

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

COMMISSIONER JOHN REYNOLDS, in attendance

ADMINISTRATIVE LAW JUDGE RAJAN MUTIALU, presiding

Order Instituting Rulemaking to	)	PREHEARING
Continue Implementation and	)	CONFERENCE
Administration, and Consider Further	)	
Development, of California	)	Rulemaking
Renewables Portfolio Standard	)	24-01-017
Program.	)	

REPORTERS' TRANSCRIPT  
Virtual Proceeding  
April 4, 2024  
Pages 1 - 60  
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Reported by: Karly Powers, CSR No. 13991  
Shannon Ross Winters, CSR No. 8916  
Rebekah L. DeRosa, CSR No. 8708



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VIRTUAL PROCEEDING

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ADMINISTRATIVE LAW JUDGE MUTIALU: On the record. The Commission will come to order. This is the time and place for the prehearing conference for Rulemaking 24-01-017, the continued implementation and administration, and consider further development of California's Renewables Portfolio Standard Program. This prehearing conference was noticed to the service list by email ruling -- by ruling, actually, on March 7, 2024.

Today's agenda will start with taking appearances and confirming the service list. We will next discuss categorization, remind parties about ex parte rules, and discuss the need for hearings, scoping items, and, finally, the schedule. I remind everyone that while we are sharing as much information as possible today, nothing is final until published by the assigned commissioner in this scoping memo.

I'm Administrative Law Judge Rajan Mutialu and I will oversee and manage this proceeding in consultation with assigned Commissioner John Reynolds. Commissioner Reynolds is in attendance and will provide remarks at this time.

1           COMMISSIONER JOHN REYNOLDS: Thank you,  
2 Judge Mutialu. Thank you for attending this prehearing  
3 conference for our newest rulemaking to continue  
4 implementation of California's Renewable Portfolio  
5 Standards, or RPS. I'm John Reynolds, the assigned  
6 commissioner to this proceeding. I was also the  
7 assigned commissioner to R.18-07-003, which was the  
8 prior RPS implementation. I would like to thank Judge  
9 Mutialu for presiding over this PHC.

10           As I'm sure most, if not everyone, on the line  
11 is aware, the RPS has long been one of the state's  
12 premier policy mechanisms to achieve our renewable  
13 energy goals. The hallmark of the RPS is a requirement  
14 that each Load Serving Entity must annually serve a  
15 minimum amount of its retail sales with a certain  
16 percentage of qualifying renewable energy generation.

17           That percentage slowly ratchets up each year and  
18 provides a healthy compliance-based market to develop  
19 more renewable energy resources. Our current longer  
20 term RPS requirement is to achieve 60 percent renewable  
21 energy by 2030, and I think we're on track to meet that  
22 accordingly.

23           This proceeding is not only the procedural  
24 avenue for the Commission to review and approve LSE RPS  
25 plans, but also as a place to undertake targeted policy

1 and improve the administration of the RPS program.

2           So I'm sure you all have seen the preliminary  
3 scope in the Order Instituting Rulemaking, and there are  
4 a couple of places that I'm most interested to hear from  
5 the parties. The first is on coordinating the RPS  
6 proceeding with the Integrated Resources Plan, or IRP,  
7 proceeding.

8           Comments on the Order Instituting Rulemaking  
9 largely supported this with no parties objecting to such  
10 coordination, but I'd like to hear a bit more from the  
11 parties on how that coordination should occur or take  
12 place. What are the concrete steps and actions that we  
13 can take in this proceeding that would lead to greater  
14 alignment with the IRP.

15           The second is on the RPS confidentiality rules.  
16 I understand there's some amount of confusion or concern  
17 with how confidentiality rules are applied to Load  
18 Sharing Entities who submitted RPS plans. I would like  
19 to hear more from parties about the specific issue here,  
20 and how the Commission can create a better, more  
21 efficient process for disposing of confidentiality  
22 requests and rules.

23           I'll also note that my advisor Jake McDermott  
24 is on the line today. I'll be working with him and the  
25 judges over the coming weeks on a full scoping memo.

1           With that, I look forward to hearing everyone's  
2 comments, and I will hand it back to Judge Mutialu.

3           ALJ MUTIALU: Thank you, Commissioner Reynolds.

4           I am Administrative Law Judge Rajan Mutialu,  
5 and I will oversee and manage this proceeding in  
6 consultation with assigned Commissioner John Reynolds.  
7 We are conducting this prehearing conference via Webex.  
8 Before we begin, I would like to review some ground  
9 rules to make sure that this is a successful prehearing  
10 conference. Number one: Please do not speak unless I  
11 call on you to speak. Would you please introduce  
12 yourself every time before you speak.

13           When I call for questions or comments, I would  
14 like parties to speak in speaking order, which will be  
15 the following: Maria Wilson, Pacific Gas and Electric  
16 Company; Janet Combs, representing Southern California  
17 Edison; Paul Szymanski, representing San Diego Gas and  
18 Electric; Justin Wynne, representing the cities of  
19 Lancaster, Pico Rivera, Rancho Mirage, Pomona,  
20 San Jacinto, Santa Barbara, Peninsula Clean Energy  
21 Authority, Apple Valley Choice Energy;

22           Jedediah Gibson, representing Bear Valley  
23 Electric Service, Incorporated, Liberty Utilities and  
24 PacifiCorp; Scott Blaising, representing the Joint  
25 BioMAT Community Choice Aggregators and Joint CCAs,

1 including Central Coast Community Energy, Marin Clean  
2 Energy, Orange County Power Authority, Pioneer Community  
3 Energy, Redwood Coast Energy Authority, and Valley Clean  
4 Energy;

5 Matt Miley, representing the Public Advocates  
6 Office of the California Public Utilities Commission;  
7 Isabella Montoya, representing The Utility Reform  
8 Network; Lisa McKenna, representing Shell Energy North  
9 America; Gregg Morris, representing Clean Power  
10 Institute;

11 Andrew Brown, representing the Alliance for  
12 Retail Energy Markets; Katherine Ramsey, representing  
13 Sierra Club; Ariel Strauss, representing Small Business  
14 Utility Advocates; and Jan Reid. I ask the parties to  
15 please follow this speaking order. Every party  
16 representative will have an opportunity to speak. Speak  
17 slowly and clearly for the benefit of the court reporter  
18 and for a clear transcript.

19 If you are not on camera, you must identify  
20 yourself and the party you represent every time you  
21 speak. Please do not speak over one another. Mute your  
22 microphones, and refrain from side conversations, and  
23 keep your comments concise, on topic, and focused.

24 If you need assistance, you may contact Melissa  
25 Wang. Her email is melissa.wang@cpuc.ca.gov. I suggest

1 we all have access to our internet and email during this  
2 prehearing conference.

3 We're going to start with the first agenda  
4 item, parties, and service list. Please make your  
5 appearances in speaking order.

6 If you are a party and requested a party  
7 representative to be a speaker before the prehearing  
8 conference, you will speak in accordance with the  
9 speaking order. If you are a party and did not notify  
10 me or the assigned proceeding analyst that you would  
11 like the party representative to speak on your behalf,  
12 you may do so now. We will add a named speaker to the  
13 speaker order that has been created.

14 Are there any additional parties that request  
15 to speak at this time?

16 (No response.)

17 ALJ MUTIALU: Hearing none, let's proceed.

18 If you're a non-party, you may motion for party  
19 status. If party status is granted, the party may  
20 identify a speaker that will be added to the speaking  
21 order. Are there any motions to party status at this  
22 time?

23 (No response.)

24 ALJ MUTIALU: Hearing none, let's proceed.

25 Now let's address the service list. If you

1 haven't already, now is a good time to look at the  
2 Docket Card for this proceeding on the Commission's  
3 website and double-check if you are already listed as a  
4 party and that the name of the individual on the "party  
5 status" section of the service list is correct.

6 When we call you today, let us know if you need  
7 to make any corrections to the service list as it  
8 stands. We ask that for the first time you identify  
9 yourself by name and your organization, and spell your  
10 first name just the first time. After that, you may  
11 introduce yourself by just name going forward. Let's  
12 return to our speaking order.

13 I'll call on Ms. Wilson first.

14 MS. WILSON: Thank you, your Honor. This is  
15 Maria Wilson for Pacific Gas and Electric Company,  
16 spelled M-a-r-i-a W-i-l-s-o-n, for Pacifica Gas and  
17 Electric Company. With regard to party status and  
18 service list, I have confirmed that PG&E is listed as a  
19 party and the service list party contact is myself and  
20 it's correct. PG&E has no concerns with its appearance  
21 on the service list or party status.

