



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

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Order Instituting Rulemaking to Consider
Distributed Energy Resource Program Cost-
Effectiveness Issues, Data Access and Use, and
Equipment Performance Standards.

Rulemaking 22-11-013
(Filed November 17, 2022)

**LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION
MOTION FOR LATE FILING OF
COMMENTS ON ADMINISTRATIVE LAW JUDGE RULING**

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August 23, 2023

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**LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION
MOTION FOR PARTY STATUS**

Pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Local Government Sustainable Energy Coalition (“LGSEC”) respectfully submits this Motion for Late Filing of Comments on Administrative Law Judge Ruling (“Motion”).

I. Interest of LGSEC in this Proceeding

LGSEC is a statewide membership network of more than 35 cities, counties, and regional entities that reflect nearly two-thirds of the state’s electricity demand, representing its members policy interests related to clean energy and climate resilience. LGSEC built the blueprint for the state’s energy strategy through the formation of Local Government Partnerships, Regional Energy Networks (RENs), and Community Choice Aggregations (CCAs). Collectively and individually, LGSEC members advance balanced energy and climate solutions that help meet California’s decarbonization goals through knowledge exchange, learning opportunities, and statewide collaboration.

Access to quality data at the appropriate detail level is essential for local governments (LGs) to effectively undertake an expanding array of climate-related responsibilities, many of which are state-mandated. These include developing climate action plans, supporting building

and transportation electrification, creating and enforcing local climate and energy ordinances, complying with state climate policy laws, bolstering community resiliency, and, especially in the case of CCAs and RENs, crafting and implementing equitable conservation, energy efficiency, and integrated demand-side management strategies. LGSEC strongly supports these local actions and believes that proper access to energy and grid data is essential to determine evolving implications and opportunities related to grid reliability and energy affordability.

As a representative of local governments throughout California, LGSEC has a clear and demonstrated interest in participating in this important proceeding.

II. Logistical Reasons for Delay in Filing of LGSEC

LGSEC initially attempted to file comments in this proceeding on August 11, 2023, in accordance with the stated deadline, under the mistaken belief that it had party status.

Remedying this error was delayed due to illnesses among LGSEC staff.

LGSEC has since obtained party status and plans to participate fully and productively in this proceeding. There is no reason to believe that any party engaged in this docket would be adversely affected by LGSEC being allowed to late-file its aforementioned comments.

Moreover, due to LGSEC's unique perspective on the issues being considered the benefit of allowing LGSEC to formally voice its comments far outweighs any inconvenience caused by this delayed filing.

III. Conclusion

For the foregoing reasons, LGSEC respectfully requests that the Commission grant this Motion for Late Filing of Comments.

Respectfully submitted,

/s/ Steven Moss

Steven Moss

M.CUBED

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