BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Petition of the Public Advocates Office to Adopt, Amend, or Repeal a Regulation Pursuant to Pub. Util. Code § 1708.5.	Petition ___________

THE PUBLIC ADVOCATES OFFICE
PETITION TO OPEN A RULEMAKING PURSUANT TO PUBLIC UTILITIES CODE SECTION 1708.5

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March 6, 2024

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I. INTRODUCTION

Pursuant to Public Utilities Code Section 1708.5 and Rule 6.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) petitions the Commission to commence a rulemaking proceeding to align demand side program designs and budgets with current electrification, decarbonization, equity, and reliability goals.[1]

The scope of this proposed new rulemaking proceeding would allow the Commission to consider the achievement of California's greenhouse gas (GHG) reduction goals alongside concerns over rate affordability, reliability, and equity outcomes for demand side programs associated with demand response, and energy efficiency, including the Energy Savings Assistance (ESA) program.

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[1] Demand side programs include energy efficiency, low-income energy efficiency via the Energy Savings Assistance (ESA) Program, demand response, self-generation, net metering, and storage. This petition intends to exclusively align energy efficiency, ESA, and demand response program designs and budgets with California's climate and energy goals.

II. BACKGROUND AND JUSTIFICATION FOR RELIEF SOUGHT UNDER PUBLIC UTILITIES CODE SECTION 1708.5

The climate crisis and a variety of legislation and state and federal initiatives, require the prioritization of electrification and decarbonization goals.[2] California faces enormous challenges in equitably achieving its electrification and decarbonization goals. While California – and by extension, the Commission – must meet a variety of electrification goals aimed at reducing GHGs and mitigating climate change, the Commission must also balance the rapid implementation of these goals with ensuring that rates remain affordable. Utility rates for energy have increased dramatically since 2013,[3] and this trend is expected to continue. Should rates for electric service become too high, these high rates could potentially serve as a disincentive for electrification and decarbonization. For instance, a customer may be discouraged from purchasing an electric vehicle if it appears too expensive to charge, a result that could impede California's efforts to electrify buildings and encourage electric vehicle adoption.

At times, the priorities of rate affordability and accelerating decarbonization and electrification, including through use of demand side measures, can compete with one another. The Commission must balance these various objectives to ensure that decarbonization and reliability goals are achieved without overly burdening ratepayers. To achieve the volume of electrification necessary to meet state climate goals, electric rates must remain below reasonable thresholds and ratepayer-funded programs must deliver real, quantifiable benefits.

While there have been prior proceedings at the Commission to implement demand side programs, there is no open proceeding to holistically consider these programs. Too often demand side programs such as demand response and energy efficiency measures, take siloed approaches to looking at methods for reducing greenhouse gases and other

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[2] See *Average Residential Electric Rate Changes* in the Public Advocates Office's Q4 2023 Electric Rates Report for rate trends from the past decade. Available at https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/q4-2023-electric-rates-report.

[3] See *Average Residential Electric Rate Changes* in the Public Advocates Office's Q4 2023 Electric Rates Report for rate trends from the past decade. Available at https://www.publicadvocates.cpuc.ca.gov/press-room/reports-and-analyses/q4-2023-electric-rates-report.

pollutants and addressing reliability. The overlapping benefits from these programs have also not been comprehensively considered.[4]

Given these changes in the policy landscape, the Commission should institute a single rulemaking to consider the advancement of energy efficiency, demand response, and ESA programs. This policymaking and budget-setting proceeding would serve as a successor proceeding to prior rulemakings that have considered these demand side programs separately.

A. R.13-11-005, the current energy efficiency rulemaking, is an inadequate forum to consider balancing decarbonization with affordability.

Currently, certain energy efficiency matters are addressed in R.13-11-005. R.13-11-005 was initiated in 2013 and was originally established to fund current energy efficiency portfolios through the year 2015 and implement energy efficiency "Rolling Portfolios," among other energy efficiency related policy issues.[5] However, this decade-old rulemaking is insufficient to holistically consider electrification and decarbonization programs alongside affordability considerations. Since 2013, the Commission's focus has appropriately moved from energy savings to consideration of when energy is consumed and the utility of shifting from gas to electricity. A new rulemaking is necessary to reflect California's current policy goals and rapidly changing grid dynamics.

