

REGULATORY UPDATE FOR FEBRUARY 14 (WEEK OF FEBRUARY 7, 2022)

CALIFORNIA PUBLIC UTILITIES COMMISSION (CPUC or COMMISSION)

New Proposed Decisions and Draft Resolutions¹

A.21-06-010 (SoCalGas Gas Cost Incentive Mechanism). This decision approves Southern California Gas Company's (SoCalGas) request for a shareholder reward of \$11,143,725 for Year 27 (2020-2021) of the company's Gas Cost Incentive Mechanism performance. The Commission's Public Advocates Office verified that SoCalGas's recorded gas costs were \$184,744,972 below the benchmark, which results in a reward of \$11,143,725 to SoCalGas's shareholders and a ratepayer benefit of \$173,601,247.

A.20-06-012 (PG&E RAMP). This decision closes Pacific Gas and Electric Company's (PG&E) 2020 Risk Assessment Mitigation Phase (RAMP) proceeding. This RAMP proceeding informs PG&E's Test Year (TY) 2023 General Rate Case (GRC) proceeding, which was filed on June 30, 2021 (Application (A.) 21-06-021) and is currently ongoing. PG&E filed its RAMP Report pursuant to the procedures set forth in Decision (D.) 14-12-025, D.16-08-018, and the settlement agreement adopted in D.18-12-014. The RAMP Report provides an initial quantitative and probabilistic assessment of PG&E's top 12 safety risks, plans to mitigate these risks, and estimates of costs associated with the proposed mitigations. The Commission's Safety Policy Division (SPD) is required to and did prepare an evaluation report of PG&E's RAMP Report. Parties were then given an opportunity to comment, and several parties filed comments and reply comments to both the RAMP Report and SPD's evaluation report. SPD and parties identified deficiencies and areas for improvement particularly with respect to increased granularity in PG&E's models, revisions to risk spend efficiency calculations, and revisions to the multi-value attribute function model and calculations. Comments and criticism were also directed towards the application of PG&E's Public Safety Power Shutoff as a mitigation of wildfire events. PG&E's TY2023 GRC proceeding incorporates PG&E's consideration of the comments and recommendations from SPD and parties. The filing of the RAMP Report, SPD's review, and comments from parties inform PG&E's TY2023 GRC. PG&E's consideration and integration of these comments and suggestions into its safety-related proposals in A.21-06-021 completes this RAMP process and no further action in this proceeding is required. Issues concerning PG&E's RAMP-related proposals in the GRC, including deficiencies and shortcomings that may still exist, shall be addressed in A.21-06-021.

Draft Resolution G-3586. This resolution approves SoCalGas to record up to \$16.494 million in Research, Development, and Demonstration (RD&D) expenses as outlined in its 2022 RD&D Program Research Plan to its RD&D Expense Account, pursuant to D.19-09-051. Any adjustments to the Program budget necessitated for the prior year (over or under) shall be carried

¹ Per CPUC Rules of Practice and Procedure Rule 14.3, comments on proposed decisions are due 20 days after issuance of the proposed decision, and reply comments are due five days thereafter. Comments on draft resolutions are due 20 days after the draft resolution appears in the CPUC's daily calendar, per Rule 14.5.



over to the following year, with any unspent RD&D funds remaining at the end of the GRC cycle returned in rates to customers as part of the next SoCalGas GRC.

R.21-03-010 (General Order (GO) 156). In accordance with Senate Bill 255 (Bradford, Stat. 2019, Ch. 407), this decision revises the Commission's Supplier Diversity Program set forth in GO 156 to incorporate community choice aggregators and electric service providers. The decision also incorporates a voluntary procurement goal for Lesbian, Gay, Bisexual, and Transgender (LGBT) business enterprises and adds a new group of business enterprises: those owned and controlled by persons with disabilities. Additionally, this decision adopts workforce and board diversity reporting and makes other program revisions to reflect recent Commission decisions on the Supplier Diversity Program.

