Briefing on Proposal for Distributed Energy Resources Action Plan 2.0

Tribal Consultation | September 16, 2021, 9:00 am



California Public Utilities Commission

Welcome

- DER Action Plan 2.0 Tribal Consultation
- The event is being recorded
- Workshop materials will be available online
- Safety
 - Note surroundings and emergency exits
 - Ergonomic check
 - Call 9-1-1 or use chat





Logistics

- All attendees have been muted
- If using the chat, make sure it is sent to "everyone"
- To ask questions, please 'raise your hand' and host will unmute you so you can ask your question. If you would rather type, use the "Q&A" function (send to "all panelists")
- Questions will be read aloud by staff; attendees may be unmuted to respond to the answer. (Reminder: Mute back!)



Commissioner Darcie L. Houck

Christina Snider

Governor Newsom's Tribal Advisor

Agenda

Time	Topic of Discussion			
9:00-10:35 am	Welcome			
	Opening Remarks from CPUC Commissioner Darcie Houck and Christina Snider, Governor's Tribal Advisor			
	Workshop Goals and Agenda			
	Overview of CPUC Tribal Consultation Policy			
	Overview of DER Action Plan			
	Overview of High DER Rulemaking			
10:35-10:45 am	Break			
10:45 am- 12:00 PM	Panel of Tribal Representatives			
	Discussion			
	•Do you have any preliminary input on the DER Action Plan or High DER Rulemaking?			
	Next Steps			
11:55 am-12:00 pm	Meeting Close			

CPUC's Tribal Consultation Policy

Kenneth C. Holbrook

Tribal Advisor California Public Utilities Commission <u>kenneth.holbrook@cpuc.ca.gov</u>

Basis for Tribal Consultation Policy at CPUC

Executive Order B-10-11 declares that "the State is committed to strengthening and sustaining effective government-to-government relationships between the State and the Tribes by identifying areas of mutual concern and working to develop partnerships and consensus."

The Executive Order directs state executive agencies and departments to "encourage communication and consultation with California Indian Tribes." It further directs state agencies and departments "to permit elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities."

For purposes of this policy, the terms "tribes" and "tribal governments" refer to elected officials and other representatives of federally-recognized tribes and other California Native Americans consistent with the definitions set forth in A.B. 52.

Goals Tribal Consultation Policy at CPUC

1. Recognize and respect tribal sovereignty

2. Encourage and facilitate tribal government participation in CPUC proceeding

3. Give meaningful consideration to tribal interests in issues within the CPUC's jurisdiction

4. Encourage and facilitate tribal government participation in CPUCapproved utility programs

5. Protect tribal cultural resources

6. Encourage investments by tribal governments and tribal members in onsite renewable energy generation, energy efficiency; low carbon transportation and energy storage.

This policy is not intended to replace or supplant obligations mandated by federal law. It sets forth provisions for consultation, communication and collaboration with tribes to the extent that a conflict does not exist with applicable laws or regulations. This policy is not a regulation and it does not

California Public Utilities Create, expand, limit, waive, or interpret any legal rights or obligations.

Resources

CPUC's Tribal Resources webpage:

<u>https://www.cpuc.ca.gov/tribal/</u> (under revision)

CPUC's Tribal Consultation Policy

Executive Order B-10-11

https://www.ca.gov/archive/gov39/2011/09/19/news17223/index.htm

Introductions

Meet the Tribal Liaisons from...

Pacific Gas & Electric (PG&E)



PG&E's Tribal Liaisons



Reno Keoni Franklin PG&E's Tribal Liaison

Tribe: Kashia Pomo Tribe (Chairman Emeritus) Past Chairman of:

- California Rural Indian Health Board
- National Indian Health Board
- National Association of Tribal Historic Preservation Officers Appointed by President Obama to the ACHP Federal Fire Fighter BIA Engine 1 SRA Elected tribal leader since 2000



Denise M. Shemenski PG&E's Deputy Tribal Liaison

Tribe: Blackfoot, Apache

Prior Role:

- Tribal Advisor for CA Governor Office of Emergency Service (CalOES)
- Tribal Advocate for CA Governor's Office of Homeland Security (Cal OHS)
- Firefighter/Dispatcher with Cal Fire
- Possess deep understanding of tribal culture, tradition, and experiences
 - Federal: subject matter experts for DOD and DOJ on tribal agency consultation
 - State-level: prior experience at state and local agencies
- Advise on PG&E's engagement and initiatives with tribal governments, communities, and organizations
- Drive initiatives for Community Wildfire Safety Program/PSPS support in partnership with the Cultural Resources Specialist team
- Support enterprise-wide efforts to better understand tribal needs and minimize environmental / cultural impacts of PG&E



Tribes within PG&E's Service Area (Electric)



California has the 2nd Highest Native American population in the U.S. (303,998)

PG&E serves 62 Federally Recognized Tribes in the PGE Service Area. 58 of those tribes have trust or allotment lands. (109 federally recognized tribes in CA)

PG&E serves 40 Non-Federally Recognized Tribes in the PG&E Service Area

The PG&E service area has more federally recognized tribes than South Dakota, North Dakota, Minnesota, Wisconsin and Oklahoma combined!



