

REGULATORY UPDATE FOR JULY 12, 2021 (WEEK OF JULY 5)

CALIFORNIA PUBLIC UTILITIES COMMISSION

New Proposed Decisions and Draft Resolutions¹

A.19-08-013 (SCE general rate case). This decision approves a test year base revenue requirement of \$6.885 billion for Southern California Edison Company (SCE). The adopted amount is a 7.42 percent increase over SCE's currently authorized revenue requirement compared to SCE's requested 19.03 percent increase. This decision also authorizes post-test year revenue requirement adjustments of \$337 million for 2022 (a 4.90 percent increase) and \$389 million for 2023 (a 5.39 percent increase). A significant component of SCE's request in this application is for capital expenditures, particularly as it relates to mitigating wildfire risk. SCE requested approximately \$5.205 billion in capital expenditures during 2021 alone. The decision approves approximately \$4.628 billion of total capital expenditures.

Voting Meetings

The Commission will hold a voting meeting on July 15, 2021. The agenda includes the following items.

Item 5. Draft Resolution E-5154. This Resolution adopts updated contract prices by Product Category for the Renewable Market Adjusting Tariff (ReMAT) using price data from Renewables Portfolio Standards (RPS) contracts executed between 2015 and 2020. In addition, it orders Pacific Gas and Electric (PG&E) and SCE to amend their Renewable Program tariff to reflect the adopted fixed prices by Product Category paid to the seller. The new prices, by Product Category, are:

ReMAT Product Category	Weighted Average Price (\$/MWh)	
As-Available Non-Peaking	\$	49.02
As-Available Peaking	\$	50.81
Baseload	\$	73.50

¹ Per California Public Regulatory Commission (CPUC or Commission) 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.



Item 7. A.20-11-004 (Hydrogen-Related Additions or Revisions to the Standard Renewable Gas Interconnection Tariff). This decision dismisses Application 20-11-004 (Application) for Hydrogen-Related Additions or Revisions to the Standard Renewable Gas Interconnection Tariff, filed by PG&E, Southern California Gas Company (SoCalGas), San Diego Gas & Electric (SDG&E), and Southwest Gas Corporation (all, Joint Utilities). The Application is dismissed because it is incomplete, and its further consideration would be premature and inefficient. The Commission finds that a subsequent, complete application will permit more effective, efficient, and timely progress towards achieving the safe and optimal use of renewable hydrogen. The decision also provides guidance to the Joint Utilities and stakeholders regarding Commission expectations of a future proposed hydrogen demonstration program and funding.

Item 8. R.19-10-005 (EPIC Funding). This decision approves the California Energy Commission's (CEC) proposed interim Electric Program Investment Charge (EPIC) investment plan. In total, the plan would fund \$147.26 million on nine initiatives, as well as administrative expenses over 12 months, ensuring continued investments in energy innovation while this proceeding continues to consider changes to the EPIC program in advance of the next full investment cycle applications.

Item 9. A.14-09-001/A.15-08-005 (Lodi Gas Storage). This decision approves, in part, the petition of Wild Goose Storage, LLC (Wild Goose) and Lodi Gas Storage, L.L.C. (Lodi) to modify D.16-06-014 to eliminate the obligation imposed upon them to seek Commission approval to operate Wild Goose and Lodi as an integrated hub. The decision finds that substantial changes in the natural gas storage market, which were not contemplated when D.16-06-014 was issued, now render operation as an integrated hub impractical and possibly detrimental to maintaining a competitive natural gas storage market within the state. However, the decision also keeps in place the prohibitions from sharing sensitive information, which were implemented by D.08-01-018 and reaffirmed in D.14-12-013 and D.16-06-014.