R.13-11-005 (Energy Efficiency). This decision (Decision Different) from Commissioner Rechtschaffen differs from the proposed decision issued by Administrative Law Judge Kao in this proceeding in that the Administrative Law Judge's decision found it is not reasonable to impose financial penalties for SoCalGas's conduct. The decision different finds the evidence of record and the public interest support a fine of \$150,000, in accordance with Public Utilities Code, Sections 451 and 2107. The penalties are based upon a finding that SoCalGas spent ratepayer funds on activities that misaligned with the Commission's directions for energy efficiency codes and standards advocacy with respect to 2014-2017 energy codes and standards advocacy activities and activities involving local governments' adoption of reach codes, in violation of Public Utilities Code, Section 451.

R.21-10-002 (Resource Adequacy). This decision adopts modifications to the central procurement entity (CPE) structure adopted in D.20-06-002 and D.20-12-006, including revisions to the requirements for self-shown local resources, revisions to the CPE's solicitation selection criteria, and revisions to the CPE procurement timeline.

A.19-11-019 (PG&E Marginal Costs/Revenue Allocation/Rate Design). This decision adopts a stipulation reached between PG&E and the California Large Energy Consumers Association (Joint Parties) on the appropriate calculation for the property tax adder to be included in the marginal generation capacity cost for new customer rates effective June 1, 2022. This issue was identified as a material dispute on factual issues in D.21-11-016. The Joint Parties' stipulation addresses and resolves the outstanding property tax issues in this proceeding.

Draft Resolution E-5134. Pursuant to D.20-08-004, this resolution approves with modifications protocols proposed by PG&E, Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E) to administer, process, and negotiate requests to prepay Power Charge Indifference Adjustment obligations.

Workshops and Hearings

The Interconnection Discussion Workshop is scheduled for February 16, 2022 from 1 p.m. to 4 p.m. This is an informal venue designed to foster proactive, constructive communication between utilities, developers, and other impacted stakeholders about Rule 21 implementation and other interconnection rules.



Voting Meetings

The Commission held a voting meeting on February 10, 2022. The agenda included the following energy-related items:

Item 5. Draft Resolution E-5191. In Advice Letter (AL) 4464-E, SCE requests a modification to its 2014 Bundled Procurement Plan to allow SCE to engage in bilateral transactions for firm energy to meet its Resource Adequacy compliance obligations. This resolution approves SCE's request in AL 4464-E without modification. **Approved.**

Item 6. Draft Resolution E-5182. This resolution adopts modifications to the Self-Generation Incentive Program (SGIP) Handbook setting forth eligibility standards for the California Manufacturer Adder. D.19-02-006 directed the SGIP Program Administrators (PAs) to jointly file an AL outlining eligibility for additional incentives for project equipment manufactured in California. On April 15, 2019, the PAs filed this joint AL seeking approval of their proposed revisions to the SGIP Handbook: SoCalGas AL 5455-G, PG&E AL 4089-G/5524-E, SCE AL 3989-E, and Center for Sustainable Energy AL 101-E (collectively, the Joint SGIP PAs' AL). The Joint SGIP PAs' AL is approved with modifications. This resolution requires the SGIP PAs to determine eligibility for the California Manufacturer Adder by assessing the value of all eligible capital inputs into eligible SGIP battery modules as a cumulative whole. **Approved.**

Item 9. Draft Resolution E-5193. This resolution approves three utility-owned energy storage contracts for 161 megawatts (MW) of incremental capacity that SDG&E procured to address 2023 summer reliability. These contracts include two Engineering, Procurement, and Construction contracts, one with Mitsubishi Power America, Inc. for 10 MW, and one with Fluence Energy, LLC for 20 MW, and a Build, Own, and Transfer agreement with Consolidated Edison Development, Inc. for 131 MW. This resolution approves the requested relief in AL 3913-E. **Approved.**

Item 10. A.21-06-001 (PG&E ERRA). This decision adopts and approves, with modifications, the following requests by PG&E: (1) 2022 forecast of electric sales; (2) 2022 forecasted energy procurement revenue requirements to be effective in rates on or after January 1, 2022; (3) Greenhouse Gas (GHG) allowance revenue return forecast and costs; (4) rate design proposals associated with PG&E's proposed electric procurement-related revenue requirements, including the Green Tariff Shared Renewables rate proposal; (5) methodology to transfer certain year-end 2021 Energy Resource Recovery Account (ERRA) balances to the latest vintage of the Portfolio Allocation Balancing Account (PABA); and (6) transfer public policy-related procurement costs from the nonvintage PABA subaccount to the Public Policy Charge Balancing Account for recovery through the Public Purpose Program Charge on a going-forward basis. The decision sets a total 2022 revenue requirement of \$2,416,928,000. Signed, D.22-02-002.