Federally Recognized Tribes by County 62 Tribes Total Across PG&E's Service Area

*Denotes tribe is in multiple counties

Alpine	Humboldt	Mendocino	Shasta		
1. Washoe Tribe of CA and NV Amador	 Bear River Band of the Rohnerville Rancheria Big Lagoon Rancheria 	 Cahto Tribe (Laytonville) Coyote Valley Band of Pomo Indians 	 *Pit River Tribe Redding Rancheria 		
1. Buena Vista Rancheria of Mi-Wuk	3. Blue Lake Rancheria	 Gui di ville Indian Rancheria Hopland Band of Pomo Indians Manchester Band of Pomo Indians Pinoleville Pomo Nation Potter Valley Tribe 	Sonoma		
 Ione Band of Miwok Indians of California Jackson band of Mi-Wuk Indians 	 Hoopa Valley Tribe Karuk Tribe Yurok Tribe Wiyot Tribe 		 Cloverdale Rancheria of Pomo Indians of California Dry Creek Rancheria of Pomo Indians 		
Butte	,	8. Redwood Valley Little River	3. Federated Indians of Graton		
 Tyme Maidu Tribe-Berry Creek Reservation *Enterprise Bancheria 	1. Tejon Indian Tribe	 9. Round Valley Reservation 10. Sherwood Valley Rancheria 	Rancheria 4. Kashia Band of Pomo Indians of the Stewart's Point Rancheria		
3. Mechoopda Indian Tribe	Kings	5. *Lytton Rancheria of California			
4. Mooretown Rancheria	1. Tachi-Yokut Tribe (Santa Rosa	Modoc			
Contra Costa	Rancheria, Leemore, CA)	1. *PitRiver	Tehama		
1. *Lytton Rancheria of California	Lake	Placer	1. Paskenta Band of Nomlaki		
Colusa	 Big Valley Band Rancheria Elem Indian Colony Habematolel Pomo of Upper Lake 	1. United Auburn Indian	Indians		
1. Cachil DeHe Band of Wintun Indians		Community	Tulare		
2. Cortina Rancheria	4. Lower Lake (Koi Tribe)	Plumas	1. Tule River Indian Reservation		
El Dorado	Indians	1. Greenville Rancheria	Tuolumne		
1. Shingle Springs Band of Miwok	 Robinson Rancheria Scotts Valley Band of Pomo Indians 	Sacramento	 Chicken Ranch Rancheria Tuolumne Band of Me-Wuk Indians 		
Indians	7. Scotts valley band of romonialans	1. Wilton Rancheria			
Fresno	Lasen	San Joaquin			
1. Big Sandy Rancheria	1. Susanville Indian Rancheria		Yolo		
 Cold Springs Rancheria Table Mountain Rancheria 	Madera		1. Yocha Dehe Wintun Nation		
Glen	1. North Fork Rancheria	Santa Baroara	Yuba		
1. Grindstone Indian Rancheria	 Picayune Rancheria of Chukchansi Indians 	 Santa Ynez Band of Chumash Mission Indians 	1. *Enterprise Rancheria		



Non-Federally Recognized Tribes by County 40 Tribes Total Across PG&E's Service Area

Alameda	Humboldt	Monterey	Shasta	
	1. Wailaki Tribe	1. Salinan Tribe of Monterey, San Luis Obispo and San Benito Counties	 Winnemem Wintu Tribe Wintu Tribe of Northern California Northern Band of Mono Yokuts 	
Amador	Kern	Placer		
	 Kern Valley Indian Council Tubatulabal Tribe 		Sonoma	
Butte	3. KawaiisuTribe	Plumas	1. Mishewal-WappoTribe of	
1. Butte Tribal Council	Kings		Alexander Valley	
	1. Kings River Choinumni Farm Tribe	Sacramento		
Contra Costa	2. Carnomia choinumni mbai Project	1. Amah Mutsun Tribal Band	Tehama	
1. Trina Marine Ruano Family 2. Xolon Salinan Tribe	Lake	San Benito		
		1. Indian Canyon Mutsun Band of Costanoan	Trinity	
Calaveras	Lassen	Santa Clara	1. Tsungwe Council	
1. Calaveras Band of Mi-Wuk Indians	1. Honey Lake Maidu	1. Muwekma Ohlone Indian Tribe	Tulare	
El Dorado	Madera		 Wuksachi Indian Tribe Wukchumni Tribal Council 	
	 The Mono Nation Sierra Mono Museum 	Santa Cruz		
		1. Coastanoan Ohlone Rumsen-Mutsen Tribe	Tuolumne	
Fresno	Mariposa	2.OhloneIndianTribe		
 Dumna Wo-Wah Tribal Government Dunlap Band of Mono Indians Nor-Rel-Muk Nation Dunlap Band of Mono Indians Historical Preservation Society Haslett Basin Traditional Committee 	1 North Fork Mono Tribe	San Luis Obispo		
	2. American Indian Council of Mariposa County (Southern Sierra	1. San Luis Obispo County Chumash Council	Yolo	
	Miwuk Nation)	San Joaquin		
	Mendocino	1. Traditional Choinumni Tribe (East of	Yuba	
Glen	1 Novo Pivor Indian Community	Kings River)	1. Strawberry Valley Rancheria	
	2. Shelbelna Band of Mendocino	Santa Barbara		
	Coast Pomo Indians	1. Coastal Band of the Chumash Nation		

Introductions

Meet the Tribal Liaisons from...

San Diego Gas & Electric (SDG&E)

Jennifer Summers <u>JSummers@sdge.com</u> Vanessa Vandever <u>VVandeve@sdge.com</u>

Introductions

Meet the Tribal Liaisons from...

Southern California Edison (SCE) Amy Olson <u>Amy.Olson@sce.com</u> Aaron M Thomas <u>Aaron.M.Thomas@sce.com</u>

DER Action Plan 2.0 Workshop Presenters

Energy Division Staff

Keishaa Austin - Staff Lead Joshua Huneycutt-Transportation Electrification Lead Forest Kaser- Grid Infrastructure Track Lead Joy Morgenstern- DER Customer Lead Gabe Petlin- Market Integration Track Lead Paul Philips- Load Flexibility and Rates Lead

DER Action Plan 2.0

• What is the DER Action Plan?

A roadmap for CPUC decision-makers, staff, and stakeholders to facilitate forward-thinking DER policy.

• What does the DER Action Plan do?

Aligns the CPUC's vision with actions that can be taken by stakeholders to ensure DER policy implementation in support of SB 100 and California's energy and climate goals is coordinated across proceedings related to grid planning, affordability, load flexibility, market integration, and customer programs.

• What is the goal of the DER Action Plan?

To Maximize the ratepayer and societal value of millions of DERs on the grid, while ensuring affordable and equitable rates.

• The DER Action Plan is not meant to:

Determine outcomes of individual proceedings.

