

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: November 14, 2024

REGULAR X CONSENT EFFECTIVE DATE N/A

DATE: November 4, 2024

TO: Public Utility Commission

FROM: Nick Sayen

THROUGH: Caroline Moore, JP Batmale, and Sarah Hall **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 2005)
Consideration of Staff's proposed revisions to distribution system planning guidelines.

STAFF RECOMMENDATION:

Approve the proposed revisions to Distribution System Planning (DSP) Guidelines, Attachment 1, for use by investor-owned electric utilities, and sunset requirements for Smart Grid Reports.

DISCUSSION:

Issue

1. Whether the Commission should approve the proposed revisions to DSP Guidelines for use by investor-owned electric utilities.
2. Whether the Commission should sunset requirements for Smart Grid Reports under Order No. 12-158 (Sections B and C) and Order No. 17-290.

Applicable Rule or Law

ORS 756.040 describes the general powers of the Commission to supervise and regulate every public utility, and to do all things necessary and convenient in the exercise of that authority.

Under ORS 756.105(1), "Every public utility or telecommunications utility shall furnish to the Public Utility Commission all information required by the commission to carry into effect the provisions of ORS chapters 756, 757, 758 and 759."

Order No. 12-158 establishes smart grid reporting requirements for electric utilities.

Order No. 17-290 requires utilities to file a Smart Grid Report biennially.

In Order No. 19-104, the Commission opened Docket No. UM 2005 to "develop a transparent, robust, holistic regulatory planning process for electric utility distribution system operations and investments."

Order No. 20-485 established procedural and substantive DSP planning requirements, including Part One and Part Two DSP Plans as well as the process for Commission review of the Plans.

In Order No. 20-485, the Commission suspended the Smart Grid Report filing cycle for 2021 in anticipation that Order Nos. 12-158 and 17-290 may be revised or superseded by new requirements adopted in UM 2005.

In Order No. 23-069, the Commission continued a suspension of the Smart Grid Report filing requirement under Order No. 17-290.

Analysis

Background

Utility distribution system spending has increased significantly since 2020. Over the last ten years, annual distribution system spending by PGE, including capital additions, operation, and maintenance, increased at an average annual rate of approximately 12 percent, rising from \$244 million in 2014 to \$657 million in 2023. From 2021 to 2023 annual spending increased at an average annual rate of approximately 19 percent.¹ Annual spending of the same kind by Pacific Power increased at an average annual rate of approximately 8 percent, rising from \$266 million in 2014 to \$330 million in 2023. From 2021 to 2023, spending increased at an average annual rate of approximately 21 percent.²

¹ Based on data compiled by Staff over multiple reports, Docket No. RE 54, PGE Annual Report FERC Form 1, <https://apps.puc.state.or.us/edockets/Docket.asp?DocketID=17519>.

² Based on data compiled by Staff over multiple reports, Docket No. RE 68, PAC Annual Report FERC Form 1, <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=17653>.

As the energy landscape grows more complex and conversations about rate pressure and utility cost containment evolve, Staff seeks to focus plans on vetting core investment planning information to promote spending discipline and inform the cost recovery process. Additionally, Staff seeks to continue to improve insight and transparency into prioritization of investments across key planning activities before the Oregon Public Utility Commission (PUC).

In the next round of plans, Staff will focus on performing a thorough review of utilities' proposed grid investments and operational plans to allow participants to influence decisions prior to their implementation when possible, and lay the groundwork for cost recovery and any associated performance metrics. Staff's primary objective is understanding the major drivers, level of spend, prioritization strategy, and benefits of each Company's five-year, Near-term Action Plan. This will require the utilities to provide detailed and comprehensive information about planned operational budgets (including operational changes) and system investments, along with a clear rationale for prioritizing these expenses to maintain, improve, or avoid investments in the grid.

This memo provides background on the adoption of DSP Guidelines in 2020, and notes important developments that have occurred since. Staff next lays out the purpose and scope of the proposed revisions, and the process of their development. The memo discusses issues on which Staff and utilities or stakeholders differ including: pre-prudency review, a process for providing regular project updates, hosting capacity analysis (HCA), scope of the Long-term Plan, and non-wires solutions (NWS) pilot concept proposals. Staff discusses the proposed revisions, and concludes with a recommendation to rescind Smart Grid Reporting requirements.

As context, Oregon DSP Guidelines (Guidelines) were adopted by the PUC in December 2020.³ The Guidelines were developed through a robust stakeholder process with the goal of improving insight and transparency into what was previously a utility process, opaque to outside parties. In response, Portland General Electric (PGE), Pacific Power (PAC), and Idaho Power Company (Idaho Power or IPC), filed inaugural plans in two parts, in October 2021 and in August 2022. The inaugural DSPs were generally well-received by Stakeholders, and successful in many respects. For example, they began to establish insight into utility planning practices and forecasted outcomes, and represented progress in engaging communities, considering equity in DSP, and exploring NWS. The Commission accepted both filings from each utility.⁴

³ Order No. 20-485, Docket No. UM 2005, December 23, 2020, <https://apps.puc.state.or.us/orders/2020ords/20-485.pdf>.

⁴ Order No. 22-083, Docket Nos. UM 2196, UM 2197, and UM 2198, March 11, 2022, <https://apps.puc.state.or.us/orders/2022ords/22-083.pdf>, (addressed the three utility Part 1 filings

The Commission and Staff also noted several shortcomings of inaugural plans, resulting in missed or incomplete transparency and insight. First, plans included partial presentation of utility decision making on projects and prioritization, but overall documentation of the link between grid needs and proposed solutions was lacking. Inaugural plans proposed ill-defined investment and expenditure amounts which lacked granularity and specificity. The plans presented an incomplete discussion of grid needs and those grid needs' connection to forecasts of load growth and distributed energy resources (DERs) and electric vehicle (EV) adoption. Finally, after inaugural plans were filed and evaluated, distribution system investments which received only brief mention or were omitted from inaugural plans surfaced in other PUC proceedings.

Stress and demands on Oregon the grid have increased since 2020. The State suffered extreme heat waves in 2021 and 2024, ice storms in 2021 and 2024, and severe wildfires in 2020 and 2024. The number of registered, and charging, light duty EVs in Oregon increased from approximately 32,000 in July 2020 to just over 100,000 in July 2024.⁵ Oregon net metering customers increased from nearly 14,000 in 2020 to nearly 37,000 in 2023.⁶ Recent utility load forecasts indicate growing demand. PGE's average 20-year growth rate is forecast to be 1.9 percent.⁷ Pacific Power's average annual growth rate over the 20-year planning horizon is forecast to be 2.13 percent.⁸

In 2021, the Oregon Legislature passed House Bill (HB) 2021. The law established a clean energy framework for electric companies to decarbonize their retail electricity sales by 2040. The law requires utilities to file Clean Energy Plans (CEPs) along with Integrated Resource Plans (IRPs). Meeting clean energy targets will be challenging broadly. There are two requirements that are likely to intersect with distribution systems and may present new complexity. First, HB 2021 requires that by 2030 at least 10 percent of aggregate capacity be made up of electricity from small-scale renewable (SSR) energy projects. Second, the Commission has directed utilities to include targets

collectively), Order No. 23-117, Docket No. UM 2196, March 24, 2023, <https://apps.puc.state.or.us/orders/2023ords/23-117.pdf>, Order No. 23-069, Docket No. UM 2197, March 3, 2023, <https://apps.puc.state.or.us/orders/2023ords/23-069.pdf>, and Order 23-116, Docket No. UM 2198, March 24, 2023, <https://apps.puc.state.or.us/orders/2023ords/23-116.pdf>.

⁵ Oregon Department of Transportation vehicle registration data, emailed to Staff from Oregon Department of Transportation on October 9, 2024, ZEV_light-duty_monthly_quarterly_summary_202407.xlsx.

⁶ Based on data compiled by Staff over multiple reports, Docket No. RE 45, PGE Net Metering Report, <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=17457>, and Docket No. RE 39, Pacific Power Net Metering Report, <https://apps.puc.state.or.us/edockets/docket.asp?DocketID=17392>.

⁷ PGE CEP & IRP Roundtable 24-3, slide 25, July 11, 2024, https://assets.ctfassets.net/416ywc1laqmd/UCFpfZzIgecl6VQGosytA/350f50c7f9f8d8c4ff8552f9c235ca01/IRP_Roundtable_July_24-3presentation.pdf.

⁸ Docket No. LC 82, PacifiCorp 2023 Integrated Resource Plan Update, page 9, April 1, 2024, <https://edocs.puc.state.or.us/efdocs/HAD/lc82had327670023.pdf>.

for acquiring community based renewable energy projects (CBREs) as annual actions proposed in the CEP.

In response to the dynamics, past learnings, and challenges discussed above, Staff proposes revisions to the DSP Guidelines that lead utilities to provide the following in future plans:

- Present a comprehensive picture of grid needs, including those driven by other utility planning processes.
- Develop a prioritized action plan covering five years of future projects.
- Provide granular information for action plan projects estimated to cost more than \$2 million, such as expected categories and unit counts of equipment, estimated cost, reasons for prioritization, description of alternatives considered, description of if, and how the project is coordinated with other planning processes.
- Present a comprehensive picture of forecasted annual spending for the next five years, presented in categories consistent with past spending.
- Develop a robust look into the future, with a list of expected projects in the next six to ten years including, as available, more granular project information.

Process to Develop Guideline Revisions

Staff published initial, proposed Guideline revisions in April 2024.⁹ Staff requested public comment and received feedback from each utility, Oregon Citizens' Utility Board (CUB), and jointly from the Energy Advocates. The feedback included requests to extend the process for more stakeholder engagement. In response to this feedback, Staff lengthened the overall Guideline revision process and extended the public comment period through July 2024. Staff also held a workshop in July to review and discuss the proposed revisions, and to address key issues raised in the public comments. The utilities, commenting jointly, and the Energy Advocates provided comments in July.

Staff used this feedback to develop a second set of proposed Guideline revisions, published in September 2024.¹⁰ Staff included a Docket Update and Response to Stakeholder Feedback to provide context for these revisions.¹¹ Staff held a workshop in September to develop a common understanding of the second proposed revisions followed by another public comment period. In October Staff received feedback from the

⁹ Docket No. UM 2005, Staff Proposed Distribution System Planning (DSP) Guideline Revisions, April 29, 2024, <https://edocs.puc.state.or.us/efdocs/HAH/um2005hah328141024.pdf>.

¹⁰ Docket No. UM 2005, Proposed DSP Revisions - Redlines and Clean, September 17, 2024, <https://edocs.puc.state.or.us/efdocs/HAH/um2005hah331431025.pdf>.

¹¹ Docket No. UM 2005, Update and Response to Stakeholder Feedback, September 17, 2024, <https://edocs.puc.state.or.us/efdocs/HAH/um2005hah331430025.pdf>.

utilities jointly and OSSIA. Staff is grateful to the utilities and stakeholders for providing over 200 specific comments throughout this process, and believes the proposed Guidelines are improved because of this input. Staff discusses select public comment and Staff response in this memo, and includes a summary of written comment as Attachment 2.

Proposed Structural Changes to Guidelines

Staff summarizes below the proposed structural changes to the Guidelines, and maps current and proposed Guideline numbers in Table 1. The most important areas of development in Staff’s view are the Grid Needs, Near-term Action Plan, and the Long-term Plan requirements.

As a note, the current Guidelines include requirements for one-time activities, or activities that are now duplicative or out of date. Staff proposes revising or deleting these requirements throughout the Guidelines. The public comment process also identified several requirements better located elsewhere in the Guidelines. Staff adopts these suggestions and proposes relocating several sections throughout the Guidelines. The current Guideline organization reflects the bifurcated filing of inaugural plans. Staff proposes reorganizing and renumbering the Guidelines since future plans will be prepared and submitted as one filing. For brevity, Staff does not discuss these changes in this memo.

