

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to
Establish Energization Timelines.

Rulemaking 24-01-018
(Filed January 25, 2024)

**REPLY COMMENTS OF THE VEHICLE-GRID INTEGRATION COUNCIL ON
ORDER INSTITUTING RULEMAKING TO ESTABLISH ENERGIZATION
TIMELINES**

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Vehicle-Grid Integration Council (“VGIC”) hereby submits these reply comments on the *Order Instituting Rulemaking to Establish Energization Timelines* (“OIR”), issued by Administrative Law Judge (“ALJ”) on January 30, 2024.

I. OPENING COMMENTS DEMONSTRATE OVERWHELMING AND URGENT SUPPORT FOR PROMOTING “FLEXIBLE ENERGIZATION” SOLUTIONS IN THIS PROCEEDING.

In opening comments, multiple stakeholders highlighted the importance of *flexible energization* as an urgent preliminary issue in this proceeding. VGIC agrees with the Enchanted Rock,¹ LLC, Environmental Defense Fund,² Mainspring Energy, Inc.,³ The Mobility House,⁴ Powering America’s Commercial Transportation (“PACT”),⁵ and Southern California Edison Company (“SCE”)⁶ that the matter of *flexible energization* should be explicitly included in the

¹ Opening Comments of Enchanted Rock, LLC at 3.

² Opening Comments of Environmental Defense Fund at 5.

³ Opening Comments of Mainspring Energy at 3.

⁴ Opening Comments of The Mobility House at 3.

⁵ Opening Comments of PACT at 7.

⁶ Opening Comments of SCE at 11.

scope of this proceeding. Mainspring Energy states that “flexible energization solutions represent a powerful tool to not only accelerate energization, but to add valuable capacity to the grid amidst significant demand growth – both before and after energization takes place.”⁷ Whether new distributed generation capacity detailed in Mainspring Energy’s comments, new energy storage capacity offered by storage-backed charging sites, or a reduction in needed capacity offered by power control systems (“PSC”) / automated load management (“ALM”) technologies), flexible energization offers a critical “relief valve” for the growing demands on the distribution grid.

SCE details a specific “bridge solution” in its opening comments: SCE’s Load Control Management Systems (“LCMS”) Pilot “allows a customer to use automated load management (ALM) systems to begin to receive service (though limited by current capacity) while grid upgrades are being completed.”⁸ Given the overwhelming support from parties to address this issue, and the recent emergence of specific solutions like SCE’s LCMS Pilot that represent important potential components of a comprehensive framework, VGIC recommends the Commission consider the critical issue of flexible energization strategies. **Specifically, the Commission should develop rules governing the processes, technical requirements, utility reporting requirements, customer education and dispute resolution processes, and tools to support the widespread deployment of solutions that support flexible energization.** Critically, flexible energization must be selected by an informed, empowered customer, and should never be forced on customers who are not active participants in this choice.

Frameworks for flexible energization must be developed alongside setting target average/maximum energization timelines. Addressing these topics in lockstep will provide a clear

⁷ Opening Comments of Mainspring at 3.

⁸ Opening Comments of SCE at 11.

pathway to *achieving* any average and maximum energization timelines. In its opening comments, VGIC recommended that the Commission establish a Phase 2 in this proceeding to address these issues or, at a minimum, address them in the TE OIR (R.23-12-008). However, based on its review of opening comments, **VGIC recommends that the Commission establish rules related to flexible energization as a parallel track/phase that advances simultaneously alongside a track/phase focused on establishing the energization timelines.**

II. PROJECTS REQUIRING INFRASTRUCTURE UPGRADES SHOULD NOT BE EXEMPT FROM ANY REQUIREMENTS TO REPORT ON ENERGIZATION TIMELINES.

SCE recommends that projects requiring infrastructure upgrades be exempt from energization timeline targets.⁹ Whether or not these projects are exempt from the energization timeline targets, VGIC recommends that these projects be subject to utility reporting requirements. The Commission should direct utilities to regularly publish energization timeline data for all energization projects, not just projects that require no upgrades. Moreover, the Commission should direct utilities to publish data indicating the quantity and type of sites electing a flexible energization pathway and/or ALM technology, the milestones achieved under this pathway, and the technology used to ensure safe, reliable, and timely energization. This reporting will not only support the further evolution of energization timelines and any customer dispute resolution processes that emerge but will also be critical to understanding the prevalence of flexible energization elections, the technologies used, and the time saved by electing these solutions. Based on VGIC's understanding, this would mirror the IOUs' long-standing quarterly Rule 21 generator interconnection queue reporting requirement, in which utilities must publish an anonymized list of Rule 21 projects and the dates of each Rule 21 milestone. **VGIC strongly recommends the**

⁹ Opening Comments of SCE at 5.

Commission consider requirements for IOUs to regularly publish milestones for Rule 15/16/29/45 projects, including sites electing a flexible energization pathway/technology, in its initial set of issues. This proceeding should consider the appropriate project milestones, reporting cadence, data collection channels, data anonymization processes, report service list, and any other specific elements needed to ensure an accurate and regular public accounting of energization timeline data and flexible energization prevalence.

III. VGIC SUPPORTS THE CALIFORNIA SOLAR AND STORAGE ASSOCIATION (CALSSA) AND SOLAR ENERGY INDUSTRIES ASSOCIATION'S (SEIA) RECOMMENDATION TO INCLUDE MAIN SERVICE PANEL UPGRADES IN SCOPE.

In opening comments, CALSSA and SEIA both recommend including main service panel upgrade timelines and solutions to achieve timely panel upgrades in this proceeding.¹⁰ VGIC believes this is reasonable, given the coming wave of main panel upgrades required to meet California's TE goals. Ensuring timely main service panel upgrades will face similar bottlenecks to energization of new load service requests, and, as such, could be addressed in this proceeding.

IV. CONCLUSION.

VGIC appreciates the opportunity to provide these reply comments on the OIR. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,
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¹⁰ Opening Comments of CALSSA at 3.