Item 12. R.20-05-003 (IRP). This decision adopts a Preferred System Plan (PSP) portfolio that meets the statewide 38 million metric ton (MMT) GHG target for the electric sector in 2030. This portfolio was developed first with an aggregation of the individual integrated resource plans (IRPs) of all load-serving entities (LSEs), reflecting the resource



preferences of those LSEs. Then, Commission staff made adjustments to extend the timeframe beyond 2030 to 2032 for transmission planning purposes and to add the resources required in D.21-06-035 for mid-term reliability purposes. Finally, the portfolio utilizes a managed middemand paired with high electric vehicle demand forecast from the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR) of 2020. This decision further recommends to the California Independent System Operator (California ISO) that the 38 MMT PSP portfolio be utilized as both the reliability base case and the policy-driven base case for study in its 2022-2023 Transmission Planning Process (TPP). The decision also evaluates the 2020 individual IRP filings of all LSEs under the CPUC's IRP purview – it approves 20 plans and finds that 24 plans are incomplete and require additional revisions through a Tier 2 AL. Signed, D.22-02-004.

Item 13. R.13-02-008 (Biomethane Standards). This decision implements Senate Bill 1440 by setting biomethane and/or bio-synthetic natural gas procurement targets to reduce short-lived climate pollutant emissions. **Held to February 24, 2022 meeting.**

CALIFORNIA ISO

Stakeholder Initiatives: Upcoming Meetings and Deadlines

2021-2022 Transmission Plan and 20-Year Transmission Outlook. On January 31, 2022, the California ISO posted a draft of its 2021-2022 Transmission Plan, as well as a draft of its 20-Year Transmission Outlook. A stakeholder meeting to discuss the drafts will be held on February 7, 2022, with written comments due February 22, 2022. The revised Transmission Plan will be adopted at the March 2022 Board of Governor's meeting.

Interconnection Process Enhancements 2021. The California ISO held a public stakeholder call on February 1, 2022 to discuss the revised straw proposal for the Interconnection Process Enhancement 2021 initiative. Written comments on the revised straw proposal are due February 15, 2022.

2023 Flexible Capacity Needs and Availability Assessment Methodology. The California ISO held a public stakeholder call on February 2, 2022 to discuss the Draft 2023 Flexible Capacity Needs and Availability Assessment methodology. Written comments on the draft assessment are due February 16, 2022.

Reliability Demand Response Resource Bidding Enhancements. The California ISO held a public stakeholder call on February 2, 2022 to discuss the Reliability Demand Response Resource Bidding Enhancements initiative. Comments on the proposals and stakeholder discussion are due February 16, 2022.

2022-2023 TPP, **Unified Planning Assumptions.** The California ISO is seeking stakeholder input on demand response assumptions and generation or other non-transmission alternatives for consideration in the draft unified planning assumptions and 2022-2023 study plan. Stakeholder input for unified planning assumptions is due February 14, 2022.



Central Procurement Entity Implementation: Final Proposal and Revised Draft Tariff Language Posted. The California ISO will hold a public stakeholder call on February 15, 2022, to discuss the final proposal for the Central Procurement Entity Implementation and Resource Adequacy Availability Incentive Mechanism (RAAIM) Settlement Modification initiative. Written comments on the revised draft tariff language are due February 15, 2022 and comments on the final proposal are due March 1, 2022.

CALIFORNIA ENERGY COMMISSION

2021 Integrated Energy Policy Report (IEPR)

In December 2021, the CEC released three of the four Draft 2021 IEPR volumes for public comment. Comments on volumes I, II, and IV were due December 21, 2021. On January 13, 2022, CEC staff <u>published</u> Draft 2021 IEPR Volume III – Decarbonizing the State's Gas System. Written comments on Draft 2021 IEPR Volume III were due January 28, 2022 and are available in <u>Docket No. 21-IEPR-01</u>. Copies of all Draft 2021 IEPR volumes, as well as comments received by the CEC on volumes I, II, and IV, are available <u>here</u>.