Table 1. Summary of Structural Changes

Current Guideline Section	Proposed Change	Proposed Guideline Section
1. Process and Timing	Substantive revisions	No change
2. Commission Action	Minor revisions	No change
3. Scope	Removed	N/A
4.1 Baseline Data and System Assessment	Substantive revisions	4. Current System Data and Assessment
4.2 Hosting Capacity Analysis	Removed	N/A
4.3 Community Engagement Plan	Substantive revisions	3. Community Engagement
4.4 Long-term Distribution System Plan	Substantive revisions	9. Long-term Plan
4.5 Plan for Part 2 Development	Removed	N/A
5.1 Forecasting of Load Growth, DER Adoption, and EV Adoption	Substantive revisions	Now Section 5
5.2 Grid Needs Identification	Substantive revisions	6. Grid Needs
5.3 Solution Identification	Substantive revisions	Now Section 7
5.4 Near-term Action Plan	Substantive revisions	8. Near-term Action Plan

Current Guideline Section	Proposed Change	Proposed Guideline Section
6. Overview of the Distribution System Planning Process	Removed	N/A

Proposed Revisions with Issues Outstanding

Most issues have been resolved through the comment and revision process to date. Staff thanks parties for efforts to find consensus. However, there are five issues on which Staff and utilities or stakeholders differ, discussed below.

1. Connection of Planning and Cost Recovery

Staff proposed language to better highlight information in DSPs that will be useful in rate case analysis. This transparency was a fundamental driver of the PUC's decision to engage in DSP originally. Each utility commented that the proposed link between DSPs and future general rate cases amounts to pre-prudency review and argued that it was problematic. Energy Advocates expressed support for Staff's revisions that sought to better inform future rate cases. Staff fundamentally disagrees that requiring utilities to highlight the information, and report the level of granularity that will better support ratemaking analysis, amounts to pre-prudency review. Staff notes that DSPs are currently filed for Commission acceptance, so the emphasis remains on transparency and issue spotting, not approval. Further, the Commission does not consider, or act on, specific investments in the DSP. This level of review and Commission action are insufficient to constitute prudence determination.¹² Staff also notes that prudence cannot be determined before a capital investment occurs, in other words, when a DSP is prepared and filed.

Staff is not proposing to change the standard of review in cost recovery dockets or to use DSP information differently than the way parties have used IRP information in rate cases for decades. Staff is looking to make DSP a better venue for utilities to clearly articulate how they think through their spending decisions, and for Staff and parties to discuss the major risks, benefits, and potential alternatives of proposed spending strategies. Having this information better articulated in a DSP will improve the efficiency, quality, and predictability of the record for this significant and growing category of costs in rate cases. It will not replace consideration of whether a utility's spending decision was prudent based on the best information available at the time the decision was made. Nor will it alter the standards for setting rates to recover reasonable O&M costs based on the suite of relevant evidence at the time of the rate case. Staff has revised guideline language to reflect Staff's perspective as clearly as possible. Staff believes that the utilities now understand Staff's perspective and intent.

¹² Further, the Guidelines themselves state that Commission acceptance does not constitute a determination on the prudence of any individual actions discussed in the Plan.

2. Process for Providing Regular Project Updates

The utilities expressed concern about filing a DSP with estimated and forecast project information, and then, after a gap possibly years long, being held accountable to those estimates and forecasts in the cost recovery process. Staff believes that PUC cost recovery processes sufficiently recognize and address the reality that projects can and do change for understandable reasons. Nevertheless, Staff suggested implementing a utility proposal for regular meetings to provide incremental project updates. The intent was to decrease the potential gap between project information in the DSP and the rate case. Staff did not formally include such meetings in Guideline revisions because the practice was discussed as informal and fluid, and so not apt for inclusion.

Utilities' October comments proposed language to include such meetings along with reports (referred to as summary-level progress reports) in the Guidelines. The utilities' proposal was ambiguous about whether such reports would be docketed. The utilities noted that because of these reports, previous project information in the DSP may be stale and out of date. And so, when considering an investment in a general rate case, the utilities asserted that the reference point should be the more recent summary-level progress reports, not the DSP. Accordingly, the utilities proposed language across several Guidelines to reflect this changed reference point. The proposed language would also increase the scope of summary-level progress reports, including the explanation of updated grid needs, investment selection in solution identification, and any Near-term Action Plan misalignment.

Staff appreciates that projects may evolve substantively during the gap from DSP filing to a general rate case, and is amenable to adding additional interim touchpoints to keep abreast of project evolution. Further, Staff understands that, as a result of interim touchpoints, project information in the DSP may become out of date. However, to adequately serve as an alternative reference point for project information, Staff believes an interim touchpoint must be formalized and docketed. Thus, instead of the utilities' suggested summary-level progress reports, Staff proposes an addition to Guideline 1 calling for each utility to file with the Commission an Interim Update. The Interim Update is to provide summary-level progress updates on projects included in the last-filed DSP, and is to be filed one year after filing a full DSP. Staff proposes to work with utilities to further develop the substance of the Interim Update, and believes it should be tightly focused on incremental project updates. Staff intends for the Interim Update to clearly communicate substantive developments such as new project initiation, project advancement, completion, or delay, that may occur between DSP filings and the cost recovery process.

Staff believes the Interim Update should avoid the additional scope proposed by the utilities noted previously. Including such substantive matter opens the door to added

Staff review and Commission action, which in Staff's view represents a major step beyond incremental project updates. Instead, the Interim Update should be informational only and not require Commission action. As such, Staff does not adopt the utilities' language regarding explanation of updated grid needs or explanation of investment selection in solution identification. Staff believes the Interim Update, as proposed, is a reasonable compromise that 1) addresses utilities' concerns about the gap between DSP filings and general rate cases, 2) provides a mechanism to document and socialize unforeseen distribution investments that may occur between filings, and 3) ensures that the information therein is adequately recorded and socialized for later Commission proceedings.

3. Removing Hosting Capacity Analysis Investment Details

Current Guideline 4.2 specifies requirements intended to initiate early stages of HCA in Oregon. These include developing rudimentary maps of where it is difficult to interconnect DERs without system upgrades, and analyzing three options for implementing increasingly rigorous HCA. Staff proposes removing the Guideline as these requirements have been completed, or were one-time in nature.

Staff proposes direction to better maintain current utility maps of the distribution systems.¹³ This is because current maps include information with a variety of vintages.¹⁴ Staff is aware of only very limited public-facing schedules to update the maps. However plans to update and maintain these maps will become more vital in the coming months as utilities make progress updating legacy data on net metering projects, resulting in a more accurate understanding of distribution feeders' capacity.¹⁵ This is especially so with the Commission's direction from Docket No. AR 659 in Order No. 24-068 to prioritize congested feeders, and use and share updated information as it

¹³ Current distributed generation maps are publicly available for each utility. PGE: <https://www.arcgis.com/apps/webappviewer/index.html?id=959db1ae628845d09b348fbf340eff03>, Pacific Power: <https://experience.arcgis.com/experience/9de589f4f0604262a0867692e58a13a2>, Idaho Power: <https://www.idahopower.com/energy-environment/energy/planning-and-electrical-projects/oregon-distribution-system-plan/generation-limited-circuits/>.

¹⁴ For example, the Pacific Power map includes the 2024 Fire High Consequence Areas, 2023 Distribution Generation Capacity data, and 2022 Reliability data. The PGE map User Guide notes that data in the map is updated twice a year, though much of the data in the map appears to be from February 2024, and so approximately seven months old. Staff accessed Pacific Power's map via the link cited above on September 9, 2024. Staff accessed both PGE's map via the link cited above, and PGE's Map User Guide, https://assets.ctfassets.net/416ywc1laqmd/5as1qOV0gY7u9TzCTcOj4V/6579a1b5df755e23de64aeefe1625b32/DG_Evaluation_Map_User_Guide_09.16.2021.pdf, on September 9, 2024.

¹⁵ Order No. 24-068, Docket No. AR 659, page 3, March 8, 2024, <https://apps.puc.state.or.us/orders/2024ords/24-068.pdf>. PGE and Idaho Power by March 2025, and Pacific Power by September 2025.

becomes available.¹⁶ Staff expects that utilities, in implementing Order No. 24-068, develop and share by March 2025 public facing schedules to update and maintain the maps. Staff further expects that utilities will update their maps' system data approximately every six months beginning in 2025,¹⁷ and other data annually.¹⁸

In light of ongoing work in Docket No. UM 2111, Staff does not propose a hosting capacity threshold as a grid need at this time. Energy Advocates in July comments, and then OSSIA in October comments, both strongly encouraged staff to reconsider proposing an HCA threshold as a grid need. These parties opined that HCA is essential to facilitating transparent and inclusive engagement of stakeholders, technical experts, and solutions developers through fair and efficient access to existing system constraints and operating conditions. Staff invites utilities to continue to use information about DER constraints in their prioritization of investments. However, Staff proposes to maintain current grid needs assessments until DSP becomes more mature, and proposes for Docket No. UM 2111 to address the currently scoped priority issues so that there is room for the Commission to consider the cost allocation implications of a more proactive planning mandate.

4. Scope of Long-term Plan

Current Guideline 4.4 addresses the Long-term Plan: the utility's vision for the distribution system over the next ten years, and the actions the utility expects to take to advance the vision. Staff proposes revisions to improve insight, transparency, and understanding of possible future investments and expenditures that ratepayers may be asked to fund. These revisions maintain a ten-year vision, but add a prioritized list of investments/expenditures the utility expects to make in years six through ten, and summaries of each investment/expenditure that require more granular information than in inaugural DSPs.

Utilities commented that the proposed revisions call for more detail and granularity than is typically included in a long-term planning discussion, and which may not be known for projects ten years in the future. Staff acknowledges the challenge to providing granular project data in planning this far ahead, and proposed a number of changes to better reflect the nature of information that is realistically available, while maintaining the goal of establishing greater insight, transparency, and understanding into utility planning.

¹⁶ Order No. 24-068, Docket No. AR 659, page 3, March 8, 2024, <https://apps.puc.state.or.us/orders/2024ords/24-068.pdf>.

¹⁷ For example, PGE: DG Ready status, Net Daytime Minimum Load, DG Capacity in Queue, Limited Generation Feeder status. PAC: Distribution System Planning Studies, Distribution Generation Readiness status, Distribution Generation Capacity. IPC: Generation Limited Circuits.

¹⁸ For example, PGE: Public Safety Power Shutoff Areas, LEAD and other demographic data. PAC: Community Grant Distribution through Energy Trust of Oregon, Reliability, Fire High Consequence Areas, Low-Income Energy Affordability Data.

Utilities' October comments proposed eliminating the prioritized list of expected investments/expenditures, estimated project cost/expenditure amounts, and description of prioritization rationale. Staff appreciates the utilities identifying the requirements which may be most challenging to meet. However, Staff believes that deciding which projects to pursue, determining the best order, and estimating the costs, represent core elements of the planning process. This is true even if the bands of uncertainty around information for projects six to ten years out stretch the comfort level utilities have been accustomed to in the past. As such, Staff does not adopt the utilities' proposed changes to the Long-term Plan. To the extent that such information is only partly known or unavailable utilities should identify that and briefly explain why.

5. NWS Pilot Concept Proposals in Solution Identification

Current Guideline 5.3 addresses how utilities propose solutions—the equipment, technology, or program(s) it will advance—to meet identified grid needs. To begin to prepare for future stages of DSP, Staff proposed that utilities assess each identified grid need for NWS opportunity, or in other words, to operationalize screening for NWS. The utilities commented that the tools and processes to implement an NWS that relies on customer-sited resources are not yet ready for deployment, and as such, screening for NWS opportunities is not an effective use of resources. Energy Advocates proposed revisions strengthening NWS identification and assessment, including piloting of emerging DER opportunities (equipment, technologies, and programs).

In response Staff recommended removing the proposed NWS screen, instead maintaining the status quo. The current Guidelines call for utilities to develop NWS pilot concept proposals (concept proposals), as was done in inaugural DSPs. Staff believes this to be a reasonable compromise between the limits of current utility systems and technology, and focusing on the future and maintaining forward momentum on NWS.

In October comments, utilities proposed language adding some flexibility that if a utility has no grid needs that could reasonably be considered candidates for concept proposals it should instead describe what investments would be necessary to enable NWS in its service area. OSSIA commented in October that it supported the NWS screen, and found the recommendation to instead maintain the status quo to be a modicum of progress. OSSIA recommended the concept proposals be applied at the substation level wherever grid needs have been established.

Staff adopts utilities' language regarding what to do should there be no candidates for concept proposals. However, Staff stresses this does not change, what is in Staff's view, the mandatory requirement to develop concept proposals. Staff appreciates OSSIA highlighting grid needs centered around substations, but believes the

recommendation may inadvertently eliminate opportunities to identify otherwise viable candidates, and so declines to adopt the recommendation.

Proposed Guideline Revisions with Stakeholder Consensus

Staff below summarizes proposed Guideline revisions, organized according to the current Guideline structure.