22 ALJ MUTIALU: Now let's turn to Ms. Combs with  
23 Southern California Edison.

24 MS. COMBS: Thank you, your Honor. Janet  
25 Combs, J-a-n-e-t C-o-m-b-s, representing Southern



1 California Edison Company. SCE is a party to the  
2 proceeding and the service list is correct. So no  
3 updates needed. Thank you.

4 ALJ MUTIALU: Thank you, Ms. Combs.

5 Now Mr. Szymanski from San Diego Gas and  
6 Electric.

7 MR. SZYMANSKI: Good afternoon, your Honor, and  
8 good afternoon, Commissioner Reynolds. I'm Paul  
9 Szymanski, P-a-u-l S-z-y-m-a-n-s-k-i. And I am filling  
10 in today for the attorney of record, whose name is  
11 Walter Waidelich, W-a-l-t-e-r W-a-i-d-e-l-i-c-h.

12 Mr. Waidelich is unavailable today. So I am  
13 filling him for him to represent SDG&E, who is a party  
14 and a respondent in this proceeding. Thank you.

15 ALJ MUTIALU: Thank you, Mr. Szymanski.

16 Now let's turn to Mr. Wynne.

17 MR. WYNNE: Thank you, your Honor. So Justin  
18 Wynne, J-u-s-t-i-n W-y-n-n-e, here on behalf of the  
19 Cities of Lancaster, Pico Rivera, Rancho Mirage, Pomona,  
20 San Jacinto, Santa Barbara, and the Peninsula Clean  
21 Energy Authority, and Apple Valley Choice Energy, and I  
22 believe the service list is correct and that each of  
23 those entities is a party.

24 ALJ MUTIALU: Thank you, Mr. Wynne.

25 Now let's turn to Mr. Gibson.

1 MR. GIBSON: Good afternoon, your Honor. Jed  
2 Gibson, J-e-d G-i-b-s-o-n, on behalf of the Small and  
3 Multi-Jurisdictional Utilities: Bear Valley Electric  
4 Service, Liberty Utilities, and PacifiCorp. The service  
5 list includes all three Small and Multi-Jurisdictional  
6 Utilities, and the contact information on the service  
7 list is correct. Thank you.

8 ALJ MUTIALU: Thank you.

9 Now let's turn to Mr. Blaising.

10 MR. BLAISING: Yes, your Honor. Scott  
11 Blaising, S-c-o-t-t B-l-a-i-s-i-n-g, representing the  
12 so-called Joint BioMAT CCAs, which consist of six  
13 Community Choice Aggregators: Central Coast Community  
14 Energy; Marin Clean Energy; Orange County Power  
15 Authority; Pioneer Community Energy; Redwood Coast  
16 Energy Authority, and Valley Clean Energy.

17 And I have confirmed that the service list is  
18 accurate with respect to the Joint BioMAT CCAs, and each  
19 of the CCAs is also a respondent in the proceeding, your  
20 Honor. Thank you.

21 ALJ MUTIALU: Thank you.

22 Now let's turn to Mr. Miley.

23 MR. MILEY: Hello, your Honor. Matt Miley for  
24 the Public Advocates Office, M-a-t-t M-i-l-e-y. I have  
25 confirmed that I am listed as a party on the service

1 list and the contact information I see is correct.

2 Thank you.

3 ALJ MUTIALU: Thank you.

4 Now let's turn to Ms. Montoya.

5 MS. MONTOYA: Good afternoon, your Honor. My  
6 name is Isabella Montoya, I-s-a-b-e-l-l-a M-o-n-t-o-y-a.

7 I'm representing The Utility Reform Network, and I  
8 believe we are listed as a party, and the service list  
9 lists Matthew Freedman as a contact, which is correct.

10 ALJ MUTIALU: Thank you, Ms. Montoya.

11 And now let's turn to Ms. McKenna.

12 MS. MCKENNA: Thank you, your Honor. Lilly  
13 McKenna, L-i-l-l-y M-c-K-e-n-n-a, here for Shell Energy,  
14 and I've confirmed that the service list is correct and  
15 I'm the party representative for Shell.

16 ALJ MUTIALU: Thank you, Ms. McKenna.

17 Now let's turn to Mr. Morris.

18 MR. MORRIS: Thank you, your Honor. Gregg  
19 Morris for the Green Power Institute, G-r-e-g-g  
20 M-o-r-r-i-s, and we are listed as a party and the  
21 service list is correct.

22 ALJ MUTIALU: Thank you, Mr. Morris.

23 Now let's turn to Mr. Brown.

24 MR. BROWN: Good afternoon, your Honor. Andy  
25 Brown, A-n-d-y B-r-o-w-n, for the Alliance of Retail

1 Energy Markets. The listing in the service list as a  
2 party is correct. No corrections there. Thank you.

3 ALJ MUTIALU: Thank you, Mr. Brown.

4 Now let's turn to Mr. Strauss.

5 MR. STRAUSS: Thank you, your Honor. This is  
6 Ariel Strauss for Small Business Utility Advocates,  
7 A-r-i-e-l S-t-r-a-u-s-s, and the service list is  
8 correct.

9 ALJ MUTIALU: Thank you.

10 Now let's turn to Ms. Ramsey.

11 MS. RAMSEY: Hello. Thank you, your Honor. My  
12 name is Katherine Ramsey, and I'm here on behalf of  
13 Sierra Club, K-a-t-h-e-r-i-n-e R-a-m-s-e-y. And I see  
14 that Judge Mutialu recently granted Sierra Club's motion  
15 for party status, but on the service list, I'm currently  
16 listed as information only. So that is an error that  
17 needs to be corrected, please. Thank you.

18 ALJ MUTIALU: Thank you, Ms. Ramsey.

19 And turning now to Mr. Reid.

20 MR. REID: Thank you, your Honor. I filed  
21 comments to the OIR. The comments were rejected due to  
22 a minor error. I resubmitted the comments, and I should  
23 have been placed on the service list, but I was not. I  
24 am representing myself in this proceeding. The name of  
25 the party is L. Jan Reid, J-a-n R-e-i-d.

1 ALJ MUTIALU: Thank you for making that note,  
2 Mr. Reid.

3 Are there any other parties that I have not  
4 called on while I've been taking appearances? Please  
5 let me know at this time.

6 (No response.)

7 ALJ MUTIALU: Thank you. Hearing none.

8 Let's proceed to categorization. The parties  
9 may now state their position regarding the  
10 categorization as ratesetting and the need for hearings  
11 in order. Let's return to our speaking order, and I'll  
12 call on Ms. Wilson first.

13 MS. WILSON: Thank you, your Honor.

14 Maria Wilson for PG&E. PG&E does not oppose  
15 the categorization of ratesetting, and RPS rulemaking  
16 has historically categorized this as ratesetting. And  
17 as of this time, it is unclear whether or not there is  
18 any need for hearings in this matter. In recent years,  
19 there has not been hearings in RPS rulemaking, and  
20 without the development of the scope and the record in  
21 the proceeding, it's not clear whether hearings will be  
22 necessary at this time.

23 ALJ MUTIALU: Thank you, Ms. Wilson.

24 Let's now turn to Ms. Combs.

25 MS. COMBS: Thank you, your Honor. Janet Combs

1 with SCE, for Southern California Edison Company. SCE  
2 agrees that ratesetting is the appropriate  
3 categorization. And in terms of the need for hearings,  
4 we agree with PG&E's comments that it's too early to  
5 tell if hearings will be needed if there's facts in  
6 dispute, and I believe normally this proceeding does not  
7 rely on testimony, but rather more on filed commentary,  
8 and so it's not clear that hearings would be necessary  
9 for those reasons. Thank you.

10 ALJ MUTIALU: Thank you, Ms. Combs.

11 Now let's turn to Mr. Szymanski.

12 MR. SZYMANSKI: Paul Szymanski with San Diego  
13 Gas and Electric Company. SDG&E agrees with the  
14 comments of Southern California Edison Company and  
15 Pacific Gas and Electric Company regarding the  
16 categorization of this proceeding. Ratesetting appears  
17 to be the most appropriate category for that. And we  
18 also agree with the other utilities that there is no  
19 apparent need for evidentiary hearings at this time.  
20 Thank you.

21 ALJ MUTIALU: Thank you, Mr. Szymanski.

22 Now let's turn to Mr. Wynne.

23 MR. WYNNE: Thank you, your Honor. Justin  
24 Wynne on behalf of the Cities of Lancaster, Pico Rivera,  
25 Rancho Mirage, Pomona, San Jacinto, Santa Barbara,

1 Peninsula Clear Energy Authority, and Apple Valley  
2 Choice Clean Energy. And we agree with the  
3 categorization as ratesetting, and then also agree with  
4 the statements that have already been made by the first  
5 party, that it's too early to tell if there would be a  
6 need for evidentiary hearings, but in the past, it has  
7 not been necessary.