According to the <u>agenda</u> for the upcoming February 16, 2022 CEC Business Meeting, the Commission will consider a proposed resolution adopting the 2021 IEPR Update: Volume I, Building Decarbonization; Volume II, Ensuring Reliability in a Changing Climate; Volume IV, California Energy Demand Forecast; and Appendix, Assessing the Benefits and Contributions of the Clean Transportation Program. The Notice of Availability and notice regarding CEC Consideration for Adoption of Final 2021 IEPR Volumes I, II, and IV, and Appendix A is available <a href="heep-the-heep-th-heep-

Senate Bill 100

CEC staff published a Notice of Joint Agency workshop regarding Analysis of Land Use Implications to meet Senate Bill (SB) 100 targets. The workshop is scheduled for February 22, 2022 at 1:00 p.m. and includes the CPUC, California ISO, and the CEC. The workshop will focus on discussing approaches for examining the environmental and land use implications of potential resource portfolios to meet SB 100 targets. Additional information, including remote access instructions, is available here.

Offshore Wind

On February 8, 2022, the CEC circulated a "Save the Date" for a remote-only offshore wind energy workshop scheduled for March 3, 2022 at 1:00 p.m. According to the Save the Date, the workshop will focus on Assembly Bill (AB) 525 (Chiu, Chapter 231, Statutes of 2021) and the requirement for the CEC to evaluate and quantify the maximum feasible capacity of offshore wind to achieve reliability, ratepayer, employment, and decarbonization benefits and establish offshore wind planning goals for 2030 and 2045. According to the CEC, more details will be forthcoming prior to the workshop, including a formal workshop notice and remote-attendance instructions.



Lithium Valley Commission

The Lithium Valley Commission will meet on February 16, 2022 at 9:00 a.m. Additional information about the meeting including remote attendance instructions is available here. In addition, on February 14, 2022, the CEC published a notice regarding a Lithium Valley Commission meeting scheduled for February 24, 2022 at 1:30 p.m. Additional information about the meeting including remote-attendance instructions is available here.

CEC Business Meetings

The next CEC Business Meeting is scheduled for February 16, 2022. The meeting agenda is available <u>here</u>.

CALIFORNIA AIR RESOURCES BOARD (CARB)

CARB is holding virtual public workshops as part of the AB 32 Scoping Plan Update. On February 15, 2022, CARB will hold a <u>public workshop</u> in collaboration with the California Department of Public Health and the California Office of Environmental Health Hazard Assessment on CARB's planned qualitative and quantitative health analysis associated with decarbonization targets under SB 32 and the AB 32 Scoping Plan Update. Recordings of past AB 32 Scoping Plan Update meetings and workshops are available <u>here</u>.

On February 17, 2022, CARB will hold a second public workgroup meeting on implementation of the Clean Off-Road Equipment Voucher Incentive Project. Registration and additional information are available here.

The next Board meeting will take place virtually February 24-25, 2022. The agenda is available here. During the meeting, the Board will hear the following items:

- Proposed amendments to the regulations designating areas of California as attainment, nonattainment, nonattainment-transitional, or unclassified for pollutants under the state ambient air quality standards.
- Proposed amendments to the Transport Refrigeration Units (TRUs) Airborne Toxic Control Measure, which would implement a transition truck TRUs to zero-emission technology, set a particulate matter emissions standard for newly manufactured non-truck TRUs, and require the use of lower global warming potential refrigerants.
- An information update on the development of the 2022 State Strategy for the State Implementation Plan, the draft Strategy, and next steps for the Board and public engagement. Informal comments on the draft Strategy can be submitted here on or before March 4, 2022.
- An information update on the AB 32 Scoping Plan Update development process, the analytical work underway, and next steps for the Board, Environmental Justice Advisory Committee, and public engagement on the Update.



MINNESOTA PUBLIC UTILITIES COMMISSION

Xcel Energy (Xcel) Integrated Resource Plan, PUC Docket No. 19-368

The Minnesota Public Utilities Commission ("Commission") concluded its hearings regarding Xcel Energy's resource plan on February 8, 2022. To briefly summarize, the Commission approved a plan that is largely consistent with Xcel's objective to be coal-free by 2030. The highlights of what was approved appear below.

