BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA


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

And Related Matters.

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

(UNITED STATES)

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

(UNITED STATES)

JOINT REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E), AND SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E) ON ASSIGNED COMMISSIONER’S RULING AND GRID MODERNIZATION STAFF WHITE PAPER

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Dated: June 28, 2017
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Rulemaking 14-08-013
(Filed August 14, 2014)

(U39E)

And Related Matters.

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( NOT CONSOLIDATED )

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I. INTRODUCTION AND GENERAL REPLY COMMENTS (JOINT IOUS).

Pursuant to the Assigned Commissioner’s Ruling (ACR) Requesting Answers to Stakeholder Questions Set Forth in the Energy Division Staff White Paper on Grid Modernization (“White Paper”), dated May 16, 2017, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (collectively, “Joint IOUs”) hereby provide their reply comments on the White Paper.¶ Sections I-V and VII of these reply comments contain joint comments by the Joint IOUs. Section VI is sponsored solely by PG&E. SCE and SDG&E do not join in that section.

California, as led by this Commission, is spearheading a transformative energy policy to achieve the state’s clean energy goals. The Joint IOUs are committed to help achieving these goals, and note that this commitment is being accomplished through numerous regulatory and policy initiatives that include the purchase of more renewables, the integration of distributed energy resources (“DERs”), the support

¶ Counsel for SCE and SDG&E have authorized PG&E to file these joint comments on their behalf. SCE and SDG&E do not join in PG&E’s specific comments in Section VI.
for transportation electrification, and the adoption of new rate designs. The Joint IOUs support widespread deployment of DERs and the innovative use of these resources to provide services and benefits to the grid while ensuring continued safe, reliable, clean, and affordable service to utility customers.

As discussed in more detail below, Joint IOUs urge the Commission not to adopt recommendations by parties such as Office of Ratepayer Advocates (ORA), Solar Energy Industries Association (SEIA), and Vote Solar for duplicative grid modernization proceedings outside of General Rate Cases (GRCs). Instead, the Commission should approve the recommendations by Joint IOUs, The Utility Reform Network, and other parties to consolidate the White Paper’s proposed “grid needs assessments” (GNAs) and “grid modernization plans” (GMPs) with each utility’s GRCs, consistent with the Commission’s Rate Case Plan and the requirements of the Distribution Resources Plan (DRP) statute.2

In further response to parties’ comments, Joint IOUs recommend the following:

- For purposes of this DRP OIR, the Grid Modernization definition should be limited to technology projects deployed at the local level whose primary purpose is to enable DERs to provide grid services.
- Review of the “Grid Needs Assessment” (GNA) and the “Grid Modernization Plan” (GMP) should occur within each utility’s GRC.
- Between GRCs, a new stakeholder review process focused on DER deferrals is appropriate, but this process must be narrowly focused only on DER deferrals as part of the Distribution Investment Deferral Framework that will be developed in this proceeding.
- The Grid Modernization guidance that will be issued in this proceeding must not be applied retroactively in the separate proceeding concerning SCE’s 2018 GRC.
- Parties’ recommendations for the Commission to issue rulings concerning specific issues that reside within SCE’s 2018 GRC proceeding are wholly inappropriate and must be disregarded. Review of such recommendations must occur within SCE’s 2018 GRC, itself, where the evidentiary record is being developed and evaluated.
- The Locational Net Benefits Analysis as currently designed is an indicative tool to provide public information and should not be used for calculation of actual costs, benefits and net benefits under AB 327.

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2 Public Utilities Code Section 769.
II. JOINT IOUS DISAGREE WITH THE RECOMMENDATION BY ORA, SEIA AND VOTE SOLAR THAT SEPARATE FORMAL ANNUAL PROCEEDINGS OUTSIDE THE GRCs SHOULD BE REQUIRED TO EVALUATE AND APPROVE UTILITY GRID NEEDS ASSESSMENTS AND GRID MODERNIZATION PLANS. (JOINT IOUS)

A. The Commission Should Reject ORA’s, SEIA’s and Vote Solar’s Recommendation for Separate and Duplicative Grid Modernization Proceedings.

