>GOODWINE MACBRIE &amp; LAMPREY</td>
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