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#### CALIFORNIA ENERGY COMMISSION

In the Matter of:

2017 IEPR Lead Commissioner Workshop On Proposed Guideline Topics for Docket No. Publicly-Owned Utilities' Integrated Resource Plans

17-IEPR-07

CALIFORNIA ENERGY COMMISSION

ART ROSENFELD HEARING ROOM

1516 NINTH STREET

SACRAMENTO, CALIFORNIA

THURSDAY, FEBRUARY 23, 2017 2:00 P.M.

Reported by Kent Odell

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## 1 P R O C E E D I N G S 2 FEBRUARY 23, 2017 2:00 P.M. MS. RAITT: Good afternoon. 3 Welcome to 4 today's IEPR commissioner workshop on publicly-owned 5 utilities for integrated resource planning. I'm Heather Raitt, the IEPR Program Manager. 6 7 Just I'll quickly go over housekeeping items. 8 9 If there's an emergency please follow staff 10 to evacuate the building diagonal and across the 11 street to Roosevelt Park. 12 Today's workshop is being broadcast through our WebEx conferencing system and parties should be 13 14 aware that you're being recorded. We'll post the 15 audio recording on the Commission's website in a couple of days and a transcript in a few weeks. 16 17 At the end of the workshop we will have an opportunity for public comments and we'll limit 18 19 comments to three minutes per person. And when it 20 comes time to comment you can just come to the

For WebEx participants, you can use your "Raise your Hand" function to let our coordinator know you would like to make a comment.

center and identify yourself to the court reporter,

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please, in the room.

And I think that's it.

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And public comments we request are due on March 9th and the notice for the workshop provides all the information for submitting comments.

Commissioner.

Welcome back. Obviously, this morning we were dealing with general questions of translating 350 into greenhouse gas goals. As I indicated this morning, obviously the integrated resource plans are planning exercises to look at your potential tools to meet the requirements to basically reduce greenhouse gas emissions, and we talked a lot this morning about the relationship between the scoping plan, you know, both the Energy Commission and the PUC processes and how we really need to worry about consistency across those.

Now having said that, we now get to the next stage on the discussion, which is we need to come up with some sort of guidelines, instructions so that basically marching through the IRP process we can actually make sense out of your filings, so this afternoon's conversation will sort of work through that issue.

Obviously, we will go through the staff

presentation and then start with some questions from folks, and then move on to public comments.

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MS. RAITT: So our speaker today is Garry O'Neill-Mariscal from Energy Commission staff.

MR. MARISCAL: Good afternoon,

Commissioner, public. Thank you guys for joining us
this afternoon. I wanted to send a special thanks
to Heather and her team for hosting two workshops
for us today. I know that was a tremendous effort
them, and I thank you.

So before I begin I wanted to just make one thing clear that came up in a conference call we had with some of the POUs yesterday, that I just wanted to make clear that this is a staff proposal and we're looking for comments and information on how we can make this proposal better before we draft our guidelines. I just wanted to make sure that everybody was aware of that.

Under SB350 Energy Commission has some roles and responsibilities that were given to us. Some of these roles include developing these guidelines to govern the IRP process for POUs. We also have roles for submitting any recommendations for any deficiencies we find in the plans. So there are some other roles and responsibilities that are

implied by these, such as data collection and analysis of the IRPs themselves.

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Under the statute there are 15, 16 POUs that would be subject to these IRP requirements. Missing from this list is San Francisco, we heard in the last -- in this morning's workshop that they may actually be still considered a POU and a CCA, so that will be something that we will have to talk about going forward.

We have held one direct IRP workshop and then two separate very targeted workshops on transportation electrification and POU renewables. Those workshops are up on the screen. We have used the comments from these workshops to build this staff proposal, and hopefully we have been responsive to a lot of the things we've heard.

So the SB350 requirements for POUs include a GHG emissions target by 2030 that needs to be set, which we were talking about this morning, and then a procurement of 50% renewables by 2030, as well as some subcategories built into the law.

In this slide we have a snapshot of current zero or low carbon non-renewable resources that POUs are currently procuring. This gives us an idea of what work still needs to be done to meet the

overarching goals of SB 350, which is to reduce the carbon footprint of the POUs.

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So some of the requirements of SB 350 that we have looked at when we were drafting the staff discussion paper were that POUs need to address the energy efficiency and demand response programs, energy storage, transportation electrification, resource adequacy, and system and local reliability. Some of these topics will need to be addressed directly or some of them need to be provided to us in some sort of a narrative format, which we will provide guidance on in the guidelines.

The staff paper was our first attempt at drafting language that we would hope to move over into the guidelines in a couple of months, and some of the guiding principles we used when we were putting together the staff paper was that POUs are different from a lot of the IOUs and they're different from themselves. It's a diverse group of utilities and we want to make sure we recognize that.

We also recognize that we need to be able to aggregate the data that is submitted with the IRPs so that we can analyze and report to the Legislature on the progress of POUs going forward

and what they are actually planning.

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One of the other more important things that we are taking a look at is how to leverage existing data requirements, data collection reports that the POUs are already submitting to the Energy Commission. We are strongly encouraged by law to take a look at these things and how to align those with the Integrated Energy Policy Report timeline.

So this is a brief overview of our staff proposal. It says proposed guidelines on here but this is an overview of our staff proposed discussion paper. I'll go over specifically each of these points.

The discussion paper was split into four topic areas. The first topic area identified some of the more administrative things; when the report should be due to the Energy Commission, some of our legal standards, dates that were actually carried in from the law itself which cannot be changed.

Some of the things that we have proposed is when the POUs actually submit the IRPs to the Energy Commission. That is something that is not addressed by the law and we recognize that there may be things that need to be changed after the board adopts an IRP. At this time the Energy Commission is

proposing a July 31, 2019 date for the first IRPs submitted to the Energy Commission.

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Within the guidelines themselves we will also have information about requesting confidentiality. These will fall within the Energy Commission confidentiality regulations. There shouldn't be much different there from other confidentiality requests that we have.

One of the things Energy Commission staff will need to is review the IRPs for completeness and identify any deficiencies, and we will be developing in the guidelines a process for review and discussion with the POUs. At this time we're proposing the requests for response to those comments or requests for more information be responded to us or presented back to us within 30 days of that request.