The scope of this proposed proceeding is broader than the current scope of the energy efficiency Rulemaking (R.13-11-005). It includes consideration of current-day priorities for demand response and low-income energy efficiency programs.

Most recently, R.13-11-005 set the total system benefit and energy savings goals for ratepayer-funded energy efficiency portfolios through 2035.[6] While R.13-11-005

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[4] As an example, heat pump water heaters can simultaneously help with decarbonization, efficiency, and demand response. Heat pumps would allow for fuel switching from gas to electricity (decarbonization). Heat pumps also are more efficient than other gas or electric technologies for providing heat or cooling (efficiency benefits). As heat pumps would increase electric load, they could be fitted with direct load-control technologies to reduce demand during peak periods (providing demand response). For an overview, see: https://www.iea.org/reports/the-future-of-heat-pumps/executive-summary.

[5] Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues, R.13-11-005 at 2 (Nov. 21, 2013).

[6] D.23-08-005.

remains open, the proceeding is limited in scope, and is largely focused on the achievement of specific goals and their cost-effectiveness. R.13-11-005 was never intended to address larger issues such as aligning electrification and demand side program goals with equity concerns while maintaining system reliability.

R.13-11-005 also does not account for the potential cumulative impacts of other demand side programs outside of energy efficiency. This includes the ESA and demand response programs. Further, there is no current open rulemaking addressing demand response.

B. Cal Advocates' proposed rulemaking will help improve demand side programs as these programs progress.

Now is an opportune moment to develop comprehensive rules for demand side measure program budgets. The current portfolio budgets for both energy efficiency and demand response expire at the end of 2027,[7] making this a rare opportunity to address both programs in concert. Given that program administrator preparations for the next budget cycle will likely begin in earnest by 2026, it is imperative that the Commission act now to ensure alignment. While the current ESA budget cycle concludes at the end of 2026,[8] receipt of Commission guidance as early as possible would ensure that programs targeted at promoting equity are aligned.

In addition, the Commission should be prepared to lead with new policies that incorporate any relevant results from the major building electrification pilots. Notably, electrification pilots for San Joaquin Valley's disadvantaged communities concluded in

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[7] D.23-06-055 authorized the 2024-2027 energy efficiency portfolio budgets and approved the 2028-2031 budget forecast for Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), San Diego Gas & Electric Company (SDG&E), Marin Clean Energy (MCE), Bay Area Regional Energy Network (BayREN), Rural Regional Energy Network (R-REN), Tri-County Regional Energy Network (3C-REN), and Southern California Regional Energy Network (SoCalREN). D.21-11-013 authorized Inland Regional Energy Network's 2022-2027 budget (I-REN). I-REN is the sole energy efficiency program administrator without a 2028-2031 budget forecast. D.23-12-005 authorized the 2024-2027 demand response portfolio budgets and directed PG&E, SCE, and SDG&E to submit their 2028-2032 Demand Response Portfolio Application by November 1, 2026.

[8] See, *Decision on Large Investor-owned Utilities' and Marin Clean Energy's California Alternate Rates for Energy (CARE), Energy Savings Assistance (ESA), And Family Electric Rate Assistance (FERA) Program Applications for Program Years 2021-2026*, D.21-06-015, A.19-11-003 et al., June 7, 2021.

2023[9] and SCE's ESA Building Electrification pilot is scheduled to conclude in 2026.[10] Other electrification pilots will launch in 2024, such as Pacific Gas and Electric Company's Zonal Equity Electrification and Residential Equity Electrification programs in its energy efficiency portfolio.[11] Substantially similar pilots and programs should not be created until results from existing pilots are available.

III. RECOMMENDED SCOPE OF THE PROCEEDING

Cal Advocates recommends that the Commission issue an Order Instituting Rulemaking that encompasses the following major issues and sub-issues within the scope of the proceeding:

a. <u>Setting goals to balance decarbonization and electrification goals with the need to keep rates just and reasonable.</u>

    i. Consideration of the use of the existing Potential and Goals Study timeline, expanding the scope of the low-income and equity customer potential studies and adding demand response to the study scope.