- Xcel will retire the remaining coal units Allen King Plant (591 MW) in 2028 and Sherco Unit 3 (566 MW) in 2030 (this is in addition to the previously approved retirements of Sherco 1 (710 MW) and Sherco 2 (720 MW)).
- Xcel will commence certificate of need and route permit proceedings for both the Sherco and King gen-tie transmission lines.
- Xcel will own the Sherco and King gen-tie transmission lines, which would support up to roughly 2,000 MW (1996 MW) of renewable resources for Sherco and up to roughly 600 MW (591 MW) of renewable resources for King, with timing below.
 - o Roughly 1,300 MW of solar by 2026;
 - 720 MW using Sherco connection (i.e., Xcel owned); and
 - 600 MW location and ownership not defined.
 - o Roughly 600 MW of solar and 2,150 MW of wind (or an equivalent amount of energy and capacity from a combination of wind, solar, and/or storage) between 2027 and 2032 to maximize the use of the Sherco gen-tie line.
 - O The Commission did, however, condition Xcel's ownership of resources interconnecting on these gen-tie lines on the outcome of the certificate of need and route permit decisions, during which the Commission will evaluate cost-effectiveness of Xcel's proposals.
- In addition, the Commission included a number of points for the next resource plan and related proceedings. To summarize, the Commission:
 - Found that it is more likely than not that there will be a need for up to 800 MW of generic firm-dispatchable resources between the years 2027 and 2029, analysis of which must be included in the next Xcel resource plan;
 - o Included a requirement for bill impact analysis for residential, commercial, and industrial classes in the next resource plan;
 - Required Xcel to also conduct additional analysis of storage, meeting local clean energy goals, and modeling;
 - o Required Xcel to address and focus on planned investment and operations at its nuclear facilities (Prairie Island and Monticello);
 - Required a plan for meeting various diversity, equity, inclusion, and environmental justice objectives;
 - o Required Xcel to consider its blackstart needs in future planning meetings; and
 - o Determined that Xcel shall file its next resource plan by February 1, 2024.

A written order is pending. Additionally, because the Commission's decisions require subsequent certificate of need and route permit approvals, it is likely that several other regulatory proceedings will be initiated in the near future.



Minnesota Commission Schedule for the Week of February 14, 2022

The Minnesota Public Utilities Commission ("Commission") will participate in the National Association of Regulatory Utility Commissioners winter policy summit Monday-Wednesday. There is a Commission agenda meeting scheduled for 8:00 a.m. PT on Thursday, February 17, 2022, where the Commission will consider the following items: (1) the site permit application submitted by Zephyr Wind, LLC; (2) Great Plains Natural Gas Company's gas utility infrastructure cost rider; (3) Great Plains Natural Gas Company's annual depreciation certification; (4) Otter Tail Power Company's annual depreciation certification; (5) Dakota Electric Association's billing variance matter; and (6) Xcel's Community Solar Garden value of solar calculation proceeding. In addition to the Commission's agenda meeting, On February 17-18, the Minnesota Office of Administrative Hearings will begin contested case hearings related to the Commission's investigation into natural gas price spikes experienced during Winter Storm Uri.

OREGON PUBLIC UTILITY COMMISSION (OPUC)

Public Utility Regulatory Policies Act (PURPA) Complaint Against PacifiCorp Dismissed Without Prejudice – UM 2125

Last Friday, OPUC issued Order 22-049 that dismissed a complaint filed by Dalreed Solar LLC (Dalreed) against PacifiCorp for creating unreasonable delays in issuing a draft power purchase agreement (PPA) under PURPA. The OPUC found that the issue was moot because resolution would not directly affect the parties as PacifiCorp committed to providing the draft PPA and negotiating in good faith for the purchase of Dalreed's power. Last week the OPUC officially granted Dalreed's motion to dismiss its complaint without prejudice. The final order can be located here.

Oregon Community Solar Program (CSP) Updates – UM 1930

Last week, the OPUC issued Order 22-037 that ended the pre-certification pause in the Oregon CSP. In a prior order, the OPUC instated an automatic pause to the CSP's precertification process that would take effect 24 months following the launch of pre-certification in 2020 if the program did not have 80 MW of capacity subscribed and billing. The automatic pause was instated in order to allow the OPUC to evaluate the program's costs. Last week, the OPUC ended this pause and resumed pre-certification of all remaining capacity across tiers. The final order can be located <a href="https://example.com/here-certification-certifica

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION (WUTC)

Request for Proposal (RFP) Updates in Washington



Avista: On January 14, 2022, Avista filed a draft RFP with the WUTC in docket UE-UE-210832. Last Thursday, WUTC approved the RFP. The draft RFP and final order can be located here.