8 ALJ MUTIALU: Thank you, Mr. Wynne.

9 Now let's turn to Mr. Gibson.

10 MR. GIBSON: Jed Gibson, Small and  
11 Multi-Jurisdictional Utilities, or SMJUs. The SMJUs  
12 agree with the categorization of the proceeding as  
13 ratesetting. Additionally, at this time we don't  
14 anticipate that evidentiary hearings will be necessary.

15 ALJ MUTIALU: Thank you, Mr. Gibson.

16 Now let's turn to Mr. Blaising.

17 MR. BLAISING: Yes, your Honor. Scott Blaising  
18 for the Joint BioMAT CCAs, and we agree with the  
19 comments set forth previously by other parties, mainly  
20 that the categorization is appropriately set as  
21 ratesetting, and we don't believe at this time  
22 evidentiary hearings would be required.

23 We also, as we will discuss later, believe that  
24 certain issues can be addressed on an expedited basis  
25 through paper comments and rulings. Thank you.

1 ALJ MUTIALU: Thank you.

2 Now let's turn to Mr. Miley.

3 MR. MILEY: Thank you, your Honor. Matt Miley  
4 for Public Advocates Office, or Cal Advocates.

5 Cal Advocates does not object to the  
6 categorization of ratesetting for this proceeding. On  
7 the need for hearings, at this time Cal Advocates does  
8 not see a need for evidentiary hearings in the  
9 proceeding. Thank you.

10 ALJ MUTIALU: Thank you, Mr. Miley.

11 Now let's turn to Ms. Montoya.

12 MS. MONTOYA: Thank you, your Honor. Isabella  
13 Montoya for The Utility Reform Network, or TURN. TURN  
14 agrees with the categorization of ratesetting, and we do  
15 not believe that there will be a need for hearings at  
16 this time.

17 ALJ MUTIALU: Thank you, Ms. Montoya.

18 Now let's turn to Ms. McKenna.

19 MS. MCKENNA: Thank you, your Honor. Rounding  
20 out the lack of controversy here, Shell Energy agrees  
21 with the proposed categorization, and we do not see a  
22 need for hearings at this time. Thank you. ]

23 ALJ MUTIALU: Thank you. Now let's turn to  
24 Mr. Morris.

25 MR. MORRIS: Thank you, your Honor. I have to



1 go with the crowd. We have no objection to the  
2 categorization, and at this point in time, we do not see  
3 a need for hearings.

4 ALJ MUTIALU: Thank you. Now let's turn to  
5 Mr. Brown.

6 MR. BROWN: Thank you, your Honor. Andrew  
7 Brown for AReM.

8 We concur with the prior comments. Thank you.

9 ALJ MUTIALU: Thank you, Mr. Brown.

10 Now let's turn to Mr. Strauss.

11 MR. STRAUSS: Your Honor, this is Ariel  
12 Strauss, thank you, for Small Business Utility  
13 Advocates.

14 While agreeing with the categorization of the  
15 proceeding, we do consider there may be actually a need  
16 for hearings in this proceeding, though we'd hope to  
17 avoid them by data requests, and that's with respect to  
18 the inclusion of addressing finding of fact 11 from  
19 D.23-12-008, as requested in the opening reply comments,  
20 and that's with respect to the assertion by the IOUs  
21 that they are at a disadvantage with respect to the  
22 short-term RPS transactions. Finding fact 11 had  
23 considered that there may -- there could be a need for  
24 additional regulatory procedures in -- in place of  
25 the -- the Tier 1 -- the tier advice letter process, and

1 the assertion that this need for change based on  
2 disadvantage is a -- a fact that hasn't been established  
3 in this proceeding.

4 ALJ MUTIALU: Thank you, Mr. Ramsey (sic).

5 Now let's turn to Mr. Reid.

6 MR. REID: I agree with the categorization --  
7 categorization of the proceeding.

8 However, I do not agree that the need -- that  
9 evident -- the -- the decision on evidentiary hearings  
10 should be based solely on factual disputes. Public  
11 Utilities Code Section 1701.1 states that the  
12 Commission, consistent with due process, public policy,  
13 and statutory requirements, shall determine whether a  
14 proceeding requires a hearing.

15 Therefore, I urge the assigned commissioner to  
16 consider due process, public policy, and statutory  
17 requirements when making a final decision concerning the  
18 need for evidentiary hearings. I note that there is no  
19 mention of factual disputes in the Public Utilities  
20 Code. Thank you very much.

21 ALJ MUTIALU: Thank you, Mr. Reid.

22 Again, we will take party comments into  
23 consideration when finalizing the -- the scoping memo  
24 ruling with the assigned commissioner's office.

25 Now let's turn to the scoping memo items.

1 Let's see.

2 MS. RAMSEY: Your Honor?

3 ALJ MUTIALU: Yes?

4 MS. RAMSEY: I apologize for interrupting --  
5 interrupting. My name's Katie Ramsey on behalf of  
6 Sierra Club, and I think you might have skipped me by  
7 accident.

8 ALJ MUTIALU: My apologies. Go ahead,  
9 Ms. Ramsey.

10 MS. RAMSEY: Sorry for the excitement. I'm  
11 going to concur with everything that was said previously  
12 about the categorization of this proceeding as  
13 ratesetting, and agree that, as it currently stands,  
14 there's not a need for evidentiary hearings. However,  
15 pending the scoping memo, I would suggest that your  
16 Honor set a date shortly after the scoping memo for  
17 motions for evidentiary hearing to provide the  
18 opportunity for parties to chime in later about whether  
19 the situation has changed, and there is a need for  
20 hearing. Thank you.

21 ALJ MUTIALU: Thank you, Ms. Ramsey. I'll take  
22 that under submission.

23 Now let's proceed to discuss the preliminary --  
24 preliminary scope of issues.

25 I provided a scope of issues in the PHC agenda,

1 which was sent out, I believe, in yesterday's ruling. I  
2 will also read the scope of issues into the record.

3 The proposed scope of issues for this  
4 proceeding is:

5 Should the Commission evaluate and establish  
6 processes for RPS and IRP coordination, including, but  
7 not limited, to coordination with a preferred system  
8 plan;

9 Number two, should the Commission modify  
10 confidentiality rules for final RPS plans to ensure the  
11 confidential information is protected;

12 And then finally, are there any other actions  
13 that the Commission should take to administer,  
14 implement, or further develop the RPS program.

15 Parties may speak to the scope of issues in  
16 this proceeding now in speaking order. I'm particularly  
17 interested in understanding whether there is a material  
18 issue of disputed fact regarding the scoping memo items.  
19 In addition, I would like to know if there are any  
20 environmental and social justice issues that should be  
21 included in the scope. If you do not have any comments,  
22 you may state so.

23 Following our speaking order, let's turn to  
24 Ms. Wilson.

25 MS. WILSON: Thank you, your Honor. Maria

1 Wilson for PG&E.

2           With regard to the preliminary scope, PG&E  
3 supports the inclusion of Item 1 which relates to IRP  
4 and RPS coordination into the scope of this proceeding,  
5 and believes that the consideration should be primarily  
6 focused on identifying overlapping compliance  
7 requirements between the RPS program and IRP planning  
8 and procurement processes and adapt -- adopting changes  
9 to better align their objectives, and this can include  
10 actions such as reducing the annual RPS filing to a  
11 single filing proceeding the first year of an IRP study  
12 period and to annually update the RPS plan through  
13 advice letter processes in intervening years to account  
14 for changes in strategic planning adopted in the IRP  
15 proceeding.

16           When PG&E filed joint comments with the other  
17 large investor-owned utilities, coordination with the  
18 preserve -- preferred system plan was not an element  
19 that PG&E considered when supporting an (sic)  
20 recommendation to consider IRP and RPS coordination.  
21 PG&E understands the PSP to be considered in the IRP,  
22 and procurement orders resulting from adoption of the  
23 PSP to be evaluated and assessed on a systemwide level.  
24 Our preliminary reaction is that increased coordination  
25 can potentially result in procurement orders that are

1 better aligned with individual LSE, or load serving  
2 entity, portfolio needs rather than system level  
3 procurement orders assigned pro rata to all LSEs.

4 PG&E believes there could be opportunities for  
5 further coordination, but that would require  
6 consideration as part of a future phase of this  
7 proceeding, given statutory limitation.