1. Guideline 1. Process and Timing

Guideline 1 addresses the development and review process for utility filings. The current Guidelines call for DSPs to be filed on a floating, approximately 24-month cadence.¹⁹ Staff recognizes that these revisions are being proposed mid-cycle, and to provide flexibility to accommodate changes, invited utilities to suggest preferred next filing dates, no later than March 31, 2026. Utilities proposed, and Staff adopts, the following dates for filing the next DSPs: Portland General Electric on April 1, 2025, Idaho Power on March 6, 2026, and Pacific Power on March 31, 2026.

Staff also proposes that the specific filing date and cadence of Plans after 2026 be set in the next Guideline revision process or by future Commission order.²⁰ Stakeholders expressed concern about maintaining adequate synchronization of DSP and other planning processes. Staff agrees with this concern, but believes maintaining flexibility is most likely to lead to coordination of planning processes. OSSIA suggested documenting an expected filing cadence of approximately two years would aide in setting parties' expectations. Staff appreciates this sentiment, but believes in maintaining flexibility and wishes to keep future filing cadence undetermined at this time.

2. Guideline 2. Commission Action

Guideline 2 addresses the Commission's action on utility filings, which is to "accept" the filed Plan as meeting the objectives, criteria and requirements of the Guidelines. Staff proposes only minor revisions to clean up language, and continues to believe it is premature to consider DSPs for acknowledgement. No parties commented on this.

3. Guideline 3. Scope

Guideline 3 addresses content of the bifurcated filing of inaugural plans. Staff proposes removal of this Guideline as future plans will be prepared and submitted as one filing. No parties commented on this.

4. Guideline 4.1 Baseline Data and System Assessment

¹⁹ Absent the proposed revisions to the Guidelines, PGE's next DSP is due February 28, 2025. Pacific Power's and Idaho Power's next DSPs are due March 21, 2025.

²⁰ Anticipated to be late 2026 or early 2027.

Guideline 4.1 specifies content utilities provide on the current physical status of distribution systems, recent investments, and the level of DERs currently integrated into those systems. Staff proposes revisions to focus content on the most important and useful information, and believes that with these changes, utilities will provide the most relevant data about the state of the grid. Staff also proposes that data assembled for this section be made available in electronic format without protective order.

Utilities commented that historical distribution system spending categories are outside the Companies' existing accounting structures, so are extraordinarily burdensome. Instead, utilities should be allowed to report past expenditures in categories that reflect their individual project and financial management practices. Staff responds by adopting this request, but maintains that having a clear picture of historical spending, and being able to compare current and future spending to that of the past, is an important part of improving insight. As such, Staff expects that utilities:

- Propose stable categories, expected to be used for the foreseeable future.
- Share proposed categories with Staff ahead of filing for the purpose of Staff review and feedback.
- Restate the historical spending provided in inaugural plans using newly proposed categories, allowing comparison across time.

Staff reserves the right to request additional granularity if proposed categories are not adequate.

5. Guideline 4.3 Community Engagement Plan

Guideline 4.3 addresses how a utility should involve the public in the preparation and implementation of a DSP. Staff proposes that engagement be integrated with ongoing community and stakeholder processes, and leverage best practices and lessons learned from prior DSPs and other planning processes. Staff believes that these changes will ease the burden on parties tracking numerous, complex, and inter-related utility processes. Staff does not propose changes to the minimum number of required workshops, or the requirement for engagement to occur while Plans are in-process.

Energy Advocates expressed concern that the pursuit of integrated engagement could come at the expense of accessible engagement forums, and proposed language to maintain accessibility. Staff adopts this language. OSSIA suggested revisions prescribing specific engagement activity. However, Staff believes that prescription may conflict with integration with ongoing processes, and does not adopt these revisions.

6. Guideline 4.5 Plan for Part 2 Development

Guideline 4.5 addresses the bifurcated filing of inaugural plans. Staff proposes removal of this Guideline as future DSPs will be one filing. No parties commented on this.

7. Guideline 5.1 Forecasting of Load Growth, DER Adoption, and EV Adoption

Guideline 5.1 specifies aspects of how a utility forecasts load growth, and DER and EV adoption across the grid. Staff first proposed that forecasting granularity increase from the substation-level to the feeder-level. Staff also proposed that forecasts include data, inputs, and assumptions from the most recent IRP/CEP, with the goal of ensuring utilities coordinate these processes internally.

Energy Advocates offered support for continued progress on refinement and granularity. Utilities commented that feeder-level was too granular for DER/EV forecasts, and that granularity ought to be allowed to vary by utility. Staff now proposes maintaining status quo granularity (the substation-level), but notes that increasing granularity will be contemplated in future stages of DSP. Utilities also noted that forecasts should use the most current and accurate data, inputs, and assumptions available at the time, rather than possibly point backwards to the most recent IRP/CEP. Staff adopts this suggestion, but includes requirements that the sources and vintage of such information be clearly identified in DSP filings, and that the source and vintage of data used in the DSP are consistent with other concurrent Company planning practices.

8. Guideline 5.2 Grid Needs Identification

Guideline 5.2 addresses aspects of a utility comparing the current capabilities of a distribution system and the demands on that system to infer its future needs, and presenting the outcomes of the process. Staff proposed utilities identify and discuss anticipated grid needs of a greater variety of types than in inaugural plans, and present a summary table of each identified grid need by asset class. As a result, Staff believes utilities will develop a broader and more holistic picture of possible future utility actions.

Utilities commented that grid needs are not identified by asset class in normal operations. Staff now orients the summary table around grid need instead of asset class. Utilities also proposed striking language referring to operational budgets, however Staff maintains this language with an understanding that operational budgets can represent a large portion of utility spending.

9. Guideline 5.4 Near-term Action Plan

Guideline 5.4 addresses the utility's proposed solutions to address grid needs over the next several years. Staff proposes a five-year plan of the utility's proposed solutions, with more granular information than in inaugural plans. Key components are a prioritized list of investments/expenditures, summaries of each investment/expenditure estimated to cost more than \$2 million, and projected spending to implement the plan. Staff believes this increased scope and detail will allow the utilities to better

demonstrate the major drivers behind, the prioritization strategy, the level of spend, and the benefits of future Near-term Action Plans.

Utilities commented that additional, detailed information is not appropriate or may be problematic as plans can and do change after filing, it may not be available at the time of filing, and could be overwhelming for parties to review. Staff maintains a \$2 million threshold for investment/expenditure summaries, but provides additional clarity that each summary should be roughly one page in length. To the extent that information is only partly known or available utilities should identify that and explain why. Staff also suggested implementing a utility proposal for regular meetings to provide incremental project updates, discussed previously above.

Utilities noted that future spending information is not structured around asset class (as per the proposed revisions). Staff now orients projected spending around projects instead of asset class, while maintaining a requirement to provide asset information when applicable. Utilities also proposed removing detail about alternative solutions. Staff instead maintains this language, but adds “where available” to address utility concerns that every alternative does not require the same level of analysis.

Staff believes that project summaries with estimated costs, and descriptions of benefits, alternatives considered, and prioritization rationale position parties to better understand impacts on affordability. This information also supports Staff’s goals to ensure that utility investments in the distribution system provide the best value commensurate with what utilities are asking ratepayers to fund.

10. Guideline 6. Overview of the Distribution System Planning Process

Guideline 6 presents a visualization of conceptual relationships of DSP elements to provide context for what was then a new process. Staff proposes removal of this Guideline as DSP context is adequately established. No parties commented on this.

Smart Grid Reporting Requirements

With the adoption of DSP Guidelines in 2020 the Commission suspended the Smart Grid Report filing cycle; this was repeated in 2023.²¹ Staff now recommends permanently ending Smart Grid Reporting. Staff bases this recommendation on three things. First, parties have a deeper and broader understanding of distribution system planning at this time than in 2020. Second, utilities successfully completed the first

²¹ Order No. 20-485, Docket No. UM 2005, December 23, 2020, <https://apps.puc.state.or.us/orders/2020ords/20-485.pdf>, and Order No. 23-069, Docket No. UM 2197, March 3, 2023, <https://apps.puc.state.or.us/orders/2023ords/23-069.pdf>.

round of DSP filings.²² Third, Staff believes the proposed revisions will position utilities for further improvement in this planning process. In sum, the proposed revisions to DSP Guidelines include reporting on the same content as the Smart Grid Reports, and with the substance incorporated into DSP filings, separate reporting is not required.

Conclusion

Staff finds that revisions to current DSP Guidelines are needed for a variety of compelling reasons. The proposed revisions will focus the next DSPs in response to these reasons, as well as shortcomings from inaugural plans. As a result, Staff believes utilities will 1) present a more comprehensive picture of grid needs, 2) develop an action plan that more clearly communicates the proposed solutions to those grid needs, 3) more thoroughly forecast annual spending, and 4) project a more robust preview into future actions.

PROPOSED COMMISSION MOTION:

Approve the proposed revisions to DSP Guidelines, Attachment 1, for use by investor-owned electric utilities, and sunset requirements for Smart Grid Reports.

RA1 UM 2005.docx

²² Order No. 20-485, Docket No. UM 2005, Vision for Distribution Planning Evolution, page 10 of Appendix A, December 23, 2020, <https://apps.puc.state.or.us/orders/2020ords/20-485.pdf>.

Distribution System Planning Guidelines

Table of Contents

1. Process and Timing	2
2. Commission Action	2
3. Community Engagement	3
4. Current System Data and Assessment	4
5. Forecasting of Load Growth, DER Adoption, and EV Adoption	7
6. Grid Needs	8
7. Solution Identification	9
8. Near-term Action Plan	10
9. Long-term Plan	12

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

1. Process and Timing

The following development and review process will guide the utility filing of a Distribution System Plan (Plan) for a utility's service territory in Oregon.

a) Each electric utility¹ must file its next Plan on or before the following dates, or an alternative date designated by Commission order.

Portland General Electric: April 1, 2025

Idaho Power: March 6, 2026

Pacific Power: March 31, 2026

b) The date and cadence of filing subsequent Plans will be set in the next Guideline revision process, or by Commission order.

c) Each utility will present the results of the filing to the Commission at a public meeting.

d) Upon filing, the Commission will set a procedural schedule under which interested parties will have the opportunity to provide comment and make recommendations on the filing.

e) The Commission will generally consider comments and recommendations on a utility's filing at a public meeting three to five months after it is filed. The Commission will consider whether to accept the filing as meeting the objectives of these Guidelines. The Commission may provide guidance on the development and content of future Plans.

f) The Commission may provide the utility an opportunity to revise the filing before making its decision.

g) Each utility will file an Interim Update to provide formal, summary-level progress reporting on projects included in the last-filed DSP.

i) The Interim Update should be filed one year after filing a full DSP.

ii) The intent of the Interim Update is to clearly communicate substantive developments such as new project initiation, project advancement, completion, or delay, that may occur between DSP filings and may appear in the cost recovery process.

iii) The Interim Update will be informational and not require Commission action.

The design and implementation of this proposed process will serve the long-term regulatory efficiency goals through aligned, streamlined processes, inclusion, and transparency.

2. Commission Action

The Commission will consider whether to accept the filed Plan as meeting the objectives of these Guidelines. As used in this Guideline, "acceptance" means the Commission finds the Plan meets the criteria and requirements of these Guidelines. Acceptance does not constitute a determination on the prudence of any individual actions discussed in the Plan. A decision to not accept a Plan means that the Plan does not meet the criteria or requirements of the Guidelines.

¹ "Electric utility" or "utility" for purposes of these guidelines means an electric company that is engaged in the business of distributing electricity to retail electricity consumers in this state and that owns and operates a distribution system connecting the transmission grid to the retail electricity consumer.

3. Community Engagement

A utility should involve the public in the preparation and implementation of each utility Distribution System Plan. Involvement includes opportunities to contribute information and ideas, as well as to receive information, similar to the public input process in an IRP. Interested parties must have an opportunity to make relevant inquiries of the utility formulating the Plan. These updated guidelines for community engagement are intended to foster a process that has continued to develop since DSP Guidelines were adopted in 2020, and that supports a human-centered approach to DSP.

Community-based organizations (CBOs) may play an integral role in DSP-related community engagement. CBOs can offer insight to inform the utility's bottom-up forecasting of technology deployment, especially in vulnerable communities. CBOs can provide input to the utility on the methodology to identify and prioritize distribution system investments and project development. CBOs can also identify or support implementation of customer-sited non-wires solutions.

Local governments and Tribal nations may also play an important role in DSP-related community engagement, and can provide input to the utility on policies intersecting with distribution system planning.