PacifiCorp: Last Thursday, the WUTC granted PacifiCorp's petition to extend the deadline for its all-source RFP. PacifiCorp argued that extending the deadline to May 1, 2022, would allow the utility time to receive final regulatory approvals for its RFPs in Oregon and Utah. The final order can be located here.

NEW YORK PUBLIC SERVICE COMMISSION

Comments Filed by NY Stakeholders on Two New Renewable Energy Transmission Lines

On February 8, 2022, the comment period ended for the proceeding involving the joint petition of New York State Energy Research and Development Authority (NYSERDA) and Department of Public Service for approval of two contracts for renewable energy credits entered into under Tier 4 of the Clean Energy Standard. The contracts would involve purchasing power from two new transmission lines.

Tier 4 was established by the Commission in October 2020 to help accelerate achievement of New York's target of 70% renewable energy by 2030. The Commission instructed NYSERDA to proceed with a Tier 4 solicitation that will increase the penetration of renewable energy into New York City. NYSERDA issued its solicitation in January 2021 and, in September 2021, selected the Clean Path New York (CPNY) project and the Champlain Hudson Power Express (CHPE) project. The CPNY project, developed by the New York Power Authority (NYPA) and Forward Power, will transmit energy generated from upstate solar and onshore wind into New York City. The CHPE project, developed by Transmission Developers Inc. and Hydro-Québec's (HQ) U.S.-based subsidiary HQUS, will transmit hydropower from Canada to Queens. The projects will deliver 18 million megawatt-hours of renewable energy per year to New York City, more than a third of the annual electric consumption, from a generation portfolio including onshore wind, solar, and hydroelectric power from upstate New York and Québec.

More than 17,000 comments were filed in the docket. The CPNY project was favored while opinion was split on the CHPE project. Regional development entities and other business groups supported both projects based on job creation and investment. Independent Power Producers of New York argued against the CHPE project, stating that it bypasses existing and new upstate renewable generation and cannot meet the city's winter needs because Québec load takes priority. Environmental organizations also held opposition to the CHPE project, arguing that hydropower from mega-dams does not constitute renewable energy. The CHPE project was supported by Bronx and Queens residents, who noted that there are a number of natural gas-fired peaking plants in the Mott Haven and Port Morris neighborhoods that are polluting the air and causing asthma hospitalization rates eight times higher than the national average and 21 times higher than any other neighborhood in the city. These projects were initially temporary, but have



become permanent. The CHPE project would help eliminate the need for these projects to continue operation.

FEDERAL ENERGY REGULATORY COMMISSION (FERC)

The Commission's next open meeting is February 17, 2022.

FERC will hold the <u>second public meeting</u> of the Joint Federal-State Task Force on Electric Transmission on February 16, 2022 at the Renaissance Downtown Hotel in Washington, D.C. The topics of discussion are: (1) Specific Categories and Types of Transmission Benefits That Transmission Providers Should Consider for the Purposes of Transmission Planning and Cost Allocation and (2) Cost Allocation Principles, Methodologies, and Decision Processes for the Purposes of Transmission Planning and Cost Allocation.

FERC issued a Notice of Proposed Rulemaking (NOPR) on January 20, 2022 that proposes to direct the North American Electric Reliability Corporation to develop and submit for FERC approval new or modified Critical Infrastructure Protection (CIP) Reliability Standards that require internal network security monitoring for high- and medium-impact Bulk Electric System (BES) Cyber Systems. The current CIP Reliability Standards address perimeter requirements but do not address internal network security monitoring, which creates a gap. The NOPR also requests comments on the potential usefulness and practicality of implementing internal network security monitoring to detect malicious activity in networks with low-impact BES Cyber Systems, including any potential benefits, technical barriers, and associated costs. Comments on the NOPR are due March 28, 2022.

FERC has extended until March 31, 2022 the waiver of its requirement that filings be notarized or supported by sworn declarations. FERC also extended the waiver of its requirements to hold in-person meetings or submit notarized documents for open access transmission tariffs.