        1. Consider individual Total System Benefits (TSB) goals for equity programs, but not necessarily cost effectiveness requirements.

    ii. Consideration of the application of TSB as the primary measure for demand response, energy efficiency, and ESA programs.

        1. Analyze how TSB can reflect GHG reduction benefits as well as the timing/location of energy savings to improve reliability.

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[9] D.18-12-015 authorized $50.7 million from 2019 to 2023 for 11 electrification pilots for SJV DACs. The first of several final annual reports for the pilots were served by PG&E, SCE, SoCalGas, and Richard Heath and Associates on December 19, 2023.

[10] D.21-06-015 authorized $103.5 million for the ESA Pilot Plus and Pilot Deep programs for all IOUs. Additionally, D.21-06-015 authorized $10.5 million for SCE's Clean Energy Homes pilot program and $40.8 million for SCE's Building Electrification pilot program.

[11] PG&E AL 4814-G/7047-E, *PG&E's 2024-2027 True-Up Advice Letter in Compliance with Decision 21-05-031, Decision 23-06-055, and Decision 23-08-005*, October 16, 2023, at 9.

b. Designing budgets to ensure that decarbonization and electrification goals are met while ensuring that electric rates remain affordable.

i. Consider how programs can combine resource types (e.g., demand response and energy efficiency).[12]

1. Consider how the Commission should work towards aligning programs with recent trends to create resource portfolio solutions for summer reliability, such as the Market Access Program.

ii. Consider the use of a third-party design/implementation model, with pay-for-performance contracts to limit risk to ratepayers for under-performance.

1. Consider the incorporation of Procurement Review Group involvement and design thresholds for advice letter approval, e.g., if contracts exceed a specific size.

c. Analyze and adopt specific parameters of what contracts may be executed by utilities without Commission approval.

1. Set rules and policies that maximize utilization of statewide program design.

ii. Determine how fund-shifting can be used for greater flexibility, making the achievement of California's various energy goals more realistic.

1. Set high-level criteria for fund shifting, based upon TSB and TRC limitations.

2. Consider rules that prohibit fund shifting between equity program and other segments.

iii. Consider the establishment of Equity Program Budgets.

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[12] This aligns with the recent energy efficiency 2024-2027 portfolio budgets decision (D.23-06-055), which allows PAs to set aside up to 2.5 percent, or $4 million, whichever is greater, up to a maximum of $15 million, of energy efficiency budgets for IDSM programs for ongoing load shifting that reduces peak consumption.

1. Consider whether ESA can be a standalone budget category or whether it should be combined into broader equity programs.

2. RENs and CCAs must face approval criteria based on assigned goals and performance requirements.

3. Create TSB performance requirements for all entities receiving ratepayer funds (including RENs and CCAs).

iv. Determine how to minimize rate impacts, especially for the most vulnerable Californians.

1. Consider a requirement for program administrators to seek and utilize CEC programs funded by federal IRA and CA General Fund dollars prior to seeking additional ratepayer funds.

2. Align incentives to support the dynamic rates proceeding.

v. Consider the establishment of workforce standards and what should be required under these standards.

1. Consider whether targeted workforce training programs can create high-road career opportunities[13] for underserved communities.

2. Consider the benefits of a properly trained workforce that can ensure programs deliver program savings and benefits (for example, properly installed HPWHs or building controls).

d. Evaluating performance in order to ensure that programs achieve measurable results for ratepayers.

i. Analyze methods to measure cost-effectiveness using TRC at both the program and portfolio levels, similar to the current demand response model.

[13] See: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/news-office/key-issues/esj/esj-high-road-workforce-en-banc-white-paper.pdf

1. Address reasonable budget constraints on potential carveouts for equity and market support.

2. Address standardization of demand response performance requirements, including for CCAs that elect to participate.

ii. Consider if the portfolios should be subject to a mid-cycle review process.

iii. Further develop ex-ante requirements.