8 With regard to the question of confidentiality  
9 rules, PG&E notes that RPS confidentiality rules were  
10 recently con- -- considered as part of the predecessor  
11 rulemaking. It's applicable to RPS. And while a broad  
12 new examination of those rules is unnecessary, PG&E  
13 supports certain revisions to the framework adopted in  
14 2021 by the 21-11-029 which resulted in a reduction of  
15 time for confidentiality of information supporting the  
16 renewables net short position as part of the RPS plan.  
17 And so our comments -- our reply comments filed on OIR  
18 address the particular unintended consequences of  
19 confidentiality where draft final RPS plans are filed in  
20 separate years, as is typical, which can cause  
21 information that is protected in a draft filing to  
22 become public in a final filing. And so PG&E shares  
23 some concerns that -- that that occurrence can erode  
24 confidentiality protections, and pose risks that newly  
25 public information can be used, when combined with other

1 information, to inadvertently real mark -- reveal,  
2 excuse me, market sensitive or proprietary information,  
3 such as a near-term RPS need. So we would support  
4 limited consideration of amendments or modifications to  
5 the confidentiality rules for final RPS plans.

6 And then finally, on the issue of whether there  
7 are other actions that the Commission should take, PG&E  
8 supports expedited consideration of regulatory changes  
9 applicable to itself and other investor-owned utilities  
10 as part of the 2024 RPS plan process so -- to increase  
11 procurement flexibility for short-term RPS transaction.  
12 PG&E requested increased procurement flexibility for  
13 short-term RPS procurement as part of its 2023 annual  
14 RPS plan request, and that the decision resolving those  
15 plans, which is D.23-11-008, denied PG&E's request  
16 without prejudice, but clarified that the Commission may  
17 add the ability of the IOUs, or investor-owned  
18 utilities, to transact for eligible renewable resources  
19 for up to five years or without the need for a Tier 1  
20 advice letter approval as part of a future RPS plan in  
21 the proceeding scope, and PG&E is supportive of  
22 consideration of that request. In PG&E's view, there's  
23 no longer policy rationale for our -- barriers to IOUs  
24 transacting short-term RPS transactions for both its RPS  
25 needs and its other energy needs to meet its short-term

1 energy and compliance objective. PG&E also supports  
2 consideration of this matter, because eliminating the  
3 Tier 1 advice letter requirement for short-term markets  
4 transactions can support customer savings, and  
5 short-term transactions can help -- be helpful in  
6 increasing the off -- offer pool for transactions that  
7 might not have an appetite for the Tier 1 RPS process.  
8 Such process does not apply to other LSEs. And so we  
9 would be supportive of consideration of this request to  
10 help facilitate affordability and achievement of the  
11 state's RPS and environmental goals.

12 Thank you very much. And PG&E had not  
13 considered the environmental justice question at this  
14 time, and so we have nothing further to add on that  
15 matter.

16 ALJ MUTIALU: Thank you, Ms. Wilson.

17 Now let's turn to Ms. Combs.

18 MS. COMBS: Thank you, your Honor. Janet Combs  
19 with Southern California Edison Company.

20 We also support, as PG&E noted, the inclusion  
21 of the issue of coordination between RPS and IRP, as  
22 mandated in Senate Bill 350. However, SCE recommends  
23 that, in scoping that item, the Commission make clear  
24 that it does not include consideration of increasing GHG  
25 emission reduction targets or RPS mandate -- mandates,



1 and that is because we believe those matters should  
2 remain firmly in the longer-term planning processes in  
3 the IRP where the Commission and the state optimize  
4 resource procurement across California to maximize the  
5 reduction of GHG emission -- emissions to meet the  
6 state's emission -- ambitious climate action goals.  
7 Optimization, we feel, would be hampered if the  
8 Commission were to consider increasing GHG reddish- --  
9 reduction targets or RPS targets in this OIR divorced  
10 from the long-term planning in the IRP. We note that  
11 the reliability and clean power procurement program is  
12 presently under active consideration in the IRP, and  
13 that this RPS OIR should not preempt that consideration.

14 For this reason, we do not see a -- a need to  
15 coordinate on the -- the preferred system plan, in  
16 particular, and we do, however, support consideration in  
17 this OIR of where in the RPS and IRP plans there are  
18 opportunities to avoid duplication to enhance  
19 efficiencies for both plans, and SCE will simply note  
20 that the IOUs did, in their joint opening comments,  
21 include examples of that oppor- -- those opportunities.  
22 One concrete step is that we support the Commission  
23 identifying a separate track for this work, as also  
24 noted and explained in the Joint IOUs' opening comments.

25 On the question of whether the Commission

1 should modify confidentiality rules, SCE submits that,  
2 to the extent there's a question of what the existing  
3 rules permit or require, SCE supports the Commission  
4 addressing that question in this OIR. And Ms. Wilson  
5 had given an example where, I believe, an ALJ ruling in  
6 2023 had called into question a practice used in the  
7 past where the year of filing for applying  
8 confidentiality protections was the RPS plan year. A  
9 ruling, I believe, directed use of the year of the final  
10 plan being filed, and that sort of divorced some of the  
11 confidentiality protections, or -- or threw them a  
12 little bit in misalignment. And so this issue, I think,  
13 can be resolved by the full Commission in this OIR, but  
14 it wouldn't require a full revisiting of the existing  
15 rules. The rules were modified in 2021, and we note  
16 that having different rules that protect different  
17 contracts can be difficult to manage, and we would not  
18 recommend another revisit of the rules as sort of an  
19 overhaul, your Honor.

20 Thirdly, in terms of other actions that the  
21 Commission may want to take to administer or implement  
22 or develop the RPS program, like PG&E, we would  
23 recommend inclusion in the scope of -- the consideration  
24 of whether the IOUs should be auth- -- authorized to  
25 transact eligible renewable resources for up to five

1 years forward without the need for a Tier 1 advice  
2 letter approval. We are not seeking a substantive  
3 determination on that matter at this time, but rather,  
4 that the question be included in the scope, that the  
5 Commission find there in considering what -- whether  
6 this OIR -- in this OIR the need for additional  
7 flexibility for the IOUs' procurement is appropriate to  
8 ensure that we can continue to meet efficiently and  
9 effectively the Commission and state goals and  
10 requirements in today's market environment.

11 And you asked, your Honor, whether we believe  
12 there were any material issues of fact in dispute on the  
13 scoping items, and SCE submits that our view is that the  
14 items are policy and legal matters that can be resolved  
15 without testimony and hearings on the -- but rather, on  
16 the pleadings of the parties in the proceeding. Thank  
17 you.

18 ALJ MUTIALU: Thank you. Now let's turn to  
19 Mr. Szymanski.

20 MR. SZYMANSKI: Thank you, your Honor. Paul  
21 Szymanski with SDG&E.

22 SDG&E's comments align closely with those of  
23 our joint compen- -- the Joint Utilities for which we  
24 filed comments. And I won't reiterate all of the  
25 points, but I would like to take them slightly out of

1 order, and emphasize what SDG&E is (sic) to be the most  
2 important issue that should be placed squarely in the  
3 scope of the case, which is the issue about procurement  
4 flexibility.

5           And without repeating all the reasons that my  
6 colleagues have given already, I want to point out that  
7 the Commission has very recently issued a proposed  
8 decision in a related case, the provider of last resort,  
9 or sometimes called the POLR proceeding, which has  
10 created further concern for the utilities if customers  
11 of a CCA or a different load serving entity other than  
12 the utilities are returned suddenly to the IOUs for  
13 receiving their -- their -- their power requirements.  
14 SDG&E is concerned that we would need to act swiftly,  
15 and there would be great risk of price instability and  
16 other issues if we're not given the authority to act  
17 promptly. So SDG&E very much supports the comments  
18 already made by Ms. Wilson and Ms. Combs in this regard  
19 that we should not have this Tier 1 advice letter  
20 authority applicable at this time.

21           I want to turn to the other issue regarding the  
22 PSP requirement framed in your preliminary issues.  
23 SDG&E is of the view that, while there should be  
24 increased coordination wherever possible between the IRP  
25 proceeding and the RPS proceeding, we also want to avoid

1 duplication and redundancies, and possibly inconsistent  
2 inclusions. And so at this time, SDG&E does not support  
3 the inclusion of a separate PSP issue in this  
4 proceeding; but again, we are very much open to other  
5 ways in which the two proceedings can be streamlined.  
6 And SDG&E bears in mind that the -- the resources  
7 associated with the utilities' and other LSEs'  
8 procurement requirements is really but a subset of all  
9 the resources that are considered in the much more  
10 comprehensive proceeding of the IRP proceeding. ]

11           Regarding the topic of confidentiality, SDG&E  
12 likewise supports the comments of Edison and PG&E. And  
13 I would like to just simply refer the Commission to the  
14 Utilities' Joint Comments and Reply dated March 14th,  
15 where on page 14, we indicate that the Commission has  
16 already determined in its Decision 21-11-029, and the  
17 prior RPS rulemaking proceeding, that the removal of  
18 confidentiality protections risks the -- pardon me --  
19 the removal of confidentiality protections poses risks  
20 that public information can be used, when combined with  
21 other public information, to reveal the utilities' and  
22 others' proprietary information and the detriment of  
23 that possible occurrence would inure, basically, to  
24 consumers who would be paying the -- the price of higher  
25 procurement -- or renewables procurement, if that were

1 to occur.