Item 13. A.10-07-009/A.19-03-002 (SDG&E GRC/Dynamic Pricing). The decision adopts the Settlement Agreement filed by SDG&E, Public Advocates Office at CPUC, Utility Consumers' Action Network, Federal Executive Agencies, California Farm Bureau Federation, San Diego Airport Parking Company, Small Business Utility Advocates, Solar Energy Industries Association, Energy Producers and Users Coalition, California Large Energy Consumers Association, California City County Street Light Association, Utility Reform Network, and City of San Diego. The settlement resolves all issues among the settling parties except for three: (1) the proposal to adopt a new schools-only rate class; (2) the proposal to extend the load limit exemption for certain small commercial customers with electric vehicle fleets; and (3) the real-time pricing dynamic rate proposal. Regarding these three issues, the decision denies the proposed schools-only rate class. The expired exemption to the small commercial rate for electric vehicle fleets is reinstated with modifications. For the real-time pricing proposal, SDG&E is directed to convene a working group to help design and implement a real-time pricing pilot for its customers. SDG&E is also directed to file a sales forecast application for 2022



within 30 days of the effective date of this decision.

Item 15. Draft Resolution E-5112. This Resolution approves, with modifications, SCE's AL 4182-E, Mid-Cycle Review Compliance Submittal for its 2018-2022 Demand Response funding application pursuant to D.17-12-003. The Mid-Cycle Review (MCR) is required by D.16-09-056, which increased the DR budget cycle from three years to five years. The MCR provides a full status report of each demand response program, and may recommend minor, noncontroversial program changes. This Resolution reviews SCE's proposed changes to its DR programs and protests filed by stakeholders, and approves those changes, with modifications based on party comments. In addition, it finds that some of the changes requested in the protests are inappropriate for the Advice Letter (AL) process or out of scope of the MCR. SCE must submit a compliance AL with these changes, and must also reduce the Category 5 (Pilots) budget by the entire amount that would have been spent on the previously-planned pilot and baseline analysis. Budget changes should be reflected in SCE's monthly ILP & DRP Report. This Resolution denies SCE's Year-Round Capacity Bidding Program Day Ahead price trigger of \$75/MWh, and instead adopts a trigger price of \$75/MWh for November to April, and an \$80/MWh trigger price for May to October. This Resolution also approves several minor changes to SCE's budget and reporting requirements.

Item 16. Draft Resolution G-3583. This Resolution adopts a Backbone Transmission Service Credit mechanism for the SDG&E customers who pay for, but do not receive, firm Backbone Transmission Services because of maintenance-related outages. The Backbone Transmission Service Credit shall be included in an affected customer's monthly gas bill.

Item 17. Draft Resolution E-5133. This Resolution approves, with modifications, AL 3618-E for SDG&E, and approves SCE's AL 4369-E. This Resolution approves SDG&E's requests for permission to deviate from tariff Schedules E-DEPART and Customer Generation Departing Load Cost Responsibility Surcharge (CGDL-CRS) by waiving departing load charges assessed in 2020 for certain customer generators, but rejects SDG&E's request for revisions to Schedules CGDL-CRS and E-DEPART to include language that would exempt customers from being assessed these departing load charges in instances when called upon to provide grid support. In addition, this Resolution approves SCE's request for a one-time deviation from SCE's Schedule CGDL-CRS and Schedule Departing Load Nonbypassable Charge to refund departing load and nonbypassable charges incurred to specific customer generators during the August and September 2020 heatwaves.

Item 18. R.19-09-009 (Microgrids). This decision directs PG&E, SCE, and SDG&E to provide rate schedule(s) that suspend the capacity reservation component of their standby charge for eligible microgrids that meet the California Air Resources Board (ARB) air pollution standards for generation. This suspension is intended to allow the Commission and stakeholders to ascertain the costs that the utilities incur to provide standby service to microgrids.

Item 19. Draft Resolution G-3581. This Resolution adopts a Backbone Transmission Service Credit mechanism for the SoCalGas customers who pay for, but not do receive, firm Backbone Transmission Services because of maintenance-related outages. The Backbone Transmission Service Credit shall be included in an affected customer's monthly gas bill.



