



# Public Service Commission

**Public Service Commission**

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January 10, 2023

*Via Electronic Mail*

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223-1350

Re: Case 16-M-0411 – In the Matter of Distributed System Implementation Plans.

Dear Secretary Phillips,

Please find the attached Proposed Commission Guidance for the Electric Utilities' 2023 DSIP Update Filings, prepared by Department of Public Service Staff, for filing in Case 16-M-0411. Please feel free to contact me should you have any questions.

Sincerely,

*/s/ Stephanie S. McDermott*

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Attachments



**Case 16-M-0411 - In the Matter of Distributed System Implementation Plans**

**DPS Whitepaper**

**Proposed Commission Guidance for the Electric Utilities'**

**DSIP Update Filings**

**Dated: January 10, 2023**

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## 1 Introduction and Background

### 1.1. Distributed System Implementation Plan Background

In 2015 the New York State Public Service Commission (Commission) issued the Reforming the Energy Vision (REV) Track One Order.<sup>1</sup> The following year, the Commission issued the subsequent Guidance Order.<sup>2</sup> Through these Orders, the Commission directed each New York State electric utility to file an Initial Distributed System Implementation Plan (DSIP) and subsequent DSIPs on a biennial basis.<sup>3</sup> The purpose of the DSIPs is to provide detailed, up-to-date information about progress and plans related to the implementation of a Distributed System Platform (DSP) featuring operational and market capabilities that will enable a market for products and services provided by the Distributed Energy Resources (DER) that are connected to the utility's distribution systems. In 2017, the Commission provided further guidance regarding the DSIP process and DSIP content in its Order on Distributed System Implementation Plan Filings.<sup>4</sup>

In a 2018 whitepaper concerning the utilities' 2018 DSIP update filings (2018 Whitepaper), Department of Public Service Staff (DPS Staff) provided detailed recommendations for the contents and organization of future DSIP filings. The 2018 Whitepaper specified fourteen technical topics to be addressed by the utilities in the DSIPs, general instructions for all technical topics, and topic-specific information needed for each individual technical topic. The fourteen technical topics specified in the 2018 Whitepaper were:

1. Integrated Planning;

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<sup>1</sup> Case 14-M-0101, Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision (REV Proceeding), Order Adopting Regulatory Policy Framework and Implementation Plan (issued February 26, 2015) (REV Track One Order).

<sup>2</sup> Case 14-M-0101, REV Proceeding, Order Adopting Distributed System Implementation Plan Guidance (issued April 20, 2016) (Guidance Order).

<sup>3</sup> The New York State electric utilities are Central Hudson, Consolidated Edison Company of New York, Inc., New York State Electric and Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas & Electric (the utilities or the Joint Utilities).

<sup>4</sup> Case 16-M-0411, In the Matter of Distributed System Implementation Plans, Order on Distributed System Implementation Plan Filings (issued March 9, 2017).

2. Advanced Forecasting;
3. Grid Operations;
4. Energy Storage Integration;
5. Electric Vehicle Integration;
6. Energy Efficiency Integration and Innovation;
7. Distribution System Data;
8. Customer Data;
9. Cyber Security;
10. DER Interconnections;
11. Advanced Metering Infrastructure;
12. Hosting Capacity;
13. Beneficial Locations for DERs and Non-Wires Alternatives; and
14. Procuring Non-Wires Alternatives.

In addition, Staff's 2018 Whitepaper described recommendations pertaining to tools and information resources available to DSIP stakeholders, utility governance of DSIP, utility marginal cost of service (MCOS) studies, and benefit-cost analysis (BCA) methodology.

## **1.2. Coordinated Grid Planning Proceeding (“CGPP”) Background**

On July 18, 2019, New York State enacted the Climate Leadership and Community Protection Act (CLCPA), which established a set of aggressive climate goals focused on de-carbonizing energy production and use in New York State by 2050. To support achievement of its climate goals, on April 3, 2020, New York enacted the Accelerated Renewable Energy Growth and Community Benefit Act (AREGCBA). The AREGCBA directs the Commission to develop and implement plans for future investments in the State's electric grid to ensure the grid will support the State's aggressive climate goals. The AREGCBA requires the Commission to:

1. Initiate and coordinate production of a statewide power grid study to identify distribution, local transmission, and bulk transmission investments needed to achieve the State's CLCPA goals.
2. Commence two proceedings to advance needed projects identified through the power grid study.

- a. a proceeding to develop a state-wide plan to identify and implement transmission-level investments that are necessary or appropriate to achieve the CLCPA targets; and
- b. a proceeding focused on establishing a distribution and local transmission capital plan for each utility.

The Commission issued two orders in response to the AREGCBA directives:

1. The Order on Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act initiated the proceeding to develop a state-wide plan to identify and implement transmission-level investments that are necessary or appropriate to achieve the CLCPA targets.<sup>5</sup> The Order directs the State's transmission and distribution utilities to:
  - a. file criteria for evaluating, funding, and prioritizing the local transmission and distribution (LT&D) investments needed to meet CLCPA objectives; and
  - b. conduct a study of their LT&D systems identifying potential upgrades.
2. The Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals which, among other things, directs the utilities to consult with Staff, NYSERDA, and the NYISO and to develop and file a coordinated power grid planning process (hereafter called the CGPP).<sup>6</sup> The directive requires the CGPP to:
  - a. support all existing grid planning needs and criteria;
  - b. identify needed facility upgrades at all grid levels;
  - c. provide accurate and actionable grid planning information to market actors, policy-makers, and key stakeholders;
  - d. use schedules, process flow diagrams, and other methods to describe and explain the coordinated grid planning cycle;
  - e. describe how and when grid planning results will be presented to stakeholders;
  - f. identify the participating grid planning actors and explain how they will coordinate

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<sup>5</sup> Case 20-E-0197, Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act, Order on Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act (issued May 14, 2020).

<sup>6</sup> Case 20-E-0197, supra, Order on Local Transmission and Distribution Planning Process and Phase 2 Project Proposals (issued September 9, 2021).

- their respective planning obligations within the overall planning process;
- g. ensure consistency of planning data inputs, planning assumptions, planning models, and planning methods to accurately and comparably capture the interdependence of distribution, local transmission, and bulk transmission across the statewide grid;
- h. facilitate stakeholder education and cross-training;
- i. ensure timely sharing of planning data inputs;
- j. facilitate group collaboration among all grid planning participants; and
- k. provide information supporting NYSERDA's annual procurement process.