Continuing on in Topic 1. We are proposing a four-year update of the IRPs. This was we were looking at a four-year update cycle to coincide with our IEPR related activities.

One of the things that we noted when we were talking about setting a four-year reporting requirement was that this actually aligns well with existing reporting requirements that the POUs

already do, and I'll go into that a little bit further.

A couple slides down.

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The other thing we were proposing is that the analysis that supports the IRP be undertaken within the two years prior to the analysis being submitted to the Energy Commission. This is the idea behind this is that we want to make sure the data that is being used to conduct the IRP is not -- and I'm going to use air quotes -- "old" and we want to make sure that it's fresh.

And then the planning horizon for the IRP we have suggested that the planning horizon go through 2030 to match up with the GHG reduction goals and the RPS.

So back onto the four-year reporting cycle that we had suggested. The Energy Commission is attempting to leverage and coordinate IRP data collection with other POU reporting requirements. As the first stage of this staff looked at the timing of developing and submitting IRPs with other legislative mandated reports such as the energy efficiency potential study and the energy storage report, which we believe would feed directly into an -- could potentially feed directly into the IRP.

Also, staff noted that the IEPR resource plans are due by biennially to the Energy Commission and the reporting requirements under that are going to be very similar to the reporting requirements that we would see under an IRP, the type of data that we would need to analyze the IRP.

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So on the screen here we've got the dates for the energy efficiency potential study and when the energy storage reports are due.

And so this is kind of a comparison of the two options of a four-year staff proposal and then the five-year alternative.

What we see here is that there would only be two years under a five-year alternative that would coordinate with the IEPR resource plans, and if we use a two-year freshness on the data that feeds into the IRP, there wouldn't be much coordination with the energy efficiency potential study and there would not be much coordination with the energy storage report.

One of the other things that we noted is that many POUs are already meeting or exceeding this four-year frequency. We found that 11 affected POUs already develop IRP type documents more frequently.

And because the IRPs will be used to inform

policy makers, having a quadrennial reporting
framework will work well with the IEPR, which is the
Energy Commission's primary report to the Governor
and the Legislature.

So the next topic we have is data reporting.

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Staff is proposing standardized reporting requirements under the IRPs. Standardized reporting is necessary to allow staff to compile and report on POU IRPs to policy makers. Staff are proposing that these following four tables be provided with the IRPs and submitted to the Energy Commission.

The first two tables should be pretty familiar. These are based off of the IEPR supply forms and should be very similar.

The bottom two tables represent compliance with the RPS and the GHG accounting table. These are two additional requirements under the IRP that we need to take a look at.

RPS compliance table would provide information to track existing and planned renewable procurement and REC transactions through the study period. This is a forward looking table and it's not intended to track historic RPS compliance in any way.

The GHG emissions accounting table is also intended as an accounting table for the particular IRP scenario that is submitted to the Energy Commission and its various measures. The purpose of this table is to inform on the trajectory of the emission reductions and demonstrate how the scenario will achieve individual utility emissions targets.

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Topic 3 of the paper went over reliability, storage, and distributed generation. These are the types of information that we would expect to see within the IRP. We will be providing guidance on what we would like the IRP to address and to what extent. We would also provide guidance on what we would expect actual data reported to the Energy Commission and what can be just provided as far as a narrative format.

On Topic 4 goes over demand size resources. Within this, in addition to the elements for electricity demand identified and the data reporting there should also be a discussion about the demand forecast. This discussion should include things that are expected to affect the demand forecast such as economic conditions, demographic changes and demand side resources that are expected to be deployed. Also included in forecasts should be

impacts from transportation electrification, energy efficiency and other demand response programs.

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One of the things I would note on this page is that as part of the guidance POUs are encouraged to make use of the 2017 IEPR transportation energy demand forecast as part of their planning efforts.

So in Topic 5 we have other IRP content.

In order to facilitate aggregation of resource plans to check for overall state progress on energy policy goals, staff is proposing that POUs use the following standardized input assumptions.

Some of the following are what we are proposing in the staff paper.

We are proposing that POUs use standard GHG emission costs, light duty plug-in electric vehicle GHG emission savings and associated electric loads per vehicle. The same forecast for light duty plug-in electric vehicle deployed through 2030. A GHG emissions intensity for existing supply resources other than utility owned resources. GHG emissions intensity for traded energy. Load forecasts for regions outside the under the influence service territories. And transmission import and export constraints. And ISO transmission access charges.

Staff is proposing that we would prepare a

lot of this information and post it on our website for POUs to use.

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One additional thing that is covered on this slide is that staff is proposing that at least one scenario within the IRP process be developed in which the POU meets or achieves the GHG reduction goals for that POU.

Risks and uncertainties pertinent to a particular POU and submitted scenario should be at a minimum be discussed. POUs are also encouraged to perform additional scenario analysis and/or sensitivity analysis to assess the risks and alternatives. But at a minimum the IRP submitted must contain at least one scenario that achieve the utility's specific targets.

And in Topic 4 we discussed demand side resources.

Other outstanding issues. So there are four topics that are being handled outside of the guidelines development that we wanted to go over, and we touch on it in the discussion paper.

One of the topics is the GHG emission reduction targets that we were talking about in the presentation or the morning workshop. That process will be handled outside of the guidelines

1 development.

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The ARB is working with the Energy

Commission and state to develop a statewide and
economy wide GHG reduction targets. These targets
will be used to inform what the POU specific targets
will be.

Energy efficiency targets will be handled which will address the doubling of the energy efficiency within SB 350 will be handled separately in a separate proceeding at the Energy Commission through an IEPR process.

RPS guidebook updates will be handled also through a separate process within the Energy Commission, including updates to POU regulations.

And then GHG emissions intensity. So the power source disclosure program under AB1110 requires that the utilities submit GHG emissions along with the procured energy under the power source disclosure program.

