



June 13, 2023

The Honorable Josh Becker
Member, California State Senate
1021 O Street, Suite 7250
Sacramento, CA 95814

**RE: Senate Bill 410 – SUPPORT
As Amended May 18, 2023**

Dear Senator Becker:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and League of California Cities (CalCities), we support your Senate Bill 410, regarding electrical interconnection and suggest a few minor amendments to ensure the bill addresses the diversity of distribution system needs.

Senate Bill 410 seeks to improve electrical distribution planning, reduce interconnection delays, and ensure that California residents and businesses can access new and increased levels of service in a timely manner. SB 410 also charges the Public Utilities Commission (CPUC) with establishing reasonable average and maximum interconnection time periods.

SB 410 is necessitated by frequent and long-term interconnection challenges faced by a wide variety of jurisdictions throughout the state. Many of our local governments have been told it will take anywhere from 2-7 years to improve utility distribution systems to provide additional capacity to support normal growth and facilitate economic development. These excessive delays have resulted in lost opportunities for transformative economic development, inhibit local ability to increase desperately needed local housing stocks, frustrate efforts to install electric vehicle charging systems, and will stymie the state's efforts to decarbonize existing residential and commercial buildings. There have also been numerous delays in connecting completed housing projects and subdivisions to the grid, which have forced developers to find alternative housing for residents who are ready and waiting to move into their new homes.

We appreciate that SB 410 establishes clear state policy that utilities must: upgrade electrical distribution systems; improve planning and construction to increase distribution system capacity; and promptly interconnect new customers to the grid. It is imperative that utilities work more collaboratively with local governments to ensure that the projected demand for a given distribution planning cycle more closely matches the

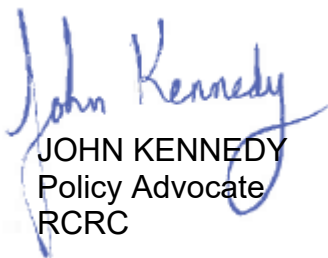
actual demand for service. Experiences have shown that some utilities develop their multi-year distribution plans without any interaction with local governments or economic development officials. Local governments and economic development officials can provide valuable input on projected development trends in the area, where those projects are anticipated to occur, and anticipated planning horizons. Failure to undertake these basic consultations has resulted in utility distribution plans that miss actual demand by a wide margin, leading to multi-year delays in service connection that result in economic stagnation.


The common-sense changes in SB 410 will significantly improve utilities' ability to meet customer expectations over the mid- and long-term planning horizon. To ensure that SB 410 addresses the full range of energy needs throughout the state, we strongly suggest a few minor amendments contained below. These changes will ensure that utility distribution planning processes and expectations appropriately integrate local needs and plans with respect to housing, economic development, and construction of critical facilities like fire stations, hospitals, police departments, etc.

We suggest the following amendments to SB 410 to ensure that it reflects the diversity of electrical needs throughout the state:

- Public Utilities Code Section 933 (a) Upgrade the state's electrical distribution systems as needed and in time to achieve the state's decarbonization goals, **and** implement federal, state, regional, and local air quality and decarbonization standards, plans, and regulations, **and facilitate community growth and economic development.**
- Public Utilities Code Section 936 (a) Consider, in its annual distribution planning process, all of the following:
 - (1) Federal, state, regional, and local air quality and decarbonization standards, plans, and regulations.
 - (2) The transportation and building electrification policies of state law.
 - (3) State agency, local agency, and local government plans and requirements related to **housing, economic development, critical facilities,** transportation, and building electrification.

For the above reasons, we support your SB 410 and **strongly encourages incorporation of the amendments outlined above.** If you should have any questions, please do not hesitate to contact us at jkennedy@rcrcnet.org, awaelder@counties.org, or dconklin@calcities.org.


JOHN KENNEDY
Policy Advocate
RCRC

Sincerely,

ADA WAELDER
Legislative Advocate
CSAC


DAMON CONKLIN
Legislative Representative
CALCITIES

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cc: The Honorable Eduardo Garcia, Chair, Assembly Utilities and Energy Committee
Members of the Assembly Utilities and Energy Committee
Laura Shybut, Chief Consultant, Assembly Utilities and Energy Committee
Greg Melkonian, Consultant, Assembly Republican Caucus