The Joint Utilities of New York filed their CGPP proposal on January 5, 2023.<sup>7</sup> Going forward, the Joint Utilities are expected to continue on a 3-year cycle with associated reporting requirements. DPS Staff expects that this planning process will result in specific grid upgrade investment plans that will be updated with each planning cycle.

### **1.3. Purpose of this Proposed Guidance**

DPS Staff provides this proposed guidance to outline the future contours of the DSIP and its interaction with the CGPP. The guidance proposed would inform users as to information available in the DSIP update filings and their future interactions with the utilities' CGPP filings. DPS Staff maintains that Commission adoption of this proposed guidance, as may be will promote lasting improvements to the utilities' future DSIP filings.

The CGPP and DSIP filings have distinct scopes, albeit with some overlapping issues. The CGPP will detail the evolution of the distribution planning processes needed to meet CLCPA goals and align with transmission planning processes, incorporate renewables at all levels of the system, and ensure that planning is integrated across transmission and distribution, including additional scenario planning, to identify needs to meet the CLCPA. The DSIP describes implementation of the much broader set of DSP activities and projects that are intended to help utilities integrate DERs in their planning, to provide for safe and reliable operations in a high DER environment, and to provide and enable market services, whereby third parties can evaluate where, when, and to what extent their services may be used to enhance the distribution system.

Future DSIPs will include the system planning themes found in the CGPP while the CGPP will

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<sup>7</sup> Case 20-E-0197, supra, CGPP Proposal (filed January 5, 2023).

be more singularly focused on a process to identify distribution system needs to meet the CLCPA and develop a T&D investment plan to meet those needs. DSIPs will reflect those system needs and investment plans, describe the timeline for current and planned DSP platform technology investments, and provide a holistic view of DSP evolution.

## **2 DSIP Update Filings**

Many electric utility functions and components are changing as the utilities evolve to fully integrate DERs into their operations and business models. The Commission's 2016 Guidance Order directed the utilities to file updated DSIPs every two years, beginning in 2018, to help stakeholders develop and maintain their awareness and understanding of the utilities' transition.<sup>8</sup> As with the initial DSIPs, filed in 2016, the principal purpose of the DSIP updates is to fully and clearly describe the processes and tools used by the utilities as well as those currently or soon to be provided to DER developers/operators and other stakeholders.

DPS Staff recommends that the Commission direct each utility to individually file, no later than June 30, 2023, an updated DSIP covering the five-year period ending in 2028. As the DSIP filings will be subject to the State Administrative Procedure Act (SAPA) public notice and comment process, public comments regarding each DSIP Update filing will be due 60 days after notice of the filing is published in the State Register. As discussed further in the detailed guidance proposed below, DPS Staff recommends that the all future DSIP Updates should:

1. report on the utility's DSP implementation progress thus far;
2. describe in detail the utility's plans for implementing DSP-related policies, processes, resources, and standards, including any plans from the CGPP that may be relevant to the DSP;
3. identify and describe how to access all the tools and information, including the new statewide Integrated Energy Data Resource (IEDR) Platform, that can be used by DER developers and other third-parties to help them understand utility system needs and potential business opportunities; and
4. describe how the utility's DSP implementation efforts are organized and managed.

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<sup>8</sup> Case 14-M-0101, supra, Guidance Order pp. 8-9.

### **3 DSIP Update General Requirements**

Maintaining a full and timely exchange of DSIP information between the utilities and stakeholders is critical to achieving the most beneficial deployment and use of DERs. DPS Staff recommends that key areas of emphasis should include: the purposeful development of stakeholder tools and information sources useful to DER providers in fostering productive DER development; collecting, managing, and sharing system and customer data; and advances toward an integrated planning environment.

Since 2016, the utilities have provided useful, updated information to stakeholders about expansion of DSP functions and program or market participation opportunities via a Joint Utilities of New York website, quarterly newsletters describing DSP enablement progress, and semiannual stakeholder webinars. DPS Staff recommends that these mechanisms should continue, with the quarterly newsletters serving as a convenient source of links to dynamically updated information, associated tools, and additional information sources.

#### **3.1 Guidelines Applicable to All Topical Sections**

Throughout the DSIP Update, DPS Staff recommends that the utility should provide planning and implementation details which will help the utilities and stakeholders align their respective needs and capabilities as the electric system evolves. Sections 4.1 through 4.13 describe specific information that DPS Staff recommends as key topics that should be addressed in the DSIP Update. In addition to the topic-specific guidelines, the following information needs are applicable to all topics and DPS Staff recommends that they should be included in each topical section of the DSIP Update:

1. Context and Background
  - a. Describe how topic-related policies, processes, resources, standards, and capabilities have evolved since the 2020 DSIP Update filing.
2. Implementation Plan, Schedule, and Investments
  - a. Current Progress
    - i. Describe the current implementation as of June 30, 2023; and
    - ii. describe how the current implementation supports stakeholders' current and future needs.

- b. Future Implementation and Planning
    - i. Describe the future implementation that is planned to be deployed by 2028, identifying planned efforts and funded efforts.
    - ii. Describe how the future implementation will support stakeholders' needs in 2028 and beyond.
    - iii. Identify and characterize the work and investments needed to progress from the current implementation to the planned future implementation.
    - iv. Describe and explain the planned timing and sequence of the work and investments needed to progress from the current implementation to the planned future implementation.
    - v. Describe where and how plans for topic-related work and investments affect the CGPP.
    - vi. Describe where and how investment plans developed through the CGPP affect the topic-related work and investments presented in the DSIP update.
  - c. Integrated Implementation Timeline
    - i. Using a common format developed jointly with the other utilities, provide a high-level implementation timeline that combines the key milestones for all topic-related work and investments planned over the five-year period ending in 2028. Along with the milestones, the timeline should show significant dependencies among the work and investments related to all topics.
3. Risks and Mitigation
- a. Identify and characterize any potential risk(s) and/or actual issue(s) that could affect timely implementation and describe the measures taken, or to be taken, to mitigate the risk(s) and/or resolve the issue(s).
4. Stakeholder Engagement
- a. Identify and characterize the categories of stakeholders engaged in DSIP development and use.
  - b. Describe when and how the goals and needs of each stakeholder category are identified and incorporated into the DSIP.
  - c. Describe when and how each stakeholder category's needs will be met over time.