Item 21. A.18-04-002/I.17-04-019 (PacifiCorp GRC). In D.20-02-025 OP 18, the Commission ordered PacifiCorp to file retirement plans for all coal facilities serving California customers, and any associated request for accelerated depreciation, consistent with its Integrated Resource Plan (IRP) filings, by second quarter 2021. PacifiCorp petitions to extend the deadline for filing these documents to the filing date of its 2023 general rate case to allow them to be efficiently considered with information obtained from PacifiCorp's 2021 IRP. This decision grants PacifiCorp's petition.

Item 22. A.20-02-009 (PG&E ERRA). This decision finds that PG&E, during the 2019 record year, complied with all the requirements that the Commission reviews during the Energy Resources Recovery Account (ERRA) compliance process. Specifically, during the 2019 record year, PG&E (1) prudently administered its energy resource contracts, (2) prudently managed its utility-owned generation facilities and dispatched energy in a least-cost manner, and (3) implemented its Bundled Procurement Plan in procuring greenhouse gas compliance instruments and in procuring and selling resource adequacy (RA). In addition, PG&E has also demonstrated that (except for the account adjustments expressly provided in the parties' Settlement Agreement) the entries PG&E recorded in the ERRA and Portfolio Allocation Balancing Account, as well as other balancing and memorandum accounts reviewed in this application, are reasonable, appropriate, and accurate. This decision approves a Settlement Agreement entered by all the parties that actively participated in Phase One of this proceeding. The Settlement Agreement resolves all but two contested issues between the parties. This decision approves the unopposed relief that PG&E is requesting in Phase One. For the two contested issues, this decision finds that PG&E shall (1) use the same methodology approved in D.20-02-047 (2020 ERRA decision) to calculate the Retained RPS adjustment and update the RPS adjustment with actual 2019 recorded sales data, and (2) retain the same Power Charge Indifference Adjustment vintage years for the power purchase agreements PG&E amended in 2019.

Item 23. R.19-09-009 (RA). This decision addresses issues scoped as Track 3B.2 to restructure the RA program and sets forth a process and schedule for further development of PG&E's slice-of-day proposal. The Commission directs parties to develop a final restructuring proposal through workshops over the next approximately six months. Parties shall undertake a minimum of five workshops to develop implementation details. The workshops should cover the following implementation details: (1) Structural Elements; (2) Resource Counting; (3) Need Determination and Allocation; (4) Hedging Component; and (5) Unforced Capacity Evaluation (UCAP) and Multi-Year Requirement Proposals. The Commission deems an implementable RA framework as one that addresses the above implementation details, as well as the four identified key principles. The Commission also directs parties to consider a final proposed framework's compatibility with existing Commission planning goals and programs, such as the IRP and RPS proceedings. The Commission recommends that the parties that submitted Track 3B.2 restructuring proposals (CalCCA, PG&E, SCE, and SDG&E) facilitate the workshops, individually or jointly. The Commission requests that California ISO (CAISO) and the CEC directly participate in these workshops, particularly on issues that pertain to their direct involvement (e.g., load forecast issues, UCAP, MOO), and that CAISO identify any required tariff modifications as early as practicable to allow for implementation prior to 2024. Energy Division shall be consulted and included throughout the workshop process. At the conclusion of



the workshops, an identified party/parties shall prepare and submit a Workshop Report that provides the final proposed framework (identifying consensus and non-consensus items) and discuss how the final proposal addresses the implementation details and the key principles. The Workshop Report shall be filed and served in the RA proceeding in February 2022. Following the submission of the Workshop Report, parties will be given an opportunity to comment. Within 30 days of the effective date of this decision, parties shall reach agreement and inform the Commission (with service to the service list) of the following: (1) the date for the first workshop and placeholder dates for at least two subsequent workshops; (2) the scope of issues for each workshop; (3) identified party(ies) to facilitate each workshop; and (4) identified party(ies) to prepare and submit the Workshop Report to the Commission. The Commission will consider the final proposed framework and intends to issue a decision in the third quarter of 2022 with details for implementation in 2023 for the 2024 RA compliance year.