Specific requirements for utilities include:

a) During Plan development a utility should host at least four stakeholder workshops prior to filing the utility's Plan.² These workshops should be held during Plan development, at a stage in which stakeholder engagement can influence the filed Plan. The workshops may include in-person meetings located in a community, and may include presentation of the Plan outline, data and assumptions under consideration or challenges encountered, and the utility's approach to community engagement. During stakeholder workshops, a utility must invite community members to share their perspectives, relevant needs, challenges, and opportunities or novel solutions for the grid.

b) To engage stakeholders and community on distribution system planning, a utility should leverage best practices, and lessons learned from engagement efforts from prior Plans, and other planning processes. A utility should also leverage ongoing community and stakeholder engagement processes, while maintaining accessible engagement forums, and integrate distribution system planning engagement to the full extent it is beneficial to do so. Ongoing processes may include but are not limited to Clean Energy Planning, and regional or local-area planning exercises.

² An electric utility that makes sales of electricity to retail electricity consumers in an amount that equals less than three percent of all electricity sold to retail electricity consumers may host at least two stakeholder workshops.

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

c) During preparation and implementation of a DSP, a utility should document community and stakeholder comments and feedback and utility response, including comments and feedback that were heard but not implemented. This documentation should be included in the utility's Plan when filed.

d) A utility should maintain a Community Engagement Plan, as developed in the Company's prior DSP. The Community Engagement Plan should describe actions the utility will implement in order to engage community members and CBOs if it needs to develop and implement non-wire solutions to address grid needs, or if it needs to engage communities around implementing larger projects that may have a reasonable expectation of impacting surrounding communities. Larger projects may exclude, for example, regular maintenance projects, or inspection projects. The Community Engagement Plan should include the activities described below.

i) Proactively engage stakeholders regarding possible non-wire solutions or larger projects in impacted communities. Engagement of the local community may include in-person meetings located in the community; presentation of the project scope, timeline, rationale; discussion of proposed utility projects and the value and risks associated with options; and solicitation of public comment, particularly to understand community needs and opportunities.

ii) Collaboratively develop and share information, for example datasets and metrics to guide community-centered planning of the possible non-wire solutions or larger projects.

iii) Consider engagement of local governments and Tribal nations for input on possible non-wire solutions, larger projects, as well as on other policies intersecting distribution system planning. Examples of such policies may include micro-grids and other resiliency planning, or local environmental and climate plans such as fleet-electrification and building-electrification efforts.

e) Utilities should aim to create a collaborative and accessible environment among all interested CBO partners, local governments, Tribal nations, and stakeholders.

4. Current System Data and Assessment

To foster transparency and enable effective decision-making, Distribution System Plans should provide a fundamental understanding of the current physical status of the utility distribution systems and equipment, progress of investment in those systems, the level of distributed energy resources (DERs) currently integrated into those systems,³ and management and monitoring practices of those systems.

³ For the purposes of these guidelines "distributed energy resource" includes distributed generation resources, distributed energy storage, demand response, energy efficiency, and electric vehicles that are connected to the electric distribution power grid.

U.S. Department of Energy, Modern Distribution Grid Volume I: Customer and State Policy Driven Functionality, page 7, https://gridarchitecture.pnnl.gov/media/Modern-Distribution-Grid_Volume-I_v1_1.pdf.

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

As some asset information is relatively static a utility may refer to or include asset information from a prior DSP, provided the utility clearly identifies any such information as unchanged from the last DSP. The utility should provide, at minimum:

- a) A summary description and table of the utility's distribution system assets including:
 - i) Asset classes
 - ii) Number of assets in each class
 - iii) Average age of assets in each class
 - iv) Age range of assets in each class
 - v) Life expectancy of assets in each class
 - vi) Percentage of assets in each class at or beyond the end of expected life
- b) A discussion of distribution system monitoring and control capabilities including:
 - i) Number of feeders
 - ii) Number of substations
 - iii) Monitoring and control technologies (such as SCADA, AMI, etc.) currently installed, and the percentage of substations, feeders, and other applicable equipment with each technology.
 - iv) A description of the monitoring and control capabilities (for example, percentage of system with each technology, resulting capacity, such as remote fault detection or power quality monitoring, and what time interval measurements are available)
- c) A discussion of any advanced control and communication systems (for example: distribution management systems, distributed energy resources management systems, demand response management systems, outage management systems, field area networks, etc.). The discussion should include:
 - i) A description of system visibility and capabilities
 - ii) The percentage of system reached with each capability, the percentage of customers reached with each capability
 - iii) Any utility programs utilizing each capability
- d) Historical distribution system spending for the past five years, in categories that reflect Company project management and financial management practices, and have been shared with Staff prior to filing.
- e) Net Metering and Small Generator information:⁴
 - i) Total existing net metering facilities and small generator facilities interconnected to the distribution grid (or to the transmission system, as appropriate for small generator facilities) at time of filing, by feeder.
 - (1) The total number of net metering facilities by resource type.

⁴ A utility that is exempt from the Annual Net Metering Report requirement pursuant to OAR 860-039-0070 is not required to report net metering data required in section f).

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

- (2) The total estimated rated generating capacity of net metering facilities by resource type.
 - (3) The total number of small generator facilities by resource type.
 - (4) The total nameplate capacity of small generator facilities by resource type.
- ii) The total number and nameplate capacity of queued net metering facilities and small generator facilities at time of filing, by feeder, broken down by resource type.
- f) Plans should include the utility's most recently filed Annual Reliability Report as an appendix to the Plan. Any descriptions of reliability challenges and opportunities in the Distribution System Plan should cross-reference underlying data and information contained in the Annual Reliability Report, or other properly cited, publicly available data source.
- g) Plans should include high-level summary data on electric vehicles (EV) and EV charging, or link to such data if it is provided through other utility planning practices or publicly available sources. If not provided through other utility planning practices or publicly available sources, the data should include:
 - i) Total number of EVs of various sizes served by the utility's system at time of filing
 - ii) Number of EVs added to the utility's system in each of the last five years
 - iii) Total number of charging stations on the utility's system, broken down by type, ownership, and feeder
 - iv) Total number of charging stations added to the utility's system in each of the last five years, broken down by type
 - v) Data on the availability and usage patterns of charging stations
 - vi) Summary data of other transportation electrification infrastructure, if applicable
- h) Plans should include high-level summary data on demand response/flexible load pilot and/or program performance metrics for the past five years, or link to such data if it is provided through other utility planning practices. If not provided through other utility planning practices, the data should include:
 - i) Number of customers participating by residential and business customer class, and
combined total
 - ii) By winter and summer demand response season:
 - (1) Maximum available capacity of DR by residential and business customer class, and combined total
 - (2) Season system peak
 - (3) Available capacity of DR, expressed as a percentage of the season system peak
- i) Data and information assembled for the Current System Data and Assessment requirement should be submitted to the Commission in electronic format and without

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

protective order. Utilities may take necessary action to protect confidential or sensitive information that is sought in this electronic submission, such as anonymizing customer data or critical infrastructure.

5. Forecasting of Load Growth, DER Adoption, and EV Adoption

Accurately forecasting load growth, a critically important exercise utilities have done for decades, enables the distribution system to reliably meet future energy, demand and ancillary grid service needs. As DER and EV adoption grows, forecasting must advance to better account for their impact on load, as well as the ability of these resources to productively modify load. The updated requirements aim to improve the accuracy and granularity of forecasting. This in turn is intended to improve the accuracy and granularity of existing and anticipated constraints on the distribution system revealed in the engineering analysis to identify Grid Needs.

The Guidelines require a utility to document in its Plan current utility load forecasting processes for distribution service, and forecasting processes for DER adoption and EV adoption as follows:

- a) Forecast of load growth to a granularity of, at a minimum, the substation level, including discussion of:
 - i) Forecasting method and tools used to develop the forecast
 - ii) Forecasting time horizon(s)
 - iii) Data sources used to inform the forecast (sources and vintage should be clearly identified in DSP filings)
 - iv) The load forecast should include data, inputs, and assumptions from the Company's most recent IRP/CEP, or from the most current and accurate sources at the time. Sources should be consistent with those used in other Company planning practices at the time. Examples include but are not limited to:
 - (1) System modeled scenarios decomposed to the distribution system
 - (2) Discussion of how IRP/CEP forecasting is decomposed to, and reconciled with, geographic areas of the distribution system, and identification of those specific geographic areas. Examples of such areas may include transitional planning areas.
- b) Forecast of DER adoption and EV adoption to a granularity of, at a minimum, the substation level, including discussion of:
 - i) Forecasting method and tools used to develop the forecast
 - ii) Forecasting time horizon(s)
 - iii) Data sources used to inform the forecast (sources and vintage should be clearly identified in DSP filings)
 - iv) The forecast should include high/medium/low scenarios for both DER adoption and EV adoption
 - v) The DER adoption and EV adoption forecasts should include data, inputs, and assumptions from the Company's most recent IRP/CEP or from the most current and accurate sources at the time. Sources should be consistent with those used

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

in other Company planning practices at the time. Examples include but are not limited to:

(1) Community based renewable energy (CBRE) forecast, potential study, RFP, needs assessment, etc.

(2) Small scale renewable (SSR) forecast, potential study, RFP, needs assessment, etc.

vi) The methodology for geographical allocation is at the utility's discretion. The Commission may provide direction for subsequent Plans.

c) If a utility does not complete forecasting for its entire distribution system and instead completes forecasting for a portion of its distribution system, it must state so clearly and:

i) Explain the reasons for completing the exercise for a portion of the system

ii) Describe for how much of the system the exercise was completed, in terms of customers, load, substation count, and feeder count

iii) Discuss whether and how the utility plans to complete the exercise in future DSPs

6. Grid Needs

Grid needs identification compares the current capabilities of a distribution system and the demands on that system to infer its future needs. At its core, a grid needs identification answers the question of what technical requirements must be addressed to ensure a safe, reliable and resilient system that provides adequate power quality to the customers it serves. Adding to this core, grid needs identification should include constraints related to forecast of customer and utility-owned or third-party DER. Additionally, the social and economic needs of the communities that depend on distribution systems, and the contributions they can make to strengthen it should be considered. Grid needs identification should be comprehensive and inclusive, identifying the biggest drivers and trends behind needed investments and operational budgets. A utility's DSP investments are expected to be generally responsive to identified grid needs. Where investments do not align with identified grid needs, a utility should be prepared to explain the change in needs and circumstances requiring substantial divergence from the DSP as part of the cost recovery process.

A utility's Distribution System Plan should:

a) Describe any currently used system assessment processes and practices (such as system reliability assessments, system asset health assessments, etc.) that are utilized in assessing grid adequacy and identifying grid needs and evaluating possible solutions, which may include:

i) Criteria, methods, and tools used to develop the assessment

ii) Forecasting time horizon(s)

iii) Key performance metrics

b) Discuss and identify anticipated grid needs, to the extent such identification does not violate customer privacy or NERC/CIP protections, including the following:

i) Replacement needs based on asset condition

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

- ii) Grid needs to address forecasted load growth, DER adoption, EV adoption
 - iii) Grid needs to address customer needs such as new service, additional service, or service quality
 - iv) Grid needs identified through other utility planning processes including, as relevant:
 - (1) IRP/CEP
 - (2) Wildfire Mitigation Plan, including but not limited to identified Increased risk, either in geographically targeted areas, or at a system-level
 - (3) Transportation Electrification Plan
 - (4) Geographically targeted efforts of any demand side programs/DER programs
 - (5) Annual reliability reporting, and any related performance issues
 - (6) Transmission planning
 - v) Timing of grid needs
- c) Provide a summary table of each identified grid need, and specify the timing of each need.

7. Solution Identification

Solution identification proposes the equipment, technology or program(s) the utility will advance to meet identified grid needs. Previously, a Distribution System Plan would rely on traditional hardware solutions (such as substation upgrades, reconductoring, and additional transformer deployment). These Guidelines advance more holistic distribution system planning, calling for consideration of a wider range of potential solutions (for example increased system monitoring automation, expanded switching capability, distributed energy resources). A utility's DSP investments are expected to be generally consistent with identified solutions. Where investments do not align with the solutions identified, a utility should be prepared to explain the information and circumstances that informed the selection of an investment inconsistent with identified solutions as part of the cost recovery process.