- d. Describe and explain the utility's needs for stakeholder-provided information, capabilities, and actions supporting specific implementation and operational outcomes.
- e. Describe the means and methods for effectively informing and engaging associated stakeholders as planning, design, and implementation progress so that the outputs effectively address, as much as feasible, the needs of the utility, DER developers, and stakeholders.
- f. Describe how the utility will ensure that the information, tools, and engagement opportunities provided to stakeholders effectively deliver the intended support and do not lead to unintended problems.

To describe the details of the current and future implementations, DPS Staff recommends that the utility should use system diagrams, process flow diagrams, tables, and narrative text as needed for clarity and thoroughness. DPS Staff further recommends that when describing the progression from the current implementation to the future implementation, the utility should use narrative text, Gantt charts, and calendars which present and explain the planned sequence and timing of the notable development activities, dependencies, and milestones. Where planning efforts are in early stages due to ongoing related proceedings and policy development, or detailed planning outputs are not yet fully developed, DPS Staff recommends that the utilities should describe their status and planned next steps, including an anticipated timeframe, to continue making progress.

### **3.2 Tools and Information Sources**

Most of the sections below describe DPS Staff's recommended guidance for describing the tools and information sources which the utility should provide to stakeholders for specific purposes. In addition to describing those specific resources throughout the body of the DSIP Update, DPS Staff recommends that the utility's filing should also include a brief section that inventories all DSP-related tools and information sources currently available to DER developers/operators, customers, and other stakeholders, including the IEDR.

In addition to the previously described section, DPS Staff recommends that the utilities should continue to maintain, enhance, and update their quarterly DSP enablement update, commonly referred to as the newsletter, that is posted in the Joint Utilities website and sent to stakeholders

who have signed up to receive it. This newsletter should be an easy-to-use, single point of reference with links to all available online information sources that are relevant to DSP implementation.

#### **4 DSIP Update Topics**

Along with satisfying the general guidelines applicable to all topics (see Section 3.1), DPS Staff proposes that the DSIP Update should provide additional information specified below in sections 4.1 – 4.13. For each topic, DPS Staff suggests that the DSIP Update should include the general and topic-specific information specified herein.

##### **4.1 Integrated Planning**

DPS Staff recommends that the utility’s electric system plan should position the utility to integrate an increasing number and variety of DERs while maintaining or improving safety, reliability, quality, and affordability of service. While stakeholders will now be able to reference the CGPP for a detailed understanding of how integrated planning will evolve to meet system needs aligned with the CLCPA, the DSIP should leverage the outputs of CGPP scenario planning and filed capital investment plans as inputs, and describe overall implementation plans and timelines as well as advances in specific planning functionalities that enhance the DSP.

Along with satisfying the general guidelines for information related to each topical area (see Section 3.1), DPS Staff suggests that the DSIP Update should provide the following additional details which are specific to the utility resources and capabilities which support integrated electric system planning:

1. The means and methods used for integrated distribution system planning.
2. How the utility’s means and methods enable probabilistic planning which effectively anticipates the inter-related effects of distributed generation, energy storage, electric vehicles, beneficial electrification, and energy efficiency.
3. How the utility ensures that the information needed for integrated system planning is timely acquired and properly evaluated.
4. The types of sensitivity analyses performed and how those analyses are applied as part of the integrated planning process.
5. How the utility will timely adjust its integrated system plan if future trends differ

significantly with predictions, both in the short-term and in the long-term beyond the DSIP timeline.

6. The factors unrelated to DERs - such as aging infrastructure, electric vehicles, and beneficial electrification - which significantly affect the utility's integrated plan and describe how the utility's planning process addresses each of those factors.
7. How the means and methods for integrated electric system planning evaluate the effects of potential energy efficiency measures.
8. How the utility will inform the development of its integrated planning through best practices and lessons learned from other jurisdictions.

#### **4.2 Advanced Forecasting**

Utility planners and operators, DER developers and operators, and other stakeholders all require load and supply forecasts which are timely, accurate, and detailed enough to support both short-term and long-term planning. Such forecasts are an important factor in predicting the hosting capacity available at existing and potential DER locations and are necessary for efficient development and use of grid resources. As the variety of methods for using DERs to address electric system needs expands, DPS Staff recommends that utilities should perform advanced forecasting analyses which integrate an increasing number and variety of DERs into their load and supply forecasts. Therefore, DPS Staff proposes that the methods for using advanced distribution system forecasting, along with plans for implementing the means and methods needed for advanced forecasting should continue to be described by the utilities in their DSIPs.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details that are specific to the utility resources and capabilities and which enable advanced electric system forecasting and provide the most current forecast results:

1. Identify where and how DER developers and other stakeholders can readily access, navigate, view, sort, filter, and download up-to-date load and supply forecasts.
2. Identify and characterize each load and supply forecasting requirement identified from stakeholder inputs.
3. Describe in detail the existing and/or planned forecasts produced for third-party use and explain how those forecasts fulfill each identified stakeholder requirement for load and

supply forecasts.

4. Describe the spatial and temporal granularity of the system-level and local-level load and supply forecasts produced.
5. Describe the forecasts provided separately for key areas including but not limited to photovoltaics, energy storage, electric vehicles, and energy efficiency.
6. Describe the advanced forecasting capabilities which are/will be implemented to enable effective probabilistic planning methods.
7. Describe how the utility's existing/planned advanced forecasting capabilities anticipate the inter-related effects of distributed generation, energy storage, electric vehicles, beneficial electrification, and energy efficiency. In particular, describe how electric vehicle and energy efficiency forecasts are reflected in utility forecasts.
8. Describe in detail the forecasts produced for utility use and explain how those forecasts fulfill the evolving utility requirements for load and supply forecasts
9. Describe the utility's specific objectives, means, and methods for acquiring and managing the data needed for its advanced forecasting methodologies.
10. Describe the means and methods used to produce substation-level load and supply forecasts.
11. Describe the levels of accuracy achieved in the substation-level forecasts produced to date for load and supply.
12. Describe the substation-level load forecasts provided to support analyses by DER developers and operators and explain why the forecasts are sufficient for supporting those analyses.
13. Provide sensitivity analyses which explain how the accuracy of substation-level forecasts is affected by distributed generation, energy storage, electric vehicles, beneficial electrification, and energy efficiency measures
14. Identify and characterize the tools and methods the utility is using/will use to acquire and apply useful forecast input data from DER developers and other third-parties.
15. Describe how the utility will inform its forecasting processes through best practices and lessons learned from other jurisdictions.
16. Describe new methodologies to improve overall accuracy of forecasts for demand and energy

reductions that derive from EE programs and increased penetration of DER. In particular, discuss how the increased potential for inaccurate load and energy forecasts associated with out-of-model EE and DER adjustments will be minimized or eliminated.