The new Rulemaking should have two tracks. One track should establish cost effective methods for promoting demand side reliability and pollution abatement measures. The second track should advance policies to ensure that the benefits of demand side programs are equitably realized by all customers. It should also advance equity programs to ensure equitable participation and access by all customers.

As part of the above stated scope of the proceeding, some key goals of the proceeding should be to re-establish a four-year application cycle for demand side customer programs and address the long-term stability of funding for these programs. In addition, the rulemaking should seek to improve ratepayer protection and innovation through 3rd party design and implementation with an emphasis on pay-for-performance.

The rulemaking should also establish total system benefits as the primary measure for demand side programs, rather than simple savings values, to appropriately value the timing/location of savings. The rulemaking should also determine what types of equity programs are appropriate to be funded through rates.

Finally, the Commission should initially categorize this new rulemaking as a quasi-legislative proceeding and consider policymaking issues in its early stages. At the outset of this proceeding, the Commission should consider its electrification, decarbonization, and affordability policy goals in order to scope issues and tracks that will allow it to establish rules or investigations to holistically address those goals.[14] As such, an initial quasi-legislative categorization is appropriate – it will encourage open

[14] Pub. Util. Code Section 1701.1(c).

participation before the Commission as it develops rules and methods for establishing future budgets.

IV. RULE 6.3 REQUIREMENTS

A. Rule 6.3(b): prior litigation before the Commission of the issues raised in this petition.

Rule 6.3(b) requires that a petition for rulemaking state whether the issues raised have, to the petitioner's knowledge, been previously litigated before the Commission, and if so to provide relevant information on that prior litigation. There are several Commission proceedings that have addressed similar issues before the Commission. This proposed rulemaking will promote budgets that align with the Commission's objectives.[15] In D.21-05-031 the Commission adopted a dollar value metric known as Total System Benefit to combine and optimize the savings goals of lifecycle energy, capacity, and GHG benefits of EE.[16] In the same decision, the Commission adopted three energy efficiency segments consisting of resource acquisition, market support, and equity, each with defined program objectives.[17] With the exception of REN program administrators, resource acquisition programs are subject to a cost-effectiveness threshold on an ex-ante basis with a total resource cost (TRC) ratio of 1 or greater.[18] The Commission has since issued guidance on the budgets for REN program administrators to be proportional to the incumbent IOU budgets based on the number of customers served by non-statewide and

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[15] *Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues*, R.13-11-005, Nov. 21, 2013; *Application of Pacific Gas and Electric Company for Approval of its Demand Response Programs, Pilots and Budgets for Program Years 2023-2027*, Application (A.) 22-05-002 and related matters, A.22-05-003, A.22-05-004, May 2, 2022; *Application of Pacific Gas and Electric Company for Approval of Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for 2021-2026 Program Years*, A.19-11-003 and related matters, A.19-11-004, A.19-11-005, A.19-11-006, A.19-11-007, November 4, 2019; *Order Instituting Rulemaking Regarding Building Decarbonization*, R.19-01-011, January 31, 2019; *Order Instituting Rulemaking to Advance Demand Flexibility through Electric Rates*, R.22-07-005, July 14, 2022.

[16] D.21-05-031 Ordering Paragraph 1.

[17] D.21-05-031 at 14-15 and Ordering Paragraph 2.

[18] D.21-05-031 at 21-22 and Conclusion of Law 8.

non-regional programs.[19] Thus, the Commission recognized that more design work is necessary to refine cost caps for REN equity and market support programs.[20]

In demand response, the Commission reaffirmed the necessity of cost-effectiveness in approving demand response programs in D.23-12-005, the decision for the most recent portfolio cycle.[21] In this decision, the Commission reemphasized the importance of using cost-effectiveness thresholds on both a program and portfolio level for demand response programs.[22] Additionally, statewide-administered portfolio programs continue to be an ongoing issue in energy efficiency[23] and an emerging consideration in demand response.[24] Since many energy efficiency statewide programs are still being launched, the Commission is waiting for the 2024-2027 portfolio cycle to conduct an assessment of statewide programs to analyze programmatic issues with the current statewide offerings, and to identify other potential candidates for statewide administration.[25] In demand response, the Commission has recognized the potential benefits for statewide administration, but has declined to adopt a statewide administered demand response programs at this time.[26]

As part of its efforts to promote equity, the Commission has previously considered whether RENs should continue on a pilot program basis or transition to become permanent portfolio administrators. The Commission has decided that RENs no longer needed the pilot designation but should continue to be monitored and evaluated according to the success of their programs.[27]

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[19] D.19-12-021 at 39.