The utility should assess grid needs to determine solutions as follows:

- a) Document the process to identify the range of possible solutions to address grid needs.
- b) Identify at a project- or program-level processes or approaches to employing no or low-incremental cost options to resolve a grid need without capital projects (examples may include rebalancing distribution loading through switching and phase balancing, or other actions).
- c) Assess each identified grid need for possible traditional solutions, alternative solutions, and for low-cost solutions.
 - i) Document possible solutions in Near-term Action Plan investment/expenditure summaries (Guideline 8bv).
- d) If a utility has grid needs that could reasonably be considered candidates for non-wires solutions, develop at least two non-wires solutions pilot concept proposals

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

(concept proposals).⁵ If no candidates are identified, a utility should describe the investments needed to enable non-wires solutions in its service area.

i) In these concept proposals non-wire solutions would be used in the place of traditional infrastructure. The purpose of these concept proposals is to gain experience and insight into the evaluation of non-wire solutions to address priority issues such as the need for new capacity to serve local load growth, or power quality improvements in underserved communities.

ii) In its concept proposals, a utility should discuss the grid need(s) addressed, various alternative solutions considered, and provide detailed accounting of the relative costs and benefits of the chosen and alternative solutions. The concept proposals should be reasonable and meet the Guidelines, even if the individual proposal may not be cost-effective. Should a utility elect to pursue implementation of a concept proposal the utility may propose regulatory investment and cost recovery treatment of implementation costs.

iii) Concept proposals should utilize the utility's Community Engagement Plan and address:

- (1) Community interest in clean energy planning and projects
- (2) Community energy needs and desires
- (3) Community barriers to clean energy needs, desires, and opportunities
- (4) Energy burden within the community
- (5) Community demographics
- (6) Any carbon reductions resulting from implementing a non-wires solution rather than providing electricity from the grid's incumbent generation mix.

iv) The concept proposal should include a process in which the utility works with stakeholders to set equity goals, as appropriate for the need.

8. Near-term Action Plan

In this section of the Plan, a utility should present the utility's proposed solutions to address near-term grid needs. The Near-term Action Plan should include a prioritized list of investments/expenditures, investment/expenditure summaries, and projected spending. These elements should guide DSP implementation and provide a preview of investments/expenditures for which cost recovery may be sought in future general rate cases. Where a utility's implementation of the Near-term Action Plan does not align with the Near-term Action Plan contained in the DSP, or does not align with more recent information included in the Interim Update, a utility should be prepared to explain its rationale for deviation in the cost recovery process.

Specific requirements include:

⁵ An electric utility that makes sales of electricity to retail electricity consumers in an amount that equals less than three percent of all electricity sold to retail electricity consumers may develop one pilot concept proposal.

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

- a) Prioritized list of the utility’s proposed solutions (investments/expenditures) over the next five years to address identified grid needs.
- b) A summary of each planned investment/expenditure estimated to cost more than \$2 million. Each summary should be roughly one page in length and should include the content listed below. A utility should use best efforts to include the content listed below and if omitting content, provide an explanation of why it was not included.
- i) Project narrative including benefits of the project, the asset classes and unit counts of proposed solution, and as available, foundational assumptions and key barriers or constraints (for example financial, technical, organizational) and mitigation plans. The narrative should identify the grid need(s) addressed by the project, and if the project was prompted by a standard, company policy, or other requirement.
 - ii) Estimated timeframe
 - iii) Estimated project cost/expenditure amount, and as applicable, estimated ongoing or maintenance costs beyond normal inspection (for example lease line costs or software maintenance costs)
 - iv) Description of the criteria and methods the utility used to prioritize the investment/expenditure in Guideline 8a, including consideration of if, and how the investment/expenditure advances State policies and goals and PUC objectives, including but not limited to:⁶
 - Reliability
 - Safety and security
 - Customer benefits and promoting inclusion of underserved populations
 - Optimized operation of the system
 - Efficient integration of DERs
- When possible, the description should include quantification of the improvement in the goal⁷ and should demonstrate improvement by using cited, publicly available data, for example a utility’s Annual Reliability Report. Should a planned investment/expenditure advance a goal not included above, a utility should explain the rationale for the investment/expenditure, and when possible, include quantitative outcomes.
- v) Description of alternative solutions considered (for example, traditional utility solutions, low-cost solutions, and if applicable any non-wires solutions the utility may have considered) including, where available, the proposed asset classes

⁶ These high-level goals were developed collaboratively with parties through the course of the Docket No. UM 2005 investigation.

⁷ Examples may include but are not limited to:

Reliability – reduction in outages or duration

Safety and security – reduction in equipment failures, or vulnerabilities

Customer benefits, and promote inclusion of underserved populations – improvement in customer service, increased program participation in underserved populations

Optimized operation of the system – reduction in operating costs

Efficient integration of DERs – increased adoption of demand-side and renewable resources

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

and unit counts, and estimated project cost/expenditure amount for each alternative.

vi) Description of if, and how the investment/expenditure is coordinated with the utility's other planning processes (such as the most recent IRP/CEP, Wildfire Mitigation Plan, Transportation Electrification (TE) Plan, and DR/Flexible Load Plan).

vii) Description of if, and how the proposed investment/expenditure interacts with non-distribution asset strategies (for example, transmission strategies), whether alternatives to distribution investment were considered, and if made, what impact does the proposed investment/expenditure have on other network assets.

c) Projected spending: Provide a table of the projected cost to implement the Action Plan. The table should present costs on an annual basis for each year of the Action Plan and break costs into the same spending categories used for historical distribution system spending (Guideline 4d). Provide a description of anticipated requests for cost recovery.

9. Long-term Plan

This section of the Plan consists of the utility's long-term investment plan. The Long-term Plan should include a 10-year vision, a list of investments/expenditures the utility expects to make in years 6 through 10 (an extension of the Near-term Action Plan), and investment/expenditure summaries. These elements should present investments/expenditures a utility anticipates pursuing, recognizing that grid needs, circumstances, and State policies may change over the planning horizon. These elements should provide Staff and stakeholders with a preview of investments/expenditures that may be seen in future distribution system plans. Staff anticipates that a utility's actions should remain consistent with its 10-year vision for the distribution system. However, refinement of the list of expected investments/expenditures will likely be necessary. A utility should be prepared to explain evolution of its Long-term Plan in each distribution system plan.

Specific requirements include:

a) The utility's vision for the distribution system for the next 10 years, and a discussion of if, and how, it aligns with State policies and goals and PUC objectives, including but not limited to:⁸

- Reliability
- Safety and security
- Customer benefits and promoting inclusion of underserved populations
- Optimized operation of the system
- Efficient integration of DERs

⁸ These high-level goals were developed collaboratively with parties through the course of the Docket No. UM 2005 investigation.

Attachment 1 – Staff Proposed Distribution System Planning Guideline Revisions

October 2024

b) Prioritized list of investments/expenditures the utility expects to make in years 6 through 10 in order to advance the 10-year vision.

c) A summary of each planned investment/expenditure which should be no more than one page in length, and include the following, as available:

i) Project narrative including benefits of the project, and as available, foundational assumptions and key barriers or constraints (for example financial, technical, organizational) and mitigation plans.

ii) Estimated timeframe

iii) Estimated project cost/expenditure amount

iv) Description of any rationale, criteria, or methods the utility used to prioritize the investment/expenditure in Guideline 9b, including consideration of if, and how the investment/expenditure advances policies/goals/objectives identified in Guideline 9a, and consideration of any connections to, and impacts on, Near-term Action Plan projects.

v) Description of if, and how the investment/expenditure fits with the utility's other planning processes (such as the most recent IRP/CEP, Transmission, Wildfire Mitigation Plan, TE Plan, and DR/Flexible Load Plan).

Comments are organized by party.						Issue originator								Addressed in final proposed Guidelines?
						PGE	PAC	IPC	Joint Utilis.	Advocates	CUB	NWEC	OSSIA	
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
1	Revisions appear to shift the goal of DSP from aspirational to practical, particularly with respect to gaining insight into investment that would track directly to costs in the next GRC; struggle is whether DSP can be simultaneously aspirational and practical	May 31 comments	p. 2	N/A	High-level goal			X						Comment is informative/positive; response not applicable
2	If expectation is a direct connection between DSP and IRP, Idaho Power asks for additional process so that Staff/stakeholders can better understand the fundamental limitations of such an expectation	May 31 comments	p. 2	multiple: 8a ii5; 9b ii6	Coordinated planning			X						Process added
3	The goal of linking planning exercises is reasonable but may not be achievable to the degree envisioned by Staff; an alternative might be narrative descriptions within respective plans in an effort to connect the dots between an activity in one plan and a shared or related activity in another	May 31 comments	p. 3	N/A	Coordinated planning			X						Included in part
4	A pivot to making DSP a distribution investment tracking document, combined with a plain text reading of several of the proposed revisions, suggests that Staff is positioning future DSPs as serving an early prudency review function	May 31 comments	p. 3	N/A	Pre-prudency			X						Addressed through additional discussion and revised language
5	if IPC were expected to reconcile its distribution-related investment and expenditure in a GRC against items in its most recent DSP, that is a form of prudency review	May 31 comments	p. 3	N/A	Pre-prudency			X						Comment is informative/positive; response not applicable
6	[With revisions] DSP is no longer a planning document, but a list of impending projects that will be built and for which the Company will be expected to link to items within its GRC	May 31 comments	p. 3	N/A	Pre-prudency			X						Comment is informative/positive; response not applicable
7	Proposed revisions suggest that a new objective of DSP is to bridge the gap between planning and cost recovery by building an interim review element. If this is the objective, IPC feels strongly that more process is required to carefully and methodically examine the guidelines and determine if such an outcome can or even should be a major component of future DSPs	May 31 comments	p. 3	N/A	Pre-prudency / additional process			X						Process added
8	IPC proposes March 6, 2026, as its next DSP filing date.	May 31 comments	p. 4	1	Filing date			X						Included
9	IPC is generally supportive of Staff's proposed revisions to the Community Engagement portion of the guidelines; appreciates the addition of the guideline revision's sixth footnote allowing fewer meetings	May 31 comments	p. 5	3a	Community engagement			X						Comment is informative/positive; response not applicable
10	We ask Staff to consider language encouraging utilities to streamline and converge relevant community engagement efforts and recommend that community engagement count toward the requirement if communities are invited to participate in distribution-related aspects of the other planning efforts, such as IRP/WMP	May 31 comments	p. 5	3b	Community engagement			X						Not included
11	IPC would appreciate a definition of "larger projects" in part (d) of this section; a qualifier would help ensure that IPC will engage communities about the kinds of projects envisioned by Staff	May 31 comments	p. 5	3d	Community engagement			X						Included
12	It would be helpful if Staff could explain what kind of information was not received under the "recent" guideline that it hopes will be captured in the "progress" revision	May 31 comments	p. 5	4h	System Data and Assessment			X						Addressed through additional discussion
13	IPC interprets the revisions as intending to capture forward-looking spend in the Near-Term Action Plan and Long-Term Plan sections. If this is not accurate reading, the Company would appreciate additional language that captures Staff's precise objective and intention with Guideline 4.	May 31 comments	p. 6	4h	System Data and Assessment			X						Addressed through additional discussion