17. Describe where CGPP forecast information can be found.

### **4.3 Grid Operations**

It is the opinion of DPS Staff that each utility must enable a much more dynamic, data-driven, multi-party mode of grid operations where DERs effectively generate customer value by increasing efficiency, stability, and reliability in both the distribution system and the bulk electric system. To achieve this outcome, DPS Staff recommends that each utility should develop and/or substantially modify a wide range of components encompassing operating policies and processes, advanced information systems, extensive data communications infrastructure, widely distributed sensors and control devices, and grid components such as switches, power flow controllers, and solid-state transformers.

Along with satisfying the general guidelines for information related to each topical area (see Section 3.1), DPS Staff suggests that the DSIP Update should provide the following additional details which are specific to the utility resources and capabilities needed to transform grid operations in both the distribution system and the bulk electric system:

1. Describe in detail the roles and responsibilities of the utility and other parties involved in planning and executing grid operations which accommodate and productively employ DERs.
2. Describe other role and responsibility models considered and explain the reasons for choosing the planned model
3. Describe how roles and responsibilities have been/will be developed, documented, and managed for each party involved in the planning and execution of grid operations.
4. Describe in detail how the utilities and other parties will provide processes, resources, and standards to support planning and execution of advanced grid operations which accommodate and extensively employ DER services. The information provided should address:
  - a. organizations;
  - b. operating policies and processes;

- c. information systems for system modeling, data acquisition and management, situational awareness, resource optimization, dispatch and control, etc. ;
  - d. data communications infrastructure;
  - e. grid sensors and control devices; and,
  - f. grid infrastructure components such as switches, power flow controllers, and solid-state transformers.
5. Describe the utility's approach and ability to implement advanced capabilities.
- a. Identify the existing level of system monitoring and distribution automation.
  - b. Identify areas to be enhanced through additional monitoring and/or distribution automation.
  - c. Describe the means and methods used for deploying additional monitoring and/or distribution automation in the utility's system.
  - d. Identify the benefits to be obtained from deploying additional monitoring and/or distribution automation in the utility's system.
  - e. Identify the capabilities currently provided by Advanced Distribution Management Systems (ADMS).
  - f. Describe how ADMS capabilities will increase and improve over time.
  - g. Identify the capabilities currently provided by DER Management Systems (DERMS).
  - h. Describe how DERMS capabilities will increase and improve over time.
  - i. Identify other approaches or functionalities used to better manage grid performance and describe how they are/will be integrated into daily operations.

#### **4.4 Energy Storage Integration**

As outlined in the recently issued "[New York's 6 GW Energy Storage Roadmap Policy Options for Continued Growth in Energy Storage](#)" significant energy storage integration will be needed

within the five-year planning horizon of the DSIP Update filing.<sup>9</sup> Meanwhile, evolving initiatives for achieving New York State's energy storage goals will likely require corresponding adjustments to utility deployment plans, use cases, and forecasts. Areas of particular interest to DPS Staff related to energy storage include:

- existing energy storage resources in the distribution system;
- the utility's planned energy storage projects;
- a five-year forecast of energy storage deployments by the utility and/or third-parties;
- potential energy storage locations and applications that could benefit customers and/or the electric system;
- resources and functions needed for integrating energy storage with utility grid operations;
- resources and functions needed for integrating energy storage with utility billing and compensation functions; and
- the utility's alignment with New York State's energy storage goals and initiatives.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following details for the areas of interest listed above, especially the means and methods to plan for energy storage deployment in the distribution system:

1. Provide the locations, types, capacities (power and energy), configurations (i.e., standalone or co-located with load and/or generation), and functions of existing energy storage resources in the distribution system.
2. Describe the utility's current efforts to plan, implement, and operate beneficial energy storage applications. Information provided should include:
  - a. a detailed description of each project, existing and planned, with an explanation of how the project fits into the utility's long range energy storage plans;
  - b. the original project schedule;
  - c. the current project status;
  - d. lessons learned to-date;
  - e. project adjustments and improvement opportunities identified to-date; and

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<sup>9</sup> Case 18-E-0130, In the Matter of Energy Storage Deployment Program, New York's 6GW Energy Storage Roadmap: Policy Options for Continued Growth in Energy Storage (filed December 28, 2022).

- f. next steps with clear timelines and deliverables.
3. Provide a five-year forecast of energy storage assets deployed and operated by third-parties. Where possible, include the likely locations, types, capacities, configurations, and functions of those assets.
4. Identify, describe, and prioritize the current and future opportunities for beneficial use of energy storage located in the distribution system. Uses considered should encompass functions which benefit utility customers, the distribution system, and/or the bulk power system. Each opportunity identified should be characterized by:
  - a. location;
  - b. energy storage capacity (power and energy);
  - c. function(s) performed;
  - d. period(s) of time when the function(s) would be performed; and
  - e. the nature and estimated economic value of each benefit derived from the energy storage resource.
5. Identify and describe all significant resources and functions that the utility and stakeholders use for planning, implementing, monitoring, and managing energy storage at multiple levels in the distribution system.
  - a. Explain how each of those resources and functions supports the utility's needs;
  - b. Explain how each of those resources and functions supports the stakeholders' needs.
6. Describe the means and methods for determining the real-time status, behavior, and effect of energy storage resources currently deployed in the distribution system. Information produced by those means and methods could include:
  - a. the amount of energy currently stored (state of charge);
  - b. the time, size, duration, energy source (grid and/or local generation), and purpose of charging events;
  - c. the time, size, duration, consumer (grid and/or local load), and purpose of energy storage discharges;

- d. the net effect (amount and duration of supply or demand) on the distribution system of charge/discharge events (considering any co-located load and/or generation); and
  - e. the capacity of the distribution system to deliver or receive power at a given location and time.
7. Describe the means and methods for forecasting the status, behavior, and effect of energy storage resources in the distribution system at future times. Forecasts produced by the utility could include:
  - a. the amount of energy stored (state of charge);
  - b. the time, size, duration, energy source (grid and/or local generation), and purpose of charging events;
  - c. the time, size, duration, consumer (grid and/or local load), and purpose of energy storage discharges;
  - d. the net effect on the distribution system of each charge/discharge event (considering any co-located load and/or generation);
  - e. the capacity of the distribution system to deliver or receive power at a given location and time.
8. Describe the resources and functions needed to support billing and compensation of energy storage owners/operators.
9. Identify the types of customer and system data that are necessary for planning, implementing, and managing energy storage and describe how the utility provides those data to developers and other stakeholders; and
10. By citing specific objectives, means, and methods, describe in detail how the utility's accomplishments and plans are aligned with the objectives established in the CLCPA.