ORA, SEIA and Vote Solar argue that separate formal annual CPUC proceedings are required to evaluate and approve the utilities’ grid needs assessments and/or grid modernization plans, outside of the utilities’ General Rate Cases (“GRCs”) even though the approval of expenditures for those needs and modernization plans must occur in the GRCs pursuant to the Commission’s Rate Case Plan and Public Utilities Code Section 769(d). The Commission should reject this duplicative and unnecessary process, because it is infeasible given the utilities’ need to implement their distribution infrastructure plans on a continuing basis between GRCs. It also would delay the Commission’s timely approval of essential safety and reliability expenditures for grid modernization in the GRCs and insert regulatory uncertainty into DER deferral selections.

As The Utility Reform Network (TURN) accurately points out in its comments:

_It is a recipe for disaster to attempt to “authorize” a GNA or GMP separately, without considering together what technology choices are being selected to address which identified needs. … In the long run, separating grid planning for DERs from other grid planning processes is not useful and will lead to sub-optimal solutions. TURN does not agree that utility distribution planning can be readily separated into DER versus reliability versus safety investments, since most assets serve multiple functions and use cases. Over time, grid planning should be incorporated into utility risk-informed decision-making, with Grid Modernization Plans providing just one input into the overall process._

Although Joint IOUs may have disagreements with TURN on the merits of specific distribution needs and projects identified and litigated in GRCs, including even the methodology for assessing safety and risk in those GRCs, TURN is absolutely correct that separate, formal proceedings to review GNAs

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3 TURN Opening Comments, pp. 2, 16.

4 See, e.g., D.17-05-013, pp. 57 (settlement reducing PG&E’s 2017 GRC Electric Distribution forecast capital request of $1.796 billion to $1.694 billion, a $101 million reduction. In testimony, ORA proposed a reduction of $88 million, while TURN proposed a reduction of $171 million.) See also, D.14-12-025 and D.15-11-005 in R.13-11-006, Order Instituting Rulemaking to Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the General Rate Case Plan for Energy Utilities.
and GMPs outside of the GRC’s risk-based safety and reliability process would be a “recipe for disaster.”

ORA provides no explanation for why a separate, formal application for the GNAs needs to be conducted outside the GRCs, stating merely that the GNA will be a “new public process” and a formal application will give interested parties time to “review the plan and file protests.” ORA provides no explanation of why the same “public process” is not already provided by the GRC applications. While ORA concedes that the GMP will be “the final cumulative version of the three years of GNAs” and thus should be included in the GRCs, ORA provides no rationale for why the same reasoning would not also apply to the GNAs.

More importantly, ORA’s proposal for a formal annual “Application process” for review and approval of the GNA provides no explanation of how the formal GNA applications – which under the Commission rules will take 18 – 24 months to complete – can be synched up with the staggered three-year schedule of utility GRCs, which are filed at least 15 months prior to their effective date under the Rate Case Plan. Simply stated, ORA’s proposed separate formal GNA approval process makes no procedural or substantive sense.

SEIA’s and Vote Solar’s rationale for separate, formal GNA and GMP proceedings outside the GRCs and Rate Case Plan are even less persuasive. SEIA and Vote Solar argue that a formal annual process for both the GNAs and GMPs is necessary outside the GRCs in order to provide “greater transparency” and accommodate the “limited resources that hinder the ability of parties to intervene in rate cases.” However, SEIA and Vote Solar agree that DER-related grid modernization investments may not feasibly be differentiated from non-DER safety and reliability grid investments, and that a formal application process would not provide timely resolution of issues “in an application process that would stretch well beyond a year.”

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5 ORA Opening Comments, p. 24.
6 Id.
7 SEIA/Vote Solar Opening Comments, p. 3.
8 Id., pp. 4, 18.
Moreover, SEIA’s and Vote Solar’s complaint about “limited resources” to intervene in GRCs is belied by their own substantial and detailed participation in the DRP and IDER proceedings themselves, each of which likely already has consumed more procedural time and stakeholder and Commission resources over the last 28 months than a utility GRC under the 15-month Rate Case Plan schedule. SEIA’s and Vote Solar’s opening comments demonstrate their own ability and the ability of other parties to participate and understand the issues and record in GRCs – SEIA and Vote Solar include not only an analysis of their own direct testimony as well as ORA’s direct testimony in SCE’s current GRC, but also a detailed description of the data they claim is necessary to evaluate the utilities’ DER-related distribution investments in GRCs – data which if relevant and within the scope of the GRC request is available to SEIA, Vote Solar and other interested parties in each GRC.²