DER Action Plan Background

- Commission endorsed DER Action Plan in November 2016
- The purpose was not to determine outcomes of individual proceedings but to:
 - Set a long-term vision for DERs and supporting policies
 - Identify CPUC Actions needed to meet that vision
 - Establish a coordinating framework across 15+ proceedings and CAISO stakeholder initiatives

RATESCustomer ChoiceTime-varying RatesInnovative Rates & TariffsAligned with Cost CausationAffordable to non-DER customers

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Grid Infrastructure

Transparent planning and sourcing

Utility "2.0" / IOU business model

Technology-neutral sourcing

Recognize full GHG and grid services value

Streamlined interconnection

DER-enabling grid investments for ratepayer benefit

Data communications and cybersecurity

Market Integration

Robust DER participation in wholesale markets

Multiple revenue streams

Market and interconnection rules supportive of BTM DERs

Predictable EV behavior in grid operations

Non-discriminatory market rules for EVs

Example of DER Action Items Fulfilled: DRP has transformed Grid Planning to utilize DERs



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DER ACTION PLAN 2.0 Scope and Structure

TRACK ONE	TRACKTWO	TRACKTHREE	TRACK FOUR		
Load Flexibility & Rates	Grid Infrastructure	Market Integration	DER Customer Programs		
9 Vision Elements	4 Vision Elements	5 Vision Elements	<u>6</u> Vision Elements		
20 Action Elements	<u>19</u> Action Elements	<u>11</u> Action Elements	<u>16</u> Action Elements		
		<u>1</u> Undefined Action Element			
<i>B</i>		\$			

DER Action Plan 2.0 Overall Vision

- DER deployment is integral to achieving a 100% clean energy future.
- The CPUC continuously explores new policies, technologies, business models, and ideas to advance distributed energy resources deployment in a manner that maximizes ratepayer and societal value and contributes to equity and affordability for all customers.
- The CPUC is committed to ensuring that DER policy is harmonized with CPUC policy directives related to safety, reliability, affordability, equity and environmental stewardship, including, but not limited to:
 - Tribal Consultation & DACAG Stakeholder Engagement
- Collaboration with other agencies (e.g., CEC, CARB, CAISO) and stakeholders is critical to meet the objectives of the DER Action Plan 2.0.

DER ACTION PLAN 2.0 Proceeding and Initiatives List

TRACK ONE

Load Flexibility & Rates

- Net Energy Metering
- PG&E Day Ahead Hourly Real Time Pricing (DAHRTP) Rate and Pilot Application to Evaluate Customer Understanding and Supporting Technology
- SDG&E, PG&E and SCE GRC Phase 2
- Rate Design Applications for evaluating and implementing default residential TOU rate designs.
- SDG&E Application for Approval of Electric Vehicle High Power (EV-HP) Charging Rate Application
- Load Flexibility Management OIR, recommended by CPUC staff.
- CEC's Load Management Standard

TRACK TWO

Grid Infrastructure

- High DER Future OIR
- Streamlining Interconnection of Distributed Energy Resources and Improvements to Rule 21
- Microgrids OIR
- PG&E, SCE and SDG&E General Rate Case Phase 1

TRACK THREE

Market Integration

- Resource Adequacy
- Successor Storage and/or Demand Response OIR(s), as recommended by CPUC staff
- Rule 21
- FERC Order 2222 and Other FERC Proceedings
- Potential CAISO Initiatives:
 - Energy Storage and Distributed Energy Resources,
 - Energy Storage Enhancements,
 - Hybrid Resources,
 - Transmission Planning Process,
 - Storage as a Transmission Asset,
 - Dispatch Enhancements (decremental market power and bid floor).

TRACK FOUR

DER Customer Programs

- Self-Generation Incentive Program
- Energy Efficiency
- Building Decarbonization
- Integrated Distributed Energy Resources
- Transportation Electrification
- Demand Response
- Net Energy Metering
- Energy Savings Assistance Program

DER Action Plan 2.0 Track One: Load Flexibility and Rates

The Load Flexibility and Rates track is focused on:

Improving demand-side resource management through more effective, integrated demand response (DR) and retail rate structures that promote widespread, scalable, and flexible load strategies enabled by electrification and DER deployment opportunities.

The vision and action elements address grid issues associated with:

The growth of renewables, electrification, and DER adoption in support of California's clean energy goals, minimize cost of electricity service, and provide fair compensation for grid services provided by customer owned DERs.

DER Action Plan 2.0 Vision Elements Track One: Load Flexibility and Rates

<u>Vision 1A</u>	<u>Vision 1B</u>	<u>Vision 1C</u>	<u>Vision 1D</u>	<u>Vision 1E</u>	<u>Vision 1F</u>	<u>Vision 1G</u>	<u>Vision 1H</u>	<u>Vision 1I</u>
A continuum of rate options, from the simple to complex, is available for customers, and customers are educated to make informed choices.	Available rates reflect time- variant and location-based marginal costs and include time of use, dynamic, and real time pricing options.	Dynamic and real time pricing rates are designed to maximize participation by customers in disadvantaged communities, load flexibility benefits and protections.	Available rates reflect cost causation and provide opportunities for fair compensation for the capacity benefits DERs provide.	Rates are designed to minimize cost- shift in either direction between customers on dynamic and real time pricing rates and other customer segments and classes.	A menu of time- varying rate options is made available to load management technologies through a "universal access" pricing platform and customized rates marketing, education and outreach for all customer segments.	Rates, charges, and tariffs are transparent, equitable, and aligned with load management standards.	Potential strategies, including non- ratepayer-funded strategies, are considered to address affordability concerns associated with high electric rates that may impede adoption of transportation and building electrification DER technologies, especially among low-income and environmental and social justice communities.	Electric vehicle owners, fleet operators, and charging station managers respond to price signals that reflect the real- time and dynamic costs and benefits of charging at different times to optimize grid operations and reduce charging costs.
3 Action Elements	3 Action Elements	1 Action Element	3 Action Elements	2 Action Elements	2 Action Elements	2 Action Elements	1 Action Element	3 Action Elements

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Vision Element 1A

A continuum of rate options, from the simple to complex, is available for customers, and customers are educated to make informed choices.

Action Element 1: By 2023, the large investor-owned utilities (IOUs) should design and complete focus group research to evaluate tolerance and acceptance of a range of dynamic and real time pricing (RTP) options for all customer segments. Small multijurisdictional utilities (SMJUs) and community choice aggregators (CCAs) are encouraged to participate in this effort.

Action Element 2: By 2023, the large investor-owned utilities (IOUs) should design and complete focus group research to evaluate tolerance and acceptance of a range of dynamic and real time pricing (RTP) options for all customer segments. Small multijurisdictional utilities (SMJUs) and community choice aggregators (CCAs) are encouraged to participate in this effort.

Action Element 3: By 2024, all utility customer classes have access to multiple rate options, including dynamic and RTP rate pilots that are informed by focus group research and supported by ME&O programs to match various customer preferences and engagement levels. SMJUs and CCAs are encouraged to provide the same for their customers.