#### **4.5 Electric Vehicle Integration**

It is DPS Staff's position that utility resources and capabilities which support electric vehicle (EV) integration at all levels in the distribution system will be needed within the five-year planning horizon of the DSIP Update filing. While plans for integrating EVs at the bulk, local transmission, and distribution levels will now be reflected in the CGPP, DPS Staff suggests that the DSIP should continue to describe means and methods for planning EV integration at the

distribution level.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details which are specific to electric vehicle integration. Where not yet fully developed or fluid due to ongoing policy development, DPS Staff suggests that the DSIP Update should provide current status and planned next steps, including an anticipated timeframe, to continue making progress.

1. Using a common framework (organization, format, semantics, definitions, etc.) developed jointly with the other utilities, identify and characterize the existing and anticipated EV charging scenarios in the utility's service territory. Each scenario identified should be characterized by:
  - a. the type of location (home, apartment complex, store, workplace, public parking site, rest stop, etc.);
  - b. the number and spatial distribution of existing instances of the scenario;
  - c. the forecast number and spatial distribution of anticipated instances of the scenario over the next five years;
  - d. the type(s) of vehicles charged at a typical location (commuter car, bus, delivery truck, taxi, ride-share, etc.);
  - e. the number of vehicles charged at a typical location, by vehicle type;
  - f. the charging pattern by vehicle type (frequency, times of day, days of week, energy per charge, duration per charge, demand per charge);
  - g. the number(s) of charging ports at a typical location, by type;
  - h. the energy storage capacity (if any) supporting EV charging at a typical location;
  - i. an hourly profile of a typical location's aggregated charging load over a one-year period;
  - j. the type and size of the existing utility service at a typical location; and
  - k. the type and size of utility service needed to support the EV charging use case.
2. Describe and explain the utility's priorities for supporting implementation of the EV charging use cases anticipated in its service territory.
3. Identify and describe all significant resources and functions that the utility and stakeholders use for planning, implementing, monitoring, and managing EV charging at multiple levels in

the distribution system.

- a. Explain how each of those resources and functions supports the utility's needs.
  - b. Explain how each of those resources and functions supports the stakeholders' needs.
4. Identify the types of customer and system data that are necessary for planning, implementing, and managing EV charging infrastructure and services and describe how the utility provides this data to interested third-parties.
  5. Describe the resources and functions needed to support billing and compensation of EV and EVSE owners/operators.
  6. By citing specific objectives, means, and methods describe in detail how the utility's accomplishments and plans are aligned with New York State policy, including its established goals for EV adoption.
  7. Describe the utility's current efforts to plan, implement, and manage EV-related projects. Information provided should include:
    - a. a detailed description of each project, existing and planned, with an explanation of how the project fits into the utility's long-range EV integration plans;
    - b. the original project schedule;
    - c. the current project status;
    - d. lessons learned to-date;
    - e. project adjustments and improvement opportunities identified to-date; and
    - f. next steps with clear timelines and deliverables.
  8. Describe how the utility is coordinating with the efforts of the New York State Energy Research and Development Authority (NYSERDA), the New York Power Authority (NYPA), New York Department of Environmental Conservation (DEC), and DPS Staff to facilitate statewide EV market development and growth.

#### **4.6 Clean Heat Integration**

The NYS Clean Heat program encourages residents, small businesses, and commercial and multifamily building owners to install cold climate air source heat pumps (ASHP) and energy

efficient ground source heat pumps (GSHP) and heat pump water heaters (HPWH).<sup>10</sup> DPS Staff believes that utility resources and capabilities which support Clean Heat integration at all levels in the distribution system will be needed within the five-year planning horizon of the DSIP Update filing. Therefore, DPS Staff recommends that the DSIP should describe means and methods for planning Clean Heat integration at the distribution level.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details which are specific to clean heat integration. DPS Staff further recommends that where not yet fully developed or fluid due to ongoing policy development, the DSIP Update should provide current status and planned next steps, including an anticipated timeframe, to continue making progress.

1. Using a common framework (organization, format, semantics, definitions, etc.) developed jointly with the other utilities, identify and characterize the existing and clean heat installation scenarios in the utility's service territory. Each scenario identified should be characterized by:
  - a. the type of location (single family residence, multifamily residence, commercial space, office space, school, hospital, etc.);
  - b. the number and spatial distribution of existing instances of the scenario;
  - c. the forecast number and spatial distribution of anticipated instances of the scenario over the next five years;
  - d. the type(s) of clean heat solution installed at a typical location (ASHP, GSHP, HPWH, etc.);
  - e. an hourly profile of a typical location's aggregated clean heating load over a one-year period;
  - f. the type and size of the existing utility service at a typical location; and
  - g. the type and size of utility service needed to support the clean heating use case.
2. Describe and explain the utility's priorities for supporting implementation of the clean heating

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<sup>10</sup> Case 18-M-0084, In the Matter of a Comprehensive Energy Efficiency Initiative, Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025, (issued January 16, 2020).

use cases anticipated in its service territory.

3. Identify and describe all significant resources and functions that the utility and stakeholders use for planning, implementing, monitoring, and managing clean heating at multiple levels in the distribution system.
  - a. Explain how each of those resources and functions supports the utility's needs.
  - b. Explain how each of those resources and functions supports the stakeholders' needs.
4. Identify the types of customer and system data that are necessary for planning, implementing, and managing clean heating infrastructure and services and describe how the utility provides this data to interested third-parties.
5. By citing specific objectives, means, and methods describe in detail how the utility's accomplishments and plans are aligned with New York State policy, including its established goals for clean heat adoption.
6. Describe the utility's current efforts to plan, implement, and manage clean heat-related projects. Information provided should include:
  - a. a detailed description of each project, existing and planned, with an explanation of how the project fits into the utility's long-range clean heat integration plans;
  - b. the original project schedule;
  - c. the current project status;
  - d. lessons learned to-date;
  - e. project adjustments and improvement opportunities identified to-date; and
  - f. next steps with clear timelines and deliverables.
7. Describe how the utility is coordinating with the efforts of the New York State Energy Research and Development Authority (NYSERDA), the New York Power Authority (NYPA), New York Department of Environmental Conservation (DEC), DPS Staff, or other governmental entities to facilitate statewide clean heat market development and growth.