And the emissions intensity, there are questions about what emissions intensities will be used. We will be working with the renewable energy division to make sure that we are coordinated with whatever GHG emissions accounting is used under the power source disclosure program will be used or

provided as guidance within the IRP document. 1 2 So as next steps, comments on the 3 discussion paper are due March 9th. We want to apologize for getting the discussion paper out so 4 5 late for this workshop. I know that most people haven't had a chance to fully digest the information 6 7 within there, but we would hope that you can have time to review and provide comments by March 9th on 8 9 the document. 10 On April 6th we expect a staff workshop on 11 the GHG targets discussed this morning. 12 In May we expect a Commission workshop on our draft quidelines. This will be a second time 1.3 14 for you to weigh in on what we are actually thinking 15 will be in the guidelines themselves, and be the first time for you to review and provide comment on 16 17 those. 18 In July we expect to be able to adopt final POU IRP quidelines. 19 2.0 This would lead into a January 1st and 21 January 31st dates for adopting and submitting the 2.2 IRPs to the Energy Commission. 2.3 With that, I would like to open it up to 24 the dais for any comments or questions.

CHAIR WEISENMILLER: On the last next

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steps, first why don't you just remind people of when 350 has a requirement for getting the first 3 IRPs through. 4 MR. MARISCAL: The first IRPs are due to be 5 adopted by the POUs on January 1st, 2019, and we are proposing that they be submitted to the Energy 6 7 Commission by January 31st. CHAIR WEISENMILLER: And what I wanted to do next was, since the paper did go out late and,

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but I mean, typically what happens is the written -for the utilities to go back, run their comments through management, etcetera, they tend to be more reflected in the written comments as opposed to the verbal comments at the workshop, but I thought it would make sense to invite the POUs up and just have the opportunity for them to ask questions of you about the presentation and the paper so that we can at least try to clarify any misunderstandings before they get to actually writing up their written comments.

So anyone that has questions, come on up. MR. TUTT: Good afternoon. It feels like déjà vu all over again.

CHAIR WEISENMILLER: Yeah, but this part does include that you get to ask questions, so

1 smaller audience and less time to prepare. So, 2 anyway. 3 MR. TUTT: I guess in terms of questions, 4 one question I had was will the IRPs that are 5 submitted replace conceptually the RPS procurement plans that are in the RPS regulations right now? 6 7 know those aren't updated on a regular basis but it seems like conceptually they have the same function. 8 9 I was wondering if there's any official notice of 10 that. 11 MR. MARISCAL: Officially we haven't taken 12 a look at that, but that is definitely something 1.3 that we could take a look at and see what overlap 14 there would be between the reporting requirements. 15 CHAIR WEISENMILLER: Yeah, one of our goals 16 is to minimize overlapping of reporting 17 requirements, so if there's a way that this can feed 18 into that or vice versa that makes a lot of sense. MR. TUTT: Okay. And then there's some 19 20 discussion about covering ramping flexibility 21 resources or ramping flexibility in the document, 2.2 and I just wanted to confirm that that ramping 23 flexibility stuff isn't part of the capacity table. Maybe it's a narrative description or something else 24 of that sort? 2.5

MR. VIDAVER: This is Dave Vidaver, Energy Commission staff. I think we're anticipating that you provide an indication that the portfolio you develop has sufficient dispatchable capacity that can move quickly enough to meet whatever resulting that load shape comes out of the set of renewables that each of you is to put in your portfolio and all the other hydro and other dispatchable resources you have.

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So I think it's an open discussion as to how rigorous the amount of data that you'd be asked to provide, but whether that would have to be the extent to which that would have to be quantitative and look at maybe two periods in the year during which your ramping requirements are kind of high, or whether it could be satisfied by a narrative.

My guess is it would depend on the utility. Some utilities really won't have any kind of problem and could demonstrate that with some kind of stacked graph which shows we're not going to have any real problems, and others might have a harder time convincing us that the portfolio they're proposing is going to accomplish a task.

Does that address your question or just confuse you more?

MR. TUTT: Probably halfway in between those two.

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MR. VIDAVER: Any input you provide us between now and the time we develop draft guidelines regarding what you and the POUs individually and collectively feel would be appropriations and doable would be greatly appreciated.

MR. TUTT: Okay. There's a part in the document that talks about looking at local reliability issues out to 2030. I'm probably beyond my expertise here, but my understanding is that usually that kind of resource adequacy question is looked at in a much shorter time horizon. I'm wondering if you really intend that.

MR. VIDAVER: Local resource adequacy requirements as imposed by the ISO and the CPUC are composed on a year-end basis, but they're looked at over a much longer timeframe. That's how the CPUC does long-term procurement, for example. So we would like the same sort of look by the utilities.

We have transmission constrained areas which are going to prevent us from reducing or eliminating gas fired capacity in certain areas we're going to result in must run constraints which are going to limit our ability to reduce gas fired

generation in these areas. Here are some of the transmission considerations that we've looked at in the past or are currently considering.

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We're not going to ask, I don't believe, for you to say exactly how you're going to solve these constraints or whether or not it's economic to come up with a transmission solution or not, but just to discuss some sort of more generally.

MR. TUTT: Okay. I had a question or two about the transportation aspects of this.

I think, Garry, in your presentation you said that a forecast of transportation electrification would be made available for POUs to use, but I think in the document it says POUs should use the state's transportation electrification forecast, and I'm wondering if that's an option, because many of us have our own forecasts of our own transportation electrification that we would probably prefer using in our IRPs.

MR. MARISCAL: That's a good comment. I would just strongly urge you when you're reading the discussion paper to read the entire thing as a staff proposal despite the language. If you believe that you have a better forecast to use, please submit that written comments and make sure that it gets

addressed in the guidelines.

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MR. TUTT: Okay. I think there was another transportation question I had. We're supposed to be looking at providing information about the number and type of electric vehicles. And what kind of detail do you mean by type, is it Tesla?

MR. VIDAVER: Working with ARB and the Public Utilities Commission staff we've developed a spreadsheet based tool which allows the utilities to choose the number of light duty electric vehicles that they are assume are deployed through 2030, and using assumptions we provide about the operating characteristics of electric vehicles and the composition of the fleet which is used to create a composite vehicle.

The tool has just come out. I think you're welcome if we divide the electric vehicle fleet into three different types of vehicles with a unique set of operating characteristics that are combined to create a composite vehicle and associated GHG emissions savings per vehicle deployed.

If you're in the city of Palo Alto and you think your vehicle fleet's going to be 97 percent Teslas, you're welcome to go in and change that set of default assumptions that we've put in place.