Comments are organized by party.						Issue originator								Addressed in final proposed Guidelines?
						PGE	PAC	IPC	Joint Utils.	Advocates	CUB	NWEC	OSSIA	
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
14	IPC would appreciate a deeper explanation (purpose/function) of new section, specifically whether the proposed summary includes a status update about every project identified in a prior DSP; would also appreciate understanding whether Staff is specifically focused on comparing estimated project costs to actual project costs, should a project transition from planned to constructed	May 31 comments	p. 6	4h	System Data and Assessment			X						Included in part
15	Subpart (ii) ("proposed investments" based on reliability be supported by the utility's Annual Reliability Report) requires more conversation, including whether this requirement is better placed in the Near-Term Action Plan section where projects and distribution system actions are identified and discussed	May 31 comments	p. 6	4g	System Data and Assessment / Near term action plan	y	y	X						Included
16	IPC notes a DSP does not identify "proposed investment" because the utility is not yet planning to take any actions nor spend any money. Rather, it identifies ways to meet system needs and estimates the possible expense of doing so. As an alternative, IPC suggests that "estimated cost" would be more appropriate.	May 31 comments	p. 6	4g	System Data and Assessment			X						Included
17	4i proposes that future DSPs should include a submitted data component available for "public review"; IPC proposes striking this, as the Company is unclear how the "summary of progress" on DSP projects in (h) does not provide all the information necessary for the Commission to review and understand progress on various projects outlined in prior DSPs	May 31 comments	p. 6	4i	System Data and Assessment			X						Addressed through additional discussion
18	Information in part (i) would typically be the basis of prudence review in a GRC; from conversation with Staff, IPC understands that DSP projects themselves are not going to be authorized nor evaluated for approval within DSPs. Yet, the specific language to provide expenditure and investment data, as currently proposed in (i) is one example where the proposed revisions transition the DSP from a planning document to pre-prudence review. In this regard, the proposed language appears at odds with Staff's suggestion that the purpose of revised guidelines is not an opportunity for early expenditure review in advance of a GRC	May 31 comments	p. 6	4i	Pre-prudence			X						Addressed through additional discussion
19	IPC considers the feeder-level requirement too granular for DERs and EVs for the Company; IPC suggests more flexibility for utilities in forecasting DERs/EVs, however, should this level of granularity be a priority for Staff, IPC respectfully requests an allowance akin to the earlier footnote	May 31 comments	p. 7	5b	Forecasting - DER/EV			X						Proposal removed
20	Proposed language calls out "front-of-meter DER," a term that could cause confusion; IPC suggests changing this language to "utility-owned or third-party DER	May 31 comments	p. 7	6	Grid needs			X						Included
21	IPC suggests that language about "can make to strengthen it should be addressed" be shifted to "considered" instead of addressed, a change to reflect that some projects must be made for safety, reliability, or other reasons and may not be able to address all the needs of a given community	May 31 comments	p. 7	6	Grid needs		y	X						Included
22	"Asset class" is not logical, as a single project could encompass a variety of asset classes. Idaho Power suggests that the proposed guidelines strike "asset class" from the DSP language, as it is not a logical nor useful way of trying to understand distribution system projects or needs	May 31 comments	p. 7	multiple: 6b; 6d	Grid needs	y	y	X						Included in part
23	IPC considers this entire list—from (i) to (v)—highly prescriptive and suggests changing the language from "..., including the following..." to "..., such as the following, as relevant and applicable..." to create space for utilities to respond only to relevant items rather than be required to explain a lack of connection.	May 31 comments	p. 8	6c	Grid needs			X						Included in part
24	Proposed revision notes "renewal" needs; IPC would appreciate additional clarity about whether Staff is speaking to distribution upgrades, re-construction efforts, both, or something else entirely	May 31 comments	p. 8	6ci	Grid needs			X						Included

Comments are organized by party.						Issue Originator								Addressed in final proposed Guidelines?
						PGE	PAC	IPC	Joint Utils.	Advocates	CUB	NWEC	OSS/A	
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
25	IPC does not support "The solutions identified should correspond to future general rate cases." This language directly indicates a prudency review function of the DSP and, further, assumes all projects identified in a DSP will be built. In reality, a number of on-the-ground considerations may change, making a project no longer cost-effective or appropriate. IPC proposes the following: "DSPs should strive to connect identified grid needs with distribution investments in future general rate cases, recognizing that distribution-level changes occur routinely and may require modifying or canceling solutions identified in prior DSPs."	May 31 comments	p. 8	7	Solution ID / Pre-prudency			X						Addressed through additional discussion; included in part
26	IPC suggests uniform language to reference the "Near-Term Action Plan," as opposed to "near-term plan" or other variations	May 31 comments	p. 8	7	Solution ID			X						Included
27	IPC would like to better understand Staff's \$1 million baseline for traditional solutions and conducting a "screen" for grid solutions	May 31 comments	p. 8	7c	Non wires solutions			X						Proposal removed
28	"Comparatively cost-effective" language does not appropriately center least-cost planning. IPC does not know how to evaluate "comparative" cost-effectiveness. If a project is more expensive than an alternative, it is not cost-effective. Requiring utilities to present NWS that are more expensive than traditional solutions could be misleading and potentially confusing, inviting inquiry into the details of system engineering, project design, and project costs. IPC believes this subsection requires additional discussion and, in the absence of such a discussion, should be stricken from consideration	May 31 comments	p. 8	7c	Non wires solutions			X						Proposal removed
29	IPC does not believe it is appropriate to require such detailed information without further conversation and reinforces its earlier comment that DSP is not a document that identifies future investment and, with this in mind, the language within Guideline 8 warrants modification.	May 31 comments	p. 9	8	Near term action plan			X						Addressed through additional discussion; included in part
30	(a)(ii)(3) asks for "investment/expenditure amount" but DSP projects are identified and can have project estimates, but those estimates do not necessarily translate to investment amounts; IPC suggests change to "High-level project cost estimate"	May 31 comments	p. 9	8aii3	Near term action plan			X						Included
31	IPC proposes striking section (c) as the language explicitly asks the utility to prepare to justify DSP items in future general rates cases. Idaho Power welcomes additional conversations with Staff and other stakeholders to come up with reasonable language that can get closer to Staff's intent without turning the DSP into a precursor to cost recovery.	May 31 comments	p. 9	8c	Near term action plan / Pre-prudency			X						Addressed through additional discussion; included in part
32	IPC would appreciate additional discussion with Staff to better understand the new objectives for the Long-Term Plan	May 31 comments	p. 9	9	Long term plan / Additional process	y	y	X						Addressed through additional discussion
33	A solution would be striking from "The roadmap should include..." through (iii) which includes duplicative Near-Term Action Plan language, as well as an additional requirement for utilities to connect items identified in the Long-Term Plan to investments in future general rate cases. Idaho Power has concerns with this language for the reasons noted previously but is open to discussion with Staff to develop revised language that achieves a reasonable and feasible outcome for the Long-Term Plan section.	May 31 comments	p. 9	9	Long term plan	y	y	X						Not included

Comments are organized by party.						Issue originator								Addressed in final proposed Guidelines?
						PGE	PAC	IPC	Joint Utils.	Advocates	CUB	NWEC	OSS/A	
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
34	Idaho Power believes more process is warranted through discussion (which could come in the form of workshops or individual conversations between parties and Staff) and additional comment opportunities on the proposed revised guidelines. Based on the significant changes proposed by Staff and the substance of Idaho Power’s comments in response, the Company respectfully requests additional process to ensure future guidelines and guideline language can be considered and revised with a shared understanding of ultimate DSP objectives.	May 31 comments	p. 10	N/A	Additional process	y	y	X						Process added
35	Given the timeline of this summer, including four complex rate cases and IRP reviews, CUB does not have the capacity to provide the reflection and feedback we would otherwise have on today’s filing deadline	May 31 comments		N/A	Additional process					X				Process added
36	CUB supports Energy Advocates’ proposal for a workshop in July with supplemental comments due in August as an alternative to today’s comment deadline	May 31 comments		N/A	Additional process				y	X				Process added
37	CUB proposes to provide review and feedback in the fall, with the same reasoning recently used by the Commission in UM 2024, where the Commission has postponed the investigation until the fall	May 31 comments		N/A	Additional process					X				Process added
38	We are unable to provide substantive feedback today because we are experiencing significant capacity constraints due to the current level of regulatory activity.	May 31 comments		N/A	Additional process				X					Process added
39	We propose the following changes to the schedule: - Conduct a workshop where Staff can outline their vision for the process that the revised Guidelines would create for the second DSP cycle. This workshop would offer an opportunity for stakeholders to ask questions, and to exchange insights, concerns, and ideas. - Add an opportunity for supplemental comments a few weeks after the workshop	May 31 comments		N/A	Additional process	y	y	y	X	y				Process added
40	We emphasize the DSP and GRC should not be connected for the purposes of investment pre-approval; DSP should communicate our vision and the associated plans to meet that vision through possible distribution system investment and DER development	May 31 comments	p. 1	N/A	Pre-prudency	X								Addressed through additional discussion; included in part
41	If interest is in regular updates regarding the execution of plans and projects found in the DSP, PGE is willing to discuss the formation of a more structured regular progress report for that purpose	May 31 comments	p. 1	N/A	Pre-prudency / Near term action plan	X								Included in part
42	PGE and utilities need space and opportunity to understand how to build dependable NWS infrastructure that can meet operational standards. The DSP should be part of the process that creates these learnings, but implementation of NWS cannot yet be pre-determined as a preferred outcome for any given investment decision	May 31 comments	p. 2	7c	Non wires solutions	X								Included in part
43	Additional opportunities to engage in process before adoption of guidance would result in less need for iteration later, clearer direction and understanding among utilities, and less contention and misinterpretation in the upcoming DSP cycle	May 31 comments	p. 2	N/A	Additional process	X	y	y		y				Process added
44	Rather than pre-prudence review of individual projects, the DSP focus should continue to be on how the Company identifies and prioritizes needs and develops different types of solutions to address them. And while PGE’s investments span a range of types, investments related to upgrades to infrastructure to accommodate broad load and hosting needs is the highest-value category to focus on in the transparent DSP planning process	May 31 comments	p. 5	N/A	Pre-prudency / Near term action plan	X								Included in part
45	We intend to continue with the development of a DSP that we submit in September/October 2024 and submit the next DSP in September/October 2026	May 31 comments	p. 6	1	Filing date	X								Included
46	PGE proposes Staff lead at least one workshop, likely followed by a comment period, to review the proposed guidelines and collectively develop new proposed language.	May 31 comments	p. 7	N/A	Additional process	X								Process added

Comments are organized by party.						Issue originator								Addressed in final proposed Guidelines?
						PGE	PAC	IPC	Joint Utils.	Advocates	CUB	NWEC	OSSIA	
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
47	PGE proposes the guidelines and regulatory structure allow utilities to combine the TEP and the Flex Load MYP into the DSP, where appropriate to their planning processes and needs	May 31 comments	p. 7	N/A	Other; additional regulatory consolidation	X								Not included
48	PGE supports balancing community and stakeholder engagement with stakeholder bandwidth; PGE will fulfill its requirement of hosting four public stakeholder engagement meetings during plan development	May 31 comments	p. 8	3	Community engagement	X								Comment is informative/positive; response not applicable
49	PGE supports Staff's proposal to incorporate engagement into ongoing community and stakeholder processes such as CEP and local-area planning, emphasizing the potential for community and in-person meetings	May 31 comments	p. 8	3	Community engagement	X								Comment is informative/positive; response not applicable
50	PGE recommends removing guideline 4.a) as it is duplicative of the information that is requested in Grid Needs guideline 6.a)	May 31 comments	p. 10	4a	System Data and Assessment / Grid needs	X								Included
51	PGE recommends a revision to the cadence of providing the data identified in revised guidelines 4.b), 4.c) and 4.d) extending the timeline for providing this data to not more often than every 5 years (or discussing an alternative mechanism to provide insight into these data)	May 31 comments	p. 11	multiple: 4b-d	System Data and Assessment	X								Not included; consider for future Guideline revisions
52	PGE recommends that guideline 4e be modified to exclude the categories provided in subparts i) – vii) and utilities be allowed to report past expenditures in the categories that reflect their individual project and financial management practices	May 31 comments	p. 11	4e	System Data and Assessment	X	y							Included
53	PGE suggests that the language of this guideline be modified to provide the data from one DSP to the next, so there is no overlap	May 31 comments	p. 11	4e	System Data and Assessment	X								Not included; consider for future Guideline revisions
54	PGE recommends that 4.g.i) and 4.g.ii) be removed from the guidelines as they are overly prescriptive	May 31 comments	p. 12	4g	System Data and Assessment	X	y	y						Proposal removed in part
55	PGE recommends that the guidelines should reflect using the most up to date and accurate input assumptions available at the time, rather than pointing backwards to CEP/IRP inputs, data, and assumptions.	May 31 comments	p. 12	multiple: 5a; 5b	Forecasting - Load	X								Included
56	PGE recommends guidelines highlight the direct connection and virtuous cycle between planning activities when it comes to load growth and DER potential, but allow latitude in developing appropriate data sources and inputs that reflect the quickly changing market realities facing the electricity sector	May 31 comments	p. 13	5	Forecasting	X								Comment is informative/positive; response not applicable
57	PGE recommends removing "... by asset class" from guideline 6.b).	May 31 comments	p. 13	6b	Grid needs	X	y	y						Included
58	PGE recommends revised guideline 6c include language that recognizes vulnerability to bad actors, such as "c) Discuss and identify anticipated grid needs (to the extent such identification does not violate customer privacy or NERC/CIP protections)..."	May 31 comments	p. 14	6c	Grid needs / Confidentiality	X								Included
59	PGE recommends removing the "thru-line" language from revised guideline 6d; similar to 6b "asset class" should be removed	May 31 comments	p. 14	6d	Grid needs / Pre-prudency	X								Addressed through additional discussion and revised language; included
60	PGE recommends removing "cost effective" from the introductory language for the Solution Identification section as follows: The utility should assess grid needs to determine solutions as follows:	May 31 comments	p. 14	N/A	Solution ID	X								Included
61	PGE recommends removing "and discuss how this process was applied to identify the proposed solutions in the Long- term and Near-term Plans" from 7a.	May 31 comments	p. 15	7a	Solution ID	X								Included in part