#### **4.7 Energy Efficiency Integration and Innovation**

Energy Efficiency integration, with a focus on innovative market enabling tools and approaches, is an essential utility function that DPS Staff suggests should be thoroughly addressed within the five-year planning horizon of the DSIP filing. It also affects the CGPP integrated system

analysis, as energy efficiency efforts act as load modifiers in distribution planning. This load impact is then incorporated into the CGPP as part of its analysis for local transmission and distribution projects.

DPS Staff recommends that the utilities should provide the information specified below to show how their joint and individual efforts are fully integrating current and expanded energy efficiency efforts into their system planning. DPS Staff further recommends that the utilities should also describe how new tools and approaches are being used to support the growth of a more dynamic market of service providers that deliver energy efficiency at a reduced cost by leveraging private capital and financing to deliver greater customer value while optimizing the grid value of these services. Each utility has evolved its Efficiency Transition Implementation Plans (ETIPs) into System Energy Efficiency Plans (SEEPs) that describe the entirety of the utility's expanded reliance on and use of cost-effective energy efficiency to support their distribution system and customer needs.<sup>11</sup> ETIPs / SEEPs will continue to be filed separately in accordance with DPS Staff issued ETIP / SEEP Content Guidance, but DPS Staff recommends that the DSIP must incorporate and plan for the integration and reliance on these expanded energy efficiency resources and should include a link to the most recent ETIP/SEEP filing.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details which are specific to energy efficiency:

1. The resources and capabilities used for integrating energy efficiency within system and utility business planning.
2. The locations and amounts of current energy and peak load reductions attributable to energy efficiency and how the utility determines these.
3. A high-level description of how the utility's accomplishments and plans are aligned with New York State climate and energy policies and incorporate innovative approaches for accelerating progress to ultimately align with the CLCPA.
4. Summary information on energy efficiency programs offered by the utility, with direction to

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<sup>11</sup> The Efficiency Transition Implementation Plans and subsequent System Energy Efficiency Plans are filed in Case 18-M-0084, *supra*.

annual filings for more detailed information on energy efficiency programs.

5. Describe how the utility is coordinating and partnering with NYSERDA's related ongoing statewide efforts to facilitate energy efficiency market development and growth.

#### 4.8 Data Sharing

DPS Staff recommends that the DSIP Update should describe the utility's existing and planned capabilities that enable timely and effective sharing of system and customer data with customers and authorized third-parties. Shared system data should enable DER developers/operators and other third-parties to timely and effectively perform the analyses (engineering, operations, and business) needed to support well-informed decisions. Shared customer data should enable both short-term and long-term analyses and decisions affecting many investments and behaviors which can materially improve customer value by reducing costs and/or improving service.

Of particular importance to this topic is NYSERDA's development of a new Integrated Energy Data Resource (IEDR).<sup>12</sup> Most utility data sharing is expected to transition to the IEDR within the five-year time horizon for the DSIP update.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should:

1. provide a functional overview of the planned IEDR;
2. provide an overview of NYSERDA's IEDR implementation program, including information pertaining to stakeholder engagement;
3. provide the web link to NYSERDA's IEDR home page along with a summary of the information provided therein;
4. describe the utility's role in supporting IEDR design, implementation, and operation;
5. describe the utility's progress, plans, and investments for generating and delivering its system and customer data to the IEDR;
6. identify and characterize each type of data to be delivered to the IEDR;
7. describe the resource(s) and method(s) used to deliver each type of data to the IEDR;

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<sup>12</sup> Case 20-M-0082, Proceeding on Motion of Commission Regarding Strategic Use of Energy Related Data, Order Implementing and Integrated Energy Data Resource (issued February 11, 2021).

8. describe how and when each type of data provided to the IEDR will begin, increase, and improve as IEDR implementation progresses; and,
9. identify and characterize any existing and future utility efforts to share system and customer data with customers and third parties through means that are separate from the IEDR.

#### **4.9 Hosting Capacity**

Providing an electric distribution system with the capacity to host large scale DER integration is a key part of New York's energy vision. To achieve that outcome, DPS Staff suggests that the utilities should perform several functions to ensure that large amounts of DER can access and utilize hosting capacity in ways that are affordable, effective, efficient, and timely. The utilities have made significant progress in producing and sharing information about the hosting capacity of their current systems. DER developers and other stakeholders value the new information as a significant improvement to the information which was previously available to them; however, more is needed in three areas.

First, while DER developers and other stakeholders already access and use the utilities' hosting capacity information, there are opportunities to enhance the information provided beyond the Joint Utilities' current development roadmap. For example, DER developers and the utilities could both be better informed by hosting capacity forecasts which look ahead three to five years. Once available, such forecasts would likely become the preferred resource for planning DER development.

Second, as grid operations evolve to accommodate and optimize significant DER development, some of those operations will come to rely on the availability of hosting capacity as a managed system resource. Such operations will continually require very current information about available hosting capacity throughout the distribution system. This means that the utilities should be prepared to timely increase the rate at which they produce and share their information about currently available hosting capacity.

And third, the availability of ample hosting capacity at a given location on the grid does not necessarily mean that other factors (i.e., space, accessibility, safety, zoning, customer interest, etc.) will also favor deploying a DER at that location. At the same time, there are many locations where circumstances strongly favor DER development; however, the amount of hosting capacity

available at those locations is limited. This could mean that utilities may need to take measures to increase hosting capacity at attractive DER development sites in order to support the State's goals for integrating renewable energy resources. Considering these points, DPS Staff suggests that the utilities should be prepared to timely increase hosting capacity in their distribution systems.