Vision Element 1B

Available rates reflect time-variant and location-based marginal costs and include time of use, dynamic, and real time pricing options.

Action Element 1: By Fall 2021, CPUC staff should issue a white paper proposal and recommend a load flexibility rulemaking process that considers how rates can be modified to better reflect dynamic and RTP pricing options that incorporate time-variant and location-based marginal costs.

Action Element 2: By Fall 2021, CPUC staff should initiate an ongoing stakeholder working group to address issues related to flexible load management and dynamic and RTP rates, including the development of IOU pilots that offer dynamic and RTP rates across all customer classes.

Action Element 3: By 2024, rates that incorporate dynamic and RTP designs should be offered on an opt-in basis to all customers.

Vision Element 1C

Dynamic and real time pricing rates are designed to maximize participation by customers in disadvantaged communities, load flexibility benefits and protections.

1. By 2022, the CPUC should conduct a workshop and/or working group sessions to address stakeholder recommendations for maximizing equity and inclusion considerations in dynamic and RTP rate designs to increase opportunities for widespread DER adoption.

Vision Element 1D

Available rates reflect cost causation and provide opportunities for fair compensation for the capacity benefits DERs provide.

Action Element 1: By 2022, the CPUC should conduct a workshop and/or working group sessions to address stakeholder recommendations for maximizing equity and inclusion considerations in dynamic and RTP rate designs to increase opportunities for widespread DER adoption.

Action Element 2: By 2023, the CPUC should evaluate the costs and benefits of dynamic and RTP rates through pilot evaluation studies to inform rate design options for IOU implementation.

Action Element 3: By 2023, the IOUs should submit proposals for opt-in and opt-out dynamic and RTP rates in certain customer classes, as permitted by law, informed by pilot evaluation studies in either a load flexibility rulemaking process or separate rate design window applications.

Vision Element 1E

Rates are designed to minimize cost-shift in either direction between customers on dynamic and real time pricing rates and other customer segments and classes.

Action Element 1: By 2023, the CPUC should assess cost-shift associated with opt-in dynamic or RTP rate pilots, at each customer class level.

Action Element 2: By 2024, the CPUC should approve rate designs that incorporate principles that minimize the potential of cost-shift between customers on dynamic and RTP rates and other customers unless deemed necessary to meet specific policy goals.

Vision Element 1F

A menu of time-varying rate options is made available to load management technologies through a "universal access" pricing platform and customized rates marketing, education and outreach for all customer segments.

Action Element 1: By 2023, the CPUC initiates consideration of proposals to ensure that customers, technology vendors, and third-party service providers have access to pricing information for a wide range of rates through a "universal access" pricing platform.

Action Element 2: By 2024, the CPUC initiates consideration of criteria to evaluate third-party subscription "pay for load shape" load management services including an assessment of how to promote participation and benefits to low-income and ESJ communities.

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Vision Element 1G

Rates, charges, and tariffs are transparent, equitable, and aligned with load management standards.

1. Starting in 2021, CPUC and CEC staff should continuously coordinate on elements of rate design and tariffs to ensure alignment with load management standards.

2. By 2024, rates that enable flexible load management and DERs to provide system benefits should be widely available to customers.

Vision Element 1H

Potential strategies, including non-ratepayer-funded strategies, are considered to address affordability concerns associated with high electric rates that may impede adoption of transportation and building electrification DER technologies, especially among low-income and environmental and social justice communities.

Action Item 1: By 2022, a workshop and/or series of working meetings will be convened in an appropriate proceeding to address affordability issues and barriers to participation in the transportation and building electrification DER marketplace, including alternative sources of funding for DERs, supporting technologies, and third-party load management services.

Vision Element 1

Potential strategies, including non-ratepayer-funded strategies, are considered to address affordability concerns associated with high electric rates that may impede adoption of transportation and building electrification DER technologies, especially among low-income and environmental and social justice communities.

Action Element 1: By 2022, utilities should offer EV owners and fleet operators RTP pilot rates set forth in the current General Rate Case (GRC) cycle and individual IOU EV rate applications, which incorporate location-based marginal costs to address grid optimization issues.

Action Element 2: By 2024, CPUC staff should complete analysis of RTP pilots to assess the ability of EV charging loads and BTM energy storage to integrate excess supply of renewables through flexible load management response to dynamic price signals.

Action Element 3: By 2024, CPUC staff should analyze the impact of RTP rates and consider whether EV owners and fleet operators should be offered such rates on an opt-out basis, as permitted by law.

DER Action Plan 2.0 Track Two: Grid Infrastructure

The Infrastructure Track is focused on:

"CPUC actions to guide utility infrastructure planning and operations to maximize the value of DERs interconnected to the electric grid".
Track 2 Vision In Plain Language

Distributed energy resources can be a type of electrical infrastructure. Electrical infrastructure and distributed energy resources should be:

- 2A: Integrated and responsive to local conditions
- 2B: Rapidly and safely interconnected
- 2C: Interoperable and cybersecure
- 2D: Helpful for electrification

Utilities Should Have Transparent and Locally Responsive Business Processes



Utilities Should Continue to Improve Interconnection



2016 - Q3 2016 - Q4 2017 - Q1 2017 - Q2 2017 - Q3 2017 - Q4 2018 - Q1 2018 - Q2 2018 - Q3 2018 - Q4 2019 - Q1 2019 - Q2

Solar Storage Other



NEM

Total time for project approval appears to be improving over time



Solar Storage Other

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AVERGAGE APPROVAL DAYS

Source: Guidehouse Inc. Rule 21 Interconnection Evaluation, March 2021 39

Utilities Should Facilitate Interoperability of Distributed Energy Resources



Figure 6 – High-DER communication pathways scenario

Source: NIST Interoperability Framework and Roadmap Release 4.0 40

Visualizing Interoperability of Simpler Systems

Machine Screw, Pan Head, Cross Recessed, 18-8 Stainless Steel



	1	Ą	ŀ	H	R	М		ſ
Nominal Size	Head D	liameter	Head	Height	Head Radius	Recess Diameter	Recess De	Gaging pth
	Max.	Min.	Max.	Min.	Min.	Ref.	Max.	Min.
#0	0.116	0.104	0.044	0.036	0.005	0.060	0.032	0.014
#1	0.142	0.130	0.053	0.044	0.005	0.067	0.040	0.022
#2	0.167	0.155	0.062	0.053	0.010	0.097	0.052	0.034
#3	0.193	0.180	0.071	0.062	0.010	0.105	0.061	0.043
#4	0.219	0.205	0.080	0.070	0.010	0.115	0.071	0.053
#5	0.245	0.231	0.089	0.079	0.015	0.152	0.072	0.046
#6	0.270	0.256	0.097	0.087	0.015	0.159	0.080	0.055
#8	0.322	0.306	0.115	0.105	0.015	0.175	0.097	0.071

- Machine screws are manufactured such that the dimensions of each relevant characteristic fall within a specific tolerance range.
- You can walk into any hardware store and expect that a #8 screw you purchase will work with any device that is threaded for a #8 screw.
- You can start a screw manufacturing plant and expect that if you can make a screw that meets the specifications at a competitive price, there is a market.
- Counterexample: BART uses 5'6" rails, most other rail systems use 4'8.5" rails.