2           So, SDG&E supports a limited narrow exemption  
3 -- or -- excuse me -- a limited and narrow consideration  
4 of this issue. And -- and rather than, as Ms. Bones  
5 well said, a comprehensive overhaul or revisiting of the  
6 PUC's confidentiality requirements as they apply to  
7 procurement which have worked, in SDG&E's view, very  
8 well for approximately 20 years and have been revisited  
9 again, recently, in the last few years.

10           SDG&E does want to speak briefly to the third  
11 question in the preliminary scope about other important  
12 issues that may enhance the proceeding. And SDG&E wants  
13 to bring to your attention two procedural matters that  
14 prot- -- that are unique to the RPS proceeding and  
15 probably would affect other parties, as well.

16           And that's, first: SDG&E recommends that the  
17 Commission revisit and eliminate the unnecessary  
18 requirement that's been in place for at least 10 years,  
19 that every RPS filing be supported by a separate  
20 verification. This is a separate document that is  
21 signed and represents that the content of the RPS filing  
22 are true and correct. And this requirement is totally  
23 redundant of the Commission's Rule 1 requirements, which  
24 have been actively in play.

25           However, in the more than 10 years I've been

1 involved in the RPS proceeding, there's not been a  
2 single instance, that I'm aware of, that has found --  
3 found the need for -- found a need for the very --  
4 separate verification requirement -- which only is an  
5 additional chore that needs to be done by every party  
6 for every filing. And so, I think that it's time to  
7 reconsider this outdated requirement and -- and  
8 streamline the case to that -- to that extent.

9           And, second, on a procedural note, I would also  
10 suggest that the -- the forthcoming scoping memo make it  
11 clear that future RPS filings are to be filed and served  
12 in the new Rulemaking Proceeding 24-01-017, and not in  
13 the prior RPS documents, unless those filings deal  
14 squarely with an unresolved issue from a prior RPS  
15 docket.

16           Separately, SDG&E is aware of no ESJ types of  
17 issues at this time. And nor do we see any facts in  
18 dispute, at this time, that would suggest the possible  
19 need for evidentiary hearings.

20           Thank you, your Honor.

21           ALJ MUTIALU: Thank you, Mr. Szymanski.

22           And now, let's turn to Mr. Wynne.

23           MR. WYNNE: Thank you, your Honor.

24 Justin Wynne, again, on behalf of the Cities of  
25 Lancaster, Pico Rivera, Rancho Mirage, Pomona,

1 San Jacinto, Santa Barbara, Peninsula Clean Energy, and  
2 Apple Valley Choice Energy.

3 In regards to the IRP issue, I think we agree  
4 with the characterization described by PG&E that the  
5 focus of the coordination of the IRP and RPS proceeding  
6 should be focused on the overlap of compliance  
7 obligations and, in particular, seeking to align, to the  
8 greatest extent possible, the IRP and RPS procurement  
9 plan filings and seeking to find ways that we can reduce  
10 the administrative burdens associated with that.

11 On the issue of confidentiality, we also agree  
12 with the statements that have been made so far by the --  
13 PG&E, Edison, and San Diego that we do not see a need  
14 for a broad re-evaluation of the confidentiality rules.  
15 And that has very recently been completed.

16 However, we do request that there be a  
17 consideration of the narrow issue that we included in  
18 opening comments, and which I think has been described  
19 very accurately by PG&E, Edison, and San Diego. And  
20 this is the change in the -- the Commission's rules, as  
21 they apply to RPS procurement plans, that is necessary  
22 to make sure that the confidential data in RPS  
23 procurement plants gets the full three years of  
24 confidentiality protection, which is provided by  
25 Decision 21-11-029.



1           And then, we don't have comments on any of the  
2 other scoping issues.

3           ALJ MUTIALU: Thank you, Mr. Wynne.

4           Now, let's turn to Mr. Gibson.

5           MR. GIBSON: Thank you, your Honor. Jed Gibson  
6 for the Small and Multi-Jurisdictional Utilities, or  
7 SMJUs.

8           The SMJUs agree with the scoping items included  
9 in the agenda. The SMJUs fully support any efforts that  
10 could reduce duplicative reporting requirements or  
11 streamlined reporting obligations on the LSEs.

12           The SMJUs also share some of the  
13 confidentiality concerns raised by the earlier parties  
14 that spoke on this issue. We -- we don't think there's  
15 a need to completely revisit RPS confidentiality roles.  
16 But there is a real concern that there's different  
17 treatment being granted with respect to draft and final  
18 RPS procurement plans that should be considered by the  
19 Commission.

20           And, finally, we support the issue raised by  
21 SDG&E. We think that it's no longer necessary to  
22 include a separate verification in all RPS filings.  
23 It's just an additional headache for every -- for every  
24 single filing. We think that could be eliminated and  
25 support that request.

1 Thank you.

2 ALJ MUTIALU: Thank you, Mr. Gibson.

3 And now, let's turn to Mr. Blaising.

4 MR. BLAISING: Thank you, your Honor.

5 Scott Blaising on behalf of the Joint BioMAT CCAs. And  
6 I'll speak first, your Honor, to what you've identified  
7 in your ruling as Preliminary Scope Issue Number 3.

8 The Joint BioMAT CCAs, in their opening  
9 comments, extensively addressed two issues that we  
10 asked be specifically addressed and called out as  
11 issues. I say, "specifically," because the preliminary  
12 scope of issues in the Order Instituting Rulemaking  
13 broadly noted that ongoing monitoring review and  
14 revision of -- as needed, would be done for all PS  
15 procurement methods and tariffs, such as, among others,  
16 the BioMAT market adjusting tariff, or BioMAT. And so,  
17 we recognize that BioMAT-program-related issues were  
18 broadly included at least in the preliminary scope of  
19 issues in the Order Instituting Rulemaking.

20 Your Honor, in our opening comments though, we  
21 specifically asked that two issues be distinctly  
22 identified and one of the issues be given expedited  
23 treatment. That issue that we ask be given expedited  
24 treatment is the end date for the current BioMAT --  
25 excuse me -- the current BioMAT expiration date, which

1 is set at December 31st, 2025. As your Honor may be  
2 aware, there was recently concluded in  
3 Rulemaking 22-10-010, a decision, Decision 23-11-084,  
4 that authorized Community Choice Aggregators, consistent  
5 with the direction in Assembly Bill 843, to enter into  
6 contract BioMAT contracts. And four Community Choice  
7 Aggregators have already moved forward with the first  
8 stage of that. Other CCAs are considering  
9 implementation. The first advice letter was filed late  
10 January of this year.

11 With the impending expiration date though, it  
12 will be very difficult and challenging for any of the  
13 CCAs to enter into a contract for -- for a BioMAT  
14 contract. The investor-owned utilities, when they first  
15 implemented the program, took roughly 12 to 14 months to  
16 enter into a contract after their documents have been  
17 approved. The CCA documents have yet to be approved.  
18 And so, we would ask that this discreet issue of the  
19 extension of the end date be given expedited treatment.  
20 We believe that that could be addressed through an  
21 issuance of an assigned commissioner or administrative  
22 law judge ruling asking for comments, and then a  
23 proposed decision.

24 We're hopeful, as we've noted in our comments,  
25 that the matter can be resolved through a decision in

1 the third quarter of this year, which would give  
2 sufficient assurance to the CCAs which have expended a  
3 significant amount of resources to date, and expect to  
4 do more so in the future, that in fact their contracting  
5 efforts will be rewarded with a reasonable extension.

6 And then, secondly, as noted in our -- or  
7 described in our comments, we ask that the BioMAT  
8 program be given a broad and robust review of the  
9 various different rules. That same type of review was  
10 given a few years ago and culminated in  
11 Decision 20-08-043, with certain changes to the BioMAT  
12 program to make it more effective and consistent with  
13 the underlying statutes. We ask that, in light of the  
14 CCA involvement, that that's a material fact that has  
15 not been considered in a robust way, we ask that that be  
16 considered and that the Commission bring forward --  
17 presumably through another Energy Division staff  
18 proposal for consideration of different program-related  
19 rules -- and we ask that that issue likewise be  
20 specifically identified as a discreet issue.