DPS Staff recommends that the DSIP Update should address the three areas addressed above and provide detailed information related to assessing current hosting capacity, forecasting hosting capacity, and increasing hosting capacity to show that the utility is timely developing – either individually or jointly with one or more of the other utilities – the necessary information resources and capabilities associated with hosting capacity.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details which are specific to hosting capacity:

1. Describe the utility's current efforts to plan, implement, and manage projects related to hosting capacity. Information provided should include:
  - a. detailed description of each project, existing and planned, with an explanation of how the project fits into the utility's long range hosting capacity plans;
  - b. the original project schedule;
  - c. the current project status;
  - d. lessons learned to-date;
  - e. project adjustments and improvement opportunities identified to-date; and
  - f. next steps with clear timelines and deliverables.
2. Describe where and how DER developers/operators and other third parties can currently access the utility's hosting capacity information.
3. Describe how and when the existing hosting capacity assessment information provided to DER developers/operators and other third parties will increase and improve as work progresses. This should include discussion of the transition of hosting capacity information access from the utility's current hosting capacity information portal to the

statewide hosting capacity solution in development on the IEDR.

4. Describe the means and methods used for determining the hosting capacity currently available at each location in the distribution system.
5. Describe the means and methods used for forecasting the future hosting capacity available at each location in the distribution system.
6. Describe how and when the future hosting capacity forecast information provided to DER developers/operators and other third parties will begin, increase, and improve as work progresses.
7. Summarize the utility's specific objectives and methods for:
  - a. identifying and characterizing locations in the utility's service area where limited hosting capacity is a barrier to productive DER development, directing users to the CGPP filing for further information; and
  - b. timely increasing hosting capacity to enable productive DER development at those locations, directing users to the IEDR platform when applicable for more information.

#### **4.10 Billing and Compensation**

A monthly bill is often the only method of engagement and communication between a utility and its customers. Because of this, customer billing and compensation are vital components of a utility's core business and, therefore, must be accurate, timely, and transparent. It is DPS Staff's position that billing that is consistent, accurate, and well explained will lead to increased customer satisfaction and reduced inquiries to the utility's call center and/or reduced customer complaints to the Commission, on social media, or to the press.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details pertaining to customer billing and compensation:

1. Describe the various DER-related billing and compensation programs (including demand response) implemented or revised by the utility since the last update. For this first inclusion in the DSIP, describe developments that have occurred since the beginning of

NEM, RNM, CDG, and VDER.

2. Describe the customer billing/compensation functions and data generally needed to expand deployment and use of DERs in the utility's service area. Include descriptions of the existing and planned components (processes, resources, and data exchanges) that will support those needs. For planned components, provide the sequence and timing of key investments and activities required for component implementation.
3. Describe the customer billing/compensation functions and data needed to enable DER participation in the NYISO's wholesale markets for energy, capacity, and ancillary services. This should include information regarding the utility's implementation of its Wholesale Distribution Service (WDS), Wholesale Value Stack (WVS), and related non-wholesale value stack (VDER without wholesale energy and capacity components). Also include descriptions of the existing and planned components (processes, resources, and data exchanges) that will support those needs. For planned components, provide the sequence and timing of key investments and activities required for component implementation.
4. Describe the utility's plans to implement or modify DER-related billing and compensation capabilities, including automation, to address the Community Distributed Generation (CDG) billing and crediting problems that were the focus of the Commission's September 15, 2022, Order in Cases 19-M-0463, et. al.<sup>13</sup>
5. For each type of DER billing and compensation, including for CDG and wholesale market participation, describe the current information system constraints preventing full automation of DER billing and compensation.
6. Describe how DER billing and compensation affects other programs such as budget billing, time of use rates, and consolidated billing for Energy Service Companies (ESCOs).
7. Describe the utility's means and methods - existing and planned – for monitoring and

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<sup>13</sup> Case 19-M-0463, In the Matter of Consolidated Billing for Distributed Energy Resources, Order Establishing Process Regarding Community Distributed Generation Billing (filed September 15, 2022).

testing new or modified customer billing and compensation functions.

8. Describe the utility's means and methods – existing and planned - for supporting customer outreach and education, including where and how customers, DER developers/operators and other third-parties can readily access information on the utility's billing and compensation procedures.
9. Describe the utility's means and methods - existing and planned – for receiving, investigating, and monitoring customer complaints and/or inquiries regarding billing and compensation issues related to DERs.

#### **4.11 DER Interconnections**

Implementing the utility resources and capabilities that enable DER interconnections to the distribution system is a critical early objective. Many of the details which identify and characterize those resources and capabilities are being worked out by the Interconnection Technology Working Group (ITWG) and the Interconnection Policy Working Group (IPWG), which are stakeholder collaboratives led jointly by DPS Staff and NYSERDA. The goal of both working groups is to establish the requirements for standard resources, processes, specifications, and policies which foster efficient, timely, safe, and reliable DER interconnections.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details, which are specific to DER interconnections:

1. Describe in detail (including the web URL) the web portal that provides efficient and timely support for DER developers' interconnection applications.
2. Describe where, how, and when the utility will implement and maintain a resource where DER developers and other stakeholders with appropriate access controls can readily access, navigate, view, sort, filter, and download up-to-date information about all DER interconnections in the utility's system. The resource should provide the following information for each DER interconnection:
  - a. DER type, size, and location;
  - b. DER developer;
  - c. DER owner;

- d. DER operator;
  - e. the connected substation, circuit, phase, and tap;
  - f. the DER's remote monitoring, measurement, and control capabilities; and
  - g. the DER's primary and secondary (where applicable) purposes; and,
  - h. the DER's current interconnection status (operational, construction in-progress, construction scheduled, or interconnection requested) and its actual/planned in-service date.
3. Describe the utility's means and methods for tracking and managing its DER interconnection application process and explain how those means and methods ensure achievement of the performance timelines established in New York State's Standardized Interconnection Requirements.
  4. Describe where, how, and when the utility will provide a resource to applicants and other appropriate stakeholders for accessing up-to-date information concerning application status and process workflows.
  5. Describe the utility's processes, resources, and standards used for constructing approved DER interconnections.
  6. Describe the utility's means and methods used for tracking and managing construction of approved DER interconnections to ensure achievement of required performance levels.
  7. Describe how and when the utility will deliver and maintain its DER interconnection information to the IEDR.