Even if separate GNA and GMP proceedings had some merit, they are simply impracticable in the near-term. The Commission barely a month ago approved PG&E’s three-year distribution grid expenditures in PG&E’s 2017 GRC decision.¹⁰ The Commission will complete hearings and the record on SCE’s three-year grid needs and modernization projects this summer with a final decision scheduled before 2018.¹¹ SDG&E will file its three-year grid needs assessment and modernization plans in its next GRC in September, 2017. Even if the Commission began conducting GNA and GMP proceedings in 2018, the results would not be applied to utility distribution investments until at the earliest 2020, 2021 and 2022 – even assuming the Commission issued final decisions on the GNAs and GMPs in time for the GRCs filed by each of the utilities in late 2018, 2019 and 2020.

Joint IOUs agree with many of the recommendations of ORA, SEIA and Vote Solar on the additional content, transparency and details on DER-related grid needs and grid modernization projects that can be included in utility GRC showings under the Rate Case Plan framework, using the new

²  Id., pp. 7, inc. fn. 5; 15-17; Attachment 1. Other parties appear to support separate GNA and GMP proceedings outside the GRCs. Those arguments should be rejected for the same reasons as ORA’s, SEIA’s and Vote Solar’s.
¹⁰ D.17-05-013.
¹¹ Joint IOU Opening Comments, pp. 16-17.
sources of data and new tools developed in the DRP proceeding, such as the LNBA tool, ICA hosting capacity analysis, and DER growth forecasts. Joint IOUs also agree, as provided in the Joint IOU Opening Comments, that between GRCs the IOUs should provide relevant information to, and consult with, the Distribution Planning Advisory Group (DPAG) and Independent Professional Engineer (IPE) regarding distribution deferral projects. However, it is not necessary nor feasible for additional DER-related distribution planning assessments and plans to be litigated in duplicative annual proceedings outside of the GRCs where the utility expenditures to support the needed and planned distribution programs are reviewed by the Commission and stakeholders.

**B. A new review process between GRCs focused on DER deferrals is appropriate, but this process must be narrowly focused only on DER distribution deferral projects.**

Joint IOUs recognize that the Commission and stakeholders need an appropriate opportunity, on a routine basis, to understand the IOUs’ incorporation of DERs into distribution planning activities through identification of deferral opportunities. However, this review is appropriately accomplished through the DPAG process. Beginning with the DRP applications filed in July 2015, Joint IOUs have supported increased transparency around the distribution deferral process, including through the creation of the DPAG, which is intended to be a new stakeholder forum specifically designed to provide an opportunity for stakeholders to review the selection of projects for distribution deferral. The IOUs expanded upon the proposal for this process in their December 2016 workshop presentation which added an “independent professional engineer” to the DPAG process to provide review from an unbiased, technical expert.

In the IOUs’ IDER pilots, the IOUs and stakeholders are testing an initial version of the deferral process, including both the convening of the DPAG to review deferral selections with stakeholders, as well as engaging an IPE to receive further expert, technical review. This initial process has enhanced transparency and been viewed as satisfactory by those involved in the process. Learnings from the IDER pilots and DRP demonstrations can serve as the model for future implementation of a stakeholder...
review of DER distribution deferrals. Stakeholder feedback about the DPAG process will help build upon the success of the initial implementation.

III. JOINT IOUS AGREE THAT DISTRIBUTION INVESTMENTS GENERALLY PROVIDE MULTIPLE SERVICES AND RECOMMEND THE DEFINITION OF GRID MODERNIZATION BE MODIFIED TO FOCUS ON INVESTMENTS TO ENABLE LOCAL DER DISTRIBUTION SERVICES. (JOINT IOUS)

Parties commenting on the White Paper’s definitions and classification of DER-related grid modernization projects generally agreed that the definitions and classification were useful, but not the only definitions and classification schema that could or should be used. This consensus among the commenters supports a key principle in Joint IOUs’ opening comments, namely, that the distinction between DER and non-DER grid projects should be drawn more pragmatically. This will ensure that DER grid projects that are local in nature and targeted at providing distribution services that defer the need for local “wires” projects, can and should be distinguished from system-level and multiple-use grid projects that provide multiple benefits with system-level costs that need to be evaluated on a system-level, overall cost-effectiveness basis. In particular, the Joint IOUs recommend that the primary driver for the investment should determine whether it falls within the DRP’s definition of grid modernization. Investments focused on enabling DERs to provide grid services are “grid modernization” for purposes of the DRP.

