

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



April 13, 2021

**SCE Supplemental Advice Letter 4260-E-A**

Gary A. Stern, Ph.D.  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street,  
Rosemead, CA 91770

Via Email to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

**SUBJECT: Southern California Edison Company's Resiliency Project Engagement Guide**

Dear Mr. Stern,

Energy Division has reviewed Southern California Edison Company (SCE) Supplemental Advice Letter (AL) 4260-E-A and hereby approves it with an effective date of April 12, 2021. Please note that only the Supplemental AL is being approved, not the initial AL filed.

**Background:**

SCE Supplemental AL 4260-E-A gives an overview of SCE's organizational structure that meets the requirements to have dedicated staff to assist local and tribal governments in the development of microgrid and resiliency solutions as required by Ordering Paragraph (OP) 10 of Decision (D.) 20-06-017. OP 10 requires SCE to explain how it assists local and tribal governments ahead of proposal development, how it prioritizes projects to ensure the needs of the public are met, how it assists local and tribal governments with permitting and interconnection, and what pre-project information it can provide to facilitate local and tribal government planning. Additionally, SCE explains its internal staffing and training requirements for the team that support local and tribal government resiliency projects, the organizational structure of that team, and its operating structure. The original Advice Letter (AL) (4260-E) was timely filed on July 17<sup>th</sup>, 2020. The Supplemental Advice Letter (4260-E-A) was filed on January 27<sup>th</sup>, 2021 at the behest of Energy Division staff to remedy issues with the initial AL and respond to Protest. The Supplemental AL replaces the initially filed AL in its entirety.

**Discussion:**

Energy Division received one Protest to the AL on August 6<sup>th</sup>, 2020. The protest was timely filed by the Green Power Institute (GPI). SCE responded to the Protest on August 13<sup>th</sup>, 2020. In its protest, GPI asserted that SCE's discussion of its current organizational structure demonstrates that SCE does not have a team of staff specifically dedicated to local and tribal government resiliency projects, in

violation of the Commission's Decision.<sup>1</sup> GPI explains that SCE's current organizational structure merely offers local and tribal governments access to the same business development staff available to all other parties, which does not achieve the benefits of having a dedicated team of staff to aid local and tribal governments in the complexities of microgrid development.<sup>2</sup> GPI proposed that SCE should, at the least, be required to provide some dedicated staff to this function so that they can be more attuned to the issues arising in this sector, and build expertise, as explained in the Decision.<sup>3</sup>

The Protest of GPI is rejected because the addition of separate dedicated staff to this function would be duplicative of already existing resources. D.20-06-017 OP 10 explicitly allows SCE to explain how current organizational structures comply with the requirements laid out therein. Energy Division agrees that SCE's currently assigned representatives are already well-positioned to fulfill the requirements of D.20-06-017 OP 10 because they have the relevant expertise, training, and responsibility to assist local and tribal governments in their project planning.<sup>4</sup> Additionally, SCE plans to assess best practices related to local and tribal government engagement as well as seek feedback from the local and tribal governments to ensure resiliency needs are being met.<sup>5</sup> Finally, SCE plans to use the semi-annual meetings required by OP 7 of D.20-06-017 to educate local and tribal governments about available resources that can assist with project planning and information.<sup>6</sup>

Energy Division received one Response to the AL on August 6<sup>th</sup>, 2020. The response was timely filed by the County of Los Angeles. SCE responded to the Response on August 13<sup>th</sup>, 2020. The County of Los Angeles Response requested that SCE consider providing supplemental training opportunities to local governments to make more informed decisions about where to focus resiliency planning efforts.<sup>7</sup> The County of Los Angeles also requested that SCE and CPUC consider making both technical assistance and financial assistance services or programs available to local and tribal governments identified to be within priority areas and in need of resiliency support to support early enablement of complex solutions.<sup>8</sup> Finally, the County of Los Angeles requests that SCE strengthen and expand its partnerships with local community-based organizations to serve underserved communities by tapping into recognized and trusted sources.<sup>9</sup>

SCE stated that because these requests were submitted in the form of a Response, they are out of scope for these ALs.<sup>10</sup> This is technically correct per General Order (GO) 96-B and SCE does not need to take any specific action relating to this Response in this AL filing. Energy Division notes, however, that this Decision aims to ensure that the utilities are responsive to local government concerns, like the ones raised by the County of Los Angeles, and are providing forums through which these concerns can be raised and addressed. Energy Division encourages the County of Los Angeles to attend and participate in the semi-annual workshops as required by

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<sup>1</sup> GPI Protest at 2

<sup>2</sup> GPI Protest at 3

<sup>3</sup> Id.

