

Transmission Project Review (TPR) Process Workshop August 17, 2023; 9 a.m. – 12 p.m.

Questions, Comments, and Responses

Below are summarized questions, comments, and responses from the August 17, 2023 TPR Process Workshop with transmission owners and stakeholders.

Overview of the TPR Process

Pushkar Wagle, Flynn Resource Consultants, Inc: Inquiring about TPP projects and if there have been changes since an original project proposal, is it possible to utilize information in the TPR Process to go back to CAISO or other forums to check on the continued need and cost of the project?

Response: Yes, it is expected that data from the TPR Process can be used freely in other forums.

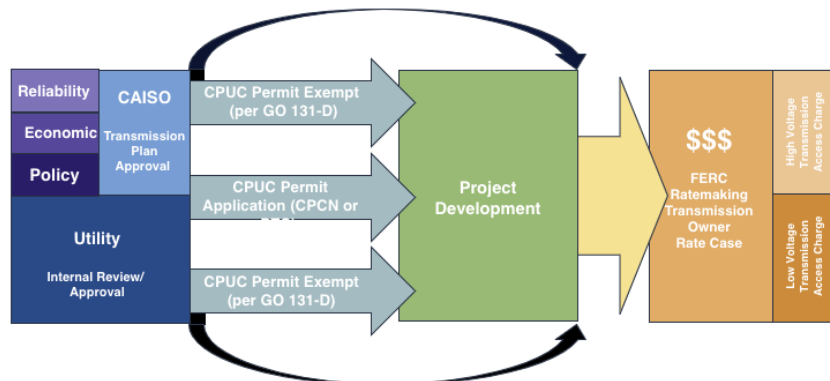
Niamh Murphy, Cal Advocates: The TPR is expected to replace FERC processes. Is that true for AB970 reporting?

Response: Quarterly AB970 reports were established in 2006 and include generator interconnection-related projects. Utilities may file petitions to modify the 2006 CPUC decision. For example, SCE currently does not file AB 970 reports because it includes all of the data in its Stakeholder Review Process data.

Jeanne Armstrong, Solar Energy Industries Association: Regarding slide 9 (“Transmission Project Review Process”) Is the green box “Project Development” where the project is being constructed? Is TPR the black arrows?

Response: Yes, the TPR is represented by the black arrows below. TPR Process occurs after project planning but before rate recovery. This would include all phases of project construction.

Transmission Project Review Process



The Transmission Project Review (TPR) Process occurs after the transmission planning process has been completed.



Hillary Hebert, HMM Energy Consulting Inc: In the “Projects in the TPR Process” slide, the TPR Process is not for discussing alternatives to TPP projects. Is there an example of how will data on TPP projects would be used?

Response: If there is a TPP project that is not moving along as quickly as it could, asking some questions to better understand the progress and costs of that project is a reasonable expectation in the TPR process. How stakeholders use this information received in the TPR Process is up to them.

David Peck, Cal Advocates: Regarding “Key Components of the TPR Process,” is there a way to include certain projects that are less than \$1 million?

Response: The threshold of \$1 million is a set expectation and brings in substantial data. Bringing in projects less than \$1 million likely becomes overwhelming for stakeholders and is perhaps unfair to the utilities.

Brian Biering, America Clean Power - California: Is it possible to see early reporting on TPP-approved projects even if utilities haven't spent money on these projects? It would be helpful to keep them on everyone's radar.

Response: That's input stakeholders can provide to the utilities in the context of the TPR Process itself. Transparency at the earliest stages after approval would seem beneficial.

Definitions and Information Slides

Antonio Ocegueda, SCE: Clarification of what is included in the TPR data. Clarification that network upgrade projects show up in the process, but interconnection costs paid by the customer would not be part of this report.

Response: If projects are paid for by customers and will not end up in IOUs' FERC jurisdictional rate base, they will not be included in the TPR Process.

Brian Turner, Advanced Energy United: Referring to “Projects in the TPR Process” slide, request to discuss the application of, and ability to discuss, alternatives to self-approved projects.

Response: There's an opportunity for scrutinizing utility self-approved projects more than TPP projects, including alternatives like grid enhancing technologies. However, the TPR Process is a review process and is non-binding. We can have a robust conversation with utilities on all kinds of ideas and alternatives, but utilities are free to take them or leave them. We're hoping the TPR Process provides the opportunity to have more dialogue and some effect on discussing some alternatives.

Inquiry and Comments, Stakeholder Meetings, Use of Data, and Dispute Resolution Slides

Fernando Cornejo, SCE: Provided comments on the consideration of having parameters for reasonableness and relevance regarding the scope of agenda items proposed for stakeholder meetings.

Response: Agenda items need to be in the context of the TPR Process. There have not been such issues in the current FERC-derived processes. The minimum of 15 days between stakeholders sending agenda items and the stakeholder meeting is an opportunity for IOUs to reach out to stakeholders if necessary to come to some reasonable outcome.

TPR Process Project Spreadsheet

Nick Medina, PG&E: Clarification on representing the altitude and longitude of transmission assets, particularly transmission lines.

Response: For transmission lines, there should be latitude and longitude coordinates for both end points. For centralized assets, latitude and longitude can be for a single midpoint.

Rahab Mahfud, SCE: Noted the definitions for data fields in the slide deck are abbreviated and do not show the required format. Will there be an updated Excel spreadsheet with more detailed definitions?

Response: Yes, the definitions are simplified for today's presentation, and some definitions do remain works in progress. If there are areas of confusion, reach out for clarification.

Rahab Mahfud: To ensure compliance, regarding indicating "false" or "true" for the "Wildfire Related" data field #17, would commas be used to separate the responses?

Response: Pipe delimiters should be used and the CPUC will make sure this is clear.