[20] D.21-05-031 at 69.

[21] D.23-12-005 at 187.

[22] D.23-12-005 at 15.

[23] D.23-06-055 at 5-13.

[24] D.23-12-005 at 76.

[25] D.23-06-055 at 9-12.

[26] D.23-12-005 at 76.

[27] D.19-12-021, Conclusions of Law 2 at 83.

In R.22-11-013, the Commission is considering modifications to the Avoided Cost Calculator for Distributed Energy Resources (DERs) as well as how to incorporate "equity" in DER cost effectiveness evaluations.[28] The Commission has approved two related ESA pilot programs, ESA Pilot Plus and ESA Pilot Deep, to test new strategies to deliver greater energy savings for customers and to assess the costs and long term benefits of these deeper ESA treatments.[29]

In response to SB 1477 (Stern, 2018), the Commission initiated the Building Decarbonization Order Instituting Rulemaking, R.19-01-011, to support a policy framework on the decarbonization of buildings.[30], [31] The Commission has determined that advancing California's building decarbonization and building electrification goals must be balanced with its statutory duty to establish just and reasonable rates.[32] Further, the Commission's recent decision on SCE's proposed building electrification application highlighted how programs must consider bill impacts, cost-effectiveness, existing programs, and non-ratepayer funded sources.[33], [34]

In the Rulemaking to Advance Demand Flexibility Through Electric Rates (R.22-07-005), the Commission is considering how to update its electric rate design and potentially implement dynamic rates and demand flexibility measures to advance state goals. Many of the potential dynamic rate tariffs under consideration would require load-control technologies.

As discussed in Section IV.C, below, Cal Advocates conferred with the Commission's Public Advisor's Office to identify any additional persons upon whom to

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[28] See, *Assigned Commissioner's Scoping Memo and Ruling*, R.22-11-013, May 31, 2023, at 3-4.

[29] D.21-06-015, Ordering Paragraph 38 at 479.

[30] Assigned Commissioner's Scoping Memo and Ruling, R.19-01-011, May 17, 2019.

[31] The Building Decarbonization Order Instituting Rulemaking has advanced decarbonization by adopting the BUILD and TECH pilot programs, establishing a Wildfire and Natural Disaster Resiliency Rebuild program, authorizing studies from the three large electric IOUs based on their energy bill impact resulting from gas water heaters to electric heat pump water heaters, eliminating gas line extension subsidies, and eliminating electric line extension subsidies for mixed fuel new construction.

[32] D.24-01-004 at 1.

[33] D.24-01-004 at 1-2.

[34] D.24-01-004 Conclusion of Law 3 at 55-56.

serve the petition. The Public Advisor's Office recommended that the following proceedings might be relevant to Cal Advocates' Petition:

- A.17-12-011, *Application of Pacific Gas and Electric Company for Approval of its Residential Rate Design Window Proposals, including to Implement a Residential Default Time-Of-Use Rate along with a Menu of Residential Rate Options, followed by addition of a Fixed Charge Component to Residential Rates (U39E)*. Proceedings A.17-12-011, A.17-12-012, and A.17-12-013 are consolidated by Ruling of January 25, 2018.
- R.13-09-011, *Order Instituting Rulemaking to Enhance the Role of Demand Response in Meeting the State's Resource Planning Needs and Operational Requirements*. Per D.17-10-017, "Pursuant to Public Utilities Code Section 1701.5, all issues addressed in the scoping memo of Rulemaking 13-09-011 have been resolved, except for the issue of new models, which this Decision determines shall be addressed in a future rulemaking."[35]
- A.1701013-17, *Application of Southern California Edison Company (U338E) for Approval of Energy Efficiency Rolling Portfolio Business Plan*. Pursuant to Chief ALJ Clopton's 1/30/2017 Ruling, proceedings A.17-01-013, A.17-01-014, A.17-01-015, A.17-01-016 and A.17-01-017 are consolidated.