If a utility does go in and change the assumptions we've got in place, they just need to explain why they've done that, and between now and the time the final guidelines are put together we'd be happy to hear any comments you might have about the accuracy of that forecast of what the composite fleet's going to look like.

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MR. TUTT: All right. Thank you. I think the last comment or question I have is about some of the standardized inputs.

As an example, light duty plug-in electric vehicle GHG savings, I don't know if that's a net or a gross number. I think it might be different in different service territories. GHG emissions intensity might be different in different service territories. There's just a lot of questions about how much should be standardized here in my mind.

MR. VIDAVER: Would you like a response to that? We generally agree with you. The emissions intensity, the marginal energy that's needed to fuel the electric vehicle fleet is entirely up to the utility, however they estimate the emissions associated with marginal generation is entirely up to them, we wouldn't presume to prescribe that.

Regarding emissions intensities of either

specific resources or trade energy, we think we're
on pretty solid ground in knowing what those numbers
are based on historical data, much of it from ARB,
and we're going to propose data sources and
associated values and you'll get those with the
draft guidelines and have a chance to comment on
them then.

MR. TUTT: Okay.

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MR. COLDWELL: So just a quick comment. So let me start by saying Commissioner Scott sends her regrets for not being able to attend this afternoon's workshop but as the lead Commissioner on transportation she's really interested in the transportation electrification piece of the IRPs, so kind of as a follow-up to the comment that you made a minute ago about using your own transportation electrification forecast, we'd be hopeful that you'd be willing to submit that into our IEPR process so we can learn from that.

MR. TUTT: Certainly I think we would be willing and open to doing that. It's usually part of our demand forecast, but if it's hidden in there in a way that's difficult to parse out, I'm sure we'd be willing to provide a separate document.

MR. BERG: This is Tim Berg from Imperial

Irrigation District. I would second a lot of the comments that SMUD made, especially around the detailed inputs and the level of detail that are required in the inputs.

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We do have an existing integrated resource planning process that we do today, and that process represents the demographics of our region and localized inputs for localized requirements from our governing board and how those match up and align with these where we'll be providing lots of comments like the details around the electrification of vehicles.

And that leads to another question of the flexibility in the resource plans of the type of resources to meet the greenhouse gases. We had created an IIDEA plan already that looks at our RPS requirements and our GHG based upon the old targets, and we're right there at 2030.

Now we're having to redo the plans to figure out how we meet the changing targets, and then that means a whole reevaluation of the resources in the plans to meet those multiple targets.

So we'll be giving a lot of comments back on the flexibility that we think is required to

reflect the local demographics of our region. 1 2 you know, we have a lot of disadvantaged customers 3 in the IID service territory, so some of the things 4 that seem apparent and simple in other regions 5 aren't apparent and simple for us and we need the flexibility. 6 7 CHAIR WEISENMILLER: I'm just going to remind people, I think (inaudible) is probably the 8 9 only one here besides myself who is here in the 10 biennial report I think is number two, but anyway, I 11 had the opportunity to work at the Commission at the 12 time and (inaudible) about a year on the assumptions saying they just didn't make any sense. 13 14 couple years later I was helping LADWP do the 15 strategic plan, and so what were you thinking? Well, we just didn't take it seriously, we just 16 17 filled it out. We thought you guys wouldn't take 18 our stuff seriously either and we're sorry you 19 wasted so much time demonstrating what we filed made 2.0 no sense. 21 So bottom line is take your filing 2.2 seriously, although I realize there will be 2.3 variations on a local level. 2.4 MR. BERG: Right. 25 MR. TUTT: And Chair Weisenmiller, we

1 certainly will be taking these filings seriously. 2 MR. BERG: Very seriously, yes. 3 MR. TUTT: And in large part because we're 4 first going to have to present them to our governing 5 boards and have those bodies adopt them. Not that we don't take you seriously, but that's clearly 6 7 something we take seriously. MR. BERG: And I would echo that, like I 8 9 already did. Our local responsibility to our local 10 governing board. 11 CHAIR WEISENMILLER: No, that's good. Ι 12 mean, this is going to be a challenge to transform, 13 obviously, how all of us do business, and probably 14 the challenge over the next couple years is getting 15 the IRP process right and coordinated across the 16 three agencies on that. So again, thanks for your 17 participation in our efforts moving forward. 18 Scott Lesch, Riverside Public MR. LESCH: 19 Utilities. I wanted to come back to the ramping 20 requirements discussion. For those of us who are in the ISO and are 21 2.2 smaller POUs, at least compared to SMUD or LADWP or 23 IID that's a balancing authority, how do you want us 24 to try to address some of these questions and to

what extent are you working with the ISO to

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identify, for example, forecasts of future FRACMU costs of integration costs, because we really don't have that information available to us.

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MR. VIDAVER: We're not working with the ISO to develop forward looking estimates of FRACMU costs. I don't believe staff envisions your analysis of the ramping needs or flexible capacity needs created by your portfolio to necessarily warrant a 8,760 hour strip of your net load.

But on the other hand, you are going to develop a renewable portfolio. In all likelihood it's going to have a lot of solar in it. Your customers are going to be putting solar on their rooftops and your load shape and your net load shape are going to change substantially over the next 13 years, perhaps. I would argue that it's likely.

This means that the requirement the ISO imposes on Riverside to provide flexible capacity, which you are well aware of the criteria they use, I think it's reasonable to assume that they will base their requirements for your provision of flexible capacity on the same drivers and same methodology and you might have 20 percent more solar energy on your system than you do today, so that's going to change your obligations to provide flexible

capacity.

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I don't think we're asking for a detailed sophisticated analysis of it, but it's going to -the very fact that 20 percent more of your energy might be provided by solar resources means your need for flexible ramping capacity is going to increase.

We would like you to discuss how the extent to which the renewable portfolio you're looking at is going to impact your need for these complimentary dispatchable resources.

MR. LESCH: Well, I would agree with that.

I mean, I would like to discuss that too, but I need to know the costs that are associated with that, and that's not explicitly obvious to me.

MR. VIDAVER: Nor is it obvious to us. If you had a crystal ball, you would look at all the costs and their trajectories for everything from transmission to renewables to energy efficiency to gas fired capacity and new gas fired capacity and develop some kind of optimal portfolio, but as a planner you have to make assumptions about what the future is likely to look like.