<sup>4</sup> SCE Response to GPI Protest at 2

<sup>5</sup> SCE Supplemental AL 4260-E-A at 4

<sup>6</sup> SCE Supplemental AL 4260-E-A at 3 and 4

<sup>7</sup> Response of the County of Los Angeles at 2

<sup>8</sup> Id.

<sup>9</sup> Response of the County of Los Angeles at 3

<sup>10</sup> SCE Response to County of Los Angeles Response at 2

OP 7 of D.20-06-017 to help with resiliency planning needs and to provide feedback and support to SCE in expanding partnerships with local community-based organizations to serve underserved communities. Energy Division would also like to draw attention to D.21-01-018,<sup>11</sup> issued as a further part of Rulemaking (R.) 19-09-009, which adopts a Microgrid Incentive Program specifically designed to provide financial and technical support to communities seeking to build resiliency solutions. D.21-01-018 requires the utilities (including SCE) to submit a plan to consult stakeholders on program design elements subject to approval by Energy Division. Energy Division encourages the County of Los Angeles to participate in these processes to address concerns raised in their Response.

Energy Division uncovered one untimely Protest to the Supplemental AL that was submitted on February 16<sup>th</sup>, 2021. The Protest was filed by the Local Government Sustainable Energy Coalition (LGSEC) with CPUC's Communications Division, though Energy Division had not reopened the Protest period on the Supplemental AL. SCE responded to the Protest on February 23<sup>rd</sup>, 2021. In its protest, LGSEC contends that SCE's current organizational structures do not meet the requirements laid out in OP 10 of D.20-06-017 based on local governments' actual experience, as shown by a survey of LGSEC members. LGSEC requested that SCE should collaborate with local governments to develop plans and strategies to achieve state and local resiliency and climate-related goals, as well as proactively meet with local governments and launching a committee or working group.<sup>12</sup> Energy Division notes (and SCE also points out in their Response to Protest)<sup>13</sup> that LGSEC provides no information about their survey questions, methods, or responses. Regardless of timeliness of filing, this Protest would have no material effect on the disposition of this AL because SCE already plans to assess best practices related to local and tribal government engagement, seek feedback from the local and tribal governments to ensure resiliency needs are being met, and use the semi-annual workshops as required by OP 7 of D.20-06-017 to help with resiliency planning needs and to provide a forum for stakeholders to give feedback and support.<sup>14</sup>

The Protest of LGSEC is untimely per GO 96-B and is hereby rejected on technical grounds. General Rule 7.4.1 of GO 96-B states that Protests must be filed with the reviewing industry division (in this case Energy Division); the Protest was instead filed with Communications Division. Additionally, Energy Division did not specifically reopen the protest period per General Rule 7.5.1 of GO 96-B, and thus is not obligated to consider this protest. For these reasons, this protest is rejected per General Rule 7.6.1 of GO 96-B. Nonetheless, Energy Division encourages LGSEC to participate in the same processes recommended to the County of Los Angeles above to address concerns that were enumerated in the text of their Protest. Energy Division also strongly encourages SCE to review LGSEC's comments in detail.

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<sup>11</sup> [D.21-01-018](#)

<sup>12</sup> LGSEC Protest at 1

<sup>13</sup> SCE Response to LGSEC Protest at 2

<sup>14</sup> SCE Supplemental AL 4260-E-A at 3 and 4

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**Conclusion:**

Energy Division hereby approves SCE Supplemental Advice Letter 4260-E-A with an effective date of April 12, 2021. GPI's Protest is rejected because the addition of separate dedicated staff to this function would be duplicative of already existing resources. LGSEC's Protest is rejected on technical grounds.

Sincerely,

 FOR

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/  
Director, Energy Division

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