Item 24. A.20-04-002 (SCE ERRA). This decision approves SCE's rate recovery for 2019 Record Year costs, including its procurement-related operations and regulatory account management. With respect to its procurement activities, the Commission finds SCE achieved least-cost dispatch of its energy resources and economically-triggered demand response programs pursuant to Standard of Conduct Number Four (SOC 4). The Commission also finds SCE prudently administered, managed, and dispatched its Utility Retained Generation Facilities, Qualified Facilities (QF), and other non-QF contracts, in compliance with all applicable rules and regulations and Commission decisions, including but not limited to SOC 4. With respect to SCE's regulatory account management, the Commission finds SCE's recorded entries in 30 accounts are appropriate, correctly stated, and in compliance with applicable Commission decisions. SCE's recovery of \$1,726,000 in litigation costs and associated interest is deferred to a future ERRA compliance proceeding. The Commission also finds reasonable and approves a \$16,065,000 net revenue requirement in SCE's 2019 rate levels associated with the following costs: (1) \$15,579,000 in the Memorandum Account (MA) for Residential Rate Implementation, (2) \$257,000 in the Building Benchmarking Data MA, and (3) \$48,000 in the Power Charge Indifference Adjustment MA. Finally, the Commission authorizes SCE to eliminate the Disadvantaged Communities Single-Family Affordable Solar Homes MA and Preliminary Statement N.22 from its tariffs.

Item 27. A.20-06-001 (SDG&E ERRA). This decision approves various 2019 ERRA-related activities and costs of SDG&E. In 2019, SDG&E administered and managed its utility-owned generation facilities prudently and its contracts for generation and power purchase agreements in accordance with the contract provisions and Commission guidelines. Except for a disallowance regarding two November 2019 incidents regarding incremental bids for thermal resources, this decision also approves SDG&E's 2019 use of energy resources based upon its achievement of least-cost dispatch.

Item 39. R.18-12-006 (EV Rates and Infrastructure). This decision adopts guidance and a streamlined AL process for PG&E, SCE, SDG&E, Liberty Utilities LLC, Bear Valley Electric Service, and PacifiCorp regarding near-term priority transportation electrification investments and addresses issues of equity as they relate to transportation electrification.

Item 40. Draft Resolution WSD-017. This Resolution ratifies the Action Statement of



the Wildfire Safety Division (WSD) approving PacifiCorp's 2021 Wildfire Mitigation Plan (WMP) Update pursuant to Public Utilities Code Section 8386.

Item 41. Draft Resolution WSD-018. This Resolution ratifies the Action Statement of the WSD approving Liberty Utilities' 2021 WMP Update pursuant to Public Utilities Code Section 8386.

Item 42. Draft Resolution WSD-016. This Resolution ratifies the Action Statements of the WSD approving Trans Bay Cable's and Horizon West Transmission's 2021 WMP Updates pursuant to Public Utilities Code Section 8386.

Item 43. Draft Resolution WSD-019. This Resolution ratifies the Action Statement of the WSD approving SDG&E's 2021 WMP Update pursuant to Public Utilities Code Section 8386.

CALIFORNIA ISO

California ISO Takes Action to Prepare for Extreme Heat. On July 9, 2021, the CAISO issued a flex alert, later extending it through Saturday, July 10, 2021, due to extreme heat forecasted across much of California, as well as a wildfire in Oregon threatening transmission into California. On Sunday, July 11, the California ISO issued another flex alert for Monday, July 12.