21 And then, finally, your Honor, with respect to  
22 Preliminary Scope Issue Number 1 in your ruling, turning  
23 to RPS and IRP coordination, we do believe that there --  
24 that in many ways those should be joined together. We  
25 will note that the decision I mentioned previously,

1 Decision 23-11-084, concluded preliminarily that the  
2 issue of receiving midterm reliability credit for BioMAT  
3 contracts should not be considered in that rulemaking,  
4 but directed it to be address in the -- integrated  
5 resources planning rulemaking. We think given its close  
6 connection to the BioMAT program, RPS goals, and IRP,  
7 that issue should be one of the issues that could be and  
8 should be considered as part of a program review that  
9 we've -- we've asked for, again, as a discreet issue.

10 Those are my comments on the preliminary scope  
11 of issues, your Honor.

12 ALJ MUTIALU: Thank you, Mr. Blaising.

13 Now, let's turn to Mr. Miley.

14 MR. MILEY: Thank you, your Honor. Matt Miley  
15 for the Public Advocates Office.

16 On the first question that your Honor has  
17 identified, Cal Advocates recommends that the Commission  
18 focus on coordinating the RPS and IRP proceedings. This  
19 is a position that we've previously supported, the  
20 coordination of the two proceedings. And we -- we  
21 restate our support here and urge the Commission to  
22 improve that coordination. We note that the  
23 Public Utilities Code 454.52 requires that the IRP  
24 process incorporate and not duplicate any other planning  
25 processes of the Commission.

1           We emphasize that the lack of coordination  
2 between IRP and RPS risks procurement of uneconomic and  
3 excess resources. We note that coordinating the two  
4 proceedings is generally supported by many of the  
5 parties to this proceeding in the comments on the OIR.  
6 And we recommend that the Commission develop a Phase 1  
7 schedule that prioritizes a decision on the issue of RPS  
8 and IRP coordination. Cal Advocates will be developing  
9 substantive positions on the best way to coordinate  
10 these proceeding. And we look forward to providing  
11 those positions on the record through the filing of  
12 comments on the docket.

13           To your Honor's second question regarding  
14 confidentiality rules, Cal Advocates has no comment on  
15 this issue at this time.

16           And regarding the third issue that your Honor's  
17 identified, other actions, Cal Advocates would like to  
18 recommend and emphasize that the Commission establish a  
19 procurement expenditure limitation for the RPS program.  
20 As your Honor is aware, and the parties are aware, the  
21 Commissioner as well, I'm sure, the Commission has not  
22 yet established a procurement expenditure limitation in  
23 the RPS program. Public Utilities Code  
24 Section 399.15(c) does require the Commission to  
25 establish that procurement expenditure limitation. It's

1 an important ratepayer protection that's meant to  
2 protect disproportionate rate impacts by protecting  
3 ratepayers from unreasonable RPS procurement costs,  
4 while also promoting cost-effective RPS procurement.  
5 Accordingly, Cal Advocates supports including  
6 establishment of a procurement expenditure limitation as  
7 an issue to be included in the scope of this proceeding.

8 Nothing further, your Honor. Thank you.

9 ALJ MUTIALU: Thank you, Mr. Miley.

10 Now, let's turn to Ms. Montoya.

11 MS. MONTOYA: Thank you, your Honor.

12 Regarding the first two preliminary issues  
13 identified, TURN does not impose the inclusion of either  
14 of these issues. However, TURN encourages the  
15 Commission to consider the relationship between central  
16 procurement, RPS compliance, and the RPS procurement  
17 entity option, specifically how central procurement  
18 conducted by the Department of Water Resources would  
19 affect the RPS compliance obligations of retail sellers.  
20 Additionally, TURN also encourages the Commission to  
21 consider enforcement of compliance with the long-term  
22 contracting requirement in the Public Utilities Code  
23 399.13(B)(1).

24 No further comments.

25 ALJ MUTIALU: Thanks, Ms. Montoya.

1           Now, let's turn to Ms. Mechanic.

2           MS. MCKENNA: Thank you, your Honor.

3           Lilly McKenna for Shell Energy.

4           Taking Issue Number 2 first, on the  
5           confidentiality rules, Shell Energy agrees with  
6           statements from other parties on this issue. And we  
7           don't have anything to add; but we do support the  
8           request for targeted improvement to the implementation  
9           of the confidentiality orders.

10          Taking Issue 1 on alignment across the RPS and  
11          IRP proceeding, we support the proposals to improve  
12          alignment across these proceedings. And with regard to  
13          the request for specific actions that could be taken, we  
14          agree with some of the examples that were provided in  
15          opening comments from other parties, including possibly  
16          combining the compliance filing and the compliance  
17          obligation across RPS and IRP as a way to  
18          more-efficiently address those competing obligations.

19          As to Issue 3, and any additional issues to  
20          consider in the RPS program, we have two additional  
21          concerns which were also addressed in Shell Energy's  
22          opening comments, so I would point there. But in  
23          response to Cal Advocates' proposal to consider a PEL in  
24          this proceeding, we have concerns with that proposal, as  
25          we think that affordability issues are better addressed



1 in other proceedings. Our concern is that  
2 implementation of the PEL would apply only to IOUs and  
3 would have a disparate impact on other LSEs that would  
4 not be subject to the PEL, but would be forced to  
5 continue to comply, regardless of cost with RPS  
6 obligations.

7 And then, one final point -- which, also, I  
8 think gets at the need for alignment across the RPS and  
9 IRP proceeding -- is our concern with the need for  
10 regulatory certainty to help with our -- our planning --  
11 our procurement planning processes. So, to the extent  
12 that the Commission is considering additional RPS  
13 procurement, we proposed that that would be considered  
14 in this proceeding and not creating an additional -- an  
15 additional procurement framework in the IRP proceeding.

16 Thank you, your Honor.

17 ALJ MUTIALU: Thank you, Ms. McKenna.

18 Now, let's turn to Mr. Morris. ]

19 MR. MORRIS: Thank you, your Honor. Gregg  
20 Morris with the Green Power Institute. We've been a  
21 pretty strong proponent of better coordination between  
22 the RPS and the IRP proceeding, and there's a -- I don't  
23 think we should limit where we coordinate.

24 Certainly, there's an annual RPS plan. There's  
25 a bi-annual individual IRP plan that the utilities have

1 to provide. And better coordination or even some form  
2 of merger of those reports, at least maybe in the years  
3 where they're both required, would certainly help.

4 We believe that there is feedback from the IRP  
5 proceeding to the RPS proceeding in terms of future  
6 targets for RPS procurement that are being lost without  
7 better alignment of the two proceedings. The IRP  
8 modeling shows the need for more RPS procurement than  
9 the RPS standards currently in place. So, you know,  
10 that doesn't necessarily mean that we want to increase  
11 the standards, but it might be. It's certainly worth  
12 considering.

13 We don't have anything really to say about the  
14 confidentiality rules. We didn't say anything in our  
15 comments about extending the BioMAT program sunset date,  
16 but having heard the BioMAT representative, I want to  
17 certainly say that the BioMAT statutes don't have a  
18 sunset date. They have targets that have to be reached.  
19 So I, certainly, support the idea of extending that  
20 date. And, finally, I just want to say that if there  
21 is -- another measure that we could consider in this  
22 proceeding is producing clear and more flexible rules  
23 for transactions of RPS products among the various LSEs.  
24 So that's my input here. Thank you.

25 ALJ MUTIALU: Thank you, Mr. Morris.

1           Now let's turn to Mr. Brown.

2           MR. BROWN: Thank you, your Honor. Andrew  
3 Brown for AReM. With respect to coordination, I think  
4 we'd like to work with various parties to discern what  
5 approach is to be taken, but the one area that has  
6 historically been a concern to us is what we call the  
7 stacking of obligations, reporting obligations. So we'd  
8 ask that the Commission be cognizant and provide  
9 sufficient time between deadlines in the IRP and the RPS  
10 proceeding so that folks who work on these documents  
11 aren't too jammed up with making good submissions on  
12 time.

13           I'll echo the concerns that you heard  
14 previously on the confidentiality issue. The narrowed  
15 window of confidentiality that the Commission adopted a  
16 few years back becomes problematic when there is a delay  
17 between drafts and final submissions, and I think others  
18 have articulated that very well. And with respect to  
19 other issues or environmental justice, we really don't  
20 have any comments on those at this time. Thank you,  
21 your Honor.