We would rather you make those cost assumptions yourself rather than our telling you what they're going to be. If you would like us to

provide some input or recommend a source for cost estimates and forecasts, we could help you, but I 3 don't think it's necessarily our responsibility to 4 tell you we've just heard comments that -- you don't 5 want us to be too prescriptive about inputs and now you're turning around and telling us you really need 6 7 this input. I understand the difficulties and frustrations and we'll be happy to try and help you. MR. LESCH: Yeah, I'm sorry, I didn't mean to imply that if that's the way you took it. What I'm asking is what will be acceptable to the CEC in an IRP submitted by a mid-sized POU that's not a 1.3 balancing authority? 14 Yes, we can take a guess at what we think those costs might be. If we state that and lay out what we're doing, is that acceptable, because I 16 don't --MS. JONES: I think that's going to be 19 acceptable, and I think what the staff would propose 20 is to work with you. A lot of this we can't specify 21 in guidelines but we would be happy to work with you 2.2 to figure out what meets the intent of what's in the 2.3 quidelines. So in some cases it's going to be narrative, in some cases there'll be some 24 25 quantification of it.

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Dave has a very detailed understanding of 1 2 the system and so when he's explaining things, don't 3 take it as you need to have that level of description of your system. 4 5 MR. LESCH: Okay. Thank you. I appreciate that. 6 7 CHAIR WEISENMILLER: And actually in terms of your written comments, if people want to 8 9 distinguish between what might be necessary here for 10 a balancing authority as opposed to someone else, 11 that's, again, certainly comments on that area would 12 be welcome. 1.3 Thank you. I will do that. MR. LESCH: 14 in fact, I'd follow up on that and say that it's 15 quite likely that for the larger POUs, particularly ones that run balancing authorities, they'll be 16 17 prepared to bring a lot of their own assumptions and 18 inputs in and we'll appreciate the opportunity to do that. And for some of us who don't have that, we're 19 20 going to be looking more to the CEC for guidance on 21 what would you like us to use here. 2.2 Thank you. 23 I did have one other follow-up question, if I could, and I know there's going to be a lot of 24 25 process where these things continue to get fleshed

out, but right now the proposal would be when you're reviewing the IRP, if you find deficiencies, you're going to, I guess, send it back to us and ask us to correct those deficiencies.

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I'm curious as to what is going to constitute a deficiency in our case, because there's some things like if we don't supply data that you're asking for that we have, obviously that's clear to us, we need to do that. But if we cannot perform some of the modeling that is being talked about in this document, is that going to be deemed a deficiency?

MS. JONES: My speculation at this point is it depends on the utility and whether you do modeling. If you don't do modeling, then we would expect something different from you. So I think we will probably have to have additional discussions on what constitute deficiencies. We didn't flesh that out in this white paper and so suggestions and comments on it would be very helpful.

MR. LESCH: Okay. Thank you.

MR. WYNNE: Thank you. Good afternoon. My name's Justin Wynne. I'm here on behalf of the California Municipal Utilities Association. So just one quick initial point.

I understand there's some confusing statutory language, but I do not believe that the IRPs can replace the procurement plan for the RPS process. We have alternating three- and four-year compliance periods, and one, just when the statutory requirements change utilities need to update their procurement plans to adopt new excess procurement rules or anything like that, and so they need the flexibility to adopt new procurement plans without this significant lead-in time and they need to be able to do it at any point.

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Additionally, like optional compliance measures, sometimes that needs to be adopted through a procurement plan, and so I don't think that the IRP can replace that. I think the procurement plan will obviously feed into the IRP and I think that's the appropriate way to do it, but I think they should be viewed as completely independent.

MS. JONES: And that's how we've proposed to view them.

MR. WYNNE: So one of the things that I think maybe this would be helpful just because we're still digesting this document and maybe in a follow-up conversation with staff, but I think it would be helpful to identify what in here is new information

1 that isn't already being reported in another place 2 so that we can have a handle on what the 3 significance of the new reporting requirements will be in here. I don't know if that's clearly spelled 4 out or not. 5 MS. JONES: I think the one thing that 6 7 would be new is the GHG reporting, which you don't do, so it would be the GHG associated with your 8 9 portfolio. I would expect that the renewables information would be stuff that you would have 10 11 through your procurement plan. 12 The other two tables are pretty much built 13 off of the existing supply plans that you file every 14 two years, so I think with the exception of that, I 15 think that's the only new piece of data. 16 MR. WYNNE: Thank you. And just one thing 17 as I'm going through and trying to understand some 18 of the assumptions about the GHG assumptions that 19 are being proposed in here. Have you considered how 20 firmed and shaped transactions will be addressed and whether that would be assumed to have a zero GHG 21 2.2 emissions associated with that? 2.3 MS. JONES: That's a good topic and we 24 would like to hear your suggestions on how to handle

it at this point. We don't have a specific

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1 proposal. 2 MR. WYNNE: And then just one other. 3 I think in the discussion about the energy 4 efficiency targets, so I think that from my initial 5 take on this, I think it's important if the assumptions in here are to have value in predicting 6 7 for planning purposes about the actions the utility needs to take, it needs to be clear that the energy 8 9 efficiency assumptions are based off of the 10 realistic expectations. And given that the doubling 11 targets may assume actions by third parties that you 12 can't necessarily reliability on, I think that 1.3 that's one of the core issues that for this to have value it needs to be based off of realistic 14 15 expectations about what will actually be achieved. 16 MS. JONES: And we agree with that. 17 Actions that are taken by others that you don't have 18 control over aren't things that we want to necessarily have reported. We're interested in the 19 20 programs that you're investing in. 21 MR. WYNNE: Thanks. And just one final 2.2 question. 2.3 So I see transportation electrification is 24 called out in here. Is there an expectation about how fuel substitution for end uses would be 2.5

addressed in the IRP? 1 2 MS. JONES: We don't have a proposal at 3 this point, so we would love to hear your comments 4 on it. We know it's an issue. 5 MR. WYNNE: Thank you. Tanya DeRivi with SCPPA. 6 MS. DeRIVI: 7 of my questions were already asked. 8 One I had a question for staff on. 9 the April 18th workshop where the chair had asked 10 about how to go about defining disadvantaged communities and then the comments we had submitted 11 12 on May 19th, we had recommended that the CEC 1.3 consider changes that local governing boards would make tailored to their communities. I noted in the 14 15 introductory section that staff has recommended that we use the state defined Cal EPA information. Does 16 17 that preclude local governing boards from tailoring 18 definitions of disadvantaged communities 19 appropriately? I don't think it precludes you 2.0 MS. JONES: 21 from doing that. I think we were trying to be 2.2 consistent with the SB 350 barriers report and its 2.3 description if disadvantaged communities. But again, if you have better information, of course you 24 have better information. 2.5