Comments are organized by party.						Issue originator								Addressed in final proposed Guidelines?
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ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
62	PGE finds recommendation 7.b) to be duplicative of 7.a) and could be removed; if the guideline is to remain, we recommend removing the word "First", as it suggests an order of operations that is not necessarily informed by practice	May 31 comments	p. 15	7b	Solution ID	X								Included in part
63	PGE recommends removing revised guidelines 7.c) and 7.d)	May 31 comments	p. 15	multiple: 7c; 7d	Non wires solutions	X								Included
64	PGE recommends modifying revised guideline 8.a. ii) to reflect a higher threshold for providing additional project details, moving from \$2M to \$10M.	May 31 comments	p. 16	8a	Near term action plan	X								Not included
65	PGE recommends removing "including foundational assumptions and key barriers or constraints (including financial, technical, organizational) and mitigation plans." from 8a.ii.1 as the information requested is not available at the time the project is provided in the NTAP	May 31 comments	p. 17	8a	Near term action plan	X								Included in part
66	PGE recommends removing revised guideline 8.a.ii.4) as it is duplicative of the information provided in the Grid Needs and Solution Identification processes.	May 31 comments	p. 17	8a	Near term action plan	X								Not included
67	PGE recommends removing revised guideline 8.a.ii.6) pursuant to the fact that we do not yet have the tools or processes to implement an NWS that relies on customer-sited resources	May 31 comments	p. 17	8a	Near term action plan / Non wires solutions	X								Included
68	PGE recommends removing "asset class" from revised guideline 8.b)	May 31 comments	p. 17	8b	Near term action plan	X								Included
69	PGE recommends removing revised guideline 8.c) and is interested in further exploring this topic to seek alignment	May 31 comments	p. 18	8c	Near term action plan / Pre-prudency	X								Addressed through additional discussion
70	PGE recommends changing revised guideline 9.b.ii.1) to "Narrative description of the actions in the long-term plan,"	May 31 comments	p. 18	9b	Long term plan	X	y	y						Not included
71	PGE recommends removing 9.b.ii.2-6).	May 31 comments	p. 18	9b	Long term plan	X	y	y						Included in part
72	PGE proposes that revised guideline 9.b.iii) be removed and instead develop a product that can help identify which rate case investments map back to DSP proposed actions	May 31 comments	p. 18	9b	Long term plan / Pre-prudency	X	y	y						Not included
73	PAC anticipates making its next DSP filing on or before March 31, 2026	May 31 comments	p. 1	1	Filing date		X							Included
74	PAC proposes engaging in a round of workshops, and additionally requests the ability to submit a second round of comments prior to presenting the revised guidelines to the Commission.	May 31 comments	p. 1	N/A	Additional process	y	X	y	y	y				Process added
75	PAC finds proposed guidelines that establish a "thru-line" between DSP submissions and future general rate cases to be problematic. The Company's concern is that the DSP process will function as a de facto preview of the Company's general rate cases, or as a "pre-prudence" or "dual prudence" inquiry. This does not align with how capital planning and investment function in the Company's normal operations or rate cases. That is, that capital investments only become subject to review once they are used and useful and filed for inclusion in rate base. See, e.g., In re Nw. Nat. Gas Co., Docket No. UM 125, UP 38, Order No. 87-1044 at 536-37 (Oct. 5, 1987)	May 31 comments	p. 2	multiple: 6d; 7; 8c; 9b	Pre-prudency		X							Addressed through additional discussion and revised language
76	DSP and procurement, considered on a ten-year going-forward basis, involves a high degree of speculation, outside the Company's normal business planning methodology, and is susceptible to a variety of factors outside of the Company's control... it requires a contemporaneous approach and flexibility to meet ever-evolving system demands. Staff's statement "when pursuing recovery in a general rate case, utilities should prepare to provide materials assembled for the DSP filing" suggests that DSP proceedings could operate prescriptively, could bind the Company and, in effect, represent a "pre-prudence" or "dual prudence" inquiry.	May 31 comments	p. 3	multiple	Pre-prudency		X							Addressed through additional discussion and revised language

Comments are organized by party.		Issue originator										Addressed in final proposed Guidelines?	
		PGE	PAC	IPC	Joint Util.	Advocates	CUB	NWEC	OSSIA	MCAAT			
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic								
77	PAC is concerned that the revised DSP Guidelines appear to directly influence Company decision making regarding proposed distribution investments and expenditures.... PAC believes that directing utility action is beyond the scope of this DSP process, could put the utility at financial risk, and could result in unnecessarily higher rates. See, e.g., proposed guidelines 8(a)(ii)(4) and 9(a).	May 31 comments	p. 3	multiple	Other / Near term action plan / Long term Plan		X						Addressed through additional discussion; included in part
78	Several of Staff's Proposed DSP Guideline Revisions would expand the scope of the DSP process far beyond distribution-focused assessments and stray into other areas of the Company's management. For example, proposed guideline 6(c)(iv)(1)-(5)... As revised, this proposed guideline would bring each of these broad areas of Company operation under the purview of the DSP process. Other similar examples of revised guidelines that would greatly expand the scope of the DSP process include proposed guidelines 4(g), 8(a)(ii)(5), and 9(b)(ii)(6).	May 31 comments	p. 4	multiple	Other / Near term action plan / Long term Plan		X						Addressed through additional discussion; included in part
79	Proposed guidelines 4(e)(i)-(vii) seek "historical distribution system spending for the past five years" for seven categories of spending that were initially requested and provided by the Company in Part 1, but that proved to be extraordinarily burdensome to derive (the requests sought data outside of the Company's existing accounting structure).	May 31 comments	p. 4	4e	System Data and Assessment	y	X						Included
80	Proposed guidelines 8(a) (Near-Term Plan) and 9(a) (Long-Term Plan) seek a similar level of detail and categorization to proposed guidelines 4(e)(i)-(vii) on a going-forward basis..... Moving forward, the Company proposes providing a level of detail and categorization like what was provided in response to OPUC Data Request No. 8 for its Part 2 filing.	May 31 comments	p. 4	multiple	Near term action plan / Long term plan		X						Addressed through additional discussion; included in part
81	Revised guideline 6(b) asks the Company to "Discuss criteria, methods, and tools used to identify needs by asset class." Similarly, revised guideline 6(d) asks the Company to "Provide a summary table of each identified grid need by asset class and specifying the timing of need." However, the Company does not in its normal operations identify grid needs by asset class.	May 31 comments	p. 5	6	Grid needs		X						Included
82	guideline 8(b) seeks "Projected spending: Provide the projected cost and timeline by asset class to implement the Action Plan. Provide a description of anticipated requests for cost recovery." However, the Company does not make cost and timeline projections by asset class.	May 31 comments	p. 5	8	Near term action plan		X						Included
83	PAC continues to have concerns regarding the confidentiality, privacy, and security of personally identifiable customer information as well as PacifiCorp's sensitive, confidential, and/or proprietary business information, particularly in the context of project-level data. In December 2022 discussions between Staff and the Company, Staff clarified that the Company would provide responses to information requests in a manner that did not contain confidential or protected information for ease of sharing. Moving forward, the Company would like to continue with this understanding in place as it provides data in response to the revised guidelines (e.g., through performing redactions, removing certain sets of sensitive and/or confidential information as needed, etc.).	May 31 comments	p. 5	multiple	Confidentiality		X						Addressed through additional discussion
84	PAC believes it would be most productive, with respect to revised guideline 5, for the OPUC to organize a workshop to discuss forecasting methodology and/or approaches before adopting any new requirements.	May 31 comments	p. 5	5	Forecasting		X						Not included

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ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic								
85	...Plans involving NWS, particularly in the context of the near-term and long-term plans on a going forward basis (and specifically in the context of any thru-line to rate recovery) would be subject to a significant level of change and evolution. This is a challenge the Company would like to clarify with Staff in advance of any requirement that NWS be integrated into the near-term and short-term planning methodology.	May 31 comments	p. 6	7	Non wires solutions					X			Proposal removed
86	3dii - Recommend strike "datasets and metrics" and replace with "information."	May 31 comments	p. 8	3	Community engagement					X			Included in part
87	3diii - Recommend striking the last sentence of the requirement that includes "may" items.	May 31 comments	p. 8	3	Community engagement					X			Included in part
88	4e - The Company proposes to strike the categories outlined below and to report based on the categories that were provided in the PacifiCorp DSP Part 2 filing and subsequent Data Responses related to investment categories. Please refer to concern (3) in the attached letter regarding communications with staff for prior data requests that are related to this requirement.	May 31 comments	p. 10	4e	System Data and Assessment					X			Included
89	4g - The Company proposes Commission Staff organize workshops to collaborate on a revised set of requirements for 4(g)(i-ii) to further define the intent and scope. See concern (2) in the attached letter regarding expansion of scope.	May 31 comments	p. 10	4g	System Data and Assessment					y	X	y	Not included
90	4i - The Company has concerns regarding the level of detail and confidentiality being requested by this requirement. Please refer to concern (3) in the attached letter. The Company proposes striking this requirement until workshops take place to further define parameters of the data being requested.	May 31 comments	p. 10	4i	System Data and Assessment					X			Not included
91	The Company proposes to strike this entire section until joint workshops can be convened to collaborate on a revised set of requirements for this section. Please refer to concern (4) in the attached letter.	May 31 comments	p. 11	5	Forecasting					X			Not included
92	The Company proposes to strike the following text unless Staff can provide clarification that can be reviewed prior to presentation to the Commission. "Additionally, the social and economic needs of the communities that depend on distribution systems, and the contributions they can make to strengthen it should be addressed"	May 31 comments	p. 12	6	Grid needs					X	y		Included in part
93	6b - The Company proposes to strike this requirement. See concern (3) in the attached letter regarding categorization by asset class.	May 31 comments	p. 12	6	Grid needs					X			Included in part
94	6civ - The Company proposes to strike this entire section until joint workshops can be convened to collaborate on a revised set of requirements for this section. See concern (2) in the attached letter.	May 31 comments	p. 12	6	Grid needs					X			Not included
95	6d - The Company proposes to strike this requirement. The Company does not track grid needs by asset class. See concerns (1) and (3) in the attached letter regarding concerns with the DSP serving as a thru-line to the GRC and the level of detail requested.	May 31 comments	p. 12	6	Grid needs					X			Included in part; addressed through additional discussion
96	The Company proposes to strike this entire section until joint workshops can be convened to collaborate on a revised set of requirements for this section. In the attached letter, please refer to concern (1) regarding concerns with DSP serving as a thru-line to the GRC and concern (5) regarding non-wires solution criteria.	May 31 comments	p. 13	7	Solution ID					X			Not included
97	8a - The Company proposes to strike this entire section until joint workshops can be convened to collaborate on a revised set of requirements for this section. Please see concern (3) in the attached letter regarding increased granularity and detail being requested.	May 31 comments	p. 13	8	Near term action plan					X			Not included
98	8aii5 - Please refer to concern (2) in the attached letter.	May 31 comments	p. 14	8	Near term action plan					X			Addressed through additional discussion; included in part