Electrification is Necessary for Decarbonization



Comparison of 2020 CPUC PATHWAYS

New Build for High Electrification Scenario



Source: <u>CPUC 2021 Proposed Preferred System Plan</u> 42

Local Resources Can Reduce System Impacts of Electrification



Transportation electrification supported by local storage + solar PV

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DER Action Plan 2.0 Track Two: Grid Infrastructure

Vision Element 2A	Vision Element 2B	Vision Element 2C	Vision Element 2D
Utility infrastructure business processes, including planning, all-source resource acquisition, and operations, are transparent, responsive to local conditions and community needs, and seamlessly integrate cost- effective distributed energy resources.	Utility operations continuously improve interconnection performance, leading to greater transparency, speed, and cost certainty.	Utilities implement standards for data communications and advanced inverters that facilitate visibility, operational control, provision of grid services, and interoperability of distributed energy resources and are consistent with best practices for ensuring cybersecurity.	Utilities integrate the anticipated impacts of electrification into distribution planning to maximize public benefits and minimize costs and to optimize deployment of complimentary and supporting infrastructure and distributed energy resources.
_c 8 Action Elements	5 Action Elements	4 Action Elements	2 Action Elements

Vision Element 2A: Integration and Local Responsiveness

	A
1. Starting in 2021 (concluding in 2022), utilities implement the systems and processes needed to ensure the export of accurate, current, and comprehensive system-wide distribution system planning data to the CPUC and CEC on a semi-annual basis (at minimum).	High DERs
2. By 2022, CPUC staff documents all existing Distribution Investment Deferral Framework requirements into a formal Guidelines document to be updated annually or as reforms are implemented.	High DERs
3. By 2022, utilities refine their Integration Capacity Analysis (ICA) tools to provide reliable, accurate, and useful data to developers and consumers seeking to integrate distributed energy resources including generation and load.	High DERs
4. By 2023, utilities establish data portals that provide Tribal and local governments with information useful for the coordinated development of resilient energy infrastructure and emergency response processes to best address community needs and reduce social burdens stemming from large-scale disruptions.	Microgrids & High DERs
5. By 2023, CPUC staff completes a technical report on Distribution Resources Planning Data Portals improvements and conducts a stakeholder process to identify and explore potential updates and additional data to host, with the goal of increasing portal usability and usefulness for DER	
6. By 2024, the CPUC considers proposals to develop a formal Distribution Planning Process Guidelines document designed to enhance DER	
integration onto the grid, increase community engagement, and ensure state electrification initiatives are achievable while maintaining cost effectiveness. Supersede the Distribution Investment Deferral Guidelines with the new Distribution Planning Process Guidelines.	
8. By 2025, utilities routinely conduct distribution planning meetings with communities to coordinate planned infrastructure investments with local DER initiatives and ensure investments are resilient, serving to reduce the social burden of outages.	High DERs & Microgrids

Vision Element 2B: Interconnection	
1. Starting late 2021, utilities pilot a notification-only interconnection process and collect data to determine practicality, safety, and associated costs. Advice Letters due in late 2023 will recommend the parameters under which this approach may	Interconnection
be extended to other interconnection use cases.	
requirements have been met, the use of technologies or products that can reduce the cost of DER implementation or optimize the performance of DER (e.g., lower cost relays, multi-port utility revenue meters).	Microgrids
3. Starting late 2022, utilities use IEEE 2030.5 servers to pilot the control of inverters for operational flexibility and telemetry.	Interconnection
4. By 2022, utilities begin tracking the installation of both AC-coupled and DC-coupled vehicle-to-grid interconnections to better understand the potential capacity available from electric vehicles to meet grid needs.	Interconnection
5. Starting in 2022, the CPUC revisits interconnection fees and the cost allocation for distribution network upgrades, with a goal of reaching a decision on these topics by Q42022.	Interconnection

Vision Element 2C: Interoperability and Cybersecurity

1. By 2022, the CPUC convenes a Smart Inverter Operationalization Working Group and, by 2023, oversees completion of a working group report, staff proposal, and stakeholder process to develop use cases, guidelines, and an implementation plan.	High DER
 Starting in 2024, utilities update the grid modernization plans filed with their general rate cases to ensure grid investments and capabilities adequately support priority smart inverter operationalization use cases. 	General Rate Cases
3. By 2022, utilities identify foundational industry or national standards for communications (e.g., IEEE 2030.5-2018 - IEEE Standard for Smart Energy Profile Application Protocol, SunSpec Alliance standards) and best practices for cybersecurity to guide development of DERs that maximize the likelihood of interoperability with the evolving distribution grid.	
4. By 2023, utilities conduct a gap analysis to identify any standards or best practices that need to be developed to facilitate	

development of DERs that will be interoperable with the evolving distribution grid.

Vision Element 2D: Electrification	
1. By 2023, CPUC staff completes a comprehensive, data-driven electrification impacts study to estimate the scope of distribution grid buildout and identify opportunities to mitigate costs.	High DERs
2. By 2025, utilities update their distribution planning processes and Distribution Investment Deferral Framework process and filings to fully account for, and report on, the scope and costs of ongoing electrification impacts.	High DERs

DER Action Plan 2.0 Track Three: Market Integration

The Market Integration Track is focused on:

The efficient integration of BTM and FTM DERs into wholesale markets to support renewable integration, GHG reduction, and grid reliability. This track addresses how market integrated DERs connected to the customer, distribution, and transmission grid "domains" can be harnessed and compensated to produce multiple streams of benefits. The Vision Elements are grouped into four primary themes.