As stated in opening comments, Joint IOUs support the following definition for DER-related Grid Modernization:

A modern grid allows for the seamless interconnection of distributed energy resources while maximizing ratepayer benefits, minimizing impacts and risks of safety and reliability. A modern grid facilitates the efficient integration of these resources into all stages of distribution system planning and operations to fully utilize the capabilities that the resources offer, and enables distributed energy resources to participate in established and emerging markets to more fully realize the value of the resources.

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13 See, e.g., Opening Comments of Interstate Renewable Energy Council, Inc. (“IREC”), pp. 4-6; ORA Opening Comments, pp. 4-6; Environmental Defense Fund Opening Comments, pp. 3-4; SEIA/Vote Solar Opening Comments, pp. 4-7.
For purposes of this DRP OIR, Grid Modernization is defined to include technology projects deployed at the local level whose primary purpose is to enable DERs to provide grid services. It does not include distribution investments that provide a combination of customer benefits including safety, reliability, and accommodation of customer growth and integration of DERs for retail customer energy and distribution services on a system-wide basis.14

The White Paper should be revised to adopt this definition for use in review of DER-related grid needs assessments and grid modernization plans.

Consistent with this proposed definition, Joint IOUs support IREC’s view that DER-related Grid Modernization investments subject to the DRP OIR’s guidance should be based upon a “but for” test, that only investments that would not be needed “but for” DERs would fall within the DER-related grid modernization framework.15 Joint IOUs emphasize that this “but for” analysis should focus on local grid investments that enable DERs to provide distribution services. System-level investments are unlikely to meet such a “but for” test, because they are used throughout the utility system and are often implemented for multiple purposes such as safety and reliability, and span across multiple use cases.

Joint IOUs also support ORA’s “qualitative” conceptualization that “[t]he appropriate definition for GM should state that only those investments whose primary objective is to accommodate DER, or enable DER benefits, should be considered GM investments consistent with AB 327.”16 However, ORA’s “quantitative” approach for this primary objective test is impractical and should not be adopted. ORA’s “quantitative” approach appears to suggest that if a certain percentage of an investment can be attributed to enabling DERs, then that percentage should be subject to AB 327’s DER-related grid modernization review requirements. This is problematic for a number of reasons. First, such an evaluation appears to be at odds with ORA’s recommendation that only those investments whose “primary objective” is to enable DERs should be included. Second, such a dichotomized review process for specific distribution system investments is impractical because of the intertwined nature of the

14 Joint IOUs Opening Comments, pp. 1-2 referencing Staff White Paper.
15 IREC Opening Comments, p. 8 (“As a preliminary matter, the GNA should identify whether each grid need would not exist ‘but for’ DERs; this initial classification would be used as a filter for the investments that must be included in the GMP.”).
16 ORA Opening Comments, p. 2.
combination of objectives and because it creates a risk for differing conclusions about the same piece of equipment.

IV. THE GRID MODERNIZATION GUIDANCE SHOULD NOT APPLY TO SCE’S 2018 GRC APPLICATION. (JOINT IOUS)

The timing for final decisions in this proceeding on Track 3 issues as well as approving or modifying the IOUs’ DRP applications as required by Public Utilities Code 769 do not align with SCE’s GRC proceeding that is well-underway and scheduled for resolution prior to 2018. SCE’s GRC must be evaluated on its own merits based upon the evidence and testimony presented in that proceeding.

It is quite possible that the DRP and GRC Decisions would be issued at approximately the same time. If the DRP is expected to apply to the GRC, this would likely lead to confusing or conflicting decisions given that the GRC decision cannot incorporate guidance that had not previously been issued. Even if SCE’s GRC Decision has not been issued, it is almost certain that the record in the GRC proceeding will likely be closed at the time of the DRP Final Decision. This record includes testimony, discovery, hearings, and briefs, all of which obviously will have likely occurred well before to the date the Commission has indicated it will issue grid modernization guidance. There is therefore no way for the grid modernization guidance to apply to SCE’s GRC unless the litigation of SCE’s GRC is essentially restarted, negating years’ worth of effort by SCE, stakeholders and the Commission.

Similarly, it is inappropriate for DRP guidance to modify the investments approved in SCE’s GRC. SCE’s 2018 GRC must be resolved in a timely manner based upon the evidence presented in the 2018 GRC to ensure SCE is able to address emergent needs and goals in a timely manner.

Comments by ORA and SEIA in this proceeding appear to request that the Commission take specific action concerning SCE’s 2018 GRC and attempt to litigate their positions concerning those actions.17 This is wholly inappropriate and must be disregarded. SCE’s 2018 GRC is the appropriate forum to resolve issues presented within the 2018 GRC proceeding, which is where those issues are in scope and where the evidentiary record is being developed.

17 ORA Opening Comments, p. 3; SEIA/Vote Solar Opening Comments, pp. 23-24.
V. THE LNBA IS AN INDICATIVE TOOL FOR PUBLIC INFORMATION, AND MAY NOT BE APPROPRIATE TO JUSTIFY GRID MODERNIZATION INVESTMENTS. (JOINT IOUS)

TURN recommends that the Commission and parties should “use the LNBA to calculate benefits” as part of an AB 327 cost and benefits analysis. Contrary to TURN, the LNBA is an indicative tool for public information, and may not be appropriate to justify DER-related grid modernization investments. Currently, most of the utility avoided costs for the LNBA tool are obtained from the Commission-adopted DER Avoided Cost (DERAC) calculator, with values based on the Commission’s requirements for cost effectiveness evaluation of demand-side programs. For example, the capacity value in the DERAC, and by extension in LNBA, is required by the Commission to be set at the long-range capacity cost, i.e., at cost of new entry of conventional combustion turbine. This is one example of why using LNBA as currently established to calculate benefits as part of "net benefits" calculations is not appropriate. Each IOU should be able to use the best available information at the time it justifies the proposed investment.

VI. PG&E AGREES GENERALLY WITH SEIA/VOTE SOLAR, ORA AND TURN WHICH RECOMMEND THAT THE INCREMENTAL COSTS OF DER-INTEGRATION SHOULD BE EVALUATED AND ALLOCATED AS PART OF THE LNBA AND “NET BENEFITS” METHODOLOGIES CONSISTENT WITH COST-BENEFIT STANDARDS ADOPTED BY THE COMMISSION, INCLUDING IN THE INTEGRATED RESOURCE PLANS. (PG&E ONLY)

Several parties note the importance of ensuring that all alternatives to solve an identified problem should be considered on an equal footing. Where DERs are considered as one alternative to meet the central policy objective facing utility planning in California – how best to meet aggressive GHG reduction goals – the Integrated Resource Plans (IRPs) are the appropriate proceeding. As parties note, the DRP only considers a limited set of options, and is therefore not appropriate. In addition to the

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18 TURN Opening Comments, p. 20.
19 This section is sponsored solely by PG&E. SCE and SDG&E do not join in this section.
20 TURN Opening Comments, p.1, “ensure all reasonable alternatives to solve an identified problem are considered;” Clean Coalition Opening Comments, p.13, “the key will be to ensure that alternative options to meeting the state’s GHG targets are also subject to a full cost and benefit analysis.”
21 Clean Coalition Opening Comments, p.13, “…non-DER alternatives [are] not within scope of this proceeding.”
importance of side-by-side assessment of available options, benefits and costs must also be evaluated together.

SEIA/Vote Solar, ORA and TURN all make similar recommendations regarding how DER-related costs should be incorporated into the “net benefits” evaluation of DERs under the Locational Net Benefits Analyses (LNBA) and the “net benefits” test required for approval of DER-related projects at the local circuit and feeder level under the DRP statute.22 SEIA/Vote Solar recommend that the LNBA methodology be adjusted to include proposed costs in the net benefit calculation, in order to ensure both the costs and benefits of local DER-related grid projects are included.23 While acknowledging the difficulty of separating system-level grid investments that provide both DER and non-DER-related benefits, ORA recommends that both the effectiveness and costs of DERs that address local adverse grid impacts of DERs be evaluated as part of the distribution deferral process.24 ORA recommends that any implementation of such a localized DER net benefits test take into account the results of the IDER pilot deferral projects.25 Similarly, TURN recommends that the full upgrade costs of local grid investments to integrate DERs should be included in the net benefits calculation for DERs, both under the LNBA and in GRC evaluations.26

Several parties suggest that the LNBA is an appropriate venue to develop and integrate a methodology for evaluating both costs and benefits.22 While PG&E recognizes the shortcomings of the current LNBA methodology, PG&E agrees that the LNBA should include hosting or integration costs attributable to DERs in its methodology. Without this enhancement, the LNBA does not meet the DRP statutory requirement to evaluate benefits and costs to utility customers and it is of limited use for

\[\text{References}\]

22 SEIA/Vote Solar Opening Comments, p. 22; TURN Opening Comments, pp. 20-21; ORA Opening Comments, pp. 26-29.
23 SEIA/Vote Solar Opening Comments, p. 22.
24 ORA Opening Comments, pp. 28-29.
25 Id., p. 28.
26 TURN Opening Comments, pp. 20-21.
27 SEIA/Vote Solar Opening Comments, p. 3, “costs fully attributed to [DER], and not to reliability or asset replacement needs, can be incorporated into the … LNBA.”
evaluating true net benefits of DERs types which are commonly considered to have such hosting or integration costs.

Incorporating hosting capacity data is important to ensure that IOUs are building out a cost effective modern grid. For a proper net benefits and optimal location analysis, the costs must be considered if DER is surpassing hosting limits of the system. DER integration investments must be done in a cost effective manner which does not over-invest in DER that is not cost effective to customers. While there may not be a bright line to distinguish between DER related investments and normal Safety and Reliability, the tools established in the DRP will help provide some insight into optimal locations to reduce excessive integration costs, increase system utilization and maximize net benefits.

PG&E supports comments made that emphasize inclusion of costs with benefits to ensure a full optimal location analysis as originally intended by PUC Code Section 769. This will help support the complex multiple use cases for DER-related and non-DER-related grid investments.

As discussed in their opening comments, Joint IOUs agree that it is difficult to separate system-level DER-related costs from non-DER-related system level costs incurred for system level reliability and safety, and allocation between these cost categories may not be feasible in all cases when such system-level grid capacity additions are proposed in GRCs. PG&E agrees that the LNBA should include DER costs in its methodology, as required by the DRP statute. As TURN points out, the differences between wholesale and retail net energy metering DERs provide an initial useful set of parameters for cost allocation under Rule 21, and further refinements of the LNBA and adoption of overall “net benefits” resource procurement criteria in the pending IRPs should assist in the cost allocation process.

Based on the opening comments by parties, PG&E recommends that learnings from the LNBA methodology, IRP criteria and results of the IDER and DRP pilots and demonstration projects be merged for holistic consideration of the next steps in calculating and incorporating DER costs into both local distribution deferral solicitations and in evaluation of utility DER-related distribution capacity additions in GRCs. As parties also note, that there is a practical need to accommodate DERs which are expected
to be adopted, and PG&E agrees that a least-cost/best-fit approach to evaluating investments to accommodate expected DERs is a logical approach.\textsuperscript{28}

\textbf{VII. CONCLUSION}

Joint IOUs appreciate the opportunity to provide these reply comments on the Staff White Paper on Grid Modernization, and respectfully request that the White Paper be revised consistent with the Joint IOUs’ opening and reply comments.

Respectfully submitted,
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By: \textit{/s/ Christopher J. Warner} \\
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Dated: June 28, 2017

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\textsuperscript{28} Siemens Opening Comments, p.7, “how to accommodate [DER] growth and change while maintaining safety and reliability … dictates that a [LCBF] approach be taken;” Clean Coalition Opening Comments, p.14 “LCBF is conceptually the most sensible approach.”
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OF THE STATE OF CALIFORNIA


(U39E)

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CERTIFICATE OF SERVICE

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department, B30A, 77 Beale Street, San Francisco, California 94105. On June 28, 2017, I served a true copy of:

JOINT REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E), AND SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E) ON ASSIGNED COMMISSIONER’S RULING AND GRID MODERNIZATION STAFF WHITE PAPER

On the official service lists for R.14-08-013, A.15-07-002, -003, -006 and A.15-07-005, -007, -008, et al.; by electronic mail for those who have provided an email address and by U.S. mail for those who have not.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 28, 2017, in San Francisco, California

/s/ Annabel Striplin  
ANNABEL STRIPLIN
# Parties

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<td>KEVIN PUTNAM</td>
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<td>LAUREN DUKE</td>
<td>DEUTSCHE BANK SECURITIES INC.</td>
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https://ia.cpuc.ca.gov/servicelists/R1408013_83193.htm  6/28/2017
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BACK TO INDEX OF SERVICE LISTS
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