Comments are organized by party.						Issue originator								
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ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									Addressed in final proposed Guidelines?
99	8c - Please see concern (1) in the attached letter, regarding DSP serving as a thru-line to the GRC.	May 31 comments	p. 15	8	Near term action plan		X							Addressed through additional discussion and revised language
100	9a - The Company proposes to strike this entire section until joint workshops can be convened to collaborate on a revised set of requirements for this section. Please see concern (3) in the attached letter regarding increased granularity and detail being requested.	May 31 comments	p. 15	9	Long term plan	y	X	y						Addressed through additional discussion; included in part
101	9bii6 - Please refer to concern (2) in the attached letter.	May 31 comments	p. 16	9	Long term plan	y	X	y						Addressed through additional discussion; included in part
102	9biii - Please see concern (1) in the attached letter regarding DSP serving as a thru-line to the GRC.	May 31 comments	p. 16	9	Long term plan / Pre-prudency	y	X	y						Addressed through additional discussion and revised language
103	...the Joint Utilities respectfully request additional process in this case to develop substantive and ultimately useful DSPs based on a shared understanding and interpretation of DSP guidelines..	Jul 26 comments	p. 2	N/A	Additional process	X	X	X						Process added
104	...we are generally supportive of Staff's approach to revising the Guidelines.	Jul 26 comments	p. 1	N/A	Other					X				Comment is informative/positive; response not applicable
105	We highlight our support for sharpening the focus on the linkage between DSP assessment and utility investment and action.	Jul 26 comments	p. 1	8c; 9b	Pre-prudency						X			Comment is informative/positive; response not applicable
106	We highlight our support for requiring consideration of coordination with local governments and Tribal nations in DSP assessment and actions.	Jul 26 comments	p. 1	3d	Community engagement						X			Comment is informative/positive; response not applicable
107	We highlight our support for better coordination between DSP and Clean Energy Plans/Integrated Resource Plans (CEPs/IRPs).	Jul 26 comments	p. 1	multiple: 5a; 5b; 6c; 8a; 9b	Coordinated planning						X			Comment is informative/positive; response not applicable
108	We highlight our support for closer alignment to other assessments and processes, including non-distribution asset development, Flexible Load Plans, Wildlife Mitigation Plans, etc.	Jul 26 comments	p. 1	8a; 9b	Coordinated planning						X			Comment is informative/positive; response not applicable
109	We highlight our support for streamlining of electronic data submissions, while not reducing the scope and depth of data provided.	Jul 26 comments	p. 1	4i	System Data and Assessment						X			Included
110	We highlight our support for continued progress on refinement and granularity for load forecasting and distribution system carrying capacity.	Jul 26 comments	p. 1	5a; 5b	Forecasting						X			Proposal removed
111	We propose strengthening the revised Guidelines in requiring utilities to maintain accessible engagement forums.	Jul 26 comments	p. 2	3b	Community engagement						X			Included
112	We propose strengthening the revised Guidelines in strengthening the recommendations on identification and assessment of non-wires solutions, while also strengthening expectations beyond the testbed phase to pilot implementations of emerging, innovative demand management technologies.	Jul 26 comments	p. 2	6c	Non wires solutions						X			Proposal removed
113	We propose strengthening the revised Guidelines in continuing progress on refining a hosting capacity threshold or metric that promotes transparent and balanced development of distribution system capacity.	Jul 26 comments	p. 2	4.2	HCA						X			Not included

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						PGE	PAC	IPC	Joint Utils.	Advocates	CUB	NWEC	OSSIA	
ID	Issue summary	Issue origin	Reference	Guideline	Overarching topic									
114	We suggest the following edit to Staff’s proposed guidelines: A utility should also leverage ongoing community and stakeholder engagement processes, <u>maintain accessible engagement forums</u> , and integrate distribution system planning engagement to the full extent it is beneficial to do so.	Jul 26 comments	p. 3	3b	Community engagement					X				Included
115	On sequencing, while there may be reasons supporting a DSP filing closely after filing an IRP, there is greater benefit to positioning the DSP ahead of the IRP. If, for practical reasons, this sequencing could not be fully accomplished given the current DSP and IRP cycles, then the Guidelines should state it as a priority for the next cycle.	Jul 26 comments	p. 4	1	Filing date					X				Not included
116	Importantly, Staff and the Commission should clearly convey to the utilities and stakeholder community that the DSP and IRP/CEP are not two separate, isolated processes that may proceed separately without the DSP informing the IRP/CEP. Rather, the cadence should reflect the importance of the DSP analysis to the modeling and outcomes of the CEP/IRP.	Jul 26 comments	p. 4	1	Filing date					X				Included
117	Specifically, we support the language that the summary table of grid needs in Guideline 6(d), the action plan prioritized list and projected spending in Guideline 8(c), and the long-term plan roadmap prioritized list in Guideline 9(b)(iii) should each “aid Staff and stakeholders in finding a thru-line” from the DSP “to investments seen in future general rate cases.” We also support the language in Guideline 7 that “solutions identified should correspond to future general rate cases.” Relatedly, we support Staff’s statement in Proposed Guideline 8(c) that “when pursuing recovery in a general rate case, utilities should prepare to provide materials assembled for the DSP filing”	Jul 26 comments	p. 4	N/A	Pre-prudency					X				Addressed through additional discussion and revised language
118	The Energy Advocates support the Solution Identification section of the Guidelines that seeks to expand the scope of equipment, technologies and programs that will be considered in the DSP.	Jul 26 comments	p. 5	6c	Non wires solutions					X				Proposal removed
119	We urge Staff to push the utilities to think beyond the testbed phase and explore pilot projects with emerging DER opportunities.	Jul 26 comments	p. 6	6c	Non wires solutions					X				Proposal removed
120	Advocates are supportive of Staff’s direction to update the maps with a new refresh cadence and latency expectations, in accordance with decisions made in Docket No. UM 2111. While UM 2111 is ongoing, it would be helpful for Staff to provide some indication in this docket about when new direction will be given to the HCA maps.	Jul 26 comments	p. 7	4.2	HCA					X				Included
121	We find it difficult to reconcile the decision to shelve a determination of a hosting capacity threshold as a grid need. Without a threshold to require utility action to upgrade congested feeders on the distribution system, the benefits of a HCA are greatly reduced.... Accordingly, Staff should reconsider their decision to shelve the hosting capacity threshold determination.	Jul 26 comments	p. 7	4.2	HCA					X				Not included
122	Statement 1 - Staff does not intend for the Commission’s acceptance of the DSP to represent any sort of finding on prudency	Oct 4 comments	p. 1	multiple	Pre-prudency					X				Included
123	Statement 2 - DSP is forwarding looking, with projections, plans, and estimates subject to change	Oct 4 comments	p. 2	8	Near term action plan					X				Not included
124	Statement 3 - Expenditures in GRC are actual and are likely to vary from estimates	Oct 4 comments	p. 2	8	Near term action plan					X				Not included
125	Statement 4 - Projects and costs may change, utilities should keep Staff abreast	Oct 4 comments	p. 2	1	Summary level progress reporting					X				Included in part
126	Statement 5 - Staff articulation of connectivity (investments responsive to needs/solutions, Action Plan is a preview, utility should be prepared to discuss deviation)	Oct 4 comments	p. 2	multiple	Pre-prudency					X				Included

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127	Statement 6 - Staff's guidance does not carry a presumption that an expenditure is imprudent if it does not appear in or varies materially from what was projected in the DSP	Oct 4 comments	p. 2	multiple	Pre-prudency				X				Included
128	Staff's best point of reference in understanding investments will likely be the most recent summary progress reports provided by the utilities, and not necessarily the DSP itself	Oct 4 comments	p. 2	1	Summary level progress reporting				X				Included in part
129	We would like to confirm that there is no expectation utilities will use the categories in the project summaries (i thru vii) as a template, rather that utilities will use their best judgment to provide relevant and sufficient detail, generally within the bounds of the kinds of information described, to allow Staff to understand the anticipated purpose, scope, cost, benefits and timeline associated with each project.	Oct 4 comments	p. 2	8	Near term action plan				X				Not included
130	PGE asks Staff to consider revising threshold to \$3 million as it would align the DSP with information provided in PGE's current GRC; \$3 million will cover over 90 percent of capital projects	Oct 4 comments	p. 2	8	Near term action plan				X				Not included
131	Redline: Recognizing that some asset information is relatively static, a utility may refer to or include asset information provided in a prior DSP. The utility should provide, at minimum:	Oct 4 comments	p. 6	4	System data and assessment				X				Included
132	Redlines on summary level progress reporting	Oct 4 comments	p. 8	4	Summary level progress reporting				X				Included in part
133	Redline: Utilities may take necessary action to protect confidential or sensitive information that is sought in this electronic submission, such as anonymizing customer data or critical infrastructure.	Oct 4 comments	p. 8	4	System data and assessment				X				Included
134	Redline removing operational budgets	Oct 4 comments	p. 10	6	Grid needs				X				Not included
135	Redlines on alignment with summary level progress reporting	Oct 4 comments	p. 10	6	Summary level progress reporting				X				Not included
136	Redlines on alignment with summary level progress reporting	Oct 4 comments	p. 10	7	Summary level progress reporting				X				Not included
137	Redline removing 7ci	Oct 4 comments	p. 11	7	Solution ID				X				Not included
138	Redlines adding NWS candidate language	Oct 4 comments	p. 11	7d	Non wires solutions				X				Included in part
139	Redlines adding regulatory and cost-recovery language	Oct 4 comments	p. 11	7d	Non wires solutions				X				Included
140	Redlines on alignment with summary level progress reporting	Oct 4 comments	p. 11	8	Summary level progress reporting				X				Included in part
141	Redline: The utility should use best efforts to include the content identified below, or provide an explanation for why it was not included	Oct 4 comments	p. 11	8	Near term action plan				X				Included in part
142	Redline removing asset class and cost requirement	Oct 4 comments	p. 12	8bv	Near term action plan				X				Not included
143	Redline removing project list and project summaries	Oct 4 comments	p. 13	9	Long term plan				X				Not included
144	Redline removing reference to general rate cases	Oct 4 comments	p. 13	9	Long term plan				X				Included
145	Redline removing 9b	Oct 4 comments	p. 13	9b	Long term plan				X				Not included
146	Redline removing 9ciii	Oct 4 comments	p. 13	9ciii	Long term plan				X				Not included

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147	Redline removing 9civ	Oct 4 comments	p. 13	9civ	Long term plan				X					Not included
148	We would like the Guidance to maintain and document an anticipated cadence of two years for subsequent plan filing with the allowance for potential deviations to be established by Commission order or future Guideline revisions	Oct 4 comments	p. 1	1	Filing date								X	Included
149	We concur with staff's conclusion regarding pre-prudency review and support regular updates between Plans and General Rate Cases	Oct 4 comments	p. 1	2	Pre-prudency								X	Comment is informative/positive; response not applicable
150	Redline: The workshops <u>shall</u> include in-person meetings....	Oct 4 comments	p. 1	3a	Community engagement								X	Not included
151	Redline: Engagement of the local community <u>shall</u> include in-person meetings....	Oct 4 comments	p. 1	3di	Community engagement								X	Not included
152	Redline: <u>Engage</u> local governments and Tribal nations....	Oct 4 comments	p. 1	3diii	Community engagement								X	Not included
153	Redline: Utilities should aim to create a collaborative and accessible environmental among all interested CBO Partners, <u>local governments, Tribal nations</u> and stakeholders <u>and demonstrate acknowledgement, valuation and compensation for CBOs, local governments and Tribal nations as vital experts in the planning process.</u>	Oct 4 comments	p. 2	3e	Community engagement								X	Not included
154	We strongly encourage staff to reconsider proposing a Hosting Capacity Analysis threshold as a grid need. Lacking HCA threshold, Guidelines should, at a minimum, establish milestones for providing public facing interfaces capable of accommodating expeditious analysis of feeder level system capacities, equipment, resources, threats and loads.	Oct 4 comments	p. 2	4.2	HCA								X	Not included
155	We support Staff's recommendation that utilities develop and share public facing schedules to update and maintain the maps by March 2025, and that beginning in 2025, update their maps' system data at a minimum twice a year, approximately every six months, and other data annually	Oct 4 comments	p. 2	4.2	HCA								X	Comment is informative/positive; response not applicable
156	We support Staff's original revisions directing that granularity increase to the feeder-level, and that DSP forecasts include info from the most recent IRP/CEP. We further suggest that forecasts be updated at a minimum every other year.	Oct 4 comments	p. 2	5	Forecasting - DER/EV								X	Proposal removed
157	Concur with staff's revisions	Oct 4 comments	p. 2	6	Grid needs								X	Comment is informative/positive; response not applicable
158	We support Staff's original revision directing NWS screening. With NWS pilot concept proposals,we recommend that pilots be applied at the substation level wherever grid needs have been established.	Oct 4 comments	p. 3	7	Non wires solutions								X	Proposal removed; not included
159	We support Staff's proposed revisions for this section; suggest that a sample one-page description be prepared to demonstrate granularity and detail envisioned by staff. We also support Staff's recommendation for regularly scheduled updates on improvements and projects identified in the most recently filed Plan.	Oct 4 comments	p. 3	8	Near term action plan								X	Comment is informative/positive; response not applicable
160	We support Staff's proposed revisions for this section; suggest that a sample one-page description be prepared to demonstrate granularity and detail envisioned by staff.	Oct 4 comments	p. 3	9	Long term plan								X	Comment is informative/positive; response not applicable