22           ALJ MUTIALU: Thank you, Mr. Brown.

23           Now let's turn to Mr. Strauss.

24           MR. STRAUSS: Thank you, your Honor. This is  
25 Ariel Strauss for Small Business Utility Advocates. My

1 statements will focus on Issue 3. And I note that  
2 Issue 3 is less granular than the scope of issues in  
3 Section 4 of the OIR, but we perceive that it still  
4 provides sufficient coverage to assess the comments that  
5 SBUA raised.

6 I do specifically want to identify two issues.  
7 The OIR does use the terminology of "prioritization,"  
8 which I think is important, and those issues are -- and  
9 those raised by PG&E, SCE, and SDG&E regarding the --  
10 any changes that occur in Tier 1 letter process,  
11 short-term market procurement, and the second is the  
12 issue raised by Cal Advocates. Also, I think that's an  
13 identified issue in Part 1-A in the OIR regarding a  
14 cost-contained mechanism. Really, both those issues are  
15 important. They fit within the scope of Issue 3,  
16 particularly prioritization.

17 Regarding ESJ, the issues include  
18 affordability. Affordability is a very serious concern,  
19 and we would support any approaches that could be  
20 incorporated in this proceeding to minimize the cost  
21 implications and the rate burden of RPS program. Thank  
22 you.

23 ALJ MUTIALU: Thank you, Mr. Strauss.

24 And now let's turn to Ms. Ramsey.

25 MS. RAMSEY: Thank you, your Honor. We support

1 the proposed scope of issues and would like to go into  
2 further detail on the proposed expedited process for the  
3 BioMat program, and as long as that expedited process  
4 includes opening comments and reply comments, then that  
5 seems appropriate.

6 We do question whether there is need for any  
7 further or deeper review of the program in the event  
8 that the expiration date is not extended. Thank you.  
9 That's all.

10 ALJ MUTIALU: Thank you, Ms. Ramsey.

11 Now let's turn to Mr. Reid.

12 MR. REID: Thank you, your Honor. I would like  
13 to address two issues. One (audio failure) which some  
14 parties opposed, and two right in the RPS requirements.  
15 In listening to some of the comments of the parties, one  
16 would think that they have to fill out a 25-page form.  
17 The verification statement is half a page long. They  
18 don't even have sign it. In the statement, all they  
19 have to say is that the statements in the foregoing  
20 documents are true to the best of my knowledge, except  
21 for those matters that are stated to my information and  
22 belief, and to those matters, I believe them to be true.  
23 In short, we're basically saying, we're not lying to the  
24 Commission; therefore, I request the Commission's  
25 verification. Thank you.

1           In the matter of raising the RPS limit, which  
2           some parties are opposed to them being in the scope. I  
3           understand that those parties are opposed to raising the  
4           RPS limit. That's fine. They would have an  
5           opportunity, during this proceeding, to make their case.  
6           I believe that the incorporation of issues, subject to  
7           time constraints of the Commission, are good things, not  
8           a bad thing.

9           And, I guess, I would like to remind the  
10          Commission that these proceedings are not just for us.  
11          They are not just for people who have a vested interest  
12          in them. They are not just for the people who work for  
13          the CPUC. The decisions that are made here affect  
14          millions of people in the state of California. That  
15          concludes my comments. Thank you very much.

16          ALJ MUTIALU: Thank you, Mr. Reid.

17          And now let's turn to the proceeding schedule.  
18          The parties may now comment on the proposed procedural  
19          schedule in the agenda. I'll go ahead and read that  
20          right now. The first item is scoping memo and ruling,  
21          with the tentative dates for issuance, mid-April 2024;  
22          the guidance ruling for filing RPS procurement plans,  
23          May 2024; RPS procurement plan filing by retail sellers,  
24          June 2024;  
25          Opening comments, July 2024; reply comments,

1 August 2024; motions, and then also motions to update  
2 the RPS Procurement Plan, August 2025; and, finally, the  
3 proposed decision, issued sometime in the fourth quarter  
4 of 2024.

5 So let's hear comments on the preliminary  
6 proceeding schedule. Let's turn to Ms. Wilson first.

7 MS. WILSON: Thank you, your Honor. This is  
8 Maria Wilson for PG&E. PG&E's reviewed the preliminary  
9 proceeding schedule and have no overall concerns, but  
10 the time to prepare an annual RPS filing between -- for  
11 filing the RPS procurement plan and the actual RPS  
12 procurement plan filing typically takes between six and  
13 eight weeks.

14 And I think our experience is we've had that  
15 period of time to prepare the draft RPS plan, which is  
16 very -- it can be very long, and while we don't have any  
17 overall concerns with the schedule, PG&E would request  
18 that the time period between the issuance of the ruling  
19 and the submittal of plans be between six and eight  
20 weeks so that PG&E would have adequate time to review  
21 the requirements, prepare quality filing.

22 And it's not apparent from the schedule how  
23 much time within the month would be afforded. So I  
24 would make that request to provide between six and eight  
25 weeks. Thank you.

1 ALJ MUTIALU: Thank you.

2 Now let's turn to Ms. Combs.

3 MS. COMBS: Thank you, your Honor. Janet Combs  
4 with Southern California Edison Company. We echo the  
5 comments of Ms. Wilson on behalf of PG&E. Thank you.

6 ALJ MUTIALU: Thank you Ms. Combs.

7 And now let's turn to Mr. Szymanski.

8 MR. SZYMANSKI: Thank you, your Honor. Paul  
9 Szymanski for SDG&E. SDG&E, likewise, supports the  
10 comments of PG&E, and notes that in most years, we have  
11 filed our annual RPS plan in July. And there's been  
12 ample time between the -- between the rulings that  
13 direct the filing of the RPS annual plan and the filing  
14 of that plan. And SDG&E agrees that it should be  
15 between six and eight weeks, but as parties, who are  
16 familiar with these filings are aware, it's an  
17 extensive, very detailed process.

18 So we would ask for something closer to eight  
19 weeks, your Honor. And, likewise, if there were to be  
20 any significant changes from the prior years' direction  
21 or the contents of the plan, we would be in favor of a  
22 somewhat longer window of time between the issuance of  
23 the requirement in the filing of the RPS plan. Thank  
24 you, your Honor.

25 ALJ MUTIALU: Thank you, Mr. Szymanski.



1           Now let's turn Mr. Wynne.

2           MR. WYNNE: Justin Wynne on behalf of the  
3           Cities of Lancaster, Pico Rivera, Rancho Mirage, Pomona,  
4           San Jacinto, Santa Barbara, Peninsula Clean Energy  
5           Authority, and Apple Valley Choice Energy, and I would  
6           echo the comments that were just made by San Diego Gas  
7           and Electric.

8           I think that the normal time period for the  
9           preparation of RPS procurement plans should be around  
10          eight weeks, and then the caveat would be if there are  
11          any changes, major changes, to the requirements, that  
12          might require additional time beyond that. Other than  
13          that, we have no comments on the proposed scope -- on  
14          the proposed schedule. Sorry. Thank you.

15          ALJ MUTIALU: Thank you, Mr. Wynne.

16          Let's turn to Mr. Gibson.

17          MR. GIBSON: Thank you, your Honor. Jed Gibson  
18          from the SMJUs. We agree with the earlier comments  
19          raised that there should be sufficient time and a  
20          deadline for LSEs to submit their RPS plans. It's an  
21          extensive, detailed document, and we need sufficient  
22          time to be able to address all the requirements that are  
23          included in the RPS. Thank you.

24          ALJ MUTIALU: Thank you.

25          Let's turn to Mr. Blaising.

1 MR. BLAISING: Scott Blaising on behalf of  
2 Joint BioMat CCAs. The first thing, I appreciate the  
3 ambition and timely issuance of the scoping memo in  
4 mid-April. That's to be commended, that time limit. I  
5 appreciate that. And without unduly repeating myself,  
6 we have asked that the extension of the BioMat program  
7 from December 31st, 2025 to the proposed 2029, be set as  
8 an expedited issue. We have the expectation and hope  
9 that a final decision could be issued in Q3 of 2024.  
10 With that, I have no further comments on the proceeding  
11 schedule. Thank you.

12 ALJ MUTIALU: Thank you.

13 Now let's turn to Mr. Miley.

14 MR. MILEY: Thank you, your Honor. Matt Miley  
15 from the Public Advocates Office. The schedule provided  
16 in your Honor's ruling appears to address only the  
17 scoping memo and ruling consideration of the RPS  
18 procurement plan, and also a proposed decision.  
19 Cal Advocates has no objection to the schedule provided  
20 in your Honor's ruling; however, we do recommend that  
21 the other scoping issues that we identified be scheduled  
22 in the final scoping memo beginning with the RPS and IRP  
23 coordination issues at the forefront of that schedule.  
24 Thank you, your Honor.