#### **4.12 Advanced Metering Infrastructure**

Advanced Metering Infrastructure (AMI) provides grid-edge measurement, data acquisition, and control capabilities which are either essential or beneficial to a number of important functions in a modern distribution system. Granular time-series data from smart meters and other intelligent devices at customers' premises enables advanced analyses, innovative rate designs, and customer engagement strategies which benefit both the customers and the grid. Voltage sensing and measurement functions support increased system efficiency and enable improved outage detection and restoration processes. Capabilities supporting DER measurement, monitoring, and control are essential for DER integration.

Along with satisfying the general guidelines for information related to each topic (see Section

3.1), DPS Staff recommends that the DSIP Update should provide the following additional details which are specific to AMI:

1. Provide a summary of the most up-to-date AMI implementation plans, including where AMI has been deployed to date.
2. Provide a summary of all new capabilities that AMI has enabled to date, and how these capabilities benefit customers, including, as applicable, customer engagement, energy efficiency, and innovative rates.
3. Describe the AMI-acquired data and information that is planned to be available through the IEDR.
4. Describe where and how DER developers, customers, and other stakeholders can access up-to-date information about the locations and capabilities of existing and planned smart meters.
5. Provide a summary of plans and timelines for future expansion and/or enhancement of AMI functions.
6. Describe where and how each type of AMI-acquired data is stored, managed, and shared with, and used by other utility information systems such as those used for billing/compensation, customer service, work management, asset management, grid planning, and grid operations.

#### **4.13 Beneficial Locations for DERs and Non-Wires Alternatives**

To help promote productive DER development, DPS Staff suggests that it is essential that the utility identify, characterize, and publicly present the locations in its service area where DERs and/or energy efficiency might provide significant benefits to the distribution system and/or to the bulk electric system. Based on its criteria for evaluating opportunities for non-wires alternatives (NWA), the utility then selects some of those locations for NWA procurements and/or energy efficiency measures that will benefit the distribution system.

In their previous DSIP filings, the utilities have separately described their processes for identifying beneficial locations, evaluating NWA suitability, and procuring non-wires solutions. However, as the utilities have evolved their planning processes to perform these functions, they have become part of a continuous process that begins with integrated planning. Therefore, DPS

Staff recommends that the utility's 2023 DSIP update, and all future updates, should reflect this updated process by combining the topics of identification of beneficial locations, NWA suitability assessment, and procurement processes into one cohesive discussion.

Along with satisfying the general guidelines for information related to each topic (see Section 3.1), DPS Staff recommends that the DSIP Update should provide the following additional details:

1. Describe where and how developers and other stakeholders can access resources for:
  - a. accessing up-to-date information about beneficial locations for DERs and/or energy efficiency measures; and
  - b. efficiently sorting and filtering locations by the type(s) of capability needed, the timing and amount of each needed capability, the type(s) and value of desired benefit, the serving substation, the circuit, and the geographic area.
2. Describe the means and methods for identifying and evaluating locations in the distribution system where:
  - a. an NWA comprising one or more DERs and/or energy efficiency measures could timely reduce, delay, or eliminate the need for upgrading distribution infrastructure and/or materially benefit distribution system reliability, efficiency, and/or operations; and/or
  - b. one or more DERs and/or energy efficiency measures including increased value-based customer incentives could reduce, delay, or eliminate the need for upgrading bulk electric system resources and/or materially benefit bulk electric system reliability, efficiency, and/or operations.
3. Describe how the NWA procurement process works within utility time constraints while enabling DER developers to properly prepare and propose NWA solutions which can be implemented in time to serve the system need. Details should include:
  - a. how utility and DER developer time and expense are minimized for each procurement transaction;
  - b. how standardized contracts and procurement methods are used across the utilities.
4. Describe where and how DER developers and other stakeholders can access up-to-date

information about current NWA project opportunities.

5. Describe how the utility considers all aspects of operational criteria and public policy goals when deciding what to procure as part of a NWA solution.
6. Describe where, how, and when the utility will provide DER developers and other stakeholders with a resource for accessing up-to-date information about all completed and in-progress NWA projects. The information provided for each project should:
  - a. describe the location, type, size, and timing of the system need addressed by the project;
  - b. provide the amount of traditional solution cost that was/will be avoided;
  - c. explain how the selected NWA solution enables the savings; and
  - d. describe the structure and functional characteristics of the procurement transaction between the utility and the solution provider(s).

## **5 Other DSIP-Related Information**

The following subsections describe other information that DPS Staff recommends be included in the DSIP as it may be of interest to DSIP stakeholders.

### **5.1. DSIP Governance**

DPS Staff recommends that the DSIP Update should clearly describe how the utility's DSIP activities and resources are organized and managed. This section will provide stakeholders with insight into the utility organizations that are responsible for developing and maintaining the DSIP and for implementing the DSP as described in the DSIP. To supplement this awareness, DPS Staff recommends that updates be made, via Joint Utility webinars or the Joint Utilities website, that provide useful, updated insights into utility responsibilities and activities. The information provided in the DSIP Update should:

1. Describe the DSIP's scope, objectives, and participant roles and responsibilities. A participant could be a utility employee, a third party supporting the utility's implementation, or a party representing one or more stakeholder entities.
2. Describe the nature, organization, governance, and timing of the work processes that

comprise the utility's current scope of DSIP work. Also describe and explain how those work processes are expected to evolve over the next five years.

## **5.2. Marginal Cost of Service Study**

DPS Staff recommends that the DSIP Update should include a publicly accessible web link to the latest version of the utility's Marginal Cost of Service Study.

## **5.3. Benefit Cost Analysis (BCA)**

### BCA Handbook

DPS Staff recommends that the DSIP Update should include a publicly accessible web link to the latest version of the utility's BCA Handbook.

### BCA Calculations

DPS Staff recommends that BCA calculations should be transparent and publicly available, including the individual cost and benefit input parameters defined in the BCA framework order.

## **6 Conclusion**

The organization and content guidelines recommended in this DPS Staff Whitepaper are designed to ensure that the utilities' DSIP filings provide readers with useful and comprehensive information pertaining to the utilities' DSP implementation progress and plans. The recommended general and topical information, organized and presented per the guidance, should help DER developers and other stakeholders better understand where, when, and how the utilities' DSP implementations will serve stakeholders' interests and plans. The recommended guidance also points out areas where the utilities should identify their means and methods for stakeholder engagement and describe linkages between their DSIPs and the Coordinated Grid Planning Process (CGPP). In conclusion, DPS Staff believes that Commission adoption of this proposed guidance will promote lasting improvements to the utilities' future DSIP filings.