1	CHAIR WEISENMILLER: Yeah.
2	MS. JONES: And we'd like to have that.
3	CHAIR WEISENMILLER: But again, as I said
4	in the barriers report, I encourage people to
5	participate in Enviroscreen's update. I'm trying to
6	avoid something that somehow the Energy Commission
7	ends up with a different definition than the rest of
8	the state, and I'm you'd probably be happier if you
9	could convert Enviroscreen to match your criteria
10	and the multiple approaches.
11	MS. DeRIVI: And then since it's the first
12	bullet on the screen, had the March 19th comment
13	deadline, since most of at least our SCPPA members
14	didn't see this document until yesterday, and that
15	an IRP does touch multiple divisions across a
16	utility. Some of our utilities are very large and
17	this touches many, many, many people. Is there any
18	way to request an extension of that March 9th
19	deadline?
20	CHAIR WEISENMILLER: How long?
21	MS. DeRIVI: Two weeks.
22	MS. JONES: We were thinking more like one
23	week, but
24	CHAIR WEISENMILLER: It's a long slot but
25	it's important to get this piece right, so let's do

the two weeks.

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I guess the other question would be whether it would make sense to have a webinar of some sort along the way so after you've done more digestion if you have more questions you can ask it. Again, I'd just as soon not have a lot of comments that are based upon mistaken understandings of where the staff's going.

MS. JONES: And we had a conference call with a number of the POUs earlier this week, and we will set up webexes or conference calls over the next few weeks to discuss a number of these issues as we get your comments in, so we're very happy to do that.

MS. DeRIVI: I would recommend since we're talking about this next week at least with the SCPPA members and eight of the sixteen POUs under the IRP are SCPPA members, we would be happy to discuss what the main topical issue areas they would like to get more clarification from once they've had a time to actually review a 37-page document and get back with staff on what topical webinar issues they would like to discuss with the rest. I'm assuming that the four NCPA members, SMUD and the IDs would probably also be willing to do that too if we could identify

1 those topics for discussion. 2 MS. JONES: That would be very helpful. 3 CHAIR WEISENMILLER: I think I sort of, 4 again, there's obviously a tradeoff between webinars and phone calls. I have no idea whether anyone else 5 is going to want to participate in the webinar but I 6 7 have a bias toward public processes. MR. WYNNE: Justin Wynne for CMUA. 8 9 had one other question. One of the code sections that is cross 10 referenced to is Public Utilities Code Section 11 12 454.52 -- I forget the subdivision, (f), which 1.3 references the term "local communities." And the 14 CPUC just sought comments on how that is defined in 15 reference if it means disadvantaged communities or if it means something different. We did provide 16 17 comments to the CPUC on that, but I don't recall 18 seeing that term defined in here and I don't know if 19 you've given a thought to how you define that terms. 20 CHAIR WEISENMILLER: And I don't see one of 21 my attorneys up there but you might want to just 2.2 file as part of your comments your comments you made 2.3 to the PUC on that topic. 2.4 MS. JONES: We haven't thought about it 25 yet.

Okay. I was just seeking 1 MR. WYNNE: 2 clarity. It isn't defined in here. 3 MS. JONES: It isn't defined there, no. 4 MR. TUTT: This is Tim Tutt from SMUD 5 again. I had another question about the greenhouse gas accounting tables. 6 So Justin asked a little bit about how 7 firmed and shaped might work. This document says 8 that the estimates of GHG emissions that we file 9 10 should be consistent with the values reported to the 11 ARB under the MRR, and we do report those values but 12 in many cases that doesn't really clearly reflect 1.3 our carbon footprint. 14 One example, we can under the RPS use 15 unbundled recs for up to ten percent of the obligation and there's no change in our GHG 16 17 reporting to CARB based on that purchase of 18 unbundled recs, but we certainly think of it as 19 carbon free power when we're talking to our 2.0 customers. There's other examples of that kind of 21 2.2 thing where the obligations reporting to CARB is 2.3 significantly different from the carbon footprint we see for our retail customers. 2.4 25 MR. VIDAVER: I think, I'm not exactly

certain what part of the discussion paper you're quoting, but the consistency we were seeking was in terms of the emissions intensity of both specific generation resources and traded power, so if CARB has an emissions intensity for a specific carboniferous resource that a utility contracts with, the emissions intensity reported by the utility should match the value that CARB uses.

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Similarly for traded power. CARB uses a value for imported power, emissions intensity for imported power. We would suggest that you use a similar emissions intensity in your reporting for market purchases. I think that was our intent.

In the GHG emission reporting let's use the unbundled recs as an example. You would report the forecasted purchase of unbundled recs and purchase of market power or firming and shaping power that had a carbon content. If that was broken out, we would know the value, assuming that the power purchased and used to firm and shape had a positive carbon value or a zero carbon value.

MR. TUTT: We'll work on it.

CHAIR WEISENMILLER: And actually, Tim, in your comments if there are areas where we need to be pulling in the ARB on a discussion on the

guidelines, also flag those.

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Again, you know, we talk a lot about the energy intensity and, as you know, the ARB is much more mass balanced, so just as soon have this process basically all fit together.

MR. TUTT: Yeah. I mean, there potentially are areas where we'd at least want to discuss with the ARB how things are reported there and how they can be consistent or whether they can be thought of as inconsistent and that would be okay.

MS. BERLIN: This is Susie Berlin for NCPA and I had a couple overarching questions.

My first question is, is the switch, I guess, to tie this in directly with the IEPR, so in this docket when we first started talking about implementing this provision it was a separate docket, 16 (inaudible) and then there were a separate aspect of it. And I know that for the 2017 IEPR within the scope is assessment of the various IRPs that are filed by the LSEs and the POUs.