25 ALJ MUTIALU: Thank you, Mr. Miley.

1           Now let's turn to Ms. Montoya.

2           MS. MONTOYA: Thank you, your Honor. Isabella  
3 Montoya with The Utility Reform Network. TURN has no  
4 concerns with the proposed schedule.

5           ALJ MUTIALU: Thank you, Ms. Montoya.

6           Now let's turn to Ms. Myers -- I apologize.  
7 Now let's turn to Ms. McKenna.

8           MS. MCKENNA: Thank you, your Honor. Lilly  
9 McKenna for Shell Energy. We have no additional  
10 comments to what other parties have stated, but we do  
11 support the request for the six-to-eight week time  
12 period in between the ruling and the Commission  
13 procurement plan, and also Cal Advocates' comments  
14 regarding the schedule. We need also to consider  
15 separate dates if we're considering the other issues in  
16 the proceeding. Thank you.

17           ALJ MUTIALU: Thank you.

18           Now let's turn to Mr. Morris.

19           MR. MORRIS: Thank you, your Honor. Gregg  
20 Morris, Green Power Institute. I don't have any  
21 comments on the schedule you proposed for the RPS  
22 procurement plans. I do want to echo again the need to  
23 schedule some of the other tracks, other issues in the  
24 scoping memo.

25           ALJ MUTIALU: Thank you, Mr. Morris.

1           Now let's turn to Mr. Brown.

2           MS. BROWN: Thank you, your Honor. Andy Brown  
3 or AREM. I'll echo those comments you've heard  
4 previously regarding the timing between guidance and the  
5 Commission's dates. If there are changes of some kind  
6 of magnitude, we'd also ask that Energy Division have  
7 some office hours for -- to go over those and assist  
8 folks who will be making these submissions. Other than  
9 that, I do appreciate the accelerated schedule. Thank  
10 you.

11           ALJ MUTIALU: Thank you.

12           Now let's turn to Mr. Strauss.

13           MR. STRAUSS: Thank you, your Honor. Ariel  
14 Strauss, SBUA. I'd like to echo the statements of  
15 Mr. Miley and Ms. McKenna's observation that the  
16 schedule does not incorporate a track for additional  
17 issues. I also want to reflect on something that  
18 Ms. Ramsey of Sierra Club said previously regarding the  
19 potential for a process for evidentiary hearings if  
20 needed. And I think my initial comment that the IOUs  
21 and their comments on the OIR would need to mention that  
22 SCE's anecdotal evidence -- which was also raised by the  
23 IOUs in the RPS listing. And so I just wanted to flag  
24 that there is a potential for an actual dispute on this  
25 issue. I don't know if that will occur or not, and we

1 would need to address the actual issues. Thank you,  
2 your Honor. ]

3 ALJ MUTIALU: Thank you, Mr. Strauss.

4 Now let's turn to Ms. Ramsey.

5 MS. RAMSEY: Thank you, your Honor. I have no  
6 further quest -- comments, at this point.

7 ALJ MUTIALU: Thank you, Ms. Ramsey.

8 And now let's turn to Mr. Reid.

9 MR. REID: Thank you, your Honor. I support  
10 the schedule proposed in the OIR. Thank you very much.

11 ALJ MUTIALU: Thank you, Mr. Reid.

12 I believe we've heard from all parties, but I  
13 just wanted to pause here, in case I've omitted anyone.

14 (No response.)

15 ALJ MUTIALU: Hearing no response, let's turn  
16 to other matters with potential impact to the procedural  
17 schedule.

18 Let's turn now to Ms. Wilson.

19 MS. WILSON: Thank you, your Honor. PG&E has  
20 nothing to add at the moment. The procedural schedule  
21 generally set forth in the ruling yesterday adheres to  
22 the typical RPS plan timeframe that PG&E has become  
23 accustomed to over the last several cycles, and so the  
24 schedule to -- and other procedural interactions do not  
25 raise immediate concern for PG&E. Thank you.

1 ALJ MUTIALU: Thank you. Now let's turn to  
2 Ms. Combs.

3 MS. COMBS: Thank you, your Honor. Janet Combs  
4 with Southern California Edison Company.

5 SCE does not have any further comments at this  
6 time. Thank you.

7 ALJ MUTIALU: Thank you, Ms. Combs.

8 Now let's turn to Mr. Szymanski.

9 MR. SZYMANSKI: Thank you, your Honor. Paul  
10 Szymanski for SDG&E.

11 SDG&E has no further comments at this time.  
12 Thank you.

13 ALJ MUTIALU: Thank you, Mr. Szymanski.

14 Now let's turn to Mr. Wynne.

15 MR. WYNNE: Thank you, your Honor. Justin  
16 Wynne on behalf of the cities of Lancaster, Pico Rivera,  
17 Rancho Mirage, Pomona, San Jacinto, Santa Barbara,  
18 Peninsula Clean Energy Authority, and Apple Valley  
19 Choice Energy, and we have no further comments at the --  
20 at this point.

21 ALJ MUTIALU: Thank you. Now let's turn to  
22 Mr. Gibson.

23 MR. GIBSON: Nothing further, your Honor.  
24 Thanks.

25 ALJ MUTIALU: Thank you, Mr. Gibson.

1           Mr. Blaising, do you have any further comments  
2 on issues that might impact the procedural schedule?

3           MR. BLAISING: Your Honor, Scott Blaising for  
4 the Joint BioMAT CCAs, and we have no further comments.

5           ALJ MUTIALU: Thank you. Let's turn to  
6 Mr. Miley.

7           MR. MILEY: Thank you, your Honor. Nothing  
8 further from the Public Advocates Office. Thank you.

9           ALJ MUTIALU: Thank you. Ms. Montoya?

10          MS. MONTOYA: Thank you, your Honor. No  
11 further comments from The Utility Reform Network.

12          ALJ MUTIALU: Thank you. Ms. McKenna?

13          MS. MCKENNA: No further comments from Shell  
14 Energy. Thank you, your Honor.

15          ALJ MUTIALU: Mr. Morris?

16          MR. MORRIS: Greg Morris for Green Power  
17 Institute.

18          No further comments.

19          ALJ MUTIALU: Mr. Brown?

20          MR. BROWN: No further comments, your Honor.  
21 Thank you.

22          ALJ MUTIALU: Ms. Ramsey?

23          MS. RAMSEY: No further comments, your Honor.

24          ALJ MUTIALU: Mr. Strauss?

25          MR. STRAUSS: Ariel Strauss for Small Business

1 Utility Advocates.

2 We have no further comments, your Honor.

3 ALJ MUTIALU: And finally, Mr. Reid.

4 MR. REID: Thank you. I -- I have no other  
5 comments on this issue. Thank you very much.

6 ALJ MUTIALU: Thank you. Before we conclude  
7 the prehearing conference, I'd just like to turn to  
8 Commissioner Reynolds to find out if there are any  
9 closing comments he'd like to provide at this time.

10 COMMISSIONER JOHN REYNOLDS: Thank you, Judge  
11 Mutialu.

12 I would like to thank the parties for their  
13 attendance today, and look forward to their -- their  
14 timely and cooperative, where possible, litigation of  
15 the issues that we have in this proceeding to facilitate  
16 a timely resolution of disputes.

17 I want to thank the PUC staff who are  
18 responsible for enabling the virtual hearing, including  
19 our IT staff and our court reporters.

20 And with that, I will turn it back to Judge  
21 Mutialu.

22 ALJ MUTIALU: Thank you, Commissioner Reynolds.

23 At this -- at this time, I -- I would also like  
24 to thank the IT staff and (indecipherable) staff, and  
25 also the staff that supported this hearing.



1           And also, thank you, intervenors and parties  
2           and other folks from the public, that have attended and  
3           to listen in. Thank you, again, for your participation.

4           We are adjourned. Off the record.

5           (At the hour of 2:35 p.m., this matter having  
6           been concluded, the Commission then  
7           adjourned.) ]

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BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

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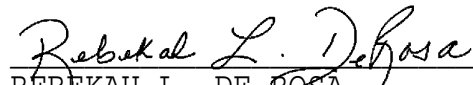
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BEFORE THE PUBLIC UTILITIES COMMISSION  
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CSR NO. 8708

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BEFORE THE PUBLIC UTILITIES COMMISSION  
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SHANNON ROSS WINTERS  
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