On July 9, 2021, the CAISO also issued a Significant Event Capacity Procurement Mechanism (CPM) designation to 11 resources, totaling 309.24 MW, to address a CPM Significant Event, defined in the CAISO tariff as an event or combination of events, resulting in a "material difference from what was assumed in the resource adequacy program for purposes of determining the Resource Adequacy Capacity requirements, or produce a material change in system conditions or in CAISO Controlled Grid operations, that causes, or threatens to cause, a failure to meet Reliability Criteria absent the recurring use of a non-Resource Adequacy Resource(s) on a prospective basis." That same day, the CAISO also issued an Exceptional Dispatch CPM to an additional resource totaling 121.42 MW. The CPM term for all 12 resources is 30 days.

Stakeholder Initiatives: Upcoming Meetings and Deadlines

Energy Storage Enhancements - Stakeholder Presentation Working Group Meeting. The CAISO has invited stakeholders to attend a working group on July 26, 2021. This is an opportunity for stakeholders to showcase proposals for solutions to the issues outlined by the CAISO in the Energy Storage Enhancements issue paper. Presentations are required to be submitted in advance of the working group meeting. Draft presentations are due by July 12, with final presentations posted publicly on July 19.

New Initiative: External Load Forward Scheduling Rights Process. The CAISO has launched a new initiative called External Load Forward Scheduling Rights Process and scheduled a public stakeholder workshop webinar on July 13, 2021. The purpose of this first



workshop is to solicit input and provide stakeholders an opportunity to present the issues that need to be addressed and guiding principles for this stakeholder initiative.

Western EIM Governance Review Committee Executive Session Teleconference Meeting: 7/15/21 Final Agenda. The CAISO has posted the final agenda for the July 15, 2021 Western EIM Governance Review Committee executive session teleconference meeting. The final agenda may be found here: FinalAgenda-EIMGovernanceReviewCommitteeMeeting-Jul15-2021.pdf (westerneim.com).

Board of Governors 7/14/21 - 7/15/21 and DMM Oversight Committee 7/14 Meetings. The CAISO has posted to its website the agendas for the July 14-15, 2021 Board of Governors meetings and the July 14, 2021 Department of Market Monitoring Oversight Committee meeting. Board of Governors' meeting agenda may be found here: final agenda. DMM Oversight Committee meeting agenda may be found here: final agenda.

RAAIM Exemptions for Demand Response Resources. The CAISO has posted a revised final proposal for the Resource Adequacy Availability Assessment Mechanism (RAAIM) Exemptions for Demand Response Resources effort. The proposal, which includes changes to the proposed tariff amendment language in response to stakeholder comments, and may be found here: RAAIM Exemptions for DR.

CALIFORNIA ENERGY COMMISSION

2021 IEPR. As part of the 2021 Integrated Energy Policy Report (IEPR) proceeding, the CEC held a remote access workshop on July 8-9, 2021 with the CPUC and the CAISO to discuss electric system and natural gas reliability for summer 2021. Topics of discussion included ongoing monitoring and evalution of summer 2021 reliability and uncertainties presented by hydro power, imports, and demand response. Presentation materials and event recordings for the four separate workshop sessions are available on the 2021 IEPR website under "Past Events."

SB 100 Implementation Planning. The CEC will jointly conduct a workshop on July 22, 2021 with the CPUC and the CAISO to discuss existing and proposed transmission projects that can potentially support the delivery of resources required to achieve the goals of Senate Bill 100 (SB 100). The workshop will be split into two sessions: session one begins at 9:00 a.m. and session two will begin at 1:30 p.m. The workshops will be remote access only. For more information, please see the Notice published in docket number 21-SIT-01, available at https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-SIT-01.

EPIC 2021-2025 Investment Plan. On June 2, 2021, CEC Staff published a Notice of Staff Workshops regarding a series of remote access workshops to discuss the EPIC 2021-2025 Investment Plan (EPIC 4 Investment Plan) and solicit public input on specific research topics to inform the plan. The workshops will review the research initiatives proposed in the draft EPIC 4 Investment Plan and solicit public input.