B. Rule 6.3(b): Verification.

Rule 6.3(b) requires that a petition's factual assertions be verified. Cal Advocates provides the requisite verification as Exhibit 1.

C. Rule 6.3(c).

Consistent with Rule 6.3(c), Cal Advocates will serve its Petition upon, among others, the Commission's Executive Director, Chief Administrative Law Judge, Director of the appropriate industry division, and Public Advisor. Cal Advocates will also serve its Petition on all parties to the proceedings in which a decision may be modified due to

[35] D.17-10-017, *Decision Adopting Steps for Implementing the Competitive Neutrality Cost Causation Principle, Requiring an Auction in 2018 for the Demand Response Auction Mechanism, and Establishing a Working Group for the Creation of New Models of Demand Response* at 92 (Ordering Paragraph 14).

overlapping issues with Cal Advocates' proposed rulemaking, as identified in Section IV.A, above.

In addition, Rule 6.3(c) requires that, prior to filing, petitioners must consult with the Public Advisor to identify any additional persons upon whom to serve the petition. Cal Advocates conferred with the Public Advisor's Office on February 12 and 13, 2024. As discussed in Section IV.A, above, the Public Advisor's Office recommended that the following proceedings might be relevant to Cal Advocates' proposed new rulemaking: A.17-12-011 (consolidated with A.17-12-012 and A.17-12-013); R.13-09-011; and A.17-01-013 (consolidated with A.17-01-014, A.17-01-015, A.17-01-016 and A.17-01-017).

Rule 6.3(c) also provides that the assigned Administrative Law Judge may direct the petitioner to serve the petition on additional persons. Here, the assigned Administrative Law Judge has not directed Cal Advocates to serve its Petition on any additional persons.

D. Rule 6.3(f).

Rule 6.3(f) clarifies that the Commission will not entertain a petition for rulemaking on an issue that the Commission has acted on or decided not act to on within the preceding 12 months. While issues related to energy efficiency have been litigated within the past 12 months in the current energy efficiency rulemaking, the issues proposed for consideration in this petition go beyond what has been determined in the energy efficiency rulemaking. As previously discussed, R.13-11-005 has set the goals for ratepayer-funded energy efficiency portfolios through 2035.[36] The rulemaking proposed in this petition would go beyond these energy efficiency goals and consider additional demand side programs and ensure that the goals for these demand side programs are aligned with California and the Commission's larger electrification goals.

V. CONCLUSION

Ever since the first energy efficiency rulemaking in 2001, the Commission has made great strides in tackling emerging energy issues and in establishing California's

[36] D.23-08-005.

authority on energy efficiency. Like its predecessors, R.13-11-005 was able to introduce several reforms including a new portfolio cycle structure, statewide administration of portfolio programs, and even third-party program administration requirements. However, as California's energy challenges have evolved, the Commission should consider new objectives to address these challenges. Currently, the Commission's objectives of decarbonization, affordability, and reliability are competing and affecting one another, resulting in an entwined web not only amongst these goals, but also the Commission's demand side programs.

The Commission needs a single rulemaking to comprehensively consider these objectives and timely implement policies which will complement the Commission's high priority demand flexibility Order Instituting Rulemaking, R.22-07-005. The proposed Rulemaking should integrate policies, outcomes, and budgets for energy efficiency, demand response, ESA demand side programs to effectively advance the state's climate and decarbonization goals. The scope of this new rulemaking should allow the Commission to develop policies and new approaches to ensure that decarbonization technologies will promote equity, cost-effectiveness, and reliability.

Respectfully submitted,

/s/ Michael Einhorn
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March 6, 2024

EXHIBIT 1
VERIFICATION

Verification Under Rule 1.11

I am an authorized employee of the Public Advocates Office, which submits the attached petition, and am authorized to make this verification on its behalf. The statements in the foregoing document are true to my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 6, 2024, at San Francisco, California.

/s/ Michael Campbell
MICHAEL CAMPBELL,
Assistant Deputy Director
Public Advocates Office