

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of Pacific Gas and Electric
Company for Approval of 2023-2026
Clean Energy Optimization Pilot.

Application 22-03-006

**RESPONSE BY THE REGENTS OF THE UNIVERSITY OF CALIFORNIA TO
APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) FOR
APPROVAL OF 2023-2026 CLEAN ENERGY OPTIMIZATION PILOT**

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Counsel to
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April 4, 2022

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OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Approval of 2023-2026
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Pursuant to Rule 2.6 of the California Public Utilities Commission Rules of Practice and Procedure, the Regents of the University of California (“UC”) responds herein in support of the March 4, 2022, *Application of Pacific Gas and Electric Company (U 39 E) for Approval of 2023-2026 Clean Energy Optimization Pilot* (“Application”). As noted in the Application, the PG&E request is to administer a Clean Energy Optimization Pilot (“CEOP”) for 2023-2026, that is premised on a similar pilot program by Southern California Edison Company (“SCE”)¹ and approved by the CPUC on April 25, 2019.² PG&E’s CEOP would be offered both to UC and to California State University (“CSU”) and would incentivize greenhouse gas (“GHG”) reductions by both universities.

I. COMMENTS

UC strongly supports this application, believing that this comprehensive yet streamlined program framework can accelerate on-site innovations to make significant GHG reductions in large and complex customers’ operations, supporting California’s efforts to reach our aggressive GHG reduction goals. The expansion of CEOP to PG&E service territory represents another major step in creating scalable solutions to counter climate change.

¹ A. 18-05-015, *Application of SCE (U 338-E) for Approval of its Clean Energy Optimization Pilot* (May 15, 2018).

² Decision (D.) 19-04-010.

II. PROPOSED CATEGORY, NEED FOR HEARING, ISSUES TO BE CONSIDERED, AND PROPOSED SCHEDULE

UC concurs with PG&E's proposal that the Application be categorized as a "quasi-legislative" proceeding within the meaning of Rule 1.3(f) of the Commission's Rules of Practice and Procedure. Further, UC agrees that hearings may not be required on the issues presented, due to the fact that PG&E's CEOP is based on SCE's Pilot and D.19-04-010 and also because PG&E has held initial conversations about this Application with intervenors in SCE's Pilot proceeding, including UC. The expedited schedule proposed by PG&E, resulting in a final decision by November of this year, seems appropriate given the likelihood that there will be little opposition to the Application.

PG&E has proposed that the issues to be considered in this proceeding are brief, namely: (1) whether PG&E's CEOP is just and reasonable and should be authorized; and (2) whether PG&E can establish and implement the budget and cost recovery for its CEOP as described in testimony. UC concurs with this list of issues.

III. SERVICE OF CORRESPONDENCE, PLEADINGS AND ORDERS

For the purpose of receipt of all correspondence, pleadings, orders and notices in this proceeding, UC requests to be placed on the service list as a party with the following individual being listed as its representative:

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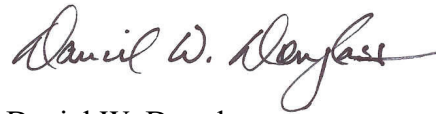
In addition, the following UC representative should be placed on the "information only" list for this proceeding:

Eric Eberhardt
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IV. CONCLUSION

UC strongly supports this application and asks that the Commission move expeditiously to approve it as submitted by the applicant, PG&E.

Respectfully submitted,



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