As background, the CPUC established EPIC in 2012 to fill a critical gap in funding for public investments in clean energy research and technology innovation that can provide benefits



to electric ratepayers through greater reliability, lower costs, and increased safety. On September 2, 2020, the CPUC renewed EPIC for an additional 10 years (January 1, 2021 through December 31, 2030) in D.20-08-042. The CPUC approved the CEC as an EPIC administrator with an annual budget of \$148 million for the first five years and ordered the investor-owned utilities to collect funds for the renewed EPIC starting January 1, 2021. The decision requires the CEC to file an investment plan to the CPUC by October 1, 2021 to cover the period of January 1, 2021 to December 31, 2025 (referred to as EPIC 4). According to the Public Notice, CEC Staff anticipates that the CPUC will issue a decision on the EPIC 4 Investment Plan in spring 2022. More information on the CEC's administration of the EPIC program is available here.

The series of CEC Staff workshops started on June 14, 2021 and will run through July 2021, culminating in an August 4, 2021 workshop entitled "Draft Initiatives for EPIC 4" that will review the research initiatives proposed in the draft EPIC 4 Investment Plan and solicit public input. A detailed list of workshop dates and times, as well as remote attendance instructions, is available here.

BOEM/CEC Meeting. The <u>Bureau of Ocean Energy Management</u> and the CEC will convene a <u>meeting</u> of the California Intergovernmental Renewable Energy Task Force on July 13, 2021. The Task Force meeting will provide an update on progress made in advancing offshore wind development in California since the last Task Force meeting in March 2020 and discuss the next steps for offshore wind off California's central and north coasts. There will also be opportunity for public comment at the meeting. Registration is available <u>here</u>.

CEC Business Meetings. The next CEC Business Meeting will be held remotely on July 15, 2021. The agenda, including remote access instructions, is available here.

CALIFORNIA AIR RESOURCES BOARD

The California Air Resources Board's (ARB) next general Board meeting will be held July 22-23, 2021. The meeting agenda is available here. ARB will also hold a Board meeting on community air protection on July 29, 2021. The agenda will be made available <a href=here.

ARB will hold a Board meeting on <u>community air protection</u> on July 29, 2021. At the meeting, the Board will consider the <u>Stockton Community Emissions Reduction Program Staff Report</u>. Notice of the meeting is available <u>here</u>, and comments on the Staff Report can be submitted to ARB on or before July 19, 2021 <u>here</u>. The full agenda will be made available <u>here</u>.

On July 20, 2021, ARB will hold a <u>Technical Workshop</u> on Natural and Working Lands, related to the <u>AB 32 Scoping Plan Update</u> for 2022. In June, ARB held a <u>series of public workshops</u> on development of the 2022 Scoping Plan Update. Recordings of the workshops are <u>available online</u>.

ARB's <u>AB 617 Consultation Group</u>, related to the Community Air Protection Program, will hold a <u>meeting</u> on July 20, 2021. The meeting can be accessed <u>here</u>.



ARB is accepting informal public comments on the proposed <u>Advanced Clean Fleets</u> regulation, which aims to achieve a zero-emissions truck and bus California fleet by 2045. Comments may be <u>submitted</u> on or before September 15, 2021.

PJM INTERCONNECTION

PJM may be headed toward filing a watered-down version of its controversial Minimum Offer Price Rule (MOPR) by mid-July. PJM's boards recently approved a revised MOPR that would still apply a price floor to certain resources, however that application would be much narrower that previously constructed, i.e., it would apply only to generators that receive a state subsidy *on the condition* of clearing the capacity auction (aka "Conditioned State Support"), as well as to sellers who may be able to assert Buyer Side Market Power through a load interest and suppress market clearing prices to the overall benefit of the seller's portfolio or the portfolio of any load serving entity.

