Potential Joint Proposal: Custom Process Improvements

**Background**

* Discussion in T2WG has primarily focused on incremental improvements to custom ex ante process found in policy dating back to 2012 (not radical overhaul)
* In this context, parties have identified a number of potential improvements, with not enough time to date to full explore all options and where there is consensus
* There are some areas, however, where there appears to be emerging consensus
* Realistically, these areas will require time extending past August to complete

**Proposal**

* T2WG consider including in its August work product agreed-upon proposals below as consensus recommendations to be worked on as custom process improvements for the end of year
* Proposal in August work product to include details and timelines per below
* Expectation would be to follow similar process to date, in which consensus-based (where possible) work product is delivered, then subject to Resolution process

**Proposal 1: Communication Improvements**

This item has been raised within T2WG exercises, and is envisioned to address some (but not all) aspects of mandated activity to “improve usability and transparency of all ex ante values.” (D.15-10-028, p. 99)

This proposal asks that parties agree to highlight the following three activities as starting pillars of improving communication and transparency at this time.

1. Revised Disposition Format [related to Task 6, Issue 11]
   1. Background is that dispositions used to be too detailed, and was changed last year to better integrate with ESPI scoring (now too high-level).
   2. Exercise here is simply about creating a happy medium between these two previous formats.
   3. Suggest embracing today’s format, since it ties to scoring, but inclusive of some additional information or arranging information differently. Example proposal attached; will likely need adjustment.



*Proposed milestone of launching early new disposition format 1.1.18.*

1. Early Collaboration on High-Impact Projects [related to Task 6, Issue 10]
   1. High-Impact Projects defined as $100,000 incentive and above (incentive threshold could be for single project or single customer)
   2. PA and implementer to meet at an early stage in project, defined as once any eligibility or influence related questions have been completed by customer
   3. Implementer to provide standardized level of information about project for discussion purposes
   4. Documentation of any PA review and PA-implementer discussion at this stage then advances to CPUC as a variation on “early opinion”
   5. If documentation proposal ok then CPUC waives any first review of project

*Proposed milestone of launching early collaboration by 11.17.17.*

1. CPUC-hosted Custom Process Resource [related to Task 6, Issue 11]
   1. Web site/online landing page containing various resources for custom project implementation and review
   2. Example items to be accessed here would include relevant policy manuals, process-related policy, dispositions, publications, ISPs, and other guidance
   3. Organization of information will be key to usability and success—should be key focus point and consider future recommendations from T2WG

*Proposed milestone of completing scope of work for 12.15.17; beta version (inclusive of updating protocols) for 3.1.17.*

**Proposal 2: Parties Recommend SLA Approach** [related to Task 6, Issues 8 & 9]

The SLA concept has been raised within T2WG exercises, and is envisioned to address long-standing ex ante review timing challenges. The proposed approach (attached) also enhances transparency for implementers by setting expectations on project status (reducing needs for updates).

 

All dates in proposed are “not to exceed” dates.

Current proposal sets timelines for almost all aspects of review, but leaves the final step open for Commission Staff to state in advance, giving them flexibility to manage within the context of their workload. Once this dates is stated by Commission Staff, this should also be a “not to exceed” date.

It should be noted that current consequence of a “not to exceed” date passing is the project is authorized to move forward to its next stage—this aspect needs to be mandated in policy and not just part of a wholesale adoption of a proposed SLA attachment.

*Proposed milestone of implementing SLA statewide by 11.1.17.*

**Final Observations**

Reminder: Custom process will require other improvements as well, but proposing these at this time.

T2WG should strongly consider how many of these need to be recommendations in work product versus things we can agree to execute outside the Resolution process. At this time, all is being proposed assuming the latter—but strong possibility at least #1 and #2 in Proposal 1 can be handled outside Resolution process. This discussion can be had alongside any that parties have about consensus.