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

Order Instituting Rulemaking to Oversee the  
Resource Adequacy Program, Consider  
Program Reforms and Refinements, and  
Establish Forward Resource Adequacy  
Procurement Obligations.

Rulemaking 23-10-011  
(Filed October 12, 2023)

**OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON  
THE PROPOSED DECISION ON TRACK 2 ISSUES**

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Dated: November 18, 2024

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**I. INTRODUCTION**

In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Pacific Gas and Electric Company (“PG&E”) respectfully submits these opening comments on the proposed *Decision on Track 2 Issues*, issued on October 29, 2024 (“Proposed Decision”).

PG&E strongly supports the Proposed Decision on Track 2 issues as well-reasoned and based on the record in this proceeding. PG&E urges adoption of the Proposed Decision without modification, and thanks the Commission for its thoughtful consideration of parties’ proposals.

**II. PG&E’S COMMENTS**

**A. PG&E Supports the Proposed Decision on Key Resource Adequacy Issues**

The Proposed Decision addresses key aspects of the Resource Adequacy (“RA”) program and appropriately resolves significant issues identified in the Track 2 scope, especially structural modifications to the Central Procurement Entity (“CPE”) framework for the local RA program. The Proposed Decision eliminates the non-compensated self-showing option and provides for improved transparency of CPE-related procurement data. Eliminating the self-showing option and implementing the data changes outlined in Ordering Paragraph 4 will allow the CPE to make

better procurement decisions on behalf of customers and provide stakeholders with greater insight into CPE procurement. PG&E supports these changes as well-reasoned improvements to the program and urges expeditious adoption. PG&E notes that this Proposed Decision also eliminates prompt year CPE procurement with the exception of incremental changes in the local RA requirements. Following implementation, PG&E supports revisiting this modification in 2027 to ensure the change has not resulted in unintended consequences.

Some issues not resolved in this Proposed Decision, including a loss of load expectation study and its calibration to the slice-of-day framework and development of an unforced capacity methodology, are slated for consideration in Track 3 of this proceeding. PG&E supports consideration of these issues in Track 3 and looks forward to further collaboration with parties on addressing these issues.

**B. PG&E Supports the Proposed Decision on the Partial Adoption of the Recommendations in the Demand Response Load Impact Protocols Working Group Report**

The Proposed Decision largely adopts the recommendations in the load impact protocols (“LIP”) simplification working group report (“Working Group Report”). PG&E supports the Proposed Decision, which has addressed the most critical aspects of the simplification recommendations in the Working Group Report. PG&E believes that the adoption of these recommendations can make the execution of demand response LIP evaluations more efficient as early as for Program Year 2024. PG&E appreciates the Commission’s thoughtful review of the Working Group Report and the subsequent party comments submitted into Track 2. PG&E is committed to continuing to produce robust, valuable, and efficient LIP evaluations.

**III. CONCLUSION**

PG&E appreciates the opportunity to provide its opening comments on the Proposed Decision and urges the Commission to adopt it expeditiously and without modification.

Respectfully submitted,

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