OREGON

OPUC Approves PGE's Annual Update to Schedule 201, Qualifying Facility (10 MW or Less) Avoided Cost Information – UM 1728

Last Tuesday, the Oregon Public Utility Commission (OPUC) issued Order 21-215 approving Portland General Electric Company's (PGE) annual update to Schedule 201, which governs avoided cost payments to QFs. In its order, OPUC accepted PGE's modified Effective Load Carrying Capacity value for solar resources. However, PGE is required to perform additional analyses related to solar QF forecasting to inform future avoided cost proceedings. The order can be located <a href="https://example.com/here-en/limits/be-public-be-publi

OPUC Meetings this Week

On Tuesday, July 13 at 9:30 a.m. PDT, the OPUC will hold a public meeting to discuss a wide range of dockets including UM 2166 (regarding appointment of an independent evaluator for PGE's 2021 All- Source Request for Proposals) and UM 1930 (regarding the assignment of two Oregon Community Solar Program power purchase agreements).

WASHINGTON

WUTC Grants PacifiCorp an Extension for Filing Its Draft Clean Energy Implementation Plan (CEIP) – UE-210223

Under WAC 480-100-640(1) which implements Washington's Clean Energy Transformation Act, utilities are required to file a draft CEIP by October 1, 2021, and every four years thereafter. In April, PacifiCorp filed a petition seeking an extension of their CEIP due to difficulties associated with transitioning to a new modeling software. Last Friday, the Washington Utilities and Transportation Commission (WUTC) issued an order extending the draft CEIP filing



deadline to November 1, 2021, subject to the condition that the utility develop and file an IRP to CEIP modeling workplan by August 15, 2021.

FEDERAL ENERGY REGULATORY COMMISSION

FERC and NERC released a joint report on SolarWinds and the related supply chain compromise. The report emphasizes the need for continued vigilance by the electricity industry related to supply chain compromises and incidents and recommends specific cybersecurity mitigation actions to better ensure the security of the bulk-power system. The report includes a list of recommended industry actions.

FERC, NERC and NERC's regional entities issued <u>a report</u> outlining recommendations for real-time assessments of grid operating conditions. The joint staff review focuses on strategies and techniques used by reliability coordinators and transmission operators to perform real-time assessments following a loss or degradation of data or tools used to maintain situational awareness. The report concludes that system operators are prepared to manage limited impairments of their primary assessment tools or data through system redundancy and redundant data sources. However, infrequent events involving significant real-time data loss or the failure of primary analysis tools lasting more than two hours require the development of alternative data sources, tools, and analyses work to mitigate the potential loss of visibility and control resulting from the impairment of their primary tools.

FERC's next open meeting is July 15, 2021. The sunshine notice for the meeting is a relatively light one as FERC heads toward its August recess, however it includes the following dockets:

- 1. A new rulemaking docket entitled "Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection."
- 2. Action on a complaint from Hecate Energy Greene County 3 LLC that the New York ISO (NYISO) and Central Hudson Gas & Electric Corp. violated the FPA and NYISO's OATT by (1) failing to use reasonable efforts when processing Complainant's small generator interconnection request and (2) applying an "Inclusion Practice" regarding the "firmness" of generator interconnection requests that is not specified in the Tariff and that contradicted the Tariff provisions regarding queue position.
- 3. Action on a settlement involving Pacific Gas & Electric's wholesale distribution tariff rates.
- 4. A rehearing request by the PJM Interconnection, L.L.C. (PJM) stakeholders of FERC's December 17, 2020 Order Rejecting Proposed Tariff Revisions, which rejected the stakeholders' proposal to roll into PJM's regional transmission expansion planning process responsibility for replacements and retirements of aging infrastructure projects a/k/a "End of Life Projects."
- Action on NV Energy's <u>Complaint</u> against the CAISO proposal to modify its curtailment practices, including reduced priority of self-scheduled wheel through transactions. FERC recently approved CAISO's controversial proposal for wheel throughs in an <u>Order</u> <u>Accepting Tariff Revisions</u>, <u>Subject to Further Compliance</u>, issued on June 25, 2021.