But I'm wondering why there's not still a separate (inaudible) where we look at just putting together this plan, because the information that's submitted for the IEPR itself is not the only element here. You know, we still have the RPS

reporting, we still have the other reports, so I was wondering about what the shift was to link it so closely to that document.

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CHAIR WEISENMILLER: It's a good question and one of the ones we're struggling with. As you know, we've been having at the business meeting reports because the 350 basically cuts across what I'll characterize as our various silos, you know, be it renewables, be it energy efficiency, and at the same point the IEPR is more of an opportunity for dialog back and forth.

So, again, I see the IEPR trying to more pull the threads together even though there can be very detailed stuff elsewhere, and certainly going forward, again, it's sort of an umbrella but we're sort of struggling with how to keep within the construct of me being basically trying to make sure that I'm coordinating with Commissioner Scott, Commissioner McAllister, Commissioner Hochschild, you know, how do we do that in a Bagley-Keene compliant fashion.

So we're trying to do all this in a very public process, but you certainly -- having hearings, we certainly picking it up at every business meeting to keep everyone tied together. So

1 it's a struggle, but as I said, it's basically
2 trying to unite across different silos and different
3 Commissioners in a way that's consistent with
4 Bagley-Keene.

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MS. JONES: I was just going to add that looking at SB 350, we have to report as part of the IEPR on POU progress, and so I think it makes sense to have it incorporated in the IEPR for that reason as well.

MS. BERLIN: Okay, thank you. Another question I have is, maybe this is something you're going to tell us you're looking for questions on, but can you tell us a little bit more about how you envision the interaction between MRR reporting, which ties into GHGs 1110 and the power source disclosure and how that fits in with the GHG reporting that's envisioned here, because it seems that there's a lot of different moving parts here.

CHAIR WEISENMILLER: There are moving parts, and frankly, the agencies are going to have to coordinate. As I said, certainly the reality is that under 350 we're coordinating -- the ARB certainly, as you know, has a lot more expertise on air quality regulation and compliance following. you know, it's pretty clear who is going to do the

1 clean power plant compliance filing, right? 2 So at the same time, as we go forward 3 trying to figure out how to tie this together, 4 particularly given our responsibilities and the 5 legislation on power disclosure is certainly at least an interesting question. 6 7 But I think certainly suggestions on how to us and basically to the extent you're flagging 8 9 issues where we need to make sure we're coordinating 10 carefully with the ARB, and at the same time you can 11 tell from this morning we're trying to make sure as 12 much as we can that the PUC doesn't go in a totally 1.3 different direction from where we're going, but it's 14 not going to be easy. 15 MS. BERLIN: Thank you. This question I guess is directed for staff. 16 17 In a couple places you talk about 18 decomposing the data. What's that going to entail? 19 MS. JONES: Just specify it. Just call it 20 Maybe that was the wrong word to use. It's 21 not a sophisticated decomposing, it's simply 2.2 delineating it on the table. I think the two 2.3 references are to the table and maybe one of them was on demand side resources. We wanted to have it 24 25 split out by energy efficiency, demand response, the

different categories there. That's as sophisticated 1 2 as we're getting. 3 MS. BERLIN: Okay. Thank you. 4 Another thing that I'm struggling with 5 overall is the interaction between the energy efficiency targets and this morning's workshop, if 6 7 you will. Where does that fall in? Where are we going to account for energy efficiency and how will 8 9 that be above the line, below the line? That's just 10 something that's going to remain a challenge. 11 CHAIR WEISENMILLER: I'll let my colleague. 12 Actually, he's gone through some pretty detailed work plans on exactly how the energy efficiency part 13 14 fits in, and again, the idea of saying the IRP is 15 integrating across pieces, but certainly go ahead. 16 MR. EARLY: Yes, Mr. Chair. 17 MS. BERLIN: I'm sorry. So part of that 18 question is then is it going to be specifically 19 removed or at least part of it from the GHG target 20 that's envisioned under the scoping plan? 21 kind of two parts. 2.2 MR. EARLY: Mr. Chair, Brian Early, I'm 23 Commissioner McAllister's adviser, who also could 24 not attend today, he's traveling. 25 So on the component of linking the energy

efficiency targets with the IRP process, I think our understanding is there's a separate sort of parallel process, and we really appreciate the cooperation and collaboration we've been having with you all on the process of establishing the SB 350 energy efficiency targets.

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So the Energy Assessment Division is engaged right now, as we discussed in a January 23 workshop, an analysis of the savings that we can expect to achieve from POU programs. So we're anticipating that a paper will be published prior to a June 19th workshop, and then that analysis will get folded into a September workshop.

So we're going to be syncing this up in a sense that whatever portion of the statewide doubling target that is assigned through that process to the POUs and the mechanism of the assigning the savings is going to be the work that you are all engaged with EAD in terms of analyzing your current potential goals study and figuring out what is a cost-effective and feasible target, which is going to be a part of that doubling target.

So whatever component of the doubling target is assigned to POUs, I would expect would be explicitly called out in your IRPs. So that's, in

1 my mind at least, the linkage between the two. 2 That's correct, yes. 3 CHAIR WEISENMILLER: Again, we've had like 4 three workshops on that topic so far, energy 5 efficiency doubling. And as he indicated, there are more like three left. 6 7 MR. EARLY: Yes. MS. BERLIN: So going back to this 8 9 morning's workshop then, the statewide doubling will 10 be removed from the range that's anticipated when we 11 look at the scoping plan target? 12 CHAIR WEISENMILLER: Well, I'm not sure if it's removed as much as built into the development 1.3 14 of the greenhouse gas compliance. I think it was 15 pretty clear from the ARB that that's part of what they've done in their assessment, and so we're 16 17 trying to basically fill that in here. 18 But again, certainly on some of your 19 questions we're certainly open or asking for 20 suggestions coming forward. 21 I should flag we do have our attorney here 2.2 now, Galen, so to the extent you have legal 2.3 questions I'm sure he'd be happy to respond to legal 24 questions. 25 MS. BERLIN: One final question, I think.