Primary Themes:

- 1. Big Picture and Wholesale Market Integration of Both BTM & FTM DERs
- 2. Multiple Use Applications (MUA) aka "Value Stacking"
- 3. Wholesale Market Integration of Exporting BTM DERs
- 4. Wholesale Market Integration of FTM DERs

Track Three: Market Integration

Vision Element 3A	Vision Element 3B	Vision Element 3C	Vision Element 3D	Vision Element 3E
Resource Adequacy DER participation in wholesale markets supports efficient grid operation focused on integration of renewable energy, reduction in system cost, grid reliability, and reduction in GHG emissions.	Resource Adequacy DERs receive fair compensation when providing multiple unique services to the wholesale market, distribution grid, and end-users ("value stacking"). Rules and procedures are in place governing how DERs may participate in the wholesale market while providing distribution capacity and other services to distribution utilities, including clear prioritization in case of reliability events. Rules include appropriate safeguards to avoid cross subsidies between retail and wholesale jurisdiction.	Rule 21 interconnection tariffs are reviewed to address barriers and resolve questions of whether, and if so how, BTM DERs can export to the wholesale grid, and the CPUC, CAISO, and CEC resolve questions of whether and how exporting DERs should receive compensation and participate in wholesale markets.	CAISO and distribution utilities under CPUC oversight resolve questions of whether and how Resource Adequacy Distributed Energy Resource Aggregations (DERAs) can and should participate in CAISO markets, and work to remove barriers, as appropriate, to achieve this vision.	Wholesale Distribution Tariffs (WDTs) for interconnection of DERs to the wholesale grid allow for reasonable cost recovery from DERs seeking interconnection based on cost causation principles while providing those resources with full access to wholesale markets.
7 Action Elements	2 Action Elements	None Defined	1 Action Element	1 Action Element
Theme #1	Theme #2	Theme #3	Theme #3	Theme #4 50

Track Three: Market Integration Action Elements

Big Picture and Wholesale Market Integration of Both BTM & FTM DERs

Vision Element 3A: Resource Adequacy DER participation in wholesale markets supports efficient grid operation focused on integration of renewable energy, reduction in system cost, grid reliability, and reduction in GHG emissions.	Potential Proceeding / Initiative
Action Element 1: CPUC reviews rules and tariffs to address barriers and resolve questions of whether, and if so, how exporting BTM DERs can more effectively participate in wholesale markets and qualify for Resource Adequacy (RA).	Resource Adequacy
Action Element 2: In consultation with CAISO, the CEC, and distribution utilities under CPUC oversight, RA rules, demand forecasting methods, and CAISO market rules are reviewed to address barriers and resolve questions of whether, and if so, how Distributed Energy Resource Aggregations and exporting BTM DERs can more effectively participate in wholesale markets and qualify for RA.	Resource Adequacy, IEPR, CAISO
Action Element 3: By 2022, CPUC staff completes an evaluation of energy storage procurement and operational performance measuring achievement of energy storage policy goals and identifying changes that can improve the future operation and procurement of energy storage.	Storage Evaluation Study & Future Storage/DR OIR
Action Element 4: By 2022, CPUC staff issues a report with the results of its inaugural energy storage procurement study. The study scope includes a review of actual wholesale market participation, identification of potential wholesale market-related barriers, a review of policy and market design practices in other jurisdictions, and consideration of shifts in future wholesale market value streams. Study recommendations include market enhancements that could increase opportunities for energy storage resources to participate in wholesale markets in a competitive and efficient manner.	Storage Evaluation Study & Future Storage/DR OIR
Action Element 5: By 2022, the CPUC will hold two public workshops for the energy storage procurement study in which stakeholders can comment on the study's draft findings.	Storage Evaluation Study
Action Element 6: By 2023, the CPUC should consider the findings of the energy storage procurement study in one or more relevant proceedings.	TBD
Action Element 7: By 2026, CPUC staff completes the 2nd evaluation of energy storage procurement as required by CPUC Decision.	TBD

Track Three: Market Integration Action Elements

Multiple Use Applications (MUA) aka "Value Stacking"	
Vision 3B: Resource Adequacy DERs receive fair compensation when providing multiple unique services to the wholesale market, distribution grid, and end-users ("value stacking"). Rules and procedures are in place governing how DERs may participate in the wholesale market while providing distribution capacity and other services to distribution utilities, including clear prioritization in case of reliability events. Rules include appropriate safeguards to avoid cross subsidies between retail and wholesale jurisdiction	Potential Proceeding/ Initiative
Action Element 1. By 2023, the CPUC should determine in a proceeding, in consultation with the CAISO, the priority MUA policy issues that should be resolved to further the MUA framework.	Future Storage/DR OIR, CAISO Initiatives and TBD
Action Element 2. By 2024, the CPUC and CAISO should identify key DER services and prioritization for those services based on reliability implications. The CPUC should identify any modifications or amendments needed to enable DER value stacking.	FutureStorage/DR OIR, CAISO initiatives and TBD

Track Three: Market Integration Action Elements

Wholesale Market Integration of Exporting BTM DERs	
Vision 3C: Rule 21 interconnection tariffs are reviewed to address barriers and resolve questions of whether, and if so how, BTM DERs can export to the wholesale grid, and the CPUC, CAISO, and CEC resolve questions of whether and how exporting DERs should receive compensation and participate in wholesale markets.	Potential Proceeding / Initiative
Action Element 1. To be defined.	TBD

Questions to address for Vision Element 3C and 3D:

- What the overlapping jurisdictional issues
- Can/should individual BTM market facing resources go through Rule 21 or Wholesale Distribution Tariff for interconnection?
- What are the primary barriers to interconneciton of exporting DERs?