Rahab Mahfud: There are some fields where IOUs need to submit drop down options, correct?

Response: There are six identified data fields for which it is the intention that IOUs will collaborate to develop uniform lists.

Niamh Murphy, Cal Advocates: Would it possible to use multiple for a data field? Can fields not specified in the resolution be implemented?

Response: We are bound by the resolution, which defines 70 fields. Operating within that binding constraint, we have divided some fields into sub-columns. Data fields with multiple answers use pipe delimiters to ensure consistency. If stakeholders wish to split data into separate fields on their own, the pipe delimiter would make that possible.

Seth Cochran, DC Energy: What fields qualify as confidential and will be eligible for redaction?

Response: The data fields eligible for redaction in the public data have not been finalized. Latitude and longitude are eligible due to physical security considerations. Also, project manager data fields may also be redacted. No other data fields have been discussed for redaction at this time.

Seth Cochran: -Were all NDAs filed by IOUs approved? If not, is there a timeline?

Response: The proposed NDAs are still under review. The CPUC appreciates that the utilities worked together to separately submit the same propose NDA. NDAs will be finalized well in advance of the first data on January 2, 2024.

David Peck, Cal Advocates: For utility unique ID, is there a possibility to have a project ID that is uniform across various data sets and forums?

Response: It seems like that is possible. Utility Unique ID #1 would be project level, #2 is higher level, and #3 is a more general work category (such as major work category (MWC) for PG&E).

Michael Postar, DWGP: Inquiry about how programmatic investments will be reflected when projects in the category add up to \$1 million.

Response: In the FERC-derived processes to this point, IOUs have grouped similar types of projects into programs, buckets, or blankets. If the projects in those groups add up to \$1 million, then the grouping gets its own project line and all projects, including those under \$1 million are included in the collective category. That is how it will be handled in the TPR Process too.

Brian Biering, America Clean Power - California: Row 47, the “Project Status” field, would projects at the surveying, permitting, and construction be captured?

Response: Yes, those items are to be captured and in the construction phase. Also, the percentages capture the spending to date as a percentage of the Estimated Cost at Completion.

Adam Currey, SDG&E: Clarification that for data field 58, “Projected Capital Expenditures (\$000)”, and data field 57, “Actual Capital Expenditures (\$000),” CPUC is looking for the project capital expenditures, correct?

Response: Yes. Historical capital expenditures for data field 57, “Actual Capital Expenditures (\$000),” and forecasted capital expenditures for data field 58, “Projected Capital Expenditures (\$000).”

Pushkar Wagle, Flynn Resource Consultants Inc: Inquiry about the expectation for how data field 66, “Cost Benefit Analysis,” would be populated.

Response: The intent is that the utility provides the ranking method and the rank score, separated by a pipe delimiter. The goal is to make it simple and readable.

Dave Cohen, TANC: For column 67, “FERC Incentives,” suggestion to have a FERC docket in which the incentives were approved.

Response: That’s something the CPUC can talk about with the utilities.

Geneva Looker, Whitfield Russell Associates: Data fields 57, “Actual Capital Expenditures (\$000),” and 59, “Construction Work in Progress Expenditures (\$000),” include actual capital expenditures and then data fields 60, “Accrued Overhead,” and 61, “Accrued AFUDC,” are for accrued overheads and accrued AFUDC. Is that presuming that the actual capital expenditures do not include the overheads?

Response: This differs by utility. Some include the AFUDC and overhead into their capital expenditures. Some just show capital expenditures as direct materials and labor costs with AFUDC and Overhead being added on when the project is complete and put into rate base. If AFUDC and Overhead are already baked into 57, “Actual Capital Expenditures (\$000),” and 58 “Projected Capital Expenditures (\$000),” then 60, “Accrued Overhead,” and 61, “Accrued AFUDC,” won't need any additional numbers.

Antonio Ocegueda, SCE: Would data fields 60, “Accrued Overhead,” and 61, “Accrued AFUDC,” be broken up by year to align capital expenditures being presented?

Response: The intent is to get the full sense of how much of each has been accrued. A single number in 60, “Accrued Overhead,” and 61, “Accrued AFUDC,” is fine.

Rahab Mahfud, SCE: confirming data field 54, “Original Projected Cost (\$000) or Cost Range” is for FERC jurisdictional costs.

Response: Correct, the TPR Process addresses FERC jurisdictional projects and costs.

Accessing TPR Process Data:

Robyn Purchia, Cal Advocates: Confirming that Cal Advocates does not need to sign an NDA.

Response: Correct.

Rahab Mahfud, SCE: Inquiring whether the dates in the TPR Process schedule are set.

Response: The challenge of the staggered schedule requires that the TPR Process dates be set as included in Resolution E-5252. Only weekends and holidays would shift dates.

Pushkar Wagle, Flynn Resource Consultants Inc: Confirming that there will not be a gap between the ending of PG&E STAR Process and the beginning of TPR, as PG&E will provide TPR Process data on May 1.

Response: Correct, there will not be any gap in the data for PG&E, as STAR Process data will be issued on December 1, 2023, with PG&E's first TPR Process data on May 1, 2024.

Dave Cohen, TANC: Inquiring whether there will be synchronized results from TPR Process filings or postings that will match forecasted capital in the 3 IOUs' formula rate filings at FERC.

Response: It is not clear how TPR Process data will align with forecasted capital additions and capital expenditures in rate case filings at FERC.

Niamh Murphy, Cal Advocates: Confirming that the TPR Process is permanent.

Response: Yes, the TPR Process was approved in Resolution E-5252 with no intended end date.

Sylwia Dakowicz, DWGP: About NDAs, how will those be distributed once CPUC approves them?

Response: It is likely that the stakeholders will get them directly from the utilities.