

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Application of Southern California Gas
Company (U 904 G), to Establish Gas
Demand Response Pilot Programs

Application 23-01-0042301004
(Filed January 6, 2023)

**CENTER FOR ACCESSIBLE TECHNOLOGY'S
COMMENTS ON PROPOSED DECISION**

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In accordance with Rule 14.3 of the Commission’s Rules of Practice and Procedure, Center for Accessible Technology (CforAT) submits these timely comments in support of the Proposed Decision Denying Application (the PD) issued on December 21, 2023.

CforAT agrees with the analysis provided in the PD determining that SoCalGas’ Application seeking ratepayer funding for various demand response (DR) pilots and a research initiative is not in the interest of ratepayers and otherwise does not meet various requirements established in D.20-02-043.¹ CforAT further agrees that SoCalGas never sought to meaningfully address the “serious, substantive objections to the proposed DR pilot proposals” made by CforAT as well as by TURN,² nor did it substantively address “the serious reservations” put forward by Energy Division staff.³

While CforAT agrees that it is unfortunate to lose a potential federal grant for California,⁴ the opportunity for such a grant should not be considered an open invitation to pursue substantial additional ratepayer funds beyond that needed to supply a match for the grant funding. The fact that SoCalGas declined repeated opportunities to present a proposal at the level needed to obtain the grant, without additional demands,⁵ seems to demonstrate that the utility saw the opportunity to pursue additional ratepayer funding as more significant than the grant it was proposing to leverage.

¹ See PD at pp. 8-10.

² See PD at p. 11. CforAT’s objections focused on the “proposed allocation of costs and benefits in the Application as too one-sided, providing most of the benefits to C&I customers while imposing most of the costs on residential customers.” *Id.* at p. 5. CforAT also expressed concern about the safety risks of the proposed residential pilot to the low-income customers who were proposed to be targeted. CforAT Protest to Application, filed on February 6, 2023, at pp. 1-3.

³ PD at p.11.

⁴ See PD at p. 11.

⁵ See PD at pp. 6-7 and 8-9; *see also id.* at pp. 13-14, Finding of Fact No. 17.

For all these reasons, CforAT believes that there is no error of fact or law in the determination of the PD that the Application should be denied, and we support adoption of the Proposed Decision.

Respectfully submitted,

January 10, 2024

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