1 What's the turnaround time staff 2 anticipates for review and assessment and providing 3 a final determination of what you believe might be 4 lacking in these deficiencies? 5 MS. JONES: We haven't addressed it yet and we would like your suggestions on how to handle it. 6 7 MS. BERLIN: Thank you. MR. BERG: I've got another guestion. 8 Berg at Imperial Irrigation District. 9 10 For the issue raised and then the receiving 11 end of having to do a lot of compliance filings 12 about the collaboration between agencies and the amount of duplication of effort that we have in many 1.3 14 of our filings, is there any definite plan that's 15 going to come forward from the agencies to say here's how we're going to collaborate in sharing 16 17 data and reducing your duplicative reporting 18 obligations? 19 CHAIR WEISENMILLER: We have actually had 20 several meetings I think many of you have been at, 21 and we have asked for specific examples, and so far 2.2 we haven't gotten much. So anyway, that's certainly 2.3 a goal and if you have specifics happy to hear it, 24 but general is not going to get us very far. 25 Sure, come on up. Anyone else in the room

have questions? Please.

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MR. CHANGUS: Just more of a comment on the last point is we have had a number of conversations about report streamlining, and a lot of that prior to IRP even was about what was already on the books and where is duplication, and there are some of us as well that recognize there's also going to be a great deal more expected going forward, and so I think, must the same as pulling together a whole bunch of things.

I think what we've been doing at NCPA as well as SCPPA is kind of more detailed of what are the existing requirements as well as what's the process of transmitting some of that data in which there may be some efficiencies in that.

But I do think that there's room to explore, I mean, really appreciate the motivation behind going to the four-year and trying to kind of build on some of that work. I think we probably need to take a closer look at what it actually means and well address that in written comments, but did want to recognize that we do appreciate the conversation Kevin Barker has been part of leading those conversations on the report streamlining but I think there are now some steps that we might be able

1 to propose and take. 2 CHAIR WEISENMILLER: That would be good. 3 As you know, we've had the meetings. We are 4 certainly always looking for ways to be more 5 efficient. Sean Neill, counsel for IID. 6 MR. NEILL: 7 had a question on the paper on Page 25 on the standardized input assumptions, and specifically 8 9 looking at load forecasts for regions outside the 10 utility service territory. I was wondering if you 11 could explain a little bit more what is meant by 12 that, what the range is and what the inputs 1.3 contemplated are. I think what we intended was 14 MR. MARISCAL: 15 that you would use the Energy Commission's demand forecast for regions outside of your utility 16 17 territory so that way there's a consistent and a 18 standard input assumption to the modeling. That was 19 simply what was meant by that. 2.0 MR. NEILL: Okay. Thank you. 21 MS. BERLIN: Could you repeat that answer? 2.2 Sorry. 2.3 MR. MARISCAL: What was meant by the text 24 was that you would use the California Energy Demand 25 Forecast developed by the Energy Commission for

1 regions outside of your utility territory. That way 2 there's standardize input assumptions within your 3 modeling. 4 MS. BERLIN: Thank you. 5 MR. WILLIAMS: Matt Williams, California Air Resources Board. I had a few general comments. 6 7 So adopting guidelines as it could be 8 encouraged beyond just, as it says in Slide 8, 9 recognizing local planning goals, we need to ensure 10 that transportation electrification programs align 11 with other state goals and leverage existing state 12 and local projects and funding, especially an 1.3 example being IOUs in their proceeding with Energy Commission have stated that they intend to assist 14 15 with in-progress Air Resources Board funded projects such as the I-710 electrification, as Edison works 16 17 with the port to electrify there. 18 Also, adopting guidelines needs to 19 encourage the inclusion of different technologies, 20 especially medium and heavy duty. 21 In addition, we need to be seeking 2.2 opportunities for alignment with these IOU projects. 23 This is especially critical in urban areas like the 24 south coast where projects are likely to cross

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utility boundaries.

1 And finally, we think that review of the 2 IRPs should include Air Resources Board and PUC to 3 ensure that the IRPs are sound and copacetic with ARB's and PUC's programs. 4 5 Thank you. 6 CHAIR WEISENMILLER: Any more comments or 7 questions? Okay. Then any public comment? 8 I'll turn it back to Heather to remind people of the 9 various dates, and encourage parties and staff to 10 work on -- oh, we have a blue card. Hang on. 11 Mr. Berg from IID? 12 MR. BERG: I think that blue card might be a duplication before we realized we'd be coming up 13 14 here. 15 CHAIR WEISENMILLER: That was my guess but I wanted to double check. 16 17 MS. RAITT: So I think I heard that the comments were extended two weeks, so instead of 18 19 March 9th it would go out to March 23rd. Is that what I heard? 2.0 2.1 CHAIR WEISENMILLER: Yes. 2.2 MS. RAITT: Okay. And so then I notice, 23 because all the information for providing comments and we'll welcome them on March 23rd. And we'll put 2.4 25 out a notice just so everybody's informed who may

have missed this workshop today.

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MS. BERLIN: Susie Berlin. I'm sorry, I have one more question.

Justin mentioned earlier the CEC's recent ruling seeking additional comments on aspects of SB 350 implementation on disadvantaged communities and some of the other provisions enhancing the bulk power system and the like.

I'm wondering to what extent the CEC is reviewing, participating, taking into account different definitions and terminology that's being used at the CPUC.

been working closely with the PUC staff and also with the ARB. At some point I'm sure we'll get into the question of making sure that all parties in this proceeding have had adequate notice of anything in terms of the definitions or whatever, and at the same time presumably that gives you an opportunity to at least address the question of whether or not those definitions should be equally applicable to the POUs. But again, as I think Rajinder said this morning, certainly consistency is one of our goals across the agencies.

And coming back, I'd remind everyone as you

1	go through your comments, we had the discussion
2	today, we saw Rajinder's timeline. We're looking at
3	this timeline going forward and certainly
4	harmonizing between the two where certainly the ARB
5	process is going to be evolving. We're going to be
6	kicking things off and we need some way at some
7	point to true up between the two.
8	But again, obviously we're giving you a
9	series of questions that we're certainly looking for
10	input on. And to the extent that you think there
11	are unresolved questions you want to flag, put them
12	in the comments.
13	Any other public comments or questions?
14	Anyone on the
15	MS. RAITT: Nobody on Webex.
16	CHAIR WEISENMILLER: No one on Webex. So I
17	think we're adjourned.
18	(Adjourned at 3:17 p.m.)
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