Track Three: Market Integration Action Elements

Wholesale Market Integration of Exporting BTM DERs	
Vision 3D: CAISO and distribution utilities under CPUC oversight resolve questions of whether and how Resource Adequacy Distributed Energy Resource Aggregations (DERAs) can and should participate in CAISO markets, and work to remove barriers, as appropriate, to achieve this vision.	Potential Proceeding / Initiative
Action Element 1. Market rules and market access tariffs are structured to facilitate BTM DERs to efficiently participate in wholesale markets, and to fulfill all requirements of that participation, including the DERA participation model.	Resource Adequacy, Rule 21, and CAISO

Track Three: Market Integration Action Elements

Wholesale Market Integration of FTM DERs	
Vision Element 3E: Wholesale Distribution Tariffs (WDTs) for interconnection of DERs to the wholesale grid allow for reasonable cost recovery from DERs seeking interconnection based on cost causation principles while providing those resources with full access to wholesale markets.	Potential Proceeding / Initiative
Action Element 1: The CPUC participates in FERC proceedings and rulemakings related to WDTs for interconnection of DERs to the wholesale grid to represent the interests of California rate-payers and state energy and climate goals affected by FERC policy.	FERC Proceedings

The DER Customer Programs track is focused on:

Improving coordination, planning and developing consistent metrics across DER proceedings related to customer programs to maximize their contributions to GHG reductions and other state energy goals.

The goal of the DER Customer Programs track is to:

Enable all customers to effectively manage their energy usage in a manner that ensures equitable participation and distribution of benefits, alignment with evolving rate design and load flexibility, alignment with distribution planning objectives, and alignment with integrated resource planning objectives.

Vision Element 4A	Vision Element 4B	Vision Element 4C	Vision Element 4D	Vision Element 4E	Vision Element 4F
Coordinated DER potential studies and other resource- and technology- specific research provides the data needed for full incorporation of DERs into Integrated Resource Planning.	CPUC decisions on budgets and priorities for all ratepayer funded DER programs are informed by metrics and guidelines for cost-effectiveness, program impact, marketing, and other criteria that are consistent across programs and proceedings. Any variation occurs because of necessary differences inherent in technology.	Understanding the impact of DER programs on low- and middle-income ratepayers, DACs, and ESJ communities becomes an inherent part of program design and management.	DER activities in disadvantaged communities are coordinated across proceedings and with the ESJ Action Plan, as well as with other Commission- wide and state-wide efforts.	Data from smart meters and other ratepayer-funded "smart" devices is available for research purposes while retaining privacy protections and is used to improve program design and marketing.	End-of-life management programs are in place to ensure the effective collection, safe transport, and environmentally responsible recycling or re-use of DERs at end of life.

Vision Element 4A

Coordinated DER potential studies and other resource- and technology-specific research provides the data needed for full incorporation of DERs into Integrated Resource Planning.

Action Elements 4 A

1. By 2022, the CPUC should prioritize which DER technology types should be studied as candidate resources for Integrated Resource Planning. For behind-the-meter DERs, the CPUC will coordinate with the CEC to ensure appropriate alignment with the demand forecast.

2. By 2023, the CPUC should develop a plan for additional combined or individual resource studies to provide DER data needed for IRP.

Vision Element 4B

CPUC decisions on budgets and priorities for all ratepayer funded DER programs are informed by metrics and guidelines for cost-effectiveness, program impact, marketing, and other criteria that are consistent across programs and proceedings. Any variation occurs because of necessary differences inherent in technology.

Action Elements 4B

1.By 2022, the CPUC should consider whether and how to best conduct a programmatic review of all DER customer programs. The objective of the review is to assess, categorize, and compare DER programs and recommend programmatic changes to further align and achieve state goals and maximize ratepayer benefits.

2. By 2023, the CPUC should adopt DER cost-effectiveness protocols, similar to the existing Demand Response Cost-Effectiveness Protocols, that apply to all DER programs.

3. During 2023 and 2024, the CPUC should use the results of a programmatic review to develop other common metrics and guidelines in addition to cost-effectiveness.

4. During 2023 and 2024, the CPUC should use the results of a programmatic review to determine whether changes are needed to the portfolio of ratepayer funded DER programs to achieve state goals and maximize ratepayer benefits. Such changes could include combining complementary programs or prioritizing based on integrated resource planning results.

Vision Element 4C

Understanding the impact of DER programs on low- and middle-income ratepayers, DACs, and ESJ communities becomes an inherent part of program design and management.

Action Element 4C

1. By 2023, the CPUC should consider whether to develop guidelines and metrics that can be used across DER programs to understand and evaluate the impact of all DER programs, whether or not they intentionally target DACs, or low- and middle-income ratepayers, to be done before program approval and as part of program evaluation

Vision Element 4D

DER activities in disadvantaged communities are coordinated across proceedings and with the ESJ Action Plan, as well as with other Commission-wide and state-wide efforts.

Action Elements 4D

1. By 2023, the CPUC should consider a framework for mutual eligibility between programs that have similar eligibility criteria and/or are seeking to expand access to similar technologies, with the goal of creating mutual eligibility or auto enrollment in all programs that focus on disadvantaged communities.

2. By 2023, the CPUC should consider issuing rules for standardized data collection for all DAC programs.

3. During 2023 and 2024, the CPUC should use the results of a programmatic review to improve program design and organization across all DER customer programs, possibly combining similar programs.

Vision Element 4E

Data from smart meters and other ratepayer-funded "smart" devices is available for research purposes while retaining privacy protections and is used to improve program design and marketing.

Action Elements 4E

1. Starting in 2021, in coordination with the Grid Infrastructure track, CPUC and CEC staff will coordinate data collection, storage, and analytical efforts related to smart meter data.

2. By 2022, the CPUC should consider updating existing rules and requirements for the release of smart meter data, and best practices for use of this data to improve customer adoption of DERs.

3. By 2022, the CPUC should consider adopting similar rules and requirements for the release of data from smart devices that receive incentives from ratepayer funds.

Vision Element 4F

End-of-life management programs are in place to ensure the effective collection, safe transport, and environmentally responsible recycling or re-use of DERs at end of life.

Action Elements 4F

1. By 2024, the CPUC should consider whether to adopt measures to ensure photovoltaic panels deployed through CPUC-overseen programs are effectively and responsibly recycled or re-used at end-of-life, considering recommendations made by the interagency working group paper Addressing End-of-Life Management of Photovoltaic Panels.

2. By 2024, the CPUC should consider whether to adopt measures to ensure electric vehicle and energy storage batteries deployed through CPUC-overseen programs are effectively and responsibly recycled or re-used at end-of-life, considering recommendations made by the interagency working group paper *Addressing End-of-Life Management of Electric Vehicle and Energy Storage Batteries*.

3. [Placeholder for potential action element regarding working with CARB to improve the end-of-life disposal of devices such as heat pumps that use refrigerants or other high global warming potential gases.]

Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future

Tribal Consultation Workshop | September 16, 2021 Rob Peterson, Energy Division



California Public Utilities Commission

We Anticipate a High-Penetration DER Future

"This OIR anticipates a high-penetration DER future and seeks to determine how to optimize the integration of millions of DERs within the distribution grid while ensuring affordable rates."

– High DER OIR at p. 9

"This OIR neither seeks to set policy on the overall number of DERs nor does it seek to increase or decrease the desired level of DERs. This OIR focuses on preparing the grid to accommodate what is expected to be a high DER future and capture as much value as possible from DERs as well as mitigate any unintended negative impacts."

– High DER OIR at p. 10

DRP and IDER Proceeding Successor (R.21-06-017)

The new proceeding will:

- Address unresolved and ongoing issues from the Distribution Resources Plans (DRP) proceeding (R.14-08-013) and Integrated Distributed Energy Resources (IDER) proceeding (R.14-10-003)
 - Note: Unresolved issues associated with the IDER Avoided Cost Calculator are expected to be scoped into a separate proceeding.

In addition, the new proceeding intends to:

- Enable swift evolution of grid capabilities and operations to integrate solar, storage, EVs/EVSE and other DERs to meet the State's 100 percent clean energy goals;
- Improve distribution planning, including charging infrastructure forecasting to support cost effective and widespread TE; and
- Optimize grid infrastructure investments by facilitating community input about planned developments, DER siting plans, and resiliency needs.

2021 Milestones

- July: OIR issued, opening proceeding R.21-06-017
- Aug: Opening comments due and Prehearing Conference
- Sept (9/22): Energy Division Workshop with CEC
 - Proceeding scope and schedule refinement and agency coordination plans
- Sept: Consultant selected (proposals were submitted 7/30)
- Oct (10/7): Reply comments due
- Nov: Scoping Memo (scope and schedule finalized)
- Nov: Final Work Plan for new consultant

Organized Under Three Tracks

1

Distribution System Operator (DSO) Roles and Responsibilities

- Long-term grid vision
- Grid architecture
- Investigation of DSO models

Distribution Planning, Data Portals, Community Engagement, and DER Integration

- IOU Distribution Planning Processes
- Data Sharing and Transparency
- Distribution Investment
 Deferral Framework (DIDF)

3

Smart Inverter Operationalization, Grid Modernization, and General Rate Case Alignment

- Business Use Cases for Smart Inverters
- DER Dispatchability
- Smart Grid Investment Planning

Consultant Reports and Staff Proposals by Track

- **T1:** White Paper for Future Grid Study
- T2: Distribution Investment Deferral Framework (DIDF) Guidelines
 - a. documenting existing DIDF requirements)
- T2: Phases 1 and 2 Electrification Impacts on Distribution Planning Reports
- **T3:** Smart Inverter Operationalization Working Group Report
- **T3:** Smart Inverter Operationalization Staff Proposal
- T3: Grid Modernization Plan Improvement and GRC Alignment Staff Proposal
- T2: Data Portal Improvement Technical Report
- T2: DPP Guidelines Staff Proposal
 - a. Supersede DIDF Guidelines
 - b. Establish Electric Utility Distribution Planning Process improvements
 - c. Memorialize electrification impacts and data portal improvement report findings as relevant to distribution planning process development

T1: Future Grid Study and En Banc

Note: Most proceeding deliverables would include workshops. One En Banc is anticipated (2024).

Proceeding Tracks and Overview Schedule (36 Months), OIR Dates

	2022			2023				2024				
	2022-Q1	2022-Q2	2022-Q3	2022-Q4	2023-Q1	2023-Q2	2023-Q3	2023-Q4	2024-Q1	2024-Q2	2024-Q3	2024-Q4
T1	White Paper and Workshop										Consultant Report and En Banc	Proposed Decision
Т2		DIDF Guidelines circulated for comment	Phase 1 Electrification Impacts Report and Workshop	DPP Improvement Workshop	Phase 2 Electrification Impacts Report and Staff Proposal with Workshop			DRP Data Portals Improvement Report and Workshop	DPP Staff Proposal and Workshop	Proposed Decision		
тз	SIO Working Group Starts (one year)					SIO Working Group Report SIO Staff Proposal and Workshop	Grid Mod and GRC Alignment Staff Proposal and Workshop	Proposed Decision				

RFP for Distribution Planning and DER Technical Services

- Consultant will complete data-driven analyses to provide actionable findings that inform policy relevant to decision making with respect to improving IOU distribution planning outcomes
- CEC coordination and data sharing expectations are built into the RFP
- For more information about the list of anticipated reports and staff proposals described on the previous slide, refer to the detailed Request for Proposals (RFP) document for RFP #20NS1109 at Cal eProcure: <u>https://caleprocure.ca.gov/event/8660/000019832</u>

For more information:

- **Supervisor:** Gabriel.Petlin@cpuc.ca.gov
- High DER Proceeding and Consultant
 Support: Rob.Peterson@cpuc.ca.gov
- **DIDF, Data Portals, DER Action Plan:** Keishaa.Austin@cpuc.ca.gov


Until 10:45

Panel of Tribal Representatives

Moderated by Mary Claire Brown – Advisor to Commissioner Houck

Panelists:

Jana Ganion, Blue Lake Rancheria Tribe Linnea Jackson, Hoopa Tribe Pilar Thomas, Partner at Quarles & Brady LLP Michael Gerace, Yurok Tribe

Open Discussion

- What DER-related issues or challenges does your tribe face?
- Do you feel your tribe's energy needs and planned developments are adequately integrated into utility distribution system planning? If not, how would you improve integration?
- Do you have any preliminary input on the DER Action Plan or High DER Rulemaking?

Future opportunities to provide feedback on DER Action Plan and High DER Rulemaking

DER Action Plan 2.0

- October 8, 2021: Deadline for submission of informal written comments on the draft DER Action Plan 2.0 (15 page maximum)
- December 2021 (tentative): Commission endorsement of the final plan

High DER Proceeding

- September 22, 2021: High DER Scoping Workshop (details available on the CPUC Daily Calendar)
- October 7, 2021: Deadline for parties to submit formal reply comments
 - Members of the public may submit informal comments at any time at this link: <u>https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO</u>:::
- November 2021 (tentative): Comr Houck issues Scoping Memo finalizing scope and schedule

THANK YOU!