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)

And Related Matters.

Application 15-07-002
Application 15-07-003
Application 15-07-006

(NOT CONSOLIDATED)

In the Matter of the Application of PacifiCorp
(U 901-E) Setting Forth its Distribution Resource
Plan Pursuant to Public Utilities Code Section
769.

Application 15-07-005
(Filed July 1, 2015)

And Related Matters.

Application 15-07-007
Application 15-07-008

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
ON THE ADMINISTRATIVE LAW JUDGE’S RULING REQUESTING COMMENTS
ON THE ENERGY DIVISION WHITE PAPER ON AVOIDED COSTS AND LOCATIONAL
GRANULARITY OF TRANSMISSION AND DISTRIBUTION DEFERRAL VALUES

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Dated:  August 23, 2019
### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
### STATE OF CALIFORNIA

| | (NOT CONSOLIDATED) | |
| In the Matter of the Application of PacifiCorp (U 901-E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769. | Application 15-07-005 (Filed July 1, 2015) |
| And Related Matters. | Application 15-07-007 | Application 15-07-008 |

### REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
### ON THE ADMINISTRATIVE LAW JUDGE’S RULING REQUESTING COMMENTS ON THE ENERGY DIVISION WHITE PAPER ON AVOIDED COSTS AND LOCATIONAL GRANULARITY OF TRANSMISSION AND DISTRIBUTION DEFERRAL VALUES
I. INTRODUCTION


In these reply comments, SCE:

- Supports Energy Division Staff’s (“Staff”) proposal to use information from annual Distribution Deferral Opportunity Reports (“DDOR”) to determine specified distribution deferral value but requests that the White Paper clarify that specified distribution deferral values should be excluded from use in planning use cases, such as the Integrated Resource Plan (“IRP”) modeling and the Avoided Cost Calculator (“ACC”), as this could lead to double counting of potential DER deferral value.
- Agrees with Staff’s conclusion that the value associated with specified transmission deferral value should be derived by CAISO and should only be used in the consideration of non-wires alternatives for discrete transmission projects.
- Recognizes that the proposed method to estimate unspecified distribution deferral values represents a marked improvement upon the current process but suggests a number of refinements to better represent the capacity value that could theoretically be deferred.
- Strongly supports Staff’s recommendation not to include an unspecified transmission deferral value in the ACC given uncertainties with developing unspecified transmission values and raises concerns regarding SEIA’s proposal to derive unspecified deferral values by examining recently cancelled or downsized CAISO transmission investments.
II. DISCUSSION

A. Specified Distribution Deferral Value

SCE supports the White Paper’s proposal to rely on information from annual DDORs for the purpose of determining specified distribution deferral value. The methodology for calculating these values should remain consistent with the approved methodology used across the IDER, DRP, and General Rate Case (“GRC”) proceedings, which is based on the Real Economic Carrying Charge (“RECC”) methodology.

SCE notes that parties generally agreed in comments and during the July 18, 2019 workshop that it is only appropriate to use this value for the purpose of establishing the cost effectiveness cap for discrete distribution deferral projects that are recommended for deferral through the Distribution Investment Deferral Framework (“DIDF”). SCE requests that the White Paper clarify that specified distribution deferral values should be excluded from use in planning use cases, such as the Integrated Resource Plan (“IRP”) modeling and the Avoided Cost Calculator (“ACC”), as this could lead to double counting of potential DER deferral value. SCE also shares The Utility Reform Network’s (“TURN”) concern\(^1\) that it is unclear how these values would be used in other procurement use cases, such as DER tariffs.

B. Specified Transmission Deferral Value

The White Paper recognizes that the California Independent System Operator (“CAISO”) has developed a robust process through its Transmission Planning Process (“TPP”) to consider non-wire’s alternatives for non-CPUC jurisdictional transmission projects.\(^2\) SCE agrees that the value associated

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\(^1\) See Opening comments of the Utility Reform Network Concerning the Staff Proposal on Avoided Cost and Locational Granularity of Transmission and Distribution Deferral Values, filed June 21, 2019, at p. 6.

with specified transmission deferral value should be derived by CAISO and should only be used in the consideration of non-wires alternatives for discrete transmission projects. No party appeared to object to this approach either in opening comments or during the July 18, 2019 workshop. For similar reasons as stated above in Section II.A, SCE notes that Specified Transmission Deferral value should also be excluded from planning use cases, such as in IRP modeling and the ACC.

C. **Unspecified Distribution Deferral Value**

As stated in comments and reiterated at the July 18, 2019 workshop, SCE appreciates the difficulty associated with developing a “counterfactual” estimate of potential future distribution capacity that could be avoided by DERs. The use of these values should be limited to planning use cases, such as IRP modeling and the ACC, and these values should not be combined with specified deferral values.

While SCE feels the proposed method to estimate unspecified distribution deferral values represents a marked improvement upon the current process and appropriately balances the level of effort with the associated value of these estimates, SCE reiterates that the proposed methodology should be refined further to better represent the capacity value which could theoretically be deferred. In response to the Staff’s presentation at the July 18, 2019 workshop, SCE offers the following suggested refinements.

1. **IOU GNA Standardization and Alignment**

The scope of the GNA filing has recently expanded to include equipment ratings and associated demand and DER forecasts for all distribution circuits. The first GNA with this expanded scope was filed on August 15, 2019, and the IOUs have not had time to standardize and fully align the way in which their GNA data is reported. Differences between IOU GNA data reporting standards, as well as planning tools and system configurations, could cause significant differences in the associated calculated unspecified distribution deferral values between IOUs. For example, SCE provides a DER capacity value that accounts for the coincidence with the distribution asset for which that DER is impacting,
while other utilities may be providing nameplate capacity. Given that Staff’s proposed methodology for estimating unspecified distribution deferral values likely requires additional IOU GNA standardization and alignment, SCE recommends providing additional time to further align GNA data.

Additionally, SCE’s existing planning tool does not have the capability to extract grid needs before no-cost load transfers have been applied.³ This is an important point to address when developing a methodology, because the White Paper proposes the use of pre-transfer values to estimate the total capacity overloads on the system.

2. **DER Production Load Shapes**

SCE recommends limiting the capacity value potentially associated with deferrable distribution capacity to those times of day in which DERs impact peak demand. These DER load shapes, most notably Distribution Generation Photovoltaic (DG-PV) shapes, must be applied to accurately remove DERs from the CEC IEPR forecast.

3. **Non-Targeted DER Growth**

While the CEC IEPR forecast does disaggregate some, but not all, Non-Targeted DER growth at the system level, the IOUs do not differentiate between these types of growth in the GNA. SCE urges the Commission to first work with the CEC to differentiate between all “Policy Incentives Driven DER Forecast” and “Naturally Occurring or Code Driven DER Forecast” so the IOUs can then disaggregate the separate DER impacts to circuits throughout the system. The IEPR must provide data in this way to accurately develop the counterfactual forecast. SCE notes that this Naturally Occurring or Code Driven DER Forecast is significant and is projected to grow as Title 20 and/or 24 requirements are incorporating many DERs previously driven by Policy Incentives. Most notably, as reflected in the

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³ SCE’s GNA will provide all needs on the system after distribution planners optimize existing electric system capacity with the resulting needs representing a location that requires an investment to solve.
most recent Energy Efficiency Potential and Goals Study, approximately two-thirds of Energy Efficiency savings in SCE territory will be driven by building codes and standards. Additionally, new building codes will be a significant factor in driving new DG-PV installations throughout the State. Given that the primary function of the ACC is determine DER cost-effectiveness for Policy and Commission mandated programs, Non-Targeted DER growth (i.e., Naturally Occurring or Code Driven DER) should not receive unspecified distribution deferral value.

4. **De-rate Capacity Projections Beyond GNA Five-Year Forecast Horizon**

SCE has significant concerns with the proposal to use a linear regression to forecast GNA DERs beyond the five-year horizon. As Staff noted in both the White Paper and the July 18, 2019 workshop, a substantial portion of distribution capacity needs are addressed through no-cost solutions. There is also significant uncertainty in the planning forecast beyond the five-year window. In some instances, these needs may not materialize, while in other instances, these needs may be significant enough to require a large project that may need to undergo a formal and lengthy licensing review. This significant uncertainty is one of the primary reasons for applying the timing screen in the DIDF. Additionally, many DERs, particularly Energy Efficiency (“EE”) and Demand Response (“DR”), have effective useful lives (“EUL”s) which are significantly less than 20 years, in which time, many of these DERs could be incorporated into Title 20/24 building codes and should not receive value. SCE also disagrees with SEIA’s assertion that increased building and transportation electrification load will likely increase grid needs in the future, as recent CEC IEPR forecasts already include projections for these resources. Given these challenges, SCE recommends de-rating the capacity value beyond the five-year window to account for both the uncertainty associated with needs beyond the five-year window, as well as the uncertainty regarding the EUL of *Policy Incentive Driven DERs*.

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4 D.19-08-034, at p. 23, Attachment A.
5. **SCE Subtransmission Projects Should Not Be Included in Estimates of Unspecified Distribution Deferral Value**

SCE’s subtransmission system has unique characteristics because it is configured to allow power to flow in different directions. As a result, subtransmission capacity needs are generally driven by N-1 contingency conditions in which the system must continue to serve customers despite the loss of a single component. Unlike distribution planning projects, N-1 contingency analysis is non-linear and cannot be estimated using an algebraic regression as proposed in the White Paper. Instead, contingencies and mitigations need to be identified through load flow simulations. Adding back in non-targeted DERs to the existing forecast and comparing this counterfactual analysis with equipment ratings will not reflect the non-normal, N-1 system conditions for these locations and contingencies. Additionally, given that subtransmission systems enable two-way power flows, DER growth could drive the need for additional subtransmission capacity, particularly under N-1 conditions, where the subtransmission system would be additionally stressed by DERs under contingency conditions. Given the unique characteristics of its subtransmission system, SCE therefore recommends that unspecified deferral value driven by subtransmission projects be removed from these calculations.

6. **GRC Values May Be a More Appropriate Reflection of Unspecified Deferral Value**

Staff proposes utilizing the DDOR values to estimate unspecified deferral value. Many parties, including SCE, noted at the July 18, 2019 workshop that using DDOR values will be challenging because it may be difficult to deduct specified values from unspecified values using DDOR data since DDOR values may change significantly from year to year. Therefore, SCE recommends the Commission continue to utilize values derived in each IOUs’ GRC, as these may be more representative of values regressed over a longer period.

In past GRCs, SCE had used load-driven capacity need at the time of a typical circuit peak as the main cost driver for determining design demand marginal cost. SCE viewed the entire portion of the
distribution system as a peak capacity resource. This view was appropriate because the provision of electricity service to customers had been the primary driver of distribution capacity investments. However, with increased proliferation of DERs, SCE is experiencing a paradigm shift in which the distribution grid is being used both to provide electricity to customers and to receive electricity from customers (as discussed in the subtransmission comments above). In response, SCE bifurcated its distribution marginal capacity costs in its most recently approved GRC into two components: (1) a “peak” capacity component driven to meet time-sensitive peak customer demand; and (2) a “grid” component that enables the bidirectional transfer of electricity to and from customers. SCE recommends that only the peak capacity portion of distribution design demand marginal costs should be used, as these values better represent the universe of potentially deferrable distribution needs. While SCE appreciates that performing a similar analysis may be difficult for other IOUs, SCE recommends the Commission utilize the values to those associated with the peak capacity component to reflect unspecified deferral value.

7. **A Pilot Study Is Needed to Refine and Approve Proposed Methodology**

In addition, and as noted in opening comments, SCE strongly recommends establishing a pilot to conduct a detailed study to estimate the ratio of the overloaded capacity to required distribution upgrades. Given the new definitions and uncertainty assumptions related to the unspecified deferral value, a pilot and detailed study will help refine and improve this estimation methodology.

D. **Unspecified Transmission Deferral Value**

Given uncertainties associated with developing unspecified transmission values, as noted in the White Paper, SCE strongly supports the Staff recommendation to not include an unspecified deferral value in the ACC.\(^5\)

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\(^5\) White Paper, Table 5, Recommendations for Transmission and Distribution Deferral Value Methodologies and Locational Granularity, at p. 22.
At the July 18, 2019 workshop, SEIA presented a methodology by which an unspecified deferral value could be derived by examining recently cancelled or downsized CAISO transmission investments. SCE, along with other IOUs, as well as Cal Advocates and TURN, pointed out several challenges with SEIA’s proposed approach. These challenges include:

- **Interchangeability Between Generation and Transmission:** The ACC already accounts for generation capacity value, and it will be difficult to either separate out the avoided transmission and generation capacity; or prevent double counting these values. The ACC provides a full generation capacity value to DERs equal to the Cost of New Entry for new generation based on the theoretical construction of a Combustion Turbine proxy. Generation in a local area could provide a substitute for transmission projects. This construction of a generation project in a local area presumably avoids the need for new transmission capacity to bring energy into that local area.

- **Specified Versus Unspecified Deferral Value:** SEIA’s proposal did not differentiate between specified and unspecified deferral value in their proposal. As mentioned previously, CAISO has a separate process for identifying the specified value associated with the DERs for discrete projects. It is unclear how the portion of these projects associated with unspecified transmission value could be determined.

- **Transmission Projects Are Driven by Other Factors Than Reliability Needs:** Unlike distribution projects, transmission projects are not necessarily always driven by reliability needs. Other needs could be driven by policy, economic, or preserving long term congestion revenue rights. DERs likely cannot defer these needs. In fact, as noted in the workshop, aggressive decarbonization may, in fact, drive the need for additional transmission projects to accommodate high penetration of renewables generation.
Similarly, some of these needs could be identified to serve N-1 contingencies, which could be exacerbated by DER growth. Given these factors, SEIA’s proposal overestimates avoided unspecified transmission deferral value.

- **Transmission Projects May Serve Both IOU and Non-IOU Customers:** The CAISO TPP involves coordination among fifteen Participating Transmission Owners (“PTOs”) and may serve municipal and other direct access customers. There is no methodology established to estimate the appropriate percentage of unspecified transmission deferral value that should be attributed to IOU DER programs.

- **Unspecified Transmission Costs Vary Significantly:** The cost of transmission upgrades is highly dependent not only the technical services they provide, but also on the relative distance of generation to the load center. Since 2009, CAISO has approved 12 SCE submitted projects, with costs ranging from a high value of $614 million (Mesa Loop In, 2013) to a lower boundary of $5 million (for example, Laguna Bell Corridor Upgrade, 2014).⁶

Given the above outlined challenges, SEIA’s proposed methodology for estimating unspecified deferral value for transmission projects is severely flawed and will result in double counting of avoided costs. SCE urges the Commission to reject SEIA’s proposal.

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III. CONCLUSION

SCE appreciates the opportunity to provide these reply comments.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure,
I have this day served a true copy of the REPLY COMMENTS OF SOUTHERN CALIFORNIA
EDISON COMPANY (U 338-E) ON THE ADMINISTRATIVE LAW JUDGE’S RULING
REQUESTING COMMENTS ON THE ENERGY DIVISION WHITE PAPER ON AVOIDED
COSTS AND LOCATIONAL GRANULARITY OF TRANSMISSION AND DISTRIBUTION
DEFERRAL VALUES on all parties identified on the attached service list(s) for R.14-08-013 and
A.15-07-005. Service was effected by one or more means indicated below:

☒ Transmitting copies via e-mail to all parties who have provided an e-mail
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☒ Placing hard copies in sealed envelopes and causing such envelopes to be delivered by
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Executed this 23rd day of August, 2019, at Rosemead, California.

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<td>DAMON FRANZ</td>
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<td>DEANNA TOY</td>
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<td>DR. ERIC C. WOYCHIK</td>
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<th>Title</th>
<th>Firm/Company</th>
<th>Address</th>
<th>City, State, Zip</th>
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<tr>
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<td>GRACE HSU</td>
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<td>MICHAEL ALCANTAR</td>
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<tr>
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<td>AMIN NOJAN</td>
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<td>AMY C. CHAMARTY</td>
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<td>BRIAN